



Planning Policy Committee
10th December 2009

Report from the Chief Planner

For Action

Wards Affected:
ALL

Report Title: Proposed Pre-submission Changes to the Site Specific Allocation Development Plan Document

Forward Plan Ref:

1.0 Summary

- 1.1 This report summarises limited changes to the draft Site Specific Allocations Submission stage Development Plan Document of the emerging Local Development Framework. The limited changes are 3 new sites and a series of minor changes to the document. The changes are proposed following publication of, and consultation on, Brent's Site Specific Allocations in June 2009 in advance of submission to the Secretary of State.

2.0 Recommendations

- 2.1 That the Planning Committee recommends that Executive agrees the proposed changes to the Site Specific Allocation Development Plan Document set out in Appendix 1, for public consultation.

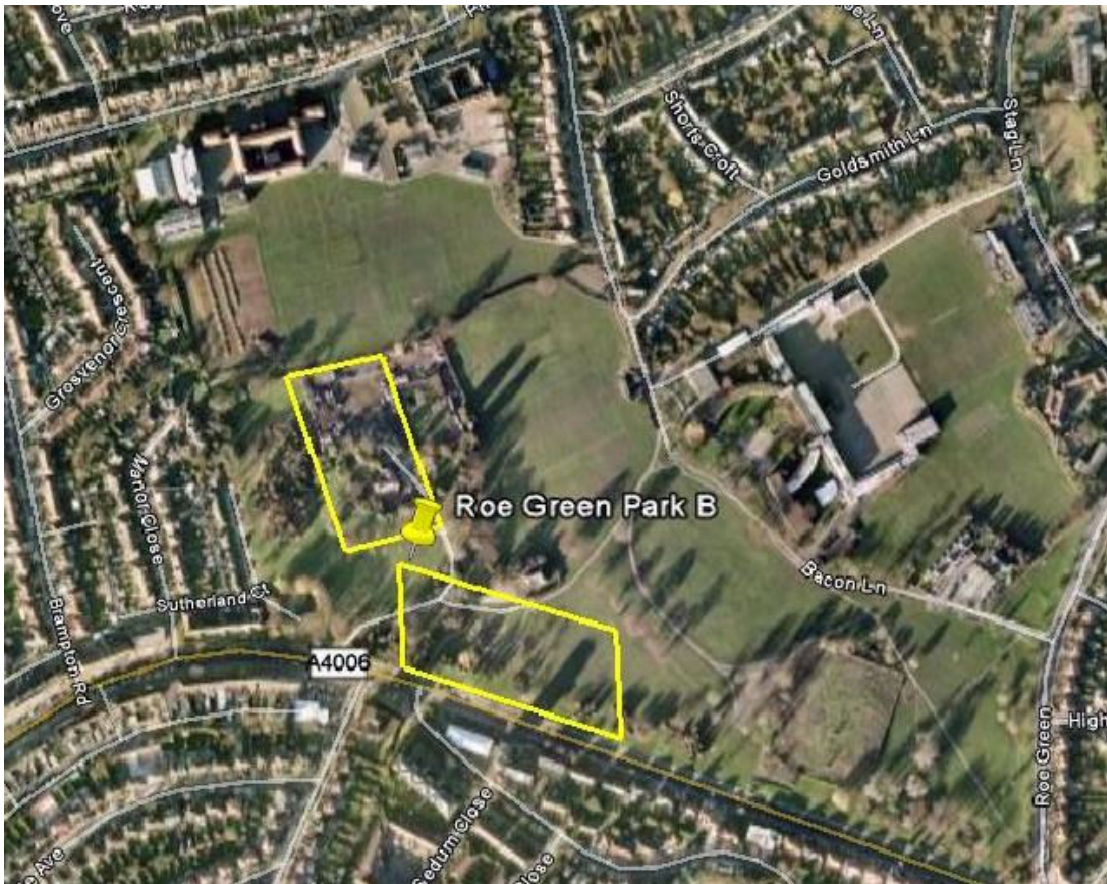
3.0 Detail

- 3.1 The Site Specific Allocations Development Plan Document contains details of development sites that are likely to come forward in the next plan period (15 – 20 years). As referred to within the report to the Council's Executive (16th November 2009), officers intend to submit the Site Specific Allocations DPD early in 2010. The document was published for consultation during the summer 2009. During this consultation period, representations were received that proposed changes be made to the document before adoption. It is proposed to submit the document so that it can be examined as soon as the Core Strategy is adopted. The role of the document is to give more details of

