



Brent Local Plan
Examination Stage Proposed
Modifications Representation Form

**Council
Reference
Number:**

30 a-d

Representations on the proposed modifications must be received by the Council by 5pm 19th August 2021.

All the representations should be submitted to planningstrategy@brent.gov.uk or Paul Lewin, Planning Policy Team Leader, Brent Civic Centre, Engineer's Way, Wembley, HA9 0FJ. Ideally provide your response in Word or similarly editable document formats. This will make it easier for us to summarise representations and speed up the process of reporting to the Inspectors.

Data Protection

The personal information you provide on this form will be processed in accordance with the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003. It may be used by the Council, the Planning Inspectors or the Local Plan Programme Officer to contact you, if necessary, regarding your submission. All representations including all accompanying personal data will be sent to the appointed Planning Inspectors undertaking the Local Plan examination. Please see the [Council's planning](#) and [Planning Inspectorate's](#) privacy notices

Your name, organisation name (if relevant) and comments will be made available for public inspection when displaying and reporting the outcome of the consultation. No other personal data will be displayed. No anonymous representations will be accepted.

If you consent the Council will place your details on our Planning Policy consultation database and inform you of any next stages in the Local Plan adoption process.

I wish / to be informed of the next stages, such as publication of the Inspectors recommendations or the adoption of the Local Plan - **delete as appropriate**.

If you consent, the Council will also retain your details to inform you of any further planning policy consultations, such as any review of the Local Plan, Community Infrastructure Levy, Supplementary Planning Documents, Article 4 Directions, conservation area/ other heritage asset reviews and neighbourhood planning.

I wish / to be informed of other planning policy consultations - **delete as appropriate**.

Please sign and date this form. Forms signed electronically or with typeset will be accepted.

Declaration:

By completing and signing this form, I agree to the above use of data submitted in association with my representations.

Signature:



Date:

19/08/21

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

**1. Personal
Details*****2. Agent's Details (if
applicable)**

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	Sonal Worldwide Ltd	Savills (UK) Ltd
Address Line 1	<input type="text"/>	Finsbury Circus House
Line 2	<input type="text"/>	15 Finsbury Circus
Line 3	<input type="text"/>	London
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	EC2M 7EB
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (necessary to assist in communicating with you effectively and ensuring the examination process is not subject to delay)	<input type="text"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which proposed modification does this representation relate?

Modification Reference e.g. MM1	Please see covering letter, dated 19 August 2021.
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see covering letter, dated 19 August 2021.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see covering letter, dated 19 August 2021.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspectors, based on the matters and issues they identify for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please see covering letter, dated 19 August 2021.

Please note the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspectors have identified the matters and issues for examination.

Guidance Note to Accompany Model Representation Form

1. Introduction

1.1. The Council has proposed modifications to the Brent Local Plan that it has been submitted for examination by the appointed Planning Inspectors. It is only the proposed modifications and associated documents that are subject to consultation. All previous representations received on the submitted Plan have been considered by the Inspectors as part of the examination process to date and do not need to be re-submitted, or additional points made on them. The *Planning and Compulsory Purchase Act 2004*, as amended, [PCPA] states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspectors will consider all representations on the plan that are made within specified consultation periods.

1.2. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names of those making representations can be made available and taken into account by the Inspector.

2. Legal Compliance and Duty to Co-operate

2.1. You should consider the following before making a representation on legal compliance:

- The plan should be included in the Council's current Local Development Scheme [LDS] and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the Council proposes to bring forward for examination. If the plan is not in the current LDS it should not have been published for representations. The LDS should be on the Council's website and available at its main offices.
- The process of community involvement for the plan in question should be in general accordance with the Council's Statement of Community Involvement [SCI]. The SCI sets out the Council's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
- The Council is required to provide a Sustainability Appraisal [SA] report when it publishes a plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- The plan should be in general conformity with the London Plan (formally known as the Spatial Development Strategy).
- The plan should comply with all other relevant requirements of the PCPA and the *Town and Country Planning (Local Planning) (England) Regulations 2012*, as amended [the Regulations].

