

## Old Oak and Park Royal Local Plan examination

Agenda 4 for Modifications Hearings: Twyford Abbey  
2pm Wednesday 12<sup>th</sup> January 2022<sup>1</sup>

**Participants:** Inspector, Corporation, Asserson (Wards of London).

Representations from: James Kon obo Wards of London properties

### Summary of issues

The Modifications to the section of policy P4 headed "Land Uses" are as follows;

Land Uses

- a) Delivering ~~3,540~~ 3,390 new jobs within SIL, by taking opportunities to intensify the use of all sites, but in particular on identified site allocations, and having regard to the locations and typologies identified in OPDC's Park Royal Intensification Study;
- b) Delivering ~~6120~~ new jobs and a minimum ~~1,200~~ 575 homes on sites outside of SIL, achieving early delivery of housing to contribute towards OPDC's 0-10 year housing supply, in line with the Brewery Cluster, and First Central and Lakeside Drive site allocations.
- ~~b~~ c) Safeguarding Twyford Waste Transfer Station site in accordance with the West London Waste Plan;

Supporting text paragraph 4.58 is also modified;

OPDC has carried out work to explore ways to deliver additional floorspace and industrial jobs<sup>1</sup>. This work highlights sites and typologies where industrial intensification may be possible through vertical/horizontal extensions, internal subdivision or comprehensive redevelopment. It demonstrates that, overall, an uplift of around ~~3,500~~ 3,390 jobs could be achieved, although this figure is indicative and is dependent on site specific constraints. Twyford Tip, if viable and deliverable<sup>2</sup>, represents a significant opportunity to provide additional industrial floorspace/jobs as it is currently vacant land; it should be noted that there is an extant planning permission for non compliant SIL uses on this site. The site is adjacent to the Twyford Waste and Recycling Centre which is safeguarded for waste apportionment purposes through the West London Waste Plan 2016 (see Policy EU6). If the Twyford Waste and Recycling Centre were redeveloped for a non-waste use then compensatory provision would need to be made in line with the London Plan Policy SI9, WLWP and Local Plan Policy EU6.

<sup>1</sup> This session will commence at 2pm unless the morning session overruns.

The proposals map is also modified to include the site as a West London Waste Plan site (thus applying policy EU6 to the site) (see page 18 of the OPDC document "Table of figure modifications", May 2021).

Clauses (a) and (b) of these modifications to the Policy 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 (c) of the policy is added to reflect the outcome of the hearing session (2(h)) on waste. The changes to the supporting text reflect the changes to the policy itself.

Wards of London seeks specific changes to the modifications;

1. Policy P4 must refer to "100 Twyford Abbey Road" in relation to the Site instead of the "Twyford Waste Transfer Station".
2. The supporting text at paragraph 4.58 should refer to the "Twyford Waste Transfer Station" instead of the "Twyford Waste and Recycling Centre", as this is consistent with the WLWP.
3. The following text should be inserted in paragraph 4.58: "100 Twyford Abbey Road is also a safeguarded site. If 100 Twyford Abbey Road were redeveloped for a nonwaste use then compensatory provision would need to be made in line with the London Plan Policy SI9, WLWP and Local Plan Policy EU6".

Wards of London also seek the removal of SIL designation from their site 100 Twyford Abbey Road for the following reasons;

- Potential to contribute to housing capacity
- Potential to contribute to jobs capacity
- Would not compromise SIL function
- Suitability as a transition zone
- High accessibility
- Availability

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

In relation to policy P4 and paragraph 4.158;

- The Local Plan (policy EU6) reflects the West London Waste Plan (WLWP) position and safeguards waste sites in the area in line with the WLWP. The WLWP was adopted in 2015 and the 100 Twyford Abbey Road site was identified as an existing site at this time. The corporation notes from the representation that the site is currently in waste use.
- Paragraph 6.2.1, supporting text for Policy WLWP explains that 'these safeguarded sites form an essential resource for dealing with all waste streams within the Plan area and protection of these sites minimises the need for any additional sites, and so they are all safeguarded'. OPDC Local Plan policy EU6 is also in general conformity with the 2021 London Plan policy SI9 that states existing waste sites should be safeguarded and retained in waste management use. Policy P2b) [*Is this a correct reference?*] refers to

the allocated Twyford Waste Transfer Station. However, other waste sites are safeguarded as required by Policy EU6 and set out in London Plan policy SI9.

Nevertheless, a change is proposed;

- Policy P4 correctly refers to the Twyford Waste Transfer Station identified as an allocated site in the WLWP. It is proposed that the supporting text is amended to ensure references to this site are consistent.

In relation to SIL, the OPDC's response is;

- The Industrial Land Review Addendum identifies a housing capacity gap, but it also undertakes an assessment to ensure that OPDC's Local Plan would be in general conformity with the 2021 London Plan with respect to meeting housing and industrial needs. This assessment looked sequentially at the most appropriate sites for further release from Strategic Industrial Location (SIL), prioritising sites in areas with the greatest access to a sustainable travel modes and contiguous with existing areas of non SIL land or land proposed for SIL release. This review released further SIL to ensure OPDC will be able to meet the London Plan 10 year housing target and the London Plan total development target of 25,500 homes. 100 Twyford Abbey Road was not identified for release from SIL as part of this assessment. Sites that are not identified for release from SIL are needed to contribute towards meeting industrial needs.
- Evidence in the Park Royal Intensification Study demonstrates that a range of intensification types and sites are viable in Park Royal. Even though the site is near to housing, it is also surrounded by designated SIL on all sides with the exception of a small interface with non SIL land. Also given the size of Wards's site (1.1ha), in line with OPDC evidence, this is a site that could potentially be viable for industrial intensification.
- If a proposal for a non-waste use came forward then this will be assessed against relevant national, 2021 London Plan and Local Plan policies, including the requirement for compensatory provision.

### **Matters for discussion**

- 1 Is policy P4(c) and paragraph 4.58 meant to refer to the Twyford Waste Transfer Station, or to Twyford Waste and Recycling Centre or to 100 Twyford Abbey Road or to all three?
- 2 Does 100 Twyford Abbey Road meet the criteria for SIL release?

*P. W. Clark*

Inspector

9.11.21