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Date: 4/2/21

**by e-mail**

Dear Inspectors,

### **Examination of the Brent Local Plan and London Plan**

Thank you for your letter dated 20 January 2021.

As you state, on 10 December 2020, the Secretary of State (SoS) wrote to the Mayor of London setting out an update on the current position with regard to the emerging London Plan, including two new Directions. Please find below the Council's response in relation to the additional Directions.

#### **Policy E4 Land for Industry**

The Direction inserts into paragraph 6.4.8 '**In exceptional circumstances when allocating land, boroughs considering the release of Green Belt or Metropolitan Open Land to accommodate housing need, may consider the re-allocation of industrial land, even where such land is in active employment uses.**'

The London Borough of Brent does not have any Green Belt and, based on the findings of the Brent Open Space, Sport and Recreation Study 2019, is not considering release of Metropolitan Open Land. As such, the circumstances outlined in the Direction do not apply to Brent.

There remains a requirement in the Publication London Plan policy E4 for 'A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions .... taking into account strategic and local employment land reviews.' As such, it is considered the approach in Local Plan policy BE2, which seeks to optimise the use of designated industrial land through intensification and co-location, remains the most appropriate policy response to meeting identified needs for both industrial floorspace and housing.

#### **Policy D9 Tall Buildings**

Whilst Development Plans can still define what constitutes a tall building based on local context, the definition should '**not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.**'

The submitted Brent Local Plan policy BD2 defines a tall building as one that is more than 6 metres above the general prevailing heights of the surrounding area or more

than 30 metres in height. The Council considers that modifications are required to policy BD2, as shown below, to ensure conformity with the London Plan.

Chapter/Policy Number	Paragraph Number or Section	Modification Proposed
6.1 Design	BD2, page 276	<p>POLICY BD2: TALL BUILDINGS IN BRENT</p> <p>A tall building is one that is more than <del>6 metres above the general prevailing heights of the surrounding area or more than 30 metres in height</del> <b><u>18 metres measured from ground to the floor level of the uppermost storey.</u></b></p> <p>Tall buildings are directed to the locations shown on the policies map in Tall Building Zones, <del>intensification corridors, town centres and site allocations.</del></p> <p>In Tall Buildings Zones heights should be consistent with the general building heights shown on the policies map, stepping down towards the Zone's edge.</p> <p>In intensification corridors and town centres outside conservation areas <b><u>and areas of distinctive character</u></b> developments of a general building height of 15 metres above ground level could be acceptable, with opportunities to go higher at strategic points in town centres.</p> <p>Elsewhere tall buildings <del>not identified in site allocations</del> <b><u>outside Tall Building Zones</u></b> will only be permitted where they are:</p> <ul style="list-style-type: none"> <li>a) of civic or cultural importance; or</li> <li>b) on sites of a sufficient size to successfully create a new character <del>area</del> while responding positively to the surrounding character and stepping down towards the site edges.</li> </ul> <p>In all cases the tall buildings must be shown to be positive additions to the skyline that would enhance the overall character of the area. They should be of exceptional design quality, consistent with London Plan Policy requirements in showing how they positively address their visual, functional, environmental and cumulative impacts.</p>

Should you require any further information please do not hesitate to contact me.

Yours sincerely,



Paul Lewin  
Team Leader Planning Policy