2.3. You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the Council to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. The Council will be expected to provide evidence of how they have complied with the duty.
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

3. Soundness

3.1. The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- **Positively prepared** – providing a strategy which, as a minimum seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

3.2. If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy or the London Plan?
- Is the issue with which you are concerned already covered by another policy in this plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

4. General advice

4.1. If you wish to make a representation seeking a modification to a plan or part of a plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 3.1 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.

4.2 You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You

should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.

4.3. Where groups or individuals share a common view on the plan, it would be very helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

4.4. Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

19 August 2021

Paul Lewin
Planning Policy Team Leader
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

(Via email: planningstrategy@brent.gov.uk)

The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a solid yellow square background.

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[REDACTED]
[REDACTED]

Finsbury Circus House
15 Finsbury Circus
London EC2M 7EB

savills.com

Dear Mr Lewin

BRENT LOCAL PLAN: CONSULTATION ON PROPOSED MAIN MODIFICATIONS

REPRESENTATIONS SUBMITTED ON BEHALF OF SONAL WORLDWIDE LIMITED

We are instructed by Sonal World Wide Limited (“Sonal”) to submit representations to the Proposed Main Modifications of the Draft Brent Local Plan (“the Draft Local Plan”) in the context of their land ownership at 18 Prospect House, Stonebridge, London, NW10 7GH (“the Site”), within the London Borough of Brent (“LBB / the Council”). For ease of reference we have attached a Site Plan, Drawing Number 11247-A-P-001 which shows the location of the Site. For reference, we have also attached the “Brent Local Plan Examination Stage Proposed Modifications Representations Form”.

The Site has significant redevelopment potential to deliver a high density residential-led mixed use scheme, the principle of which has been agreed by LBB in a pre-application response letter (26 March 2021). Therefore the Site has the potential to deliver significant planning and public benefits for the local community.

Site, Context and Background

The Site occupies an area of approximately 2,540 sqm or 0.254 hectares. The Site is relatively flat with only a small drop to the south to accommodate the slope of the slip road, and beyond this to the south is the main arterial road of the Northern Circular Road (A406). To the north-west of the Site is the River Brent (designated as a Site of Interest for Nature Conservation (SINC)) where there is a steep incline which levels out at nearly 9 metres above the Site’s AOD (Above Ordnance Datum). Beyond this, further to the north is the extensive Northfields redevelopment site (subject to Proposed Site Allocation BSWSA7 of the Draft Local Plan). To east of the Site is a storage unit (occupied by Shurgard) and beyond this another site occupied by a scaffolder. Further to the east is the approved ‘Generator’ site as part of the Northfields redevelopment. Immediately to the west of the Site is a wooded area designated as a SINC which forms a steep gradient which transitions between the Site and the aqueduct. The latter is part of the Grand Union Canal which lies north-west/south-east.

The existing building on the Site was constructed in the 1930s and consists of a 3 storey structure which was previously used as an office (Use Class E – formerly Use Class B1a). In April 2015, Prior Approval was granted (Ref. 15/0752) for a change of use of the upper two storeys from offices (Use Class E – formerly Use Class B1a) to residential (Use Class C3) comprising 17 self-contained flats (“the 2015 Prior Approval”). In August 2019, Full Planning Permission was granted (Ref 17/0637) for the erection of four additional floors comprising 28 self-contained flats and other associated works (“the 2019 Permission”). The remaining office space at

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ground floor level has been actively marketed for 13 years by Sonal since their acquisition of the Site in 2008 and has remained unoccupied.

Adopted Planning Designations

In terms of the Site's current adopted planning designations pursuant to LBB's Core Strategy (2010), the Site is located in a Strategic Industrial Location (SIL) which we understand is part of the wider adopted Park Royal SIL – or what is also known as Northfield East SIL. Notwithstanding the Site's Article 4 Direction which removes Permitted Development for office to residential, the principle of residential uses was established before this direction came into force, through the 2015 Prior Approval (Ref. 15/0752). The established residential use is also reinforced through LBB's grant of the 2019 Permission. The Site is also within an Air Quality Management Area and within Flood Zone 3a. The Greater London Authority's (GLA) Planning Data Map shows the Site as within the Alperton Housing Zone designated by the Mayor of London in 2015.

