

2 July 2021

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Local Plan Consultation  
Old Oak and Park Royal Development Corporation  
City Hall  
Queen's Walk  
London SE1 2AA

Dear Sirs

**Submission of representations to the Old Oak and Park Royal Development Corporation (OPDC) Post Submission Modified Draft Local Plan**

**Waste Recovery Facility, 100 Twyford Abbey Road, Park Royal, London NW10 7XE ("the Site")  
Ward of London Properties Ltd ("WLP")**

**INTRODUCTION**

On behalf of our client, Ward of London Properties, we hereby submit representations in response to the Old Oak and Park Royal Development Corporation (OPDC) Post Submission Modified Draft Local Plan, published for consultation on 5<sup>th</sup> March 2021.

These representations are supported by and should be read together with:

1. A report prepared by Ove Arup & Partners Ltd (Arup) providing advice on the waste provision and potential compensatory provision for the Site.
2. A masterplan feasibility option prepared by Allies & Morrison for a mixed use residential led scheme at the Site.

These representations are submitted at this particular stage of the consultation for the following reasons, analysed in more detail below:

- (a) There was no mention of the Site at all in the early versions of the draft Local Plan, including the version submitted to the Secretary of State for examination.
- (b) The latest version of the OPDC's Post Submission Modified Draft Local Plan confuses the Site with the Twyford Waste Transfer Station ("TWTS") which lies to the north of the Site on Abbey Road. This must be addressed because the TWTS is allocated in the West London Waste Plan ("WLWP") for waste apportionment purposes whereas the Site is not. The development potential of the two sites is therefore significantly different.

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**See below: Part 1: CORRECTIONS REQUIRED TO OPDC'S POST SUBMISSION MODIFIED DRAFT LOCAL PLAN**

- (c) The Inspector's interim report dated 10 September 2019 required the deletion of the Cargiant Old Oak North, EMR and Triangle Business Estate allocation from the draft Local Plan. These sites were originally allocated to contribute to housing capacity in the OPDC area (total of 7000 homes for the 20 plan period) and for commercial intensification (circa 600 jobs) and the decision to delete these sites from the original allocation represents a seismic shift in the overall planning strategy for the opportunity area and has a significant knock on impact in relation to aspirations for housing delivery and commercial intensification.
- (d) The 2021 London Plan retains indicative targets of 25,500 new homes and 65,000 new jobs in the Old Oak and Park Royal Opportunity Area over the 20 year plan period. The OPDC's submission draft Local Plan (2016) targeted 20,100 new homes. This figure has now been reduced to 19,850 in the latest draft Local Plan.
- (e) Job targets have similarly been reduced from 40,400 to 36,350 reflecting a greater proportion of industrial jobs and their lower job densities.
- (f) This means that there is a need to find alternative sites for housing and employment uses so that OPDC can maintain general conformity and maximise the delivery of housing and jobs in line with the London Plan targets.
- (g) The Site has potential to close the gap between the London Plan and OPDC's original housing targets and the less ambitious ones now proposed. The Site will help to ensure that the OOC opportunity area fully realizes its growth and regeneration potential.
- (h) The SIL designation unnecessarily constrains the development potential of the Site and a design solution appropriate to the Site's location and consistent with policy is feasible, as demonstrated by the Allies & Morrison ("A&M") masterplan.
- (i) The Site is suitable and available for an economically viable residential led, mixed-use development and the potential for the Site to be brought forward during the first 5 years of the plan period is achievable.

