

5th March 2021

Dear Inspector,

We are pleased to present to you our Post Submission Modified Draft Local Plan (PSMDLP) (Appendix A) and supporting documents (Appendices B-T) for your consideration as part of the examination in public on OPDC's Local Plan.

1. Overview and structure of modifications

- 1.1. We consider that the PSMDLP comprises an improved and more deliverable Local Plan for the Old Oak and Park Royal area. The reasons for this include the following:
- a) The housing allocations are spread over a larger number of sites and focus housing delivery on public sector land, where OPDC will be working positively with public sector partners to ensure a coordinated approach to the comprehensive development on these landholdings.
 - b) Key landowners have expressed their in-principle support for the new land uses and homes and jobs targets for their landholdings.
 - c) The infrastructure requirements to support the modified sites result in a smaller infrastructure funding gap and consequently, more certainty that sites will be brought forward for development.
 - d) Several of the modified housing sites have better connectivity to the main Old Oak Common station access point, the associated concourse and public realm.
 - e) The revised housing site allocations are focussed closer to existing residential communities, providing better opportunities to knit together existing and new communities in the area, provide facilities to serve these communities and support existing established centres such as Harlesden.
 - f) The modifications maintain our existing overall vision for the OPDC area as set out in the Draft Local Plan and the cross-cutting policies which require developments to deliver good growth and high standards of design, place-making, sustainable travel and energy performance.
 - g) The modifications support the delivery of a greater quantum of industrial floorspace, helping to better meet local and London-wide industrial needs and delivering a greater diversity of jobs. In Old Oak North the modifications will enable significant industrial intensification including multi-level buildings, where landowners are keen to progress with modernisation plans, which would support a greener economy and new job creation.
 - h) It accords with your requested modifications made to date, whilst maintaining general conformity with the London Plan and consistency with the National Planning Policy Framework and changes to the Use Class Order.
- 1.2. The PSMDLP (Appendix A) shows text changes as track changes. There is a corresponding Table of Text Modifications (Appendix B) which itemises these text modifications and provides a reasoned justification for these modifications. Modifications within Appendix A and B are coded:
- Modifications with the reference MM/PS2/OPDC/REF are main modifications that have been made to the draft Local Plan to address your interim findings for Cargiant, ensure general conformity with the London Plan 2021, ensure alignment

with the amended Use Class Order or address typographical errors or factual corrections.

- Modifications with the reference MINOR/PS2/OPDC/REF are minor modifications that have been made to the draft Local Plan after the publication of your interim findings for Cargiant.
- Modifications with the reference MINOR/GeneralREF or MINOR/2/REF are minor modifications that were made to the draft Local Plan following Regulation 19(2) public consultation in July 2018 and prior to the submission of the draft Local Plan to the Secretary of State in October 2018. These modifications have already been reviewed by you.
- Modifications with the reference MM(1-17)/PS/REF are main modifications made to the draft Local Plan in response your requests during the examination between November 2018 and August 2019, up to the point of the Inspector's Interim findings for the IIA and Cargiant. Some of these have been reviewed by you previously whilst some are new.
- Modifications with the reference MINOR/PS/REF are minor modifications made to the draft Local Plan in response to your requests during the examination between November 2018 and August 2019, up to the point of your Interim findings for the IIA and Cargiant. Some of these have been reviewed by your previously whilst some are new.

1.3. The Table of Figure Modifications at Appendix C shows and describes amendments that have been made to figures/maps within the PSMDLP. Modifications within Appendix C are coded as per Appendices A and B.

1.4. An OPDC response to the Matters arising from Hearing Sessions ([Examination Library ID 26](#)) that took place in April 2019 is included in Appendix R. This identifies where modifications have been made to address these matters.

2. Proposed modifications

2.1. The PSMDLP includes the following main and minor modifications, which are outlined in further detail in the sections below.

1. Modifications to address your Inspector's Interim Findings for Cargiant, Old Oak North and to ensure general conformity with the Mayor's London Plan (2021) in respect of OPDC's housing targets.
2. Other modifications required to ensure general conformity with the Mayor's London Plan (2021).
3. Modifications to ensure that the draft Local Plan is aligned with the Government's changes to the Use Class Order introduced in September 2020.
4. Modifications requested by the planning inspector during the examination in public, prior to the issuing of the interim findings in September 2019.
5. Modifications made to the draft Local Plan, post Regulation 19 consultation but prior to submission of the draft Local Plan to the planning inspectorate in October 2018.

