

GREATER LONDON AUTHORITY

Mayor's Office

Rt Hon Eric Pickles MP

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Dear Eric

PERMITTED DEVELOPMENT RIGHTS FOR CHANGE OF USE FROM COMMERCIAL TO RESIDENTIAL

I have pleasure in submitting our case for an exemption from the Government's proposed introduction of permitted development rights from commercial to residential use in respect of the Central Activities Zone (covering London's economic core including the City of London, South Bank and the West End), that part of the City Fringe that makes up "Tech City", the commercial northern part of the Isle of Dogs and London's two Enterprise Zones, the Royal Docks and Vauxhall Nine Elms Battersea.

These are areas of national importance in the terms used in Mr Quartermain's letter of 24 January 2013. Our case draws on the principles outlined in that letter, and seeks to draw the boundaries as tightly as possible while also recognising the need to keep the planning system as streamlined as possible; wherever we can, we have suggested using established sets of boundaries where these approximate to office market areas.

As indicated below, the principle of this case to exempt the key parts of the central London office market is supported by the main central London planning authorities, though they will of course wish to make their own more detailed submissions which highlight the economic consequences of government's proposals for other parts of the central London office market. Cumulatively these are of strategic concern. For example, their impact in Kensington & Chelsea could undermine provision for local clusters of high value activities of national and international importance and their impact in north Westminster and parts of Camden and Islington is likely to erode growth prospects for a range of office based sectors, especially technology, media and telecommunications. My submission is explicitly without prejudice to these locally based cases.

We are united in our commitment to ensuring the continued success of an area that is home to a number of unique clusters of economic activity which employ millions of people from London and beyond, and which contribute billions to the national economy. These clusters have formed and endured because of the economic benefits of agglomeration; if they were broken up by piecemeal conversions to residential use these benefits would disappear. Firms displaced will not move to other parts of London, or in many cases even to other parts of the UK.

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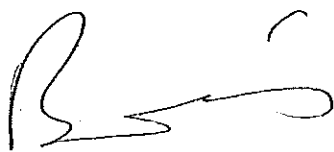
For these reasons, which are set out in more detail and evidenced in the attached submission, we are collectively and separately requesting an exemption from the Government's proposals. We are not against the principle of old and unused office buildings being used for housing; we recognise the importance of securing more homes and of stimulating the construction sector. London has in fact seen a major shift of office space to residential use in recent years. Even though current office vacancy rates are high (largely but not entirely a result of cyclical rather than structural forces), most space is in fact occupied and it is crucial that existing employment is not compromised. A more sensitive mechanism is required to encourage and manage release to avoid this and to focus on the release only of truly surplus space. The London Plan has already put this approach in place to address the unique circumstances of the different parts of the capital's office market, and this is yielding some 4,000 new homes pa across London as well as sustaining employment provision where this is still required.

We see a very real risk, however, that with the very high residential values we have in this part of London, offices performing national, regional and locally important functions could be undermined and the character of economically important neighbourhoods could change significantly, to the detriment of business. There is a vital role for the planning system in making sure that the mix of uses in central London, and significant changes between them, are properly considered so that we, business and residents can continue to ensure the vibrancy and vitality of this nationally distinctive area.

In addition to this strategic case for exemption from government's proposals for key parts of the central London office market, I have also submitted a strategic context for Boroughs seeking exemptions elsewhere in London to support these providing they can be justified robustly in terms of CLG's criteria. We hope that these will be given careful and sympathetic consideration.

Our officers are ready to meet with their counterparts in your Department to explain or elaborate on any aspect of our case, or to provide any further information. We trust that after giving the matter consideration you will find our case compelling.

Yours ever,



Boris Johnson
Mayor of London