**See below: Part 2: REQUEST FOR REMOVAL OF SIL DESIGNATION**

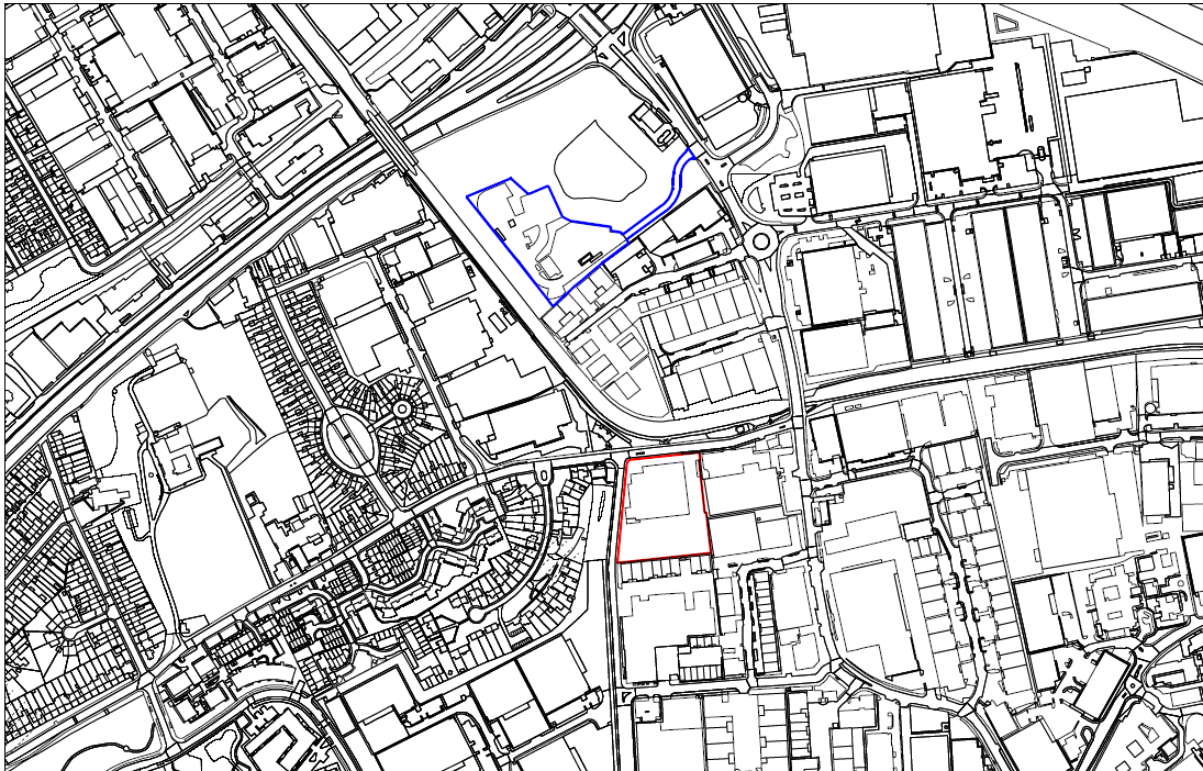
WLP would welcome a site visit and landowner engagement with the OPDC following submission of these representations should the OPDC deem this appropriate.

**THE SITE**

The Site is 1.1 hectares and is located to the immediate west of the Old Oak Common opportunity area, within Park Royals SIL. The Site is bounded by Rainsford Road to the west and Twyford Abbey Road to the north. The Grand Union Canal is located to the north of the Site.

The Site is adjacent to the LB of Brent boundary. Established residential communities are located immediately to the west of the Site along Rainsford Road and to the north of the Site along Twyford Abbey Road. To the south of the Site there is a business park occupied primarily for warehousing and storage purposes.

We have identified the Site within the location plan below, edged in red (Figure 1).



The Site is operated by Bridgemarts Ltd and is trading as Gowing & Pursey. The Site is currently operated as a waste transfer station receiving predominantly construction, demolition and excavation waste.

The Site is a safeguarded site in the West London Waste Plan by virtue of its existing use. However, the Site is not one of the eight sites within that Plan allocated to meet West London's apportionment need going forwards.

The Site is not suitable for heavy industrial intensification because of its proximity to residential areas.

