

Local Plan Independent Examination

OPDC Response to Hearing Actions (Session 16, Matter 12 – industrial intensification)

OPDC to consider matters raised (compatibility of neighbouring uses; specific needs of varying range of businesses; need to be proactive in identifying intensification opportunities; absence of relocation strategy, recognising linkages; identification of minimum degree (plot ratio) for intensification to achieve and of premises/sites not offering potential for further intensification; measures to encourage existing businesses to thrive and grow) and consider whether more can be done.

1.1 OPDC has considered the matters raised and has provided the below responses.

Compatibility of neighbouring uses

1.2 The draft Local Plan place policies provide strategic guidance on the appropriate mix of uses in new developments across the OPDC area. This is supplemented by draft Local Plan policies SP9 a) iii) and D6 c) which set out criteria to ensure that amenity and the function of existing uses is appropriately safeguarded. In accordance with D6c), OPDC will employ the Agent of Change principle and will expect the applicant to demonstrate that existing uses can continue to function and/or that their amenity is not unacceptably harmed. These policies will ensure that the compatibility of uses is properly assessed, and any potential harm is mitigated.

Specific needs of varying range of businesses

Land designated/allocated for employment uses

1.3 Policies SP5, SP6 and SP10 and Place policies plan for the development needs of a range of different businesses. These policies continue to designate the Strategic Industrial Location (SIL) in Park Royal, designate new mixed use town centres as well as supporting the delivery of employment space of a range of sizes, types, tenures, forms and affordabilities across the OPDC area. Policy E1 specifically requires proposals to be comprised of broad industrial type activities within SIL, inclusive of B1b, B1c, B2, B8 and other industrial related uses.

Mix of unit sizes

1.4 There are an array of different space types and sizes across the Park Royal SIL, which helps to make it a competitive and attractive business location. Through policies SP5 f), E1 and E2 OPDC will look to secure a range of unit sizes to meet a range of business needs and that provides opportunities for businesses to start up, scale up and ultimately to remain in the area.

Services for businesses and employees

1.5 The Plan recognises that there are gaps in the provision of business focussed services and demand for 3,000sqm of additional A use class floorspace within Park Royal in supporting text to P6. We have sought to address these issues by ensuring there is sufficient capacity with the proposed Park Royal town centre boundary to accommodate floorspace to meet the demand for these services. The appropriate town centre boundary has been tested through the Park Royal Development Framework Principles Document (SD6).

Transport and parking

1.6 The draft Plan does recognise the need for improved connections, both within the development area and to surrounding areas, and to support both businesses and employees. The policies encourage a shift towards more active travel modes, use of public transport and more efficient business freight movements. Policies (P4, P5, P6, T1, T2, T3, T4, T5, T6) include the following provisions which would apply to the Park Royal SIL area:

- Improving existing and creating new walking and cycling routes, particularly those which connect to stations;
- Requiring cycle parking provision;
- A car parking policy which considers the operational requirements of different types of businesses;
- Seeking to rationalise, minimise or remove on-street parking where possible and where practicable to enable walking, cycling and public realm improvements;
- Improving road junctions to ease the flow of traffic in Park Royal; and
- Supporting improvements to bus services and enhanced rail capacity.

Identification of intensification opportunities

1.7 In OPDC's role as the local planning authority and within the remit of the Local Plan, OPDC considers that the approach taken is proactive in identifying intensification opportunities and setting a supportive planning framework. Specifically, the draft Local Plan includes industrial site allocations (site reference 6,7 and 26 in Table 3.1 of the Plan) and other potential suitable and viable intensification sites are shown on page 107 of the Park Royal Intensification Study. P4, P5 and E1 support intensification on all SIL sites in the OPDC area so windfall applications can also come forward. Policy D14 also lists a number of mechanisms that we will use to support delivery and encourage intensification, including pre-application discussions, land assembly and the preparation of Supplementary Planning Documents. In addition to this, the ongoing monitoring of the Plan in line with D14 d) will help us to understand how effective the policies have been at achieving net increases in industrial floorspace over time.

1.8 As OPDC does not own land in the Park Royal area, we appreciate the need to work with the Park Royal Business Group, landowners, developers and other stakeholders to successfully deliver intensification. The Park Royal Intensification Study does include recommended next steps which sit outside of planning but can help with delivery, examples include potential sources of funding and promoting the findings of the report. We have a dedicated OPDC Park Royal team who are responsible for working and engaging with businesses and projects aimed at protecting, strengthening and intensifying the industrial area. This resource means that we can also be proactive in trying to take these planning recommendations forward as part of the wider Park Royal team work programme.

Relocation Strategy

- 1.9 During the hearing there was a discussion about whether OPDC could be more proactive in terms of a corporate strategy for business relocations. OPDC considers that policies E2 b) and c) will be effective at enabling OPDC as a Mayoral Development Corporation to support business relocations. However, to provide greater clarity on how OPDC can assist we propose to introduce additional supporting paragraph to policy E2 as follows:

In accordance with D14b, where appropriate, OPDC would make use of compulsory purchase powers to facilitate business relocations. This would be considered on a case by case basis.

Recognising linkages

- 1.10 The draft Plan aims to promote physical walking and cycling linkages across the OPDC area, including between Old Oak and Park Royal, and to surrounding areas as shown on Figures 7.5 and 7.7 of the Plan. The linkages and mix of uses will support opportunities for people to live and work in close proximity (i.e. people living in Old Oak will be able to easily access Park Royal and vice versa).

Identification of minimum degree (plot ratio) for intensification to achieve and of premises/sites not offering potential for further intensification

- 1.11 A proposed minor modification (MINOR/2/E1/1) was included in the Submission Proposed Minor Modifications Schedule (KD4) to reference that intensification should provide the existing quantum of industrial floorspace or a plot ratio of 65% (whichever is greater). However, we note that as part of the London Plan Examination in Public a modification has been proposed to clarify that there may be exceptional justification for a lower plot ratio. To align with the latest proposed modification to the draft London Plan, a further amendment to MINOR/2/E1/1 is proposed as follows:

Policy E1 seeks to, as a minimum, protect existing industrial floorspace capacity or the potential industrial floorspace that could be accommodated on site. The draft new London Plan uses the existing floorspace or a 65% plot ratio (whichever is the greater) as the basis for measuring this but notes that exceptional justification for lower plot ratios could apply. Wherever feasible, sites should exceed this, delivering high densities through industrial intensification.

Measures to encourage existing businesses to thrive and grow

- 1.12 Policy E1, in supporting a mix of unit sizes and the intensification, can help provide opportunities for existing businesses to stay and grow within the OPDC area. In addition to this, Policy E2 tries to mitigate the impact to existing business occupiers in Old Oak and states that re-provision of industrial floorspace should seek to incorporate existing businesses where possible.
- 1.13 To assist business occupiers, additional wording to Policy E2 and supporting text is proposed to recognise the scope for interim changes as follows:

Policy E2 – new criteria

e) deliver interim employment development where this would not impact on the deliverability and phasing of the Site Allocations identified in Table 3.1.

Supporting text after paragraph 9.19:

Given the long term phasing of certain sites in the Old Oak area, there is potential for premises and sites to stay in productive use as interim employment uses prior to their planned redevelopment for mixed use in line with Table 3.1. E2 provides scope to support a range of short term development, such as improvements to employment premises, new employment buildings, where this will not compromise the deliverability and phasing of the Site Allocations in Table 3.1 on the subject site or surrounding sites.