Emerging Development Context

There is a significant emerging urban context surrounding the Site with major development approved at Northfields Industrial Estate adjacent to the north (Draft Local Plan Site Allocation BSWSA7). A Hybrid application for Outline Planning Permission and Full Planning Permission for Phase 1 of the Northfields Industrial Estate (Ref. 18/0321) was approved on 28 September 2018 (for 2,900 dwellings, business, commercial, community and leisure uses and tall buildings including heights of 20 and 24 storeys). Construction has started on the approved masterplan. A revised masterplan (Ref. 20/2784) was approved on 15 June 2021. The wider site now benefits from planning permission for 3,030 homes and includes a number of tall buildings ranging in heights of 24 to 28 storeys, with the 25 storey building immediately adjacent to the north of the Site.

In August 2020 LBB approved Argenta House (Ref. 18/4847) located to the north east of the Site by Stonebridge Park station which will deliver a 24 storey residential tower providing 130 units. This is also located adjacent to the existing 21 storey Wembley Point which provides 439 studio units. On 26 November 2020 the Council resolved to grant planning permission (subject to GLA stage II referral) at Wembley Park Station Car Park (Ref. 18/0321) to the north east of the Site which will deliver a mixed use residential development including a 21 storey tower, a 17 storey tower as well as a 14 storey and two 13 storey buildings.

Site Redevelopment – Pre-Application Discussions

Extensive pre-application discussions for a high-density, residential-led redevelopment have been taking place and remain ongoing with key stakeholders, including LBB officers. A formal public exhibition is due to take place in the Autumn. Earlier this year LBB considered pre-application proposals for a 27 storey building providing 159 residential units (Use Class C3) and 743 sqm of light industrial floorspace (formerly B1c now Use Class E).

The Council advised in writing that notwithstanding the SIL designation, by virtue of the 2015 Prior Approval and the 2019 Permission, the principle of residential development at the Site is considered to have already been established and is acceptable subject to all other policy considerations. Officers also supported the principle of increased employment floorspace subject to being used for light industry equivalent uses (formerly B1c, now Use Class E). Officers also supported the principle of a tall building.

Sonal remain committed to redeveloping the underutilised site to provide a high quality redevelopment that has the capability to deliver a number of planning and public benefits, including: new high quality homes – including

affordable homes and associated amenities; intensified employment provision – including affordable work space; improved flood capacity; commitment to working with the relevant landowners and authorities to support a new pedestrian/cycle access either through the neighbouring SINC (subject to negotiations) – or alternative access to provide new pedestrian links to the Grand Union Canal for the local community; and overall a catalyst to promote regeneration for other sites along the North Circular, improving the quality and public realm.

National Planning Policy Context

The NPPF (National Planning Policy Framework) was updated on 20 July 2021. Paragraph 35 states that Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. Plans are 'sound' if they are:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

These tests of soundness should also be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies of the area.

Brent Draft Local Plan Proposed Main Modifications

We note that the Site is subject to the following key planning policy designations in the Draft Local Plan:

- Within the Alperton Growth Area;
- Within the SIL (Northfields east and west of Grand Union Canal); and
- Within the Alperton Tall Building Zone.

Having regards to national planning context in preparing Local Plans, we have commented on the draft Local Plan in detail, as set out below.

Alperton Growth Area

Sonal are fully supportive of Draft Policy Map Modification 18 (Map Mod 18) which includes the Site within the Alperton Growth Area.

With regard to the Alperton Growth Area, Sonal are fundamentally supportive of the aspirations of Policy BP7 (South West Place) to deliver significant residential development within the Alperton Growth Area. However, it

is noted that Main Modification 80 (MM80) of Policy BP7 states that within the Alperton Growth Area a minimum of 6,800 additional homes should be delivered within the period to 2041. To ensure the delivery of new homes, including affordable housing across and LBB and London, we respectfully request that the indicative target is strongly reiterated as a minimum requirement. This would ensure that the Proposed Local Plan is **positively prepared** and **effective** in its delivery of new homes, as well as affordable homes.