#### **PART 1: CORRECTIONS REQUIRED TO OPDC POST SUBMISSION MODIFIED DRAFT LOCAL PLAN**

There was no mention of the Site at all in the early versions of the draft Local Plan, including the version submitted to the Secretary of State for examination.

By contrast, the waste transfer station which lies to the north of the Site on Abbey Road (see Figure 1, site edged in blue) is specifically mentioned in text stating that “the Twyford Waste and Recycling Centre...is safeguarded for waste apportionment purposes through the West London Waste Plan 2016 (WLWP) 2016 (see Policy EU6).

Following queries raised by the Inspector in 2018 - 2019 (see question 16 and the OPDC’s response), the Main Modifications draft has made the following changes:

1. The inclusion of the Site as a WLWP site in the proposals map (and therefore its inclusion within Policy EU6);
2. The inclusion of text in Policy P4 “safeguarding Twyford Waste Transfer Station Site in accordance with the West London Waste Plan”. As this does not refer to the waste transfer site to the north of the Site (edged blue on Figure 1), it is assumed that this must refer to the Site.

We are concerned that the terminology relating to both the Site and the waste transfer site to the north in the latest draft Local Plan is confusing.

**To ensure consistency with the WLWP and to avoid confusion the following amendments to the draft Local Plan are therefore requested:**

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 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”.

## **PART 2: REQUEST FOR REMOVAL OF SIL DESIGNATION**

As identified above, the recommendations in the Inspector’s interim findings and the decision to retain key strategic sites in SIL will result in a significant loss of housing capacity, and also a reduction in employment capacity.

As a result of this, the OPDC’s Industrial Land Review Addendum (ILRA) (February 2021) considers a revised approach to SIL designations and makes recommendations for modifications to the SIL boundary.

Outputs from the ILRA have informed the OPDC's Development Capacity Study Update (February 2021), which identifies sites and broad locations with potential for development over the plan period and assesses the development potential of sites and broad locations.

We have drawn on these two documents to assess the suitability, availability and achievability of the Site and to demonstrate why the removal of the proposed Strategic Industrial Land (SIL) designation for the Site should be supported, for the following reasons:

### **Potential to contribute to housing capacity**

The 2021 London Plan policy H1(B)(1)(c) requires local planning authorities to enable the delivery of housing capacities identified in Opportunity Areas and policy H1(B)(2) also requires the need to optimize the potential for housing delivery on all suitable and available brownfield sites.

As demonstrated by the A&M masterplan feasibility solution, the Site, a brownfield site, has the potential to deliver 315 new homes through sensitive redevelopment of the Site. This number would go a significant way towards addressing the capacity gap identified in the OPDC's Development Capacity Study and, for that reason alone, must be given serious consideration. The proposed housing densities (802 habitable rooms per hectare/286 dwellings per hectare) are appropriate given the location of this 'transitional' site.

It is important to note that eight of the sites in the OPDC's Development Capacity Study identified as having potential for housing development and economic uses (Cumberland Business Park, Old Oak Common Lane sites (north), Big Yellow Storage (Scrubs Lane), Algerian Embassy, 3 Portal Way, Big Yellow Storage (Wales Farm Road), Ursula Lapp Estate) are not in fact available for development because the landowner has not yet expressed an interest in the development of the relevant site, as acknowledged in that study. In the event these sites do not come forward, the projected housing capacity for the plan period would be reduced by a further 1350 and the number of jobs available would be reduced by a further 1390.

Additional SIL release is therefore required on sites genuinely available so that OPDC can maintain general conformity and maximise the delivery of housing in line with the London Plan targets, and in line with Policies H1 and SP4 of the draft Local Plan which state that the OPDC will provide "new homes that help to meet a local and London-wide need".

### **Potential to contribute to jobs capacity**

As noted above, there is also a shortfall in jobs capacity when compared with the London Plan and the original draft OPDC Local Plan submitted to the Secretary of State.

