

Appendix A

Article 4 Direction Consultation – B1a and B1c to C3 Rest of the Borough October – December 2019

Summary of representations received and officer comment

Eight representations received, seven in support and one neither for nor against.

Respondent	Summary of Comments	Officer response	Change to Article 4
Highways England	Changes will not materially affect the safety, reliability, and/ or operation of the Strategic Road Network (SRN).	Noted.	No change.
Resident	In support. Space for small businesses, entrepreneurship, and job opportunities for local residents is important. Demand for housing cannot be to the detriment of long-term community benefit.	Noted. This is consistent with the Council's desire to ensure a suitable range of business premises within the borough, which the permitted development rights were undermining.	No change.
Resident	In support. Landlords should be restricted from profiting at the expense of the wider community, and that of the tenants who inhabit these often poor dwellings. Impact on neighbours is unacceptable, and impacts on waste, sewerage, noise, footfall, character and parking needs to be considered. Going forward, future development proposals should consider: impact on employment/ businesses, accommodation standards, and impact on neighbours.	Noted. The impacts identified are some matters that may arise from changes of use through prior approvals where the Council has less control over matters that it would normally address through grant of a planning permission, or if impacts are unacceptable, refusal. These matters therefore will be better addressed by introducing the Article 4. Nevertheless, the prevention of inappropriate loss of office and industrial floorspace is the principal reason that was sought to justify the making of the Article 4.	No change.
Resident	In support. Planning permission should be required for change of use from business to residential and vice-versa.	Noted.	No change.
Mayor of London	In support. Draft London Plan identifies Wembley, Kilburn Park and Wembley Park as office locations. In non-designated industrial areas there should be controls to ensure policy E7 can operate effectively. The Mayor also supports the B1c element in recognition of Brent's identification as a 'provide capacity' borough. The	Noted. Wembley and Wembley Park are already subject to an Article 4. The Article 4 subject to consultation covers Kilburn Park. It is agreed that the Article 4 will allow good planning decisions to be made, which may also provide for residential accommodation as part of developments which are	No change.

Respondent	Summary of Comments	Officer response	Change to Article 4
	introduction of the A4 will not necessarily impact on housing delivery, as the draft London Plan 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.	likely to require planning permission if the Article 4 is confirmed.	
Resident	In support. The Council should have more control over how the borough is developed.	The Article 4 would allow for a greater degree of control by requiring planning permission to be obtained for development that would otherwise be permitted development.	No change.
Brent Park's Forum	In support. Not implementing the Article 4 would have long lasting negative impacts on economic growth in Brent. It would make future planning complex and uncertain. However, permitted development rights are preferable to developing on green space, even if changes in management resulting through austerity have resulted in adverse impacts on the quality of this space.	Noted, the impacts on Brent's economy were identified when considering the decision to make the Article 4. There are no proposals to develop designated open space which is protected in development plan policies.	No change.
Theatres Trust	In support. The need to support the provision of suitable light industrial floorspace has been clearly articulated by the Council. The Trust has concerns about the impact of this type of development in relation to the 'agent of change' principle whereby residential can potentially adversely impact on cultural facilities. It is also the case that supply of industrial floorspace is also essential to help support the arts and creative industries. The Trust is concerned by a shortage of supply across London.	Noted, these are additional reasons that support the decision to proceed with an Article 4.	No change.