Sonal are also fully supportive of the aspirations of Alperton Growth Area to deliver creative industries i.e. 'makerspace'. Sonal are in advanced discussions ASC studios, one of Brent's Preferred Affordable Workspace Providers and are fully committed to providing affordable 'makerspace' on the Site.

Furthermore, Sonal are supportive of the aspirations of Policy BP7 in co-locating residential uses on areas of industrial and employment land within the Alperton Growth Area. MM80 of Policy BP7 states that new homes will be delivered by:

"e) Co-locating residential uses on areas of industrial and employment land within the Alperton Growth Area, taking advantage of areas well-served by public transport. Where alternative uses are co-located on industrial sites this will be as part of a comprehensive regeneration scheme which ensures a net increase in industrial floorspace."

To ensure that the existing uses of sites are taken into account when considering residential and industrial uses within industrial and employment land, we respectfully request that the following paragraphs be added:

"e i) When considering applications for residential development within industrial and employment land, flexibility should be given to sites which can demonstrate existing and established non-industrial uses, such as residential uses;

This would reflect LBB's current approach at the Site.

This would also ensure that the Proposed Local Plan is **consistent with national policy, positively prepared** and **effective** in its delivery of new homes, affordable homes, light industrial and industrial uses.

Strategic Industrial Land (Northfields east and west of Grand Union Canal)

We note that Map Mod 31 (MM31) 'Amend boundary of Northfields East SIL' propose to de-designate the former Northfields Industrial Estate site area from the SIL and this is supported. However, we note that the remaining parts of the SIL (which includes the Site) will carry over the SIL designation. As it relates to the Site, the retention of the SIL is **not justified** given the Site's established residential uses and therefore must be removed.

We also question why the SIL designation is being retained on the adjacent woodland area which is designated as a SINC. We have attached an annotated drawing (Drawing No. 11247-A-010) showing the location of the Site (Prospect House) and the adjacent SINC superimposed "Before" and "After" SIL areas in the Brent Draft Local Plan Proposed Modifications Policy Maps.

Whilst Sonal is committed to delivering an intensified employment use (specifically light industrial uses) as part of a comprehensive residential-led redevelopment proposal, given the established and existing residential uses on the Site, the de-designation of the SIL from the Site will provide clarity and will therefore be **effective** and **justified**.

We note that LBB's Employment Land Demand Study (ELDS) July 2015 recommended the removal of the Northfields Industrial Estate from the SIL. Page 79 of the ELDS states that *'To help retain an appropriate balance of supply and demand of industrial land over the planning period, the Council could consider a more flexible approach to changes of use away from industrial uses'*. Page 79 also details justifications for the release of the Northfields Industrial Estate from the SIL. These can be summarised as follows:

- Enabling the wider regeneration and objectives of Alperton;
- High levels of vacancy;
- Neighbouring impacts of industrial uses;
- Release of the Site would enable greater regeneration benefits for the surrounding area; and
- If residential uses replaced existing industrial uses then this would help achieve boroughs housing targets.

The ELDS also acknowledges the area of the Site to the south of the canal and adjacent to the North Circular Road. Whilst the Site is east of the canal and south of the River Brent, we have understood that the area the ELDS refers to is likely to be the strip of land running south of the River Brent and north of the North Circular. We have understood that this ELDS recommended this strip of land be retained as employment use. Whilst the ELDS commented that it did not consider residential use was appropriate because of noise impacts of the road, it fails to identify and take into account the 2015 Prior Approval which permits residential use. The latter was granted on 20 April 2015 which was some 3 months before the issue of the ELDS in July 2015. Furthermore, this blanket approach also fails to take into account and weigh up the variety of precedent redevelopment throughout London which has successfully designed and mitigated impacts on residential use which are adjacent to roads and other similar noise-generating activities and uses.