development within individual sites, including within the Core Strategy's growth areas.

- 3.2 Government best practice guidance (2008) for the Local Development Framework categorises changes to documents as "extensive changes", "focused changes" and "minor post-publication changes". None of the proposed changes are considered to be "extensive".
- 3.3 Having considered representations, officers recommend a number of changes to the document. These include:
- 3 new Site Specific Allocations – these are considered and recommended below. Draft allocations are included within the changes document at Appendix 1
 - Focused changes to existing Site Specific Allocations – these are included at Appendix 2
 - A focused change to the introductory text - this is discussed at para. 3.22.
 - Minor post publication (editing) changes – these are discussed at para. 3.28.
- 3.4 Focused changes: New Site Specific Allocations
Below, the inclusion of 3 new allocations is considered and recommended. Draft allocations for these are included at Appendix 1.
- 3.5 *Moberly Leisure Centre, South Kilburn*
A representation was received from the London Borough of Westminster for the inclusion of an allocation on the Moberly Leisure Centre in South Kilburn. The centre sits within Brent but is owned and operated by Westminster Council.
- 3.6 The representation seeks an allocation that promotes the redevelopment of the site for a new or improved leisure centre and enabling residential development. This site is within the South Kilburn growth area and entails the provision of improved facilities for the local community. Part of the site is a Victorian school and caretakers' house.
- 3.7 Although not listed, these are of some architectural and historical merit and this should be carefully considered as any proposal is brought forward. In principle, officers recommend the inclusion of this new site as a Site Specific Allocation. The Council would want to secure some affordable housing as part of any development to assist with the redevelopment of South Kilburn.
- 3.8 *Former service station garage Rucklidge Avenue*
Abermarle Trust, the owners of this site submitted a representation requesting the inclusion of this site within the document. The representation seeks allocation text that merely states "residential development". The site was subject to a planning application in 2007 where, despite officer recommendation, committee refused planning permission. Since then, the owners have resubmitted a planning application for residential development.

- 3.9 As this site is brownfield land within an urban development, officers feel that in principle, this site can be included within the document as it is in line with national and regional planning policy. However, officers suggest that the allocation is worded so as to refer to the difficulties of development derived from the outlook, privacy, mass and scale in relation to the surrounding properties.
- 3.10 *Former Wembley Mini-Market, Lancelot Road, Wembley*
London and Quadrant Housing Trust requested that this site be included as a site specific allocation for either solely residential or the mixed use redevelopment of this site.
- 3.11 This brownfield site has long been vacant and officers feel that in principle, the site is suitable for redevelopment. However, officers feel that in the interests of supporting the role of Wembley town centre, the development should include commercial uses at lower floors. This will supersede the proposals for the site included in the adopted UDP.
- 3.12 New sites considered but not included within the document
- 3.13 *Swimming Pool at Roe Green Park, Kingsbury*
The Council's Executive has considered and recommended the findings of a report in October 2009 that identified possible sites for a third swimming pool to serve the north of the borough. Executive accepted that Roe Green Park contained 2 potential sites and requested a detailed feasibility study to determine the preferred site. The sites present different planning considerations in respect of accessibility, potential loss of trees and the impact upon Kingsbury Manor, which is a listed building.
- 3.15 Officers feel that it is not possible to include an allocation at such an advanced stage in the document, when the actual site for this proposal has still not been agreed by the Council. Additionally, officers are concerned that the progress of the document is not held up while a site is agreed.
- 3.16 An allocation can be proposed at the Examination in Public if a site has been agreed before then. If this is not possible, officers suggest that a planning brief can be prepared that can be supplementary to the Core Strategy which itself includes a statement that the Council is seeking a pool in the north of the borough. This can deal with the more detailed site development issues and would be subject to public consultation.
- 3.17 An aerial photo taken from the Executive report is included below to indicate the 2 potential sites within Roe Green Park.