1. *Modifications to address the inspector's interim findings and ensuring general conformity with mayoral housing targets.*
- 2.2 Your Interim Findings for Cargiant found that rising industrial land values, coupled with infrastructure and policy requirements and the need to fund an alternative site for the existing landowner, rendered parts of Old Oak North unviable for housing-led development and you therefore directed OPDC to remove Site Allocations 2 (Cargiant) and 3 (Triangle Business Centre) from the draft Local Plan but that the sites remain de-designated from Strategic Industrial Location (SIL). In doing so, you drew comparisons to approach taken in the draft Local Plan to the Elizabeth Line depot.
- 2.3 Following your Interim Findings, OPDC withdrew its Housing Infrastructure Fund (HIF) bid for Phase 1a in Old Oak North. As well as parts of Site Allocation 2 and 3, Phase 1a of our Old Oak North Plan proposals had included the European Metal Recycling (EMR) site (Site Allocation 4). Officers consider that the withdrawal of OPDC's HIF bid and the removal of housing site allocations to the south render the EMR site no longer appropriate or deliverable for housing-led development.
- 2.4 Following the examination hearings in summer 2019, you encouraged us to work positively with Cargiant to consider appropriate modifications for their site. Cargiant have publicly stated that they have significant plans to expand their industrial operations on their site and support London's transition to electric vehicles by building an electric car sales and maintenance plant. OPDC officers considered that the interim findings would have resulted in little planning certainty for their site in that it would have still been de-designated from Strategic Industrial Location (SIL), providing Cargiant with limited planning certainty on which to continue to expand their business.
- 2.5 We believe that there is a fundamental difference between Old Oak North and the Elizabeth Line depot in this regard. The Elizabeth Line depot has been built, is operational and is covered by a long lease until the late 2030s. There is therefore little need within OPDC's Local Plan to provide any site-specific planning policies to support the remaining operation of this depot. Equally, subject to the relocation of the depot, there is potential for the site to be delivered within the Local Plan period and the Local Plan should be open to and acknowledge this potential. By contrast, your interim findings for Site allocations 2 and 3 deem these to be unviable and the landowners and developers in Old Oak North have flourishing businesses which they wish to expand. To make this investment, they need long-term certainty that continued industrial operations in this location would be supported.
- 2.6 Officers therefore propose to reinstate SIL designations in Old Oak North (Site Allocations 2 (except for parts of the site allocation on Scrubs Lane which continue to be proposed for SIL release – see ID39 in table 1, figure 1), 3, and 4) to provide clear planning policies to support industrial uses. The reinstated SIL will also support industrial intensification and an increase in industrial floorspace across Old Oak and Park Royal to meet local and strategic needs. We have Statements of Common Ground with Cargiant, Network Rail and Lancefield/NEMA for these landholdings, confirming their support for the re-instatement of SIL and associated economic floorspace targets (see paras 4.25 and 5.1 and Appendix S)

- 2.7 The removal of housing site allocations 2, 3 and 4 coupled with the re-instatement of SIL in parts of Old Oak North would have consequent impacts on OPDC’s ability to demonstrate general conformity with the London Plan 2021 and help meet housing needs within OPDC’s strategic housing market area. The London Plan sets OPDC a target to deliver 13,670 homes over a ten-year housing period from 2018/19 to 2028/29 and an overarching target to deliver 25,500 homes.
- 2.8 The removal of housing site allocations 2, 3 and 4 results in OPDC being short 4,219 homes and 6,000 homes respectively towards these targets and the loss of this capacity means there is a need to identify alternative sites for housing to maintain general conformity with the London Plan.
- 2.9 The modifications propose that some of this housing capacity can be met by recognising development that has occurred on windfall sites, revising the phasing for some sites that can now be delivered sooner in the plan period and amending land use splits on existing sites allocated for mixed use development. However, there is also a need to release further SIL for housing development to maintain general conformity with the London Plan. Officers have been reviewing sites for SIL release in a sequential manner, prioritising those sites considered to be deliverable/developable, close to public transport and contiguous with existing areas already proposed for SIL release. The methodology and approach to SIL release has been set out within the Industrial Land Review Addendum (Appendix I).
- 2.10 Table 1 provides a summary of the sites that are proposed to be modified, showing the development capacities within the Submission Draft Local Plan (2018) compared to their new capacities in the PSMDLP (2021). The site locations are marked on Figure 1. Further detail on the rationale for these modifications is set out in section 6 of the Development Capacity Study Update (Appendix G). Statements of Common Ground have been secured with key landowners for these modified sites (see paras 4.25 and 5.1 and Appendix S). These modified sites when combined with the draft Local Plan’s extant unmodified sites ensures that OPDC maintains general conformity with the London Plan’s housing targets. The PSMDLP delivers a minimum 13,801 homes between 2019-29 against a London Plan target to deliver a minimum 13,670 homes and a total development capacity for 26,000 homes against a London Plan target for 25,500 homes.