Having regards to the above justifications (in the ELDS) to de-designated the SIL from the Northfields site, we consider these could be equally be applied to the Site for the following reasons:

- Compared to the existing site and 2019 Permission, a high-density residential-led redevelopment would enable the delivery of significantly greater regeneration benefits which would contribute to the aims and objectives Alperton Growth Area, contributing to new homes and new jobs;
- As noted above, the existing ground floor offices i.e. a non-industrial use have been vacant for more than a decade and therefore has been failing to contribute to the strategic function of the SIL designation for a significant period of time;
- We note the adjacent Northfields Masterplan is being built out. Whilst redevelopment of the Site could invariably be perceived as a "bolt on" to this masterplan, the Site's redevelopment can and would successfully integrate to the existing masterplan, and also be designed to protect future and surrounding residential amenity from the impacts of industrial uses;
- The release of the Site would enable greater regeneration benefits for the surrounding area, and overall would be a catalyst to promote regeneration for other sites along the North Circular; and
- A comprehensive residential-led mixed use scheme would replace existing employment uses (currently vacant offices) and provide an uplift in employment floor area in the form 'maker/creator' spaces which we note that there is strong demand for this workspace typology (as noted in para 4.66 of the Brent Workspace Study dated March 2017) with the potential to provide affordable workspace. It would also deliver new homes and affordable homes and therefore contribute to other key policy and regeneration targets in the Local Plan.

In addition, we note that Section 2.16 of the Brent Industrial Land Audit (ILA) (October 2019) also considered SIL-designated areas. The Site (including Prospect House) falls within the subsection 'North Circular Road'. Whilst the ILA acknowledges the 2015 Prior Approval for residential uses and the ground floor offices, it fails to refer to the long-term vacancy of the offices (i.e. since 2008). The ILA also fails to acknowledge the 2019 Permission which granted new residential for 28 flats in a four storey extension on 7 August 2019 i.e. 2 months before the ILA was issued.

As it relates to the areas identified in Figure 25 of the ILA (which are extensive areas subject to the current SIL designations), page 78 of the ILA concludes these areas (in summary): have good access to the North Circular Road and that this is a strategic location for logistics; that there is a range of employment space; suggests that retaining a designation for purely employment uses will enable the market to respond to meeting the needs of industrial occupiers; could be a sustainable location for housing given its proximity to services e.g. schools and town centres but notes the physical barrier of the canal; the low PTAL would be car reliant and exacerbate existing air quality issues; and comments that it is not a sustainable location due to its very low PTAL.

Whilst these conclusions of the ILA are at odds with the recommendations in the ELDS – specifically the Northfields site, in any event the Proposed Modifications seek to de-designate the SIL from the Northfields site.

Furthermore, whilst the technicality of the Site's PTAL renders a lower score of 2 to 3, in reality the Site is located in a sustainable location. For example, the Site is within a 8 to 12 minute walk (1km north east) of Stonebridge Park Overground Station on the Bakerloo and London Overground lines, providing access to Central London. There are nearby bus stops (within c600m of the Site) for three bus routes on the North Circular Road serving local destinations such as Wembley and Brent Cross. Furthermore, with the emerging, wider redevelopment proposals, we understand the PTAL score is likely to rise to PTAL 3 in the near future, with proposals to extend the 83 bus route to Stonebridge Park Station and to enhance the frequency of route 112 to support the significant emerging development context of the area. In addition, the Site's redevelopment provides an opportunity to work collaboratively with key stakeholders to provide an access route to the canal so as to improve connectivity and accessibility to the wider area and other amenities, including the adjacent Northfields site where new social infrastructure e.g. play areas will be located. There are also a number of precedents throughout London that support car-free schemes in "lower" PTAL areas. Therefore future redevelopment proposals would not be car reliant and air quality issues would not be exacerbated. As it relates to the future redevelopment potential for intensified employment uses, the proximity of the North Circular would also be advantage to new maker/creator uses and make it an attractive location for a range of future occupiers for deliveries etc.

