

Old Oak and Park Royal Local Plan examination

Agenda Session 16: Industrial intensification (matter 12)

Participants: Inspector, Corporation, Grand Union Alliance; HGH (QPR FC and Stadium Capital Developments)

Summary of issues

- 1 Whether the Plan's policies towards industrial intensification would be effective (derived from the twenty-seventh, twenty-eighth and twenty-ninth Key Issues of table 5 of Key document 5 identified at Regulation 19(1) stage and by representations from Aberdeen Standard Investments 2/SP5/7, 2/SP7/21, 2/E1/various from Grand Union Alliance, 2/E2/4 from Old Oak Common Ltd and 2/E3/5 from SEGRO amongst others) in the light of the following points (summarised from representations made at Regulation 19(1) and 19(2) stages);
 - (a) Question whether industrial intensification is achievable. The strategy of intensification proposed is at odds with the evaluation of what is viable and effective for that area. The costs to developers, losses to existing businesses (notably owner-occupier businesses) is often prohibitive, and the preference of developers is for low-risk, low-management, high value developments. Scope for intensification in Old Park Royal is limited. Requests for OPDC to be clearer about support for industrial intensification to ensure that Park Royal SIL can support the attainment of jobs targets. The Plan should be clearer in setting out how SIL intensification will be delivered, including identifying site allocations for industrial intensification. Careful consideration needs to be given to occupier needs and their operational requirements as part of intensification. The draft Local Plan does not have a well-considered response to draft new London Plan focus on industrial intensification and floor space provision and expectations around no net loss are not clearly expressed in either the London Plan or the OPDC draft revised Regulation 19 Local Plan. Recommend that OPDC explicitly acknowledges that there will be exceptional circumstance which means that the principle of achieving 'no net loss' of industrial floorspace is not appropriate and conflicts with meeting the operational needs of modern businesses. Concerned that the requirement for all sites to seek intensification to compensate for Old Oak de-designation will be onerous. Re-provision of small business units through planning obligations will be difficult if not impossible to achieve. Intensification will affect the loss of existing businesses as well as affordable, small and owner-occupied industrial spaces, and increase traffic, infrastructure use and demands for social

infrastructure important for workplaces (eg nurseries and recreation), and directly impact on the quality of life of residents in the area.

- (b) The Plan should identify where the intensification of industrial land should occur and should be less about protection and more about a proactive strategy for delivery of growth. This should also consider decant arrangements. The 'Places' chapter should provide a clearly defined spatial vision, together with proposals which seek to actively promote and facilitate the delivery of industrial intensification. Para 3.13 should recognise that not all sites in Park Royal will be suitable for SIL uses above two storeys.
- (c) Channel Gate can act as an exemplar for SIL intensification and in making a successful transition between industrial zones and the core of Old Oak.
- (d) Support increased building heights where this will deliver industrial intensification and SIL compliant broad industrial type activities. This will allow other policy requirements, such as providing a range of unit sizes, to be accorded with i.e. through the stacking of units. All sites should be required to demonstrate that they have considered the opportunity to intensify their use of land, not just those allocated in the Intensification Study. The strengthening and intensification of Park Royal is supported. Supporting uses could be provided along a linear high street or next to Central Middlesex Hospital.
- (e) Clusters should be designated around Harlesden and Stonebridge Stations, as has been done for P4C1 Brewery Cluster.
- (f) Concern about how proposals, including industrial intensification, will affect the quality of residential areas. SP3 should be at forefront of any redevelopment plans.
- (g) Question the deliverability/accuracy of jobs targets as the figures do not take into account the closure and relocation of businesses/jobs. New jobs target is potentially unsound as it is not clear that it is informed by a robust evidence base. Development Capacity is based on assessment of Park Royal SIL designation as a single, broad location. Further work is required that considers individual sites within the Park Royal.

The Corporation's response (the following is summarised from responses made to representations at regulation 19(1) and 19(2) stages)

Wording in the Place and employment policies have been revised to provide clearer support for and requirements for industrial intensification and industrial Site Allocations have been incorporated into the Local Plan. The vision and policies already support intensification across Park Royal. Policies SP5, P4, P5 and P6 provide guidance for strengthening and intensifying Park Royal including the expansion of the neighbourhood town centre at Park Royal Centre.

