

# Old Oak and Park Royal Local Plan examination

## Agenda Session 17: SIL

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

### Summary of issues

- 1 Whether the inclusion or exclusion of land from SIL is justified (derived from the thirty-first Key Issues of table 5 of Key document 5 identified at Regulation 19(1) stage and the second identified in table 7 of Key document 5 at Regulation 19(2) stage and representations 2/P4/1 from Ashia Centur and 2/P8/14 from Grand Union Alliance and 2/P9/1 amongst others. At Regulation 18 stage, Midland Terrace RG and Old Oak Interim Forum sought greater release of SIL land and a number of organisations sought a buffer between industry and residential land. This matter and issue includes consideration of representations relating to individual sites). The issue needs to be discussed in relation to the following points (summarised from representations made at regulation 19(1) and 19(2) stages;

### De-designation or re-designation

- (a) Further land should be de-designated from Strategic Industrial Location: Request for additional sites/areas to be released from SIL or allowed to be developed for mixed-uses. Old Park Royal should be de-designated from SIL to allow for a wider range of uses to mediate transition between Old Oak and Park Royal.
- (b) Recognise loss of SIL across west London is an issue and that the Mayor will be restricting this. Suggest dedesignation is a balancing act between uses and priorities. There should not be a blanket refusal to refuse dedesignation. Loss of 1.2 hectares of SIL would not significantly impact industrial land supply.
- (c) Should reclassify Park Royal as Strategic Commercial Land as there is a whole range of employment uses ranging from offices to industrial, catering to small craft businesses
- (d) The proposed amendment to the boundary of the Park Royal Strategic Industrial Location (SIL) which has been extended to the west of the Neighbourhood Centre to include a parcel of land on Western Road which is owned by RBKC is not justified, nor effective and as such is unsound. The proposals map for the emerging OPDC Local Plan should be corrected in line with the existing adopted Ealing Proposals Map. A change of use to a sui-generis to be utilised as a car pound would be the best future alternative use of the site.

- (e) Designation of SIL has not been applied consistently. Explanation for releasing the Westway Estate from SIL but retaining Old Park Royal as SIL is required.
- (f) Oppose release of SIL south of the WCML. The retention of SIL could support delivery of a new bypass.
- (g) Strong support for retention of SIL designation of the Willesden Junction Bus Depot.
- (h) Continued designation of SIL at Willesden Junction Bus Depot restricts connections north and south of railways. Harlesden Bus Depot should be dedesignated as SIL due to: Isolation from wider Park Royal Considered to be part of Harlesden. Adjacent to residential areas Adjacent to Harlesden Town Centre Shop units fronting onto Station Road within SIL Derelict building in west of depot Environmental impact on surrounding areas Site needs to support movement to/from Old Oak along Station Road. Dedesignation of Harlesden Bus Depot from SIL would allow for site to be redeveloped in the long term if the bus depot could be satisfactorily relocated nearby. OPDC should allocate land elsewhere for the bus depot.
- (i) Plantagenet House and Windsor House will be handed back as cleared sites following end of construction. Policies should be flexible. Mixed use development would bring benefits and should be supported. The sites fronting Victoria Road should be released from SIL. Policies should provide sufficient flexibility for the site (Plantagenet, Stuart, Windsor House) to contribute positively to OPDC's strategic objectives. A mix of uses including employment, residential and other uses will facilitate intensification and meet other Local Plan objectives. Request that frontage is de-designated from SIL.

### Policy change

- (j) Policies are over restrictive in terms of their protection of SIL, more flexibility is required across SIL (Park Royal West and Old Park Royal). There is a need for justification of why Park Royal can't have some mixed use. More flexibility is required in the SIL area to allow for mixed use development in SIL around residential areas (i.e. railway cottages and Midland Terrace) on Old Oak side of the development zone. Support minimising need to travel but this cannot be achieved by resisting mixed use on strategic industrial location. Allowing mixed use development in SIL would have a positive impact on travel patterns. There is the opportunity for the OPDC to have sites that comprise industrial uses but also other employment generating uses that are not industrial but which remain complementary and compatible. Innovative approaches should be fostered and included on sites designated for SIL in conjunction with other uses as part of mixed industrial another uses, especially on sites in close proximity to public transport.
- (k) Support the objective of draft Policy SP5 which seeks the protection, strengthening and intensification of the Strategic Industrial Location (SIL) in Park Royal. However, SIL sites

require supporting/ancillary uses for workers etc. more flexibility should be built into the SIL definition.