In planning terms, there are a number considerations to support the Proposed Modifications to de-designate the SIL from the Site. We note the following:

- There is an established residential use by virtue of the 2015 Prior Approval and 2019 Permission;
- Due to the inherent site and context constraints, in reality there is an extremely limited range of SIL use typologies that a site of 0.254 hectares could accommodate. For example, larger industrial units/logistics/yards require a significant landholding as illustrated in the GLA's Industrial Intensification and Co-Location Study (2018). In reality, given the established residential use it is better suited to smaller light industry uses which have the capability to co-exist with these existing residential uses;
- This Site's "island" type attributes is largely owing to its location along the remaining 'end of strip' of SIL land which is then cornered into SINC land i.e. the River Brent to the north and wooded landholding to the west (the latter is a SINC as identified in the attached plan). We question the wooded area's SIL designation as SIL uses on SINC land is very likely to be at odds with the aspiration to retain existing

natural green spaces. Beyond this is the Grand Union Canal and the slip road/North Circular to the south-west and south of the Site respectively;

- In light of the above, together with the Site being adjacent to the approved Northfields Masterplan redevelopment (and given the Northfields site is being removed from the SIL), the Site i.e. Prospect House can successfully integrate in design and mixed use terms to the wider masterplan. A comprehensive residential-led mixed use redevelopment which would enable the delivery of a significantly greater range of planning and public benefits when compared to the quality of the accommodate of the existing homes on the Site and vacant office use;
- In addition, the only possibility of bringing the Site forward with other sites would be to combine the Site and the other two neighbouring sites (i.e. the Shurgard site and the scaffolding site). This would not be considered a comprehensive redevelopment the total area of these three sites would only be approximately 0.66 hectares. Furthermore following discussions with Shurgard they have strongly indicated to Sonal that they do not want to redevelop their site;
- HGV (Heavy Goods Vehicles) maneuvering on Site is also problematic due to on-site deliveries reducing the footprint of any proposals thus reducing the attractiveness of the site for a range of future occupiers;
- Given the Site's location within, and objectives of the Alperton Growth Area, there should be some concession to the realities of bringing development forward in a more piecemeal fashion. De-designating the SIL from the site would achieve this; and
- Whilst there is the potential the Site could also be reverted to an LSIS (Locally Significant Industrial Site) 'status', there remain limitations via a masterplan-led approach as explained above. Rather, if the Site is considered as a non-designated employment site (in London Planning terms) or a Local Employment Site (Draft Local Plan Policy BE3), given the established on-site residential uses, it would provide greater flexibilities, enabling future redevelopment proposals at the Site to deliver a range of planning and public benefits. This would include the delivery of new creative industries (including the potential for affordable workspace), in line with the objective for creative clusters within the Alperton Growth Area.

In summary, the de-designation of the SIL would allow the redevelopment of the Site to meet the objectives of the Alperton Growth Area as well as deliver the significant planning and public benefits, unlocking the potential of a underutilised site. Therefore, it is considered that this suggested change would ensure that the draft Local Plan is Plan has been **positively prepared**, is **effective**, is **justified** in the delivery of its objectives and also **consistent with national policy**, including Section 11 (Making effective use of land) of the NPPF.

Alperton Tall Buildings Zone

Sonal is fully supportive of Map Mod 18 (MM18) which includes the Site within the Alperton Tall Buildings Zone. However, it is considered that the annotated text of "up to 78 metres" is unduly prescriptive and should be deleted. The heights should be a design-led process and not prescriptive.

The adjacent revised Northfields Masterplan (Ref. 20/2784) which was formally granted planning permission this year falls within the proposed Alperton Tall Buildings Zone and includes multiple buildings which we understand exceeds 78 metres.

A design-led process in line with the London Plan will also ensure the delivery of optimum high density residential development, including affordable housing which can be delivered within the Alperton Growth Area, which is a key objective of Policy BP7 (South West) and Policy BSWGA1 (Alperton Growth Area).



This proposed change would ensure that then draft Local Plan is **justified** and also **positively prepared** in meeting the objectives of the Alperton Growth Area.

Conclusion

In summary, Sonal support the inclusion of the Site within of the Alperton Growth Area and Alperton Tall Buildings Zone, subject to the suggested amendments outlined above. However, as noted throughout this letter, Sonal remain committed to redeveloping the Site for high density residential-led mixed use development, including light industrial uses and affordable housing. It is considered that the de-designation of the SIL would allow the redevelopment of the Site to meet the objectives of the Alperton Growth Area as well as deliver the significant planning and public benefits, unlocking the potential of a underutilised site.