- 3.18 *Asiatic Carpets and Chancel House, Church End*
These sites were already included within the document but were identified for mixed use development. However, representations were received from Cllr James Powney and Cllr Janice Long that these sites be proposed to accommodate a new secondary school and a sixth form college.
- 3.19 Chancel House was considered for disposal by its owners but is now well occupied and there are no immediate prospects for the site to come forward for development. The level of occupation suggests that it would be extremely expensive to acquire this site and would not be achieved without complex compulsory purchase procedures. Discussions have also taken place with the owners of the carpet warehouse site who have been reluctant to move until they secure sufficient funds from housing development to finance a move to a nearby location in order to relocate their business. The floorspace needs for carpet storage are significant. Again this will be a costly exercise likely to be resisted by the owners.
- 3.20 Furthermore, the Infrastructure Investment Framework suggests that proposed development in Church End will give rise to half a form of entry at secondary level, and approximately $\frac{3}{4}$ of a form of entry at primary school level. Therefore, it is considered more appropriate in the short term to accommodate growth within existing schools whether by using up capacity (as at Cardinal Hinsley) or by extending capacity in other secondary schools in the borough. Officers continue to consider sites in the south of the borough for new schools.

3.21 *McNicholas House, Kingsbury Road*
An allocation was proposed by the new owners of this site for the mixed use redevelopment for a new Shree Swarminarayan temple building with indoor sports and multi use community facilities and employment floorspace. Officers feel that this allocation cannot be included as the site is designated as a Borough Employment Area and the case has not yet been made to depart from this.

3.22 *Taylor's Lane Power Station, Stonebridge*
Owners E.ON requested that this site be included as an allocation as a "strategic energy generation" site. Officers feel that, although its inclusion would not necessarily harm the document, the allocation proposes no change of use or redevelopment and merely maintains its current status. It is felt there is simply no need for this allocation.

Focused change: Introductory section

3.23 Officers have clarified paragraph 1.17 of the introductory section that refers to "Planning for Infrastructure" to include a statement on utilities infrastructure in addition to social infrastructure to support development.

Minor post-publication (editing) changes

3.24 Changes have been made throughout the document to clarify the planning history by including planning application numbers. This should make the document more accessible for readers.

3.26 All references to Flood Risk have been amended to reflect the need for Flood Risk Assessments to be updated and reassessed in the light of updated data from the Environment Agency; the following text will be added to all relevant allocations: *"therefore any assessment must be ensured that the most up to date data is used as part of the FRA."*

3.27 The reference to Core Policy 7 – Wembley Growth Area, references to sites W9 and W10 have been added. These should have been included in the policy and was an error of omission.

3.28 SSA16 Morrison's Supermarket has been amended to replace the reference to the Metropolitan Line with the Jubilee Line. The Metropolitan Line has long since ceased to use this line.

3.29 B/C1 Oriental City has been amended so that the planning history only refers to the former Oriental City site, and not the Asda supermarket, that also falls within the red-line.

4.0 Financial Implications

4.1 There are no financial implications arising directly from this report.

5.0 Legal Implications

- 5.1 The preparation of the LDF, including the Core Strategy, is governed by a statutory process set out in Government planning guidance and regulations. The regulations allow for changes to be proposed to the draft Plan after publication. The changes proposed will be put to the Inspector for consideration along with any representations that may be made upon them.