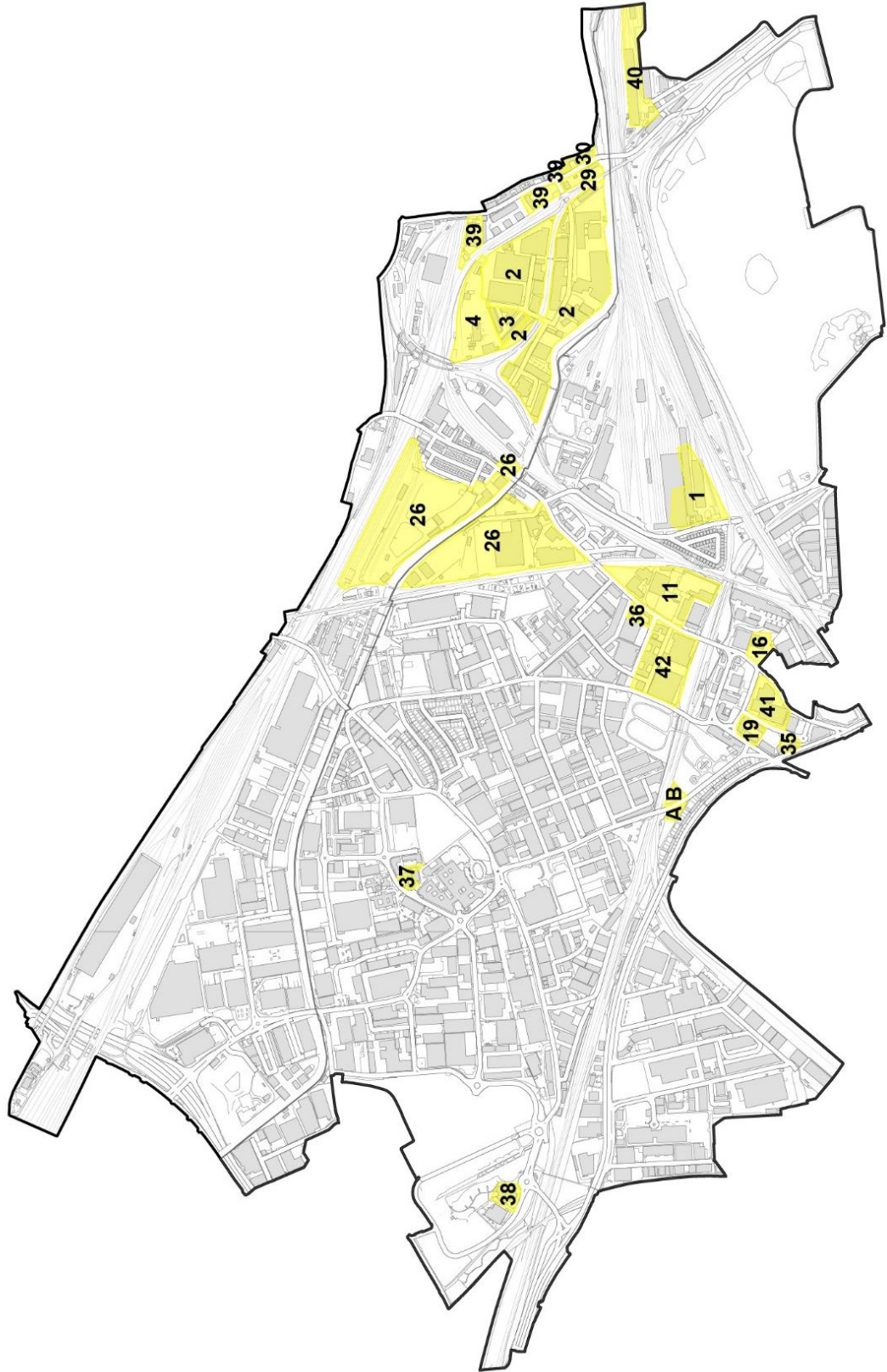
Table 1 – List of site allocations proposed for modification (NB sites A and B are not site allocations due to their development capacity being below the threshold site allocations)