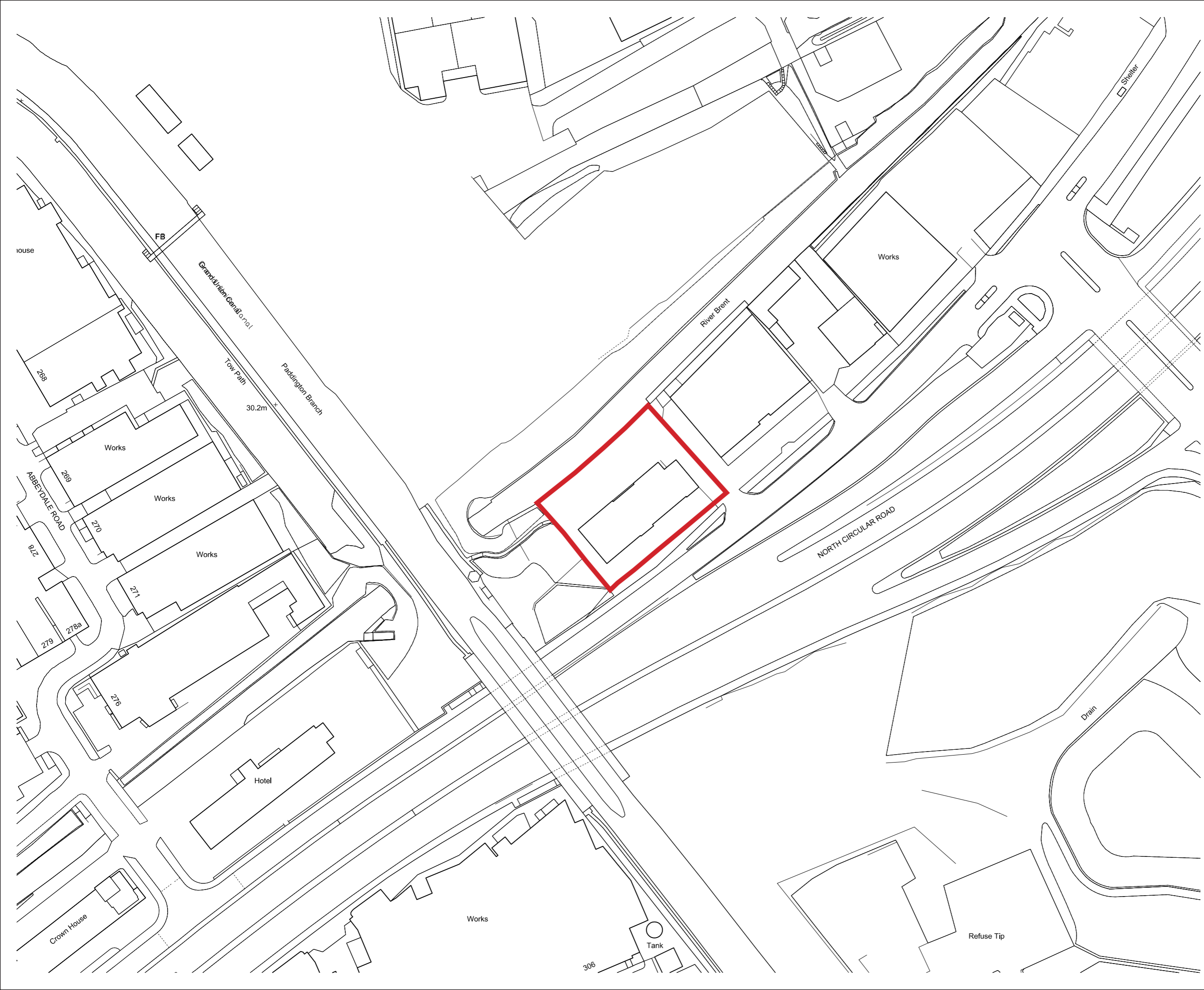
Due to the items outlined above it is considered that the draft Local Plan in its current form would constrain the development potential of the Site and would therefore, **not be effective** in its **delivery** and would **not be consistent** with national policy. Therefore, it is considered that the draft Local Plan is not currently sound.