The Park Royal Intensification Study identifies different approaches to intensification, some of which would could be achieved by in-fill

development and would not require increased building heights. Para 3.32 of the Local Plan identifies that opportunities to intensify Park Royal should be taken, where feasible, recognising that not all sites in Park Royal will be suitable for intensification. The Park Royal Intensification Study explores opportunities as well as deliverable and commercially viable strategies to intensify industrial land. The Park Royal Intensification Study demonstrates that the intensification of SIL is deliverable and viable. Intensification can range from small to larger scale interventions and can include space for small business units. The Park Royal Intensification Study demonstrates that the intensification of SIL is deliverable and viable so proposals could help deliver additional value for owner occupiers. The most significant intensification opportunities have been identified as site allocations in the Local Plan. This Study demonstrates that there are sites where it is possible to increase the amount of floorspace and jobs in Park Royal. The Local Plan identifies new industrial site allocations based on this work. The Local Plan will require all sites to be intensified where feasible and changes have made to confirm this. Policy P4 needs to be read in conjunction with E1. Both Policies P5 and E1 make it clear that intensification should be considered on all sites in SIL and development should be comprised of uses suitable for broad industrial type activities. If intensification is not feasible, this should be demonstrated by the applicant as clarified by supporting text for Policy E1. Small business units will help ensure a mix of units sizes for different type/size of businesses.

The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification. OPDC's Intensification Study identifies sites likely to be suitable and viable for intensification. Where sites meet the threshold, they have been identified as new industrial site allocations. OPDC acknowledge that other sites identified in the Study or windfall sites could also contribute towards intensification and policy E1 would support this.

The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the area's London-wide role and the ongoing demand for industrial space. A mix of uses within SIL would undermine its core function as a reservoir or land for industrial uses. Transport policies seek to limit car parking and would require travel plans and transport assessments. Policy E1 is in general conformity with the London Plan and is informed by the Industrial Land Review which is a supporting study to the Local Plan. The Industrial Land Review Addendum includes detailed commentary on the approach towards achieving no net loss of industrial floorspace in the OPDC area.

Cluster policies within the Local Plan are considered necessary to provide extra policy detail at the points in the area where most activity is likely to occur. Currently the locations adjacent to Harlesden and Stonebridge within the OPDC area have limited development potential. The objective to deliver intensification, positive and/or active frontages, a more attractive public realm, reduced car parking and the provision of small walk to uses outside of Park Royal Centre are considered in Local Plan policies (SP9,

P4, P5, P6, TCC1 and T4) and these would apply across the Park Royal area. OPDC will be preparing a Park Royal Supplementary Planning Document and this would provide an opportunity to set out more detailed guidance to support the implementation of the Local Plan.

The Local Plan seeks to facilitate improvements needed in order to support intensification such as enhanced walking and cycling routes, supporting more facilities in Park Royal Centre. Policies SP9, D4, D5, D6, EU4 and EU5 alongside London Plan policies and national guidance, will be used to ensure existing residential areas benefit from appropriate standards of amenity.

The jobs capacity figure is based on a robust assessment of the development potential of suitable sites and broad locations over the plan period. Detailed information on the assessment is set out in the Development Capacity Study and the Park Royal Intensification Study. However, the text has been amended to clarify that the targets refer to new jobs. Development capacity has been identified using National Planning Practice Guidance Housing and Economic Land Availability Assessment guidance. For Park Royal, this has been informed by evidence in the Park Royal Intensification Study, which considered a range of case study sites and other potential intensification sites. The Park Royal Intensification Study demonstrates that the intensification of SIL is deliverable and viable. The jobs figures are not maximum targets but they do provide an indication of the number of jobs that could be delivered over the plan period. Policies SP5 and E1 are clear that development within SIL should help contribute towards meeting the strategic target of 40,400 new jobs. SP1 and E1 set clear priorities for SIL in seeking to protect, strengthen and intensify it in order to ensure the delivery of additional floorspace as well as new jobs.

Matters for discussion

- 1)** Have I correctly understood the thrust of the representations?
- 2)** In what way is Park Royal Intensification study unconvincing?
- 3)** Any other issues related to intensification

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Inspector

14.02.19