

Survey:

What is your name? _____Greg Blaquiere_____

What is your organisation (if applicable)? _____Terence O'Rourke on behalf of

Mercedes-Benz

1. Which part of the Plan are you commenting on?

Policy: Paragraph: Table: Map:

2. Do you consider the Plan is:

Legally compliant? Yes: No:

Sound? Yes: No:

3. If you believe the Plan to be unsound, is this because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

4. Please give reasons for your objection or support:

This draft policy BNSA1: Capitol Way Valley details the site allocation, which includes this site along with areas to the west and south beyond the Northern Quarter, which is currently being built out.

The landowner strongly supports the inclusion of this site as part of the allocation. The long term vision for the landowner is the continued investment in the Colindale area through the redevelopment of the dealership and rationalisation of the existing floorspace. This will protect the employment use at the site (important to both Mercedes-Benz's and LB Brent's vision) as well as including the provision of residential units on the upper floors, to assist in meeting the housing targets for the area and across LB Brent.

Whilst the allocation provides an opportunity for the redevelopment of the site, this draft policy is not sufficiently positively prepared as a direct consequence of requiring the masterplanning of the whole allocation, prior to any planning application being prepared

and submitted. The risk outlined by LB Brent in regard to the landownership is understood. However, this could require land assembly and the undertaking of a comprehensive masterplan process for the allocation may unnecessarily delay the deliverability of the allocation to create new homes and re-provide employment and commercial space within the plan period.

The site is currently allocated as part of the Site Specific Allocation (2011) along with an area to the south known as 'the Northern Quarter'. In this situation, the Northern Quarter was subject to a successful planning application in September 2009 (application reference: 08/2823) and is currently nearing completion. Whilst the two parcels of land were included within the same allocation, the allocation has not sought to restrict the individual parcels of development coming forward and as a consequence, the Northern Quarter was able to be developed ahead of the Mercedes-Benz and Smart dealership site.

The redevelopment of this site would provide an opportunity to re-establish an employment site within the area and create new homes in the early part of the plan period, whilst the land assembly and strategy for the wider allocation can be established. The early development of this site will not prejudice the development potential of the wider allocation, especially given that it is outside of the LSIS and is subject to the existing allocation within the currently adopted Development Plan.

The benefits of undertaking a masterplan of the whole allocation are apparent, however the masterplanning process may be resource consuming to LB Brent (as well as any possible masterplanning partner) and may require one or two consultation period(s) and modification process, if it is to be adopted as a formal policy document as part of the Local Plan. From experience, this process can take a minimum of 12 months to complete. It is therefore suggested that wording of the policy is revised to enable the redevelopment of this site without the reliance on other parcels of land or masterplanning process. More specifically, the following text should be deleted from the planning considerations sub-section of the draft policy:

"the whole site will be subject to a masterplan process to comprehensively identify how it can increase useable employment floorspace, whilst contributing to the council's vision for the Burnt Oak and Colindale area of creating 'a mixed, vital, accessible and pleasant district'. Until a masterplan for the site has been agreed/ adopted by the council, no redevelopments (apart from 17/0837) will be permitted within this area".

When creating the indicative masterplan for the wider site allocation site, consideration was paid to the full raft of design principles included with draft policy BNSA1: Capitol Way Valley. This includes the re-provision and co-location of the commercial and employment uses and inclusion of retail uses and active frontages as well as the creation of new residential units within this allocation. In addition, in line with national policy and draft NLP policy D12, the 'Agent of Change' principles have also been taken into account. These principles place responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. This considers noise and dust pollution and all vehicle movements associated with all users of the site and how all uses co-exist at this allocation.

In summary, as the draft site allocation policy is currently written, it is not considered to be sufficiently positively prepared with the reliance on comprehensive masterplanning of the whole site allocation prior to any planning application on individual development parcels. In order for this draft policy to be found sound, LB Brent should remove the wording within this policy to allow individual parcels of land to come forward for development independently of the wider allocation, subject to satisfactorily demonstrating development would not harm the delivery of the policy aspirations set out by draft policy BNSA1.

5. What change(s) do you consider necessary to make the Plan legally compliant or sound?

See response to question 4 above.

6. If your representation is seeking a change, do you wish to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We consider that Mercedes-Benz Retail Group UK Limited should be provided with an opportunity to participate at the hearing part of the examination. The issues raised in regard to the soundness of the Draft Local Plan, in the submitted representation, require detailed examination before an independent inspector.

If you would like to comment on additional policies, please fix another sheet to this.

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 and addresses of those making representations can be made available and taken into account by the Inspector. The Council, its appointed Local Plan Programme Officer or the Planning Inspector appointed to undertake the Examination may also contact you regarding your response.

X Please indicate if you wish your personal data to be used for reasons other than identifying your representation and being contacted in relation to that representation.