

**THE MAYOR'S OFFICE FOR POLICING AND CRIME  
(PERIVALE) COMPULSORY PURCHASE ORDER  
2020**

**SUMMARY PROOF OF EVIDENCE  
OF  
THADDAEUS JACKSON-BROWNE, DIRECTOR AT  
LAMBERT SMITH HAMPTON (PLANNING,  
DEVELOPMENT AND REGENERATION)**

**6 AUGUST 2021**

## **THADDAEUS JACKSON-BROWNE'S – SUMMARY PROOF OF EVIDENCE**

- 1.1 I, Thaddaeus Jackson-Browne, am a practicing town planner, a chartered member of [the Royal Town Planning Institute] and a Director at Lambert Smith Hampton (Planning, Development and Regeneration).
- 1.2 My proof of evidence dated 6<sup>th</sup> August 2021 (my "**Evidence**") is a Planning Commentary Note which reviews the planning position in relation to the suggested alternative sites proposed by Ben Gomez-Baldwin at Appendix 10 of his proof of evidence dated 20<sup>th</sup> April 2021 (the "**Alternative Sites**") which were in turn addressed by Simon Warren, a Partner at Knight Frank LLP, in his rebuttal statement of evidence dated 4<sup>th</sup> May 2021 on behalf of the Mayor's Office for Policing and Crime ("**MOPAC**").
- 1.3 Section 3 of my Evidence sets out my general planning policy observations in relation to the Order Land. This section demonstrates why a move to one of the Alternative Site is not a feasible option for MOPAC in land use planning terms, notably for the following reasons:
  - 1.3.1 In terms of the London Plan 2021 and the Greater London context, there is insufficient detail in the London Plan 2021 Policy GC6 'Increasing efficient and resilience' to confirm that there is a specified need to support Police infrastructure. As such, should MOPAC find a potentially suitable site for its Vehicle Recovery and Examination Services ("**VRES**") use, it will be competing with other uses and occupiers that benefit from direct, clear and defined policy support in relation to the typical type of development that would be expected on such land.
  - 1.3.2 The Order Land is allocated on the adopted Ealing Local Plan Proposals (policies) Map as Strategic Industrial Land but does not form part of any of the designated development sites. The Council has not identified or

earmarked the Order Land for the purposes of comprehensive redevelopment, with any specific aspirations that would suggest that SEGRO's intended redevelopment plans carry so much policy support weight that would justify the removal of the already established (and as proved very difficult to relocate) VRES facility.

1.3.3 Given the wording of the Core Strategy Policy 3.2 'From Northolt to Perivale, Safeguard Employment Land Along the A40 Corridor' (which does not seek to uproot existing businesses and operations), it is my view that the harm that would be caused to policing and public safety by changing the use of the Order Land from the VRES use would outweigh any benefits of intensification of industrial land.

1.3.4 There is clear consistency between the various development plan policies referred to in my Evidence and the National Planning Policy Framework which both promote the protection of Strategic Industrial Locations affording them significant weight in the planning balance.

1.4 Should MOPAC seek to use any alternative site for its VRES facility within the Borough of Ealing, it would be confronted by the terms of the Development Management Policy 4A 'Ealing Local policy – Employment Uses'. This policy favours resistance against the loss of any employment uses and would therefore be against the likely required demolition (net loss) of employment floorspace needed to be undertaken by MOPAC to facilitate VRES on any other industrial (employment) use land.

1.5 Section 4 of my Evidence provides a general planning policy planning policy review in relation to the Alternative Sites. This demonstrates that none of the Alternative Sites identified would be suitable for MOPAC's VRES use for the following reasons:

1.5.1 Both the land use planning constraints and general industrial land policy

priorities which focus on the optimisation and intensification of employment land prevent such suitability. For instance, there are no special sets of circumstances which would enable MOPAC to demonstrate that the benefits of its VRES facility outweigh the impacts and economic harm associated with the net loss of employment use floorspace should MOPAC acquire or lease one of the Alternative Sites.

- 1.6 None of the Alternative Sites have a "*Sui Generis (Car Compound) Use Planning Permission*" in place meaning that MOPAC would need to obtain a change of use planning consent to secure the lawful VRES use (as is the current position of the land at Walmgate Road, Perivale Park Industrial Estate, London, UB6 7LR (the "**Order Land**")).
- 1.7 It is uncertain whether MOPAC would be granted the specific type of planning permission required for VRES use at the Alternative Sites (noting that planning permission would also be required for any reconfigurations of a selected site if/where the demolition of existing buildings and/or the construction of any new buildings would be required).
- 1.8 Furthermore, my Evidence demonstrates that it is unlikely that the proposal to relocate VRES to the MPS's Northolt site would be supported by Ealing Council. London Borough of Ealing's own adopted Local Plan makes clear that the default policy position is the resistance against the loss of any employment uses, while confirming that change of use from employment (B1, B2 and B8) uses to non-employment is not accepted on SIL and LSIS land. The alternative sites suggested by SEGRO at the North West of Rowdell Road, Northolt are comprised of buildings that cover nearly the entire site area, whereas a VRES proposal requires a large expanse of outdoor parking spaces. This would result in the reduction of significant amounts of employment floor areas which is contrary to planning Policy.

- 1.9 In light of the above, given the lack of alternative sites and the planning constraints imposed by planning policy at Borough / local level, at the London Plan level and at the National Planning Policy Framework level, the Order Land is the only viable option in planning terms for the VRES facility.