- (l) Residential above industrial uses in Park Royal should be delivered. Mixed industrial-residential development should be supported in Park Royal Centre. Providing additional non SIL uses above SIL uses would not jeopardise the SIL use but continue to increase employment densities as part of intensification strategy.
- (m) Low value live-work units in high value areas will not be deliverable. Live-work units should be permitted in a range of tenures, within SIL, on the edge of SIL designations adjacent to residential areas, be allowed for residential reversion and identified as a potential meanwhile use.
- (n) OPDC should explore the concepts of self build housing in industrial areas.
- (o) The delivery of small workspaces and flexible workspaces will be hampered by plans to protect, strengthen and intensify the Strategic Industrial Location (SIL) in Park Royal.
- (p) In the right location and with the right design and planning controls, SIL uses can be located next to non SIL Uses
- (q) 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.
- (r) Whilst the remaining SIL should be protected, this should not be at the expense of tenants and landowners to reallocate their buildings and sites to more productive uses if market conditions dictate. Building in flexibility to allow buildings to be re-used is a sustainable form of development.
- (s) 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.

### Specific sites

- (t) Re-provision of creative businesses (in terms of quantum, type or re-provision of businesses) is not appropriate. Rolls Royce Building should not be identified to have the opportunity to deliver space for meanwhile uses.
- (u) The Local Plan should make reference to the extant planning permission on the Twyford tip site. Policy on SIL is too narrowly worded and does not properly reflect proposals for the Twyford Tip site.
- (v) Policy E1 would prevent delivery of shops or cafes on to Station Road. Positive frontages won't contribute to supporting movement to Old Oak.

**The Corporation's response (The following comments are summarised from responses to representations made at Regulation 1991) and 19(2) stages**

*Designation and de-designation*

Additional work has been undertaken to assess whether additional changes to the SIL boundary are appropriate and in relation to the Twyford Tip (or Land at Abbey Road) site. Recommendations in the evidence base are reflected in the Local Plan. The Industrial Land Review and its Addendum set out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, the area's London-wide role, the loss of industrial land across London and the ongoing demand for industrial space. Detailed changes to the SIL boundary have been assessed in the Industrial Land Review Addendum.

The release of SIL designation with the wider Old Oak area, including the Westway Estate is set out in London Plan Opportunity Area guidance, the Old Oak and Park Royal Opportunity Area Planning Framework and the Industrial Land Review supporting study. This reflects the development opportunities presented by Old Oak Common Station. This opportunity is reflected in OPDC's Industrial Lane Review which sets out an evidence based approach for the release of SIL. Further release of SIL is not considered appropriate as this would undermine the functioning of Park Royal as London's largest and most successful industrial location.

*Policy*

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.

The Mayor's London Plan sets out the strategic approach to promoting and managing industrial land, including defining which uses are appropriate within Strategic Industrial Locations (SIL). In line with the Industrial Land Review, OPDC's key priorities for SIL are to protect, strengthen and intensify industrial activities. To ensure these objectives are met, development will only be permitted if it does not materially affect the ongoing functioning of employment uses in line with policy D6. A more flexible approach in designated SIL would not be in general conformity with London Plan policies.

It is noted that the new draft London Plan (2017) requires no net loss of industrial floorspace capacity within designated SIL. The Industrial Land Review Addendum demonstrates how this objective will be achieved

through OPDC's Local Plan, including through industrial intensification and co-location of uses. Policies E1 and E2 have been amended to reflect this requirement. The requirement to co-locate floorspace only applies to broad industrial type activities which are compatible with the Place land use policy.

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 ongoing demand for industrial space. The proliferation of non SIL uses within SIL would undermine the functioning of existing and future industrial uses. The London Plan provides strategic protection to SIL and defines which uses are appropriate in these areas. A more flexible approach in designated SIL would not be in general conformity with these policies. A mix of uses within SIL would undermine its core function as a reservoir or land for industrial uses. Policy P6 and supporting text already support a mix of uses as long they mitigate the impacts on the Strategic Industrial Location (SIL) and accord with other policies in the Plan.

Transport policies seek to limit car parking and would require travel plans and transport assessments. OPDC considers that achieving the Mayor's aspirations is deliverable while supporting the functions of Park Royal. Transport policies within the Local Plan set out Park Royal specific guidance.

Both P4 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.

It is considered that protecting, intensifying and strengthening Park Royal will not compromise the implementation of policy E3. Protecting and intensifying SIL will ensure that industrial floorspace is available to help meet demand. This floorspace can be used to accommodate small businesses and a range of broad industrial type activities. In relation to RBKC's request, a car pound would be an appropriate use for SIL

The provision of small scale 'walk to' services for industrial occupiers is covered in the Town Centre and Community Uses chapter.

