

GREATER LONDON AUTHORITY

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Department: Planning

Our reference: LDF04 / Article 4
Directions/ HA01

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By email to: planningstrategy@brent.gov.uk

Dear Paul,

RE: Brent Article 4 Direction for Offices (B1a) and Light industrial (B1c) to C3 dwellinghouses – remainder of the Borough consultation

Thank you for consulting the Mayor of London on Brent's introduction of a Non-Immediate Article 4 Direction to permanently remove permitted development rights for light industrial use B1(c) and office B1(a) to residential use (C3) for the whole borough from November 2020.

The Mayor welcomes the introduction of this Article 4 Direction so that Brent can control employment uses across the whole borough.

The draft new London Plan identifies those locations where office development is considered suitable in Table A1.1. These locations are Wembley, Kilburn and Wembley Park. In accordance with draft new London Plan Policy E1, viable office floorspace capacity should be retained and supported by Article 4 Directions. Where existing offices are located within non-designated industrial areas there should be controls in place to oversee the proposed introduction of residential uses so that the operation of Part D of draft new London Plan Policy E7 can operate effectively.

The Mayor supports Brent's introduction of the B1(c) element of this Article 4 Direction so that it can appropriately manage industrial land within the whole borough and in response to the fact that Brent is identified as a 'provide capacity' borough as established in Table 6.2 of the draft new London Plan.

London depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. Industrial land and floorspace provides the capacity for these activities to operate effectively.

In 2015, London had an estimated 6,976 hectares of land in industrial and related uses of which about 36 per cent was in Non-Designated Industrial Sites which are not designated in Local Plan policies maps. Over the period 2001 to 2015, more than 1,300 hectares of industrial land (including SILs, LSIS and Non-Designated Industrial Sites) was released to other uses. This was well in excess of previously established London Plan monitoring benchmarks set out in the

Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG)¹. Research for the Greater London Authority (GLA), the London Industrial Land Demand Study (ILDS) 2017 (CAG)², indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041, mostly driven by strong demand for logistics to service growth in London's economy and population. This has been recognised in the Panel Report following the hearing session of the Examination in Public of the draft new London Plan.

Brent is in the 'provide capacity' industrial category as set out in Table 6.2 of the draft new London Plan. The London ILDS establishes that up to 2041 Brent will need to provide approximately 43ha of industrial land to meet demand, or the equivalent floorspace capacity. As a 'provide capacity' borough, Brent should seek to deliver intensified floorspace capacity in either existing and/or new locations accessible to the strategic road network and in locations with the potential for transport of goods by rail and/or water.

The introduction of this Article 4 Direction would not necessarily impact the potential delivery of housing as draft new London Plan policy E7 supports the retention, intensification and co-location of industrial capacity (except those in SIL) with residential development, where appropriate and in line with the criteria set out in that policy.

I hope that you find these comments helpful to finalise this Article 4 Direction. If you would like to discuss any of my representations in more detail, please contact Hassan Ahmed (020 7084 2751).

¹ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance-and-practice-notes/land-industry-and>

² https://www.london.gov.uk/sites/default/files/ilds_revised_final_report_october_2017.pdf