

Old Oak and Park Royal Local Plan examination

Agenda 3 for Modifications Hearings: Policies E1 and E2

10am Wednesday 12th January 2022

Participants: Inspector, Corporation, Robin Brown (Grand Union Alliance).

Representations from: Amanda Souter, Andrew Slaughter MP, Robin Brown (Grand Union Alliance).

Summary of issues

The Modifications to policies E1 and E2 are as follows;

POLICY E1: Protecting, Strengthening & Intensifying the Strategic Industrial Location

OPDC will protect, strengthen and intensify land within the designated SIL boundary by ensuring proposals:

- a) are comprised of uses suitable for broad industrial type activities, ~~as defined in line with~~ Mayoral policy and/or guidance, that contribute to meeting the strategic target of ~~40,400~~ 36,350 new jobs in Policy SP5 and the relevant place jobs targets in chapter 4;
- b) achieve no net loss of industrial floorspace capacity and where feasible, intensify the use of sites, in particular on Site Allocations and on other sites identified in OPDC's Park Royal and Old Oak North Intensification Studies;
- c) provide a mix of unit sizes ~~and in particular,~~ including small business units. Existing small business units should be reprovided;
- d) provide adequate servicing and delivery space in accordance with Policy T8. Particular consideration should be given to the need for appropriate yard space provision to allow for the viable function of businesses; and
- e) ~~demonstrate through a Design and Access Statement that they~~ are well designed for their intended purpose having regard to providing flexibility for a range of broad industrial type activities, including appropriate identified future employment growth sectors. Adequate floor to ceiling heights should be provided having regard to relevant evidence base studies.

POLICY E2: Employment Sites Outside SIL

Outside of SIL, OPDC will support proposals that:

- a) deliver employment floorspace that:
 - i. contributes to meeting the strategic jobs target of ~~40,400~~ 36,350 in Policy SP5 and the place jobs targets in chapter 4;

- ii. is well designed for their intended purpose having regard to providing flexibility for a range of appropriate identified future employment growth sectors, as demonstrated through an applicant's Design and Access Statement; and
- iii. accords with the Site Allocations and relevant place policy land use designations in Chapter 4;
- b) re-provide existing industrial floorspace suitable for broad industrial type activities on site where the existing use is compatible with the land use policy relevant to the application site. This re-provision should seek to incorporate existing businesses where possible by:
 - i. undertaking proactive engagement to identify whether there are any existing businesses on site which it would be feasible and desirable to retain on site; and
 - ii. providing units of a suitable land use, unit size, design and with appropriate servicing to enable the retention of existing businesses;
- c) support any existing businesses that can not be incorporated in line with part b) to relocate off site; and
- d) involve the change the use of employment floorspace to other land uses, where it is shown to no longer be economically viable, as demonstrated by accounts data and through competitive marketing for a period of at least 12 months for relevant employment uses without an appropriate offer being received.

On the face of it, these modifications do no more than reflect the changes in job creation which would result from the SIL designation and site allocation changes which were required by my interim findings. Clause (b) of policy E1 is also extended to protect, not just existing floorspace but also the capacity for floorspace.

Nevertheless the Grand Union Alliance seeks specific changes to the two modified policies by adding two sections to clause (b) of policy E1, firstly inserting the words "no net loss of jobs" after the word "capacity" and also by adding "Re-provide suitable premises for all existing businesses from across the OPDC area as a priority in any redevelopment in Park Royal and Old Oak North," and secondly, adding to policy E2 (c) the following; "support any existing businesses that cannot be incorporated in line with part (b) to relocate off-site."

The Grand Union Alliance gives four reasons for seeking these further modifications. These may be summarised as follows;

- Arising from hearing session 16 on day 8, the OPDC were requested to review the matters raised and consider whether more can be done
- As policies E1 and E2 have evolved through iterations of the plan, the protections of policy E2 (b) and (c) have become restricted to businesses outside of SIL. The further modifications are sought to remedy this.

- The policies contain drafting errors; policy E1(d) cross referencing T8 instead of T7; the requirement for a Design and Access Statement has been deleted from Policy E1(e) but not from E2(a(ii))
- Recent development trends, previously 'big box' warehousing and currently 'data centres' may well be argued to retain and intensify industrial floorspace, but their job creation is often much lower than many existing businesses operating within the OPDC area. Functionally they may contribute to economic vitality and productivity elsewhere, but strengthening and intensifying OPDC's industrial areas and supporting new employment growth is doubtful. It is a jobs target, rather than a floor space target that is part of the London Plan's strategic quanta of development.

The Corporation's response to these representations is to propose no further change. Their explanations are as follows;

- The word "capacity" has been added as a Modification to clarify that the policy applies in circumstances where there was reduced or no existing industrial floorspace on site.
- Policies SP5 and E1 are clear that development within SIL should help contribute towards meeting the Local Plan strategic jobs target - 36,350 new jobs - and the Plan identifies sites that will contribute towards delivering this target. Policy E1 seeks to ensure a range of suitable workspaces are delivered so that industrial uses and different business sizes can be accommodated within the Strategic Industrial Location. The range of workspaces will help provide opportunities for industrial businesses to stay, grow and locate in the OPDC area.
- Paragraph 9.18 sets out a sequential approach if applicants are supporting businesses to relocate off site. The first step in the sequential process focusses within the OPDC area.

Matters for discussion

- 1 Is the introduction of the word "capacity" an adequate response to the earlier hearing findings?
- 2 Are the further modifications sought by the GUA unnecessary in the light of the OPDC's responses?

P. W. Clark

Inspector

17.11.21