In line with the London Plan, hotel uses are not appropriate in SIL. OPDC's key priorities for SIL are to protect, strengthen and intensify the industrial area. Delivering high employment densities is not the overriding objective of SIL, it is supposed to provide a reservoir of land and floorspace/uses for broad industrial type activities. Therefore, Policy E1 requires all applications in SIL to be comprised of uses appropriate to this location. The Park Royal Intensification Study demonstrates that intensification is deliverable and, as such, intensification will be supported wherever feasible and where it is comprised of appropriate uses. If intensification is not feasible, this should be demonstrated by the applicant.

Policy H1 commits OPDC to support applications for self-build and custom build where these accord with other Local Plan policies. Responsibility under the Self-Build and Custom Housebuilding Act does not fall to Mayoral Development Corporations. However, OPDC will work with the

London Boroughs of Brent, Ealing and Hammersmith & Fulham to ensure that the area is meeting the need of people registering a wish to build their own home. Residential development is not a SIL compliant use.

Live work accommodation is intended to help provide affordable workspace for start-up businesses so the tenure should reflect this. Policies E4 and TCC9 do not preclude work-live units being proposed as meanwhile uses provided they satisfy the criteria within policy TCC9 and other relevant policies in the Local Plan.

Policy SP9 provides guidance to ensure buildings respond appropriately to the setting of sensitive locations including heritage assets, open spaces, existing residential communities. Tall buildings will need to take into account the surrounding sensitive locations and accord with national, London Plan policies, Local Plan policies and other material considerations.

### Sites

Policy E2 provides guidance for the re-provision of existing businesses outside of SIL. The Rolls Royce Building is proposed to be Locally Listed and the envisaged retention in the short/medium would place this as an appropriate location for meanwhile uses.

The supporting text to Policy P4 notes that the Twyford Tip site has extant planning permission. However, works have not progressed and there does not appear to have been any site clearance works and no buildings have been erected. OPDC's evidence base indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use and therefore it is proposed to remain designated as part of the Strategic Industrial Location (SIL).

The Harlesden Bus Depot is required to continue to be designated as SIL in accordance with London Plan Policy 2.17 to continue to provide strategic functions as a bus depot and rail freight site. This will help to deliver the following benefits: Secures sustainable transport services to serve existing and planned growth; Robust service provision supported accessibility provided by close proximity to Willesden Junction Station; Employment of over 300 people with training facilities. OPDC has met with Harlesden Neighbourhood Forum during the development of the Revised Draft Local Plan to respond to concerns regarding adjacency to residential uses, environmental impacts and provide a high quality frontage to Station Road. Policy P8 has been updated to address these concerns while continuing to retain the SIL designation. Relevant policy components include: - requiring active and positive frontages on to the public realm - ensuring impacts of SIL uses are mitigated for surrounding housing and publicly accessible open space OPDC will work with landowners and the Harlesden Neighbourhood Forum to explore delivery of improvements to edges of the bus depot.

Channel Gate is required to continue to be designated as SIL in accordance with London Plan Policy 2.17 and to continue to provide strategic functions as a rail freight site. This is reflected in OPDC's Industrial Land Review which sets out an evidence based approach for the release and retention of SIL. The Strategic Industrial Location designation for the place of Channel Gate, including Plantagenet House and Windsor House, is critical to delivering OPDC's Local Plan's Spatial Vision to

strengthen and intensify Park Royal. This importance is illustrated by its designation as a site allocation and is key to enabling OPDC in meeting its employment targets with the provision of 7,600 new jobs. This significant level of employment reflects the current need for industrial floorspace as set out in OPDC's Industrial Land Review. The Industrial Land Review Addendum has also undertaken a robust assessment for managing the release of Strategic Industrial Location. This sets out a number of criteria which OPDC does not consider the sites of Plantagenet House and Windsor House would meet. Therefore Plantagenet House and Windsor House are proposed to continue to be designated as SIL for the plan period.

247 Acton Lane does not meet the capacity thresholds for site allocations (100 homes in first ten years, 1,000 homes in 11-20 years and/or over 10,000 sqm of non-residential floorspace over plan period) and is therefore not appropriate for designation.

Land at Abbey Road is not considered to be deliverable/developable within the Local Plan period and is therefore not identified as a Site Allocation. Further details are provided within the Land at Abbey Road Development Options Appraisal Report, which is a supporting study to OPDC's Local Plan.

**Matters for discussion**

- 1)** Have I correctly understood the thrust of the representations?
- 2)** In what way are the Industrial Land Review and the Park Royal Intensification study unconvincing?
- 3)** Any other issues related to SIL and retention of industrial land

*P. W. Clark*

Inspector

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