6.0 Diversity Implications

- 6.1 Full statutory public consultation has been carried out in preparing the Core Strategy and an Impact Needs / Requirement Assessment (INRA), which assessed the process of preparing the Site Specific Allocations, was prepared and made available in November 2008.

Background Papers

London Borough of Brent LDF - Site Specific Allocations Proposed
Submission DPD, June 2009

London Borough of Brent LDF - Core Strategy Proposed Submission DPD,
June 2009

Executive Report, Oct 19th 2009, Third Pool in Brent - Progress Report

Contact Officers

Alex Hearn, Principal Policy and Regeneration Planner, Brent Planning
Service 0208 937 5346

Chief Planner
Chris Walker.

Appendix 1 Additional Sites

Appendix 2: Focused changes to existing Site Specific Allocations

Number	Site Specific Allocation	Proposed change	Justification
W3	Brent Town Hall	Include policy reference to Core Policies 17, and 23.	A representation was made in this respect and officers feel this is a reasonable change to make. However it should be clear that the "Core Strategy Policy context" is not an exhaustive list of relevant Core Policies but is intended to demonstrate a policy reference with the Core Strategy,
W6	Amex House	<p>Include the following text to the Flood risk comments section: At the end of the second sentence add the words "<i>or reduce flood water storage.</i>"</p> <p>The following text be added to the sentence that begins "<i>The FRA should include</i>": <i>"Demonstration that the site layout has been designed sequentially to place development in areas of lowest flood risk; design criteria for proposed development to ensure it is not at risk of flooding; demonstration of safe access/egress from the site during a flood event."</i></p> <p>The flowing text should be added at the end of the paragraph: "<i>therefore it must be ensured that the most up to date data is used as part of the FRA.</i>"</p>	These changes have been requested by the Environment Agency.

W9	Wembley High Road	Include policy reference to Core Policies 16	A representation was made in this respect and officers feel this is a reasonable change to make. However it should be clear that the "Core Strategy Policy context" is not an exhaustive list of relevant Core Policies but is intended to demonstrate a policy reference with the Core Strategy,
W10	Wembley Chiltern Embankments	Include sentence " <i>Embankments must be stabilised and development must not disrupt the rail service through the site.</i> "	A representation was made in this respect and officers feel that this is a reasonable change to make.
W10	Wembley Chiltern Embankments	Include policy reference to Core Policy 17.	A representation was made in this respect and officers feel this is a reasonable change to make. However it should be clear that the "Core Strategy Policy context" is not an exhaustive list of relevant Core Policies but is intended to demonstrate a policy reference with the Core Strategy,
A2	Minavil House and Unit 7 Rosemont Road	Remove sentence " <i>To assist this, an undeveloped buffer strip of 5 metres from the canal will be encouraged</i> ".	This sentence was added at an earlier stage as it was requested by the Environment Agency. The Environment Agency is not the authority for the canal and British Waterways (which is) have requested that this be removed. As officers embarking on a masterplan for the Alperton area that includes the SSAs along the canal, retaining an element of flexibility over this issue in beneficial until the correct relationship with the canal for particular sites is established.
A3	Former B&Q and	Remove sentence " <i>To assist this, an</i>	This sentence was added at an earlier stage as it

	Marvelfairs House	<i>undeveloped buffer strip of 5 metres from the canal will be encouraged</i> ".	<p>was requested by the Environment Agency. The Environment Agency is not the authority for the canal and British Waterways (which is) have requested that this be removed.</p> <p>As officers embarking on a masterplan for the Alperton area that includes the SSAs along the canal, retaining an element of flexibility over this issue in beneficial until the correct relationship with the canal for particular sites is established.</p>
A4	Atlip Road	Remove sentence " <i>To assist this, an undeveloped buffer strip of 5 metres from the canal will be encouraged</i> ".	<p>This sentence was added at an earlier stage as it was requested by the Environment Agency. The Environment Agency is not the authority for the canal and British Waterways (which is) have requested that this be removed.</p> <p>As officers embarking on a masterplan for the Alperton area that includes the SSAs along the canal, retaining an element of flexibility over this issue in beneficial until the correct relationship with the canal for particular sites is established.</p>
A5	Sunleigh Road	Remove sentence " <i>To assist this, an undeveloped buffer strip of 5 metres from the canal will be encouraged</i> ".	<p>This sentence was added at an earlier stage as it was requested by the Environment Agency. The Environment Agency is not the authority for the canal and British Waterways (which is) have requested that this be removed.</p> <p>As officers embarking on a masterplan for the Alperton area that includes the SSAs along the</p>

