



Paul Lewin, Team Leader, Planning Policy
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Date: 18th August 2021

Dear Paul,

The Old Oak and Park Royal Development Corporation (OPDC) welcomes the opportunity to respond to consultation on proposed Modifications to Brent's draft Local Plan.

Since the submission of Action Ref 49 as part of Brent's Local Plan Examination, OPDC has submitted a Post Submission Modified Draft Local Plan (PSMDLP) to our Planning Inspector and this has been published for consultation.

With regards to industrial capacity and as part of the PSMDLP consultation, OPDC published an updated supporting study - Industrial Land Review Addendum (ILRA). The ILRA includes indicative figures showing the potential uplift in industrial capacity in each of the boroughs within the OPDC area. Within the Brent part of the OPDC area, there is potential to deliver a net gain of 112,873sqm of industrial capacity. This is the same figure that was quoted in Action ref 49 already submitted as part of Brent's examination and therefore our position, with regards to the potential industrial capacity that could be delivered, is unchanged. This potential net gain in industrial floorspace (112,873sqm) can help contribute to some of the identified industrial demand. Therefore, provisions that ensure developments in Brent will provide additional capacity towards meeting industrial demand targets in the London Plan and Brent local evidence base are helpful and necessary in clarifying the Council's commitment to working positively to meet identified needs in the Brent area. A small change is proposed to reflect the publication of the ILRA (please see table overleaf).

Should you have any queries on this response please contact Tom Cardis, at tom.cardis@opdc.london.gov.uk. Otherwise, OPDC look forward to working closely with LB Brent and other partners, to facilitate industrial intensification in Park Royal.

Yours sincerely,

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Old Oak and Park Royal Development Corporation

Modification number	Chapter/Policy number/Paragraph number	Modification text	Notes
MiM166	Para 6.4.18a	<p>Para 6.4.18a There is a large divergence in the results of LILDS and WLELE. In relation to the LILDS, the London Plan provides no specific industrial land needs target for Brent or the OPDC. Park Royal as the preeminent industrial location in West London, with the associated higher rents and development values is the most viable area in the borough and West London to accommodate the London Plan’s emphasis on intensification of SIL. It is anticipated that there it will be a potential net uplift in industrial capacity within the Brent part of the OPDC area play a significant role in meeting the additional needs, as evidenced in OPDC’s Industrial Land Review Addendum accompanying its Post Submission Modified Draft Local Plan. Elsewhere the viability of intensification purely for industrial purposes is less clear and will need further assessment, although for co-location with other development including residential, it is more encouraging. The Council will work closely with the OPDC who are producing their Local Plan and with the GLA to clarify the extent to which intensification in Park Royal will provide additional industrial capacity. This work will also need to involve LB Ealing as Park Royal is also within their borough and similar to Brent has OPDC as local planning authority and other boroughs/stakeholders across west London if necessary. Notwithstanding this, w Within the area covered by this Local Plan Consistent with its 'provide capacity' status Brent the Council is committed to delivering an exceeding this figure to increase in industrial floorspace to support growth in business and employment. Currently, many of the borough’s industrial sites are underutilised and include non-industrial uses...</p>	<p>To reflect and reference the publication of an updated OPDC supporting study, which now includes an indication of the potential uplift in industrial capacity that could be achieved in the Brent part of Park Royal, within the OPDC area.</p>

