

## 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:

Draft policy DP3: North sets out the vision for the northern part of LB Brent. Within the policy, it states that, where appropriate, proposals should plan positively to deliver the vision for this area by contributing and delivering the following:

- Enhancement to character, heritage and design
- Homes
- Town centre improvements
- Community and cultural facilities and
- Employment and skills opportunities.

Whilst the overall aspiration of this draft policy is supported, there is a lack of specific detail and quantum within the 'homes' sub-section, which creates a lack of effectiveness. The inclusion of a housing target would help contextualise the area within the wider housing target for the Borough and will help define the specific targets for the area,

providing support to LB Brent's overall Vision. This inclusion of a housing target (based on the Local Plan's evidence base) over a specific time period (either over the Local Plan period or other defined timeframe) will ensure that this is effective and justified.

In addition, the 'homes' subsection of the policy also has reference to the requirement for masterplanning for the Burnt Oak/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*". As further discussed within comments on draft policy BNSA1: Capitol Way Valley below from paragraph 2.13, although the masterplanning is considered to be a useful exercise, this requirement would be better suited within the supporting text for the policy, rather than the policy text itself. By including this reference within the policy, an added restriction is placed on individual parcels of land coming forward, ahead of the required land assembly and masterplanning process taking place.

As currently drafted, the supporting text at paragraph 5.3.28 provides this clarity and more positive wording by stating: "in advance of the adoption of a masterplan for this site, the council will resist small scale release, unless it can be shown to not undermine the outcomes of any likely adopted masterplan". This wording would include reference to the aspiration for the masterplan of the Capitol Way area when the text from the policy is removed, whilst ensuring that it does not restrict individual parcels of land coming forward. This is supported by the landowner.

The masterplanning process may be resource consuming to LB Brent and could 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. To this end, the requirement to masterplan could prohibit individual parcels of land being proposed for development and slow down the delivery of new homes, employment space, community facilities or creation of improved public realm and open space.

Whilst supportive of this policy, the policy should be amended to include key targets to ensure that it can be effective and help deliver the key vision for this part of the Borough. LB Brent should also look to reword the policy to exclude the requirement of masterplanning at the 'homes' subsection and rely on the positively prepared wording at paragraph 5.3.28 of the supporting text of the draft Local Plan.

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

n/a

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.