			canal, retaining an element of flexibility over this issue in beneficial until the correct relationship with the canal for particular sites is established.
A6	Woodside Avenue	Remove sentence <i>“To assist this, an undeveloped buffer strip of 5 metres from the canal will be encouraged”</i> .	<p>This sentence was added at an earlier stage as it was requested by the Environment Agency. The Environment Agency is not the authority for the canal and British Waterways (which is) have requested that this be removed.</p> <p>As officers embarking on a masterplan for the Alperton area that includes the SSAs along the canal, retaining an element of flexibility over this issue in beneficial until the correct relationship with the canal for particular sites is established.</p>
A7	Mount Pleasant/Beresford Avenue	Remove sentence <i>“To assist this, an undeveloped buffer strip of 5 metres from the canal will be encouraged”</i> .	<p>This sentence was added at an earlier stage as it was requested by the Environment Agency. The Environment Agency is not the authority for the canal and British Waterways (which is) have requested that this be removed.</p> <p>As officers embarking on a masterplan for the Alperton area that includes the SSAs along the canal, retaining an element of flexibility over this issue in beneficial until the correct relationship with the canal for particular sites is established.</p>
A8	Northfields Industrial Estate	Remove sentence <i>“To assist this, an undeveloped buffer strip of 5 metres from the canal will be encouraged”</i> .	<p>This sentence was added at an earlier stage as it was requested by the Environment Agency. The Environment Agency is not the authority for the canal and British Waterways (which is) have</p>

			requested that this be removed. As officers embarking on a masterplan for the Alperton area that includes the SSAs along the canal, retaining an element of flexibility over this issue in beneficial until the correct relationship with the canal for particular sites is established.
SSA1	Metro House	Include sentence <i>"Until development proposal is forthcoming, continued use of the site as a hostel is supported."</i>	This was agreed at an earlier stage of consultation but was omitted from the submission stage document.
SSA20	Former Unisys and Bridge Park Centre	Include sentence <i>"The design of development proposals can further mitigate the potential impacts of noise pollution through orientation and internal layout of buildings"</i> .	A representation was made in this respect and officers feel that this is a reasonable change to make.
SSA20	Former Unisys and Bridge Park Centre	Include the following text to the Flood risk comments section: At the end of the second sentence add the words <i>"or reduce flood water storage."</i>	This was requested by the Environment Agency
SSA24	Wembley Point	Include sentence <i>"The design of development proposals can further mitigate the potential impacts of noise pollution through orientation and internal layout of buildings"</i> .	A representation was made in this respect and officers feel that this is a reasonable change to make.
SSA24	Wembley Point	Include sentence: <i>"This site requires a revised Flood Risk Assessment based upon the most up to date data before it can be included as an adopted Site Specific Allocation."</i>	This was requested by the Environment Agency
B/C3	Capital Way	Clarify uses within buffer zone to include <i>"community uses"</i> .	This change would be inline with the planning permission on the site.

PR2	First Central	Include sentence <i>“Development must minimise loss of existing trees and must include a comprehensive and detailed landscape strategy including planting, materials and landscaping”</i> .	Although phases of the extant permission have not been built out, the landscaped parkland and lake have been delivered resulting in a high quality public realm. Recent related residential development benefits from this and this must be considered with any forthcoming development proposals.
-----	---------------	---	--