The scheme proposed by A&M has the capacity to contribute 2,656 sqm of commercial floorspace, representing approximately 225 more jobs to the area and therefore increases employment numbers

(currently approximately 50 at the Site) and employment densities and supports the delivery of new jobs in line with policy SP5(a).

### **Potential impact on SIL**

It is noted that draft Policy E1 seeks to protect the functioning, attractiveness and competitiveness of the Strategic Industrial Location (SIL) and its ability to support employment and economic functions. The policy goes on to state that this should be done by providing SIL compliant broad industrial type uses, by increasing or at least maintaining employment densities (see above, "Potential to contribute to jobs capacity") and that there should be no net loss of industrial floorspace unless this is required to make a more efficient use of space and provided this would not have a significant impact on the overall amount of industrial floorspace in the SIL.

The Site is only 1.1 hectares and therefore does not make a strategic contribution to the Park Royal SIL which covers an area of 1,200 acres.

The Site is located at the western extremity of the Opportunity Area and Park Royal SIL; it is not a key integrated site within the SIL. The Site could therefore be successfully removed from the edge of the SIL without undermining the function of other SIL activities. The Site's removal from the Park Royal SIL would not compromise the integrity or delivery of the remaining SIL land and would not compromise the successful operation of neighbouring industrial uses within the Park Royal SIL.

The Arup report indicates at paragraph 2.5 that the contribution of the Site in terms of the annual waste throughput is not significant at the Greater London regional level and sub-regional level.

Arup also identify (paragraph 2.3) that the Site has never operated at capacity. The Site has a maximum permitted annual throughput of 350,000 tonnes of waste. The annual waste throughputs for the Site for the period 2016-2020 have been significantly lower in comparison to its permitted annual capacity (which is similar to comparative sites). The highest annual waste received was in 2016 when 124,610 tonnes of waste was received at the Site. Arup identify that the potential to significantly increase waste throughput at the Site beyond the five-year maximum is considered unlikely as this would require additional waste processing lines to extract and store more recyclables and circulation areas for mobile plant and operatives which, in turn, would require additional operation space at the Site.

Furthermore, the potential for intensification beyond the Site's permitted annual throughput is very limited by virtue of the Site's location close to neighbouring residential areas.

### **Site suitability**

The location of the Site and its proximity to residential properties lends itself to act as a transition zone between the substantial residential uses to the north and west of the Site and the industrial



activities to the east and south of the Site in the remaining SIL (see A&M's schematic masterplan, page 1 "A moment of transition").

The land uses (residential/commercial) and the layout proposed by A&M are complimentary to both the residential properties and the industrial uses that flank the Site to the north and east.

There are no physical limitations associated with the Site or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination that cannot be successfully mitigated. There is no potential adverse impact on landscape features, nature or heritage conservation. There is a likely market attractiveness for the type of development proposed.

As can be seen from the A&M design led masterplan approach, the Site is large enough that new open space can be provided on site.

### **Site accessibility**

A key aim of the OPDC Local Plan, and national planning policy, is to deliver sustainable development. This is in part achieved by the accessibility of a development proposal, particularly one for residential uses, to a good range of everyday services and facilities. These should be accessed by, in order of preference, walking, cycling, and public transport.

The Site is surrounded by a comprehensive pedestrian infrastructure providing direct links to a range of everyday services and facilities within a 10 minute walk including a local primary school, Central Middlesex Hospital, and numerous employment sites.

Cyclists are catered for by a bus/cycle lane directly outside the Site leading directly to the off-carriageway cycle facilities on Abbey Road to the east, enabling access to a wider range of employment, education, and retail facilities within a short 20 minutes cycle. The Site's location directly opposite the Grand Union Canal, also ensures that attractive, direct, and traffic free walking, and potentially cycle opportunities can also be facilitated by way of minor enhancements in the future.