Please do not hesitate to contact me or my colleague Henry Bell (07977 030131 henry.bell@savills.com) to arrange a meeting and/or you have any further queries.

Yours faithfully

- Enc.** Brent Draft Local Plan Proposed Modification Policies Map (Drawing No. 11247-A-P-010)
- Site Plan (Drawing No. 11247-A-P-001)
- Brent Local Plan Examination Stage Proposed Modifications Representations Form

Notes
 Do not scale from drawing
 All dimensions to be checked on site
 This drawing is copyright ©



Rev	Date	Description
-	27.12.19	First Drawn



40 GREAT PORTLAND STREET
 LONDON W1W 7LZ
 0203 051 0001
 info@faluk.com
 www.faluk.com

Project	PROSPECT HOUSE		
Client	Sonat Worldwide Ltd.		
Date	18.08.21	Scale	1:1250 at A3
Title	LOCATION PLAN		
Drawn	FN	Checked	SF
Approved	NF		
Status	AS EXISTING		
Project	Discipline	View	Drawing No. Rev.

11247 | A | P | 001 | -

BRENT DRAFT LOCAL PLAN PROPOSED MODIFICATIONS

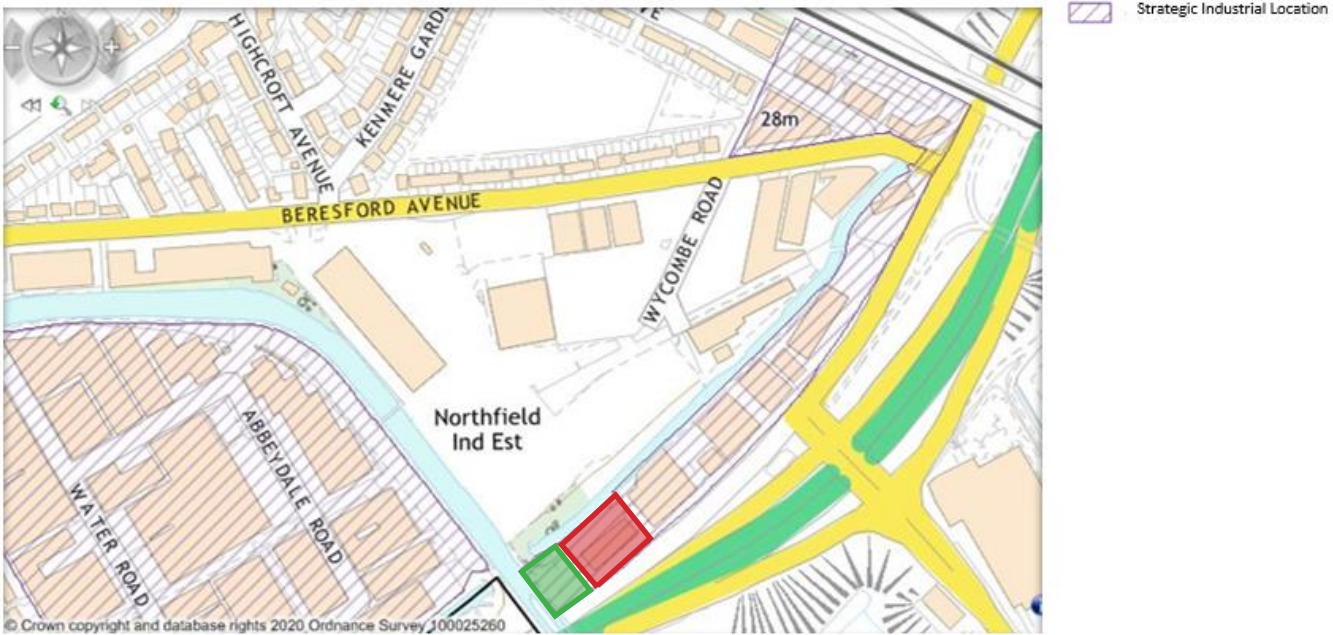
POLICIES MAP



11247-A-P-010

BEFORE



AFTER



-  PROSPECT HOUSE
-  SINC