

Planning Strategy,  
Brent Council,  
Engineers' Way,  
Wembley,  
HA9 0FJ

05 December 2019

Dear Sir/Madam

### Written Representation for Consultation on Brent Local Plan 2041 – Publication Stage

On behalf of Aberdeen Standard Investments (hereafter “Aberdeen Standard”) we hereby submit a representation to LB Brent’s Local Plan Consultation (Publication Stage), in connection with the site at 76 Capitol Way, Capitol Industrial Park, NW9 0EW, which is managed by Aberdeen Standard on behalf of South Yorkshire Pensions Authority (hereafter “SYPA”).

#### Site Location and Background

Aberdeen Standard is a leading global asset manager and is a key institutional investor in the UK real estate market. As well as being a key landholder within Capitol Industrial Park, Aberdeen Standard has a long term commitment to the future redevelopment and regeneration of this area, and is keen to ensure that the Council’s vision for Capitol Way Valley closely aligns with its long-term development aspirations.

The site currently includes a Vehicle Service Centre and associated car parking. It is located to the south-west of Capitol Industrial Park and is bounded to the south and west by Kingsbury Health & Wellbeing Centre and Stag Lane, respectively, beyond which lies residential development. The site fronts onto Capitol Way to the north, which is the main spine road serving the Industrial Park. Edgware Road is located 400m to the east of the site.

#### Brent Local Plan 2041 – Publication Stage

These representations build on previous ones submitted last December to the Preferred Options version of the Local Plan in connection with the site at 76 Capitol Way, which falls within the wider emerging allocation BNSA1 ‘Capitol Way Valley’. In relation to its ‘allocated use’, the wording of BNSA1 remains unchanged from the Preferred Options draft. In this respect, our client re-emphasises its support for the Council’s recognition that 76 Capitol Way, together with the wider Capitol Industrial Park, is suitable for mixed-use redevelopment, including, inter alia, employment intensification, residential development and relevant social infrastructure.

While the policy wording of BNSA1 in the Publication Stage Local Plan remains largely in line with that of the Preferred Options Draft, one crucial difference is the number of residential dwellings that are envisaged being delivered over a 0-5, 5-10 and 10+ year period. The variations are detailed below in Table 1:

Timeframe for delivery	0-5 years	5-10 years	10+ years	Total
BNSA1 – Preferred Options	300	114	786	1,200
BNSA1 – Publication Stage	14	0	686	500

**Table 1 Timeframes for delivery of residential development**

In the first instance, our client questions the need to include specific timeframes for residential delivery, particularly when BNSA1's supporting text states that the indicative capacity of the allocation will be subject to a future masterplanning process. This is reiterated by Part D) of Policy BP3 'North' which states that, "*the potential residential development for the extension of the Burnt Oak and Colindale Growth Area, referred to as Capitol Valley, will be determined by a masterplan, taking into account the need to intensify employment use on the site.*" Ultimately, imposing specific timeframes for delivery of residential development in respect of BNSA1, would act as a barrier to the future delivery of residential uses within the wider allocation.

Notwithstanding the above, if the timeframes for delivery of residential development are taken forward as part of the Local Plan, our client questions why the Council now envisages 700 fewer residential units being delivered as part of BNSA1 over a 0-5, 5-10, and 10+ period, particularly when the Council's overall housing requirement has been increased to 27,482 homes (Publication Stage) from 23,711 homes (Preferred Options Draft) over the same period 2019/20-2028/29.

As previously stated, the site is included within the amended boundary of the Burnt Oak and Colindale Growth Area as part of the wider Opportunity Area, which has the potential to accommodate significant growth. In recognition of this and coupled with the 'Intend to Publish' Draft of the London Plan's requirement for LB Brent to provide 23,250 new homes from 2019/20 to 2028/29, our client feels that more priority needs to be placed on increasing the quantum of development that can be achieved with the wider BNSA1 allocation, particularly in relation to residential uses. Doing so, would contribute to achieving the Local Plan's objective to, "*meet and ideally exceed the final adopted housing target as set out in the emerging London Plan.*" Moreover, increasing residential densities within BNSA1 would also facilitate the delivery of family accommodation, in recognition of the need to provide 65% of additional homes as 3 bedrooms or more at a local level, and to meet the acute need for affordable housing at a borough and strategic level.

In view of the above, and given that BNSA1 is a highly accessible site within an Opportunity Area, our client requests that, in the event that the timeframes for residential development cannot be omitted from BNSA1, that they are increased over the 0-5, 5-10 and 10+ periods to reflect those indicated in the Preferred Options Draft of the Local Plan i.e. 300 (0-5), 114 (5-10) and 786 (10+), culminating in a total residential quantum of 1,200.

The comments previously provided in respect of directing residential development towards the west of the allocation boundary (adjacent to the existing residential areas) and more intensive industrial uses (within B2 and B8) to the east towards Edgware Road (in the interests of protecting the amenity of existing residents), remain valid. As does our client's previous contention that the height, scale and massing of development at the site can be maximised to intensify proposed uses – where appropriate and subject to design considerations – whilst also noting the need to step-down building heights to 2/3-storeys in the west, in response to the surrounding residential context.

Furthermore, our client contends that the requirement for the entirety of the BNSA1 site to provide a masterplan before any schemes can be approved, imposes an unnecessary barrier to the redevelopment and delivery of a key mixed-use development site, whose delivery is crucial to meeting LB Brent's objectively assessed employment and housing needs. As previously stated, the masterplan will need to go through various consultation stages, including engaging with key stakeholders and the public, which could take up to 18 months to fully prepare and formally adopt. As Policy BNSA1 is currently worded, this would all need to happen before a single planning application could be made on the site, and therefore represents a substantial barrier to development.

Our client respectfully requests that the text of BNSA1 be amended as follows – (proposed additional text is bold and underlined and text to be removed is struck through):

*“The site is included within the amended boundary of the Burnt Oak and Colindale Growth Area which has the potential to accommodate significant growth. A significant portion of the site is designated as a Locally Significant Industrial Site. 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. **Future proposals for redevelopment will need to ensure they do not prejudice the future delivery of a wider masterplan.**”*

The proposed wording above removes a key barrier to development, and also puts in place measures to prevent harmful piecemeal development that prejudices the wider delivery of BNSA1 ‘Capitol Way’.

In any event, LB Brent will retain complete control of the type and form of redevelopment which could come forward within the BNSA1 allocation via the planning application process and, if it is has the potential to prejudice the future delivery of a wider masterplan, they can refuse it.

## **Conclusion**

In conclusion our client continues to support the Council’s recognition that 76 Capitol Way, together with the wider Capitol Industrial Park, is suitable for mixed-use redevelopment, as confirmed through allocation BNSA1.

However, more priority needs to be placed on increasing the quantum of development that can be achieved with the wider BNSA1 boundary, particularly in relation to residential uses, in order to meet LB Brent’s increased housing requirement and to facilitate the delivery of family accommodation and affordable homes.

We trust that the proposed amendments to BNSA1 will be duly considered before the Publication Stage Local Plan is submitted for examination in 2020. In the meantime, we would be more than happy to discuss any aspect of the representation in further detail if required.