For longer distance journeys, a minimum of 6 buses per hour serve the bus stops directly adjacent to the Site, providing fast and direct services to London Underground and Overground services on the Piccadilly Line (at Alperton) and the Bakerloo Line (at Harlesden) for direct connections to central London.

While a number of car parking spaces are likely to be included in any planning application for the Site (particularly for blue badge holders, and with electric charging facilities), there would be opportunities to further enhance walking and cycling opportunities around the Site and to provide a car club scheme given the proximity of the Site to both residential and commercial uses. Any future development would also be accompanied by a large number of safe and secure cycle parking spaces, alongside a Travel Plan, to further promote active travel opportunities, further reducing the reliance on private vehicles.

### **Site availability and achievability**

The Site is in the single ownership of WLP and does not require further land assembly so its delivery is straightforward.

The Site is anticipated to come forward in the first 5 years of the local plan.

### **Proposed masterplan**

A&M have prepared a design solution to maximize the potential of the Site. Their masterplan seeks to optimise housing density through a design-led approach that responds to the Site's context and capacity for change and growth. This is one feasible option which could be explored with OPDC in more detail in pre-application discussions.

The proposed masterplan has the potential to deliver 315 residential units, 2,656 sq m of commercial floorspace and approximately 225 jobs. This means that the homes and jobs targets of the Plan could be higher and more closely aligned to the OPDC's original targets.

Appropriate heights and massing provide a sense of enclosure to the development whilst responding to existing residential areas to the north and west.

### **Compensatory capacity**

As highlighted in the Arup report (section 4) the redevelopment of waste management sites for non-waste uses is not prohibited by planning policy. However, planning policy does seek to preserve waste management capacity, requiring any capacity lost to other types of development to be replaced through compensatory provision.

Therefore any SIL release and subsequent redevelopment of the Site would be subject to compensatory requirements which would result in no net loss of waste facility floorspace.

OPDC policy requirements are that site provision should be made in the most appropriate location in a sequential manner:

- (a) within the OPDC area; or
- (b) within the relevant waste authority area based on where the lost site is; or
- (c) within Greater London.

As Arup conclude, in relation to the Site it is likely that the relevant waste authority area would be interpreted as the London Borough of Brent and then the area of the West London Waste Authority.



Arup have carried out a detailed analysis of eight waste sites with similar waste management operations to those at the Site to assess if these sites can provide sufficient capacity to compensate for the loss of the Site. Seven of these waste sites are located within the geographic area of the West London Waste Authority (WLWA), and one within the North London Waste Authority (NLWA) area in the London Borough of Barnet. No allocated sites in the WLWP have been included in the detailed analysis undertaken. Arup have confirmed that all eight sites are still trading.

Arup's analysis demonstrates that based on both the maximum permitted throughput of the Site of 350,000 tonnes/annum, and its adjusted maximum throughput of 130,000 tonnes, there is more than sufficient waste throughput capacity (as adjusted) in the WLWA area to compensate for the loss of the Site.

In section 4.7 of their Report, Arup identify that alternative, compensatory provision could also be delivered by providing space within a new developed site for establishing a circular economy hub, which would be at, or above, the 'recycling' level of the waste hierarchy of the Site. This would provide an opportunity to reduce carbon emissions related to waste and create more employment and social value in the local area responding to the planning policies of the GLA and OPDC.

## **Conclusion**

Based on the reasons set out above, we consider that the release of the Site from the SIL designation is justified and indeed supported by policy.

The Site is available now, offers a suitable location for development and is achievable with a realistic prospect that housing and jobs will be delivered on the site within 5 years.

The development of the Site as proposed will help to recover some of the housing capacity and in excess of 200 jobs lost from Old Oak North within the plan period.

We would like to highlight that we reserve the right to submit further representations in due course as the review of the Local Plan progresses and would wish to appear at any hearings into the Local Plan Examination.

Yours faithfully



**Asserson Law Offices**