ID	Site	Modification summary	Capacity		Phasing	
			2018 Submission Draft Local Plan	2021 Post Submission Modified Draft Local Plan	2018 SDLP	2021 PSMDLP
1	Old Oak Common Station Adjacent Station Development site	Decreased homes capacity; increased no-residential	Homes: 350 Economic floorspace: 178,400 sqm	Homes: 100 Economic floorspace: 200,500 sqm	11 to 20 years	11 to 20 years

		floorspace capacity				
2	Cargiant Old Oak North	SIL retention for intensified industrial uses	Homes: 5,300 Economic floorspace: 48,800 sqm	Homes: 0 Economic floorspace: 170,800 sqm	6 to 20 years	Through out the plan period
3	Triangle Business Estate	SIL retention for intensified industrial uses	Homes: 600 Economic floorspace: 2,800 sqm	Homes: 0 Economic floorspace: 20,500 sqm	6 to 20 years	Through out the plan period
4	European Metal Recycling (EMR)	SIL retention for intensified industrial uses	Homes: 1,100 Economic floorspace: 21,330 sqm	Homes: 0 Economic floorspace: 21,300 sqm.	6 to 20 years	Through out the plan period
11	Acton Wells East	Increased homes capacity; decreased non-resi floorspace capacity. Phasing brought forward.	Homes: 1,200 Economic floorspace: 18,100 sqm	Homes: 1,650 Economic floorspace: 8,000 sqm	11 to 20 years	6 to 20 years
16	Perfume Factory South	Increased homes capacity reflecting London Plan methodology for recording student bed places; Phasing brought forward to 0 to 5 year period	Homes: 286 Economic floorspace: 4,970 sqm	Homes: 326 Economic floorspace: 4,970 sqm	6 to 10 years	0 to 5 years
19	6 Portal Way (Portal West)	Increased homes capacity reflecting development management information; Phasing adjusted to reflect earlier delivery	Homes: 578 Economic floorspace: 3,200 sqm	Homes: 651 Economic floorspace: 3,200 sqm	6 to 10 years	0 to 10 years
26	Channel Gate	SIL release for housing-led mixed use development	Homes: 0 Economic floorspace: 124,000 sqm	Homes: 3,100 Economic floorspace: 10,700 sqm	Throug hout the plan period	6 to 20 years
29	Mitre Yard	Increased homes capacity reflecting planning approval	Homes: 200 Economic floorspace: 1,123 sqm	Homes: 241 Economic floorspace: 1,123 sqm	0 to 5 years	0 to 5 years
30	North Kensington Gate South	Increased homes capacity reflecting planning approval	Homes: 164 Economic floorspace: 750 sqm	Homes: 206 Economic floorspace: 750 sqm	0 to 5 years	0 to 5 years
35	4 Portal Way	New homes and jobs capacity reflecting	Homes: 0	Homes: 702	N/A new site	6 to 10 years

		development management information	Economic floorspace: 0 sqm	Economic floorspace: 1,946 sqm		
36	3 School Road / 99 Victoria Road	Site released from SIL with new homes and non-resi floorspace capacity	Homes: 0 Economic floorspace: 0 sqm	Homes: 250 Economic floorspace: 800 sqm	N/A new site	6 to 10 years
37	Central Middlesex Hospital North East site	New homes capacity reflecting planning approval	Homes: 0 Economic floorspace: 0 sqm	Homes: 158 Economic floorspace: 0 sqm	N/A new site	0 to 5 years
38	1 Lakeside Drive	New homes and jobs capacity	Homes: 0 Economic floorspace: 0 sqm	Homes: 300 Economic floorspace: 500 sqm	N/A new site	6 to 10 years
39	Cargiant Scrubs Lane	Increased homes capacity and decreased non-resi floorspace capacity	Previously part of Cargiant Old Oak North (DCS site 7)	Homes: 600 Economic floorspace: 2,400 sqm	Previously part of Cargiant Old Oak North (DCS site 7)	6-20 years
40	North Pole East Depot	Phasing brought forward to 0-10 year period. New homes and non-resi floorspace capacity	Homes: 0 Economic floorspace: 0 sqm	Homes: 750 Economic floorspace: 500 sqm	21+ years	0 to 10 years
41	1 Portal Way (Carphone Warehouse)	Phasing brought forward to 0-10 year period.	Homes: 764 Economic floorspace: 3,500 sqm	Homes: 764 Economic floorspace: 3,500 sqm	11 to 20 years	0 to 10 years
42	Acton Wells West	Increased homes and non-resi floorspace capacity	Homes: 100 Economic floorspace: 3,600 sqm	Homes: 555 Economic floorspace: 30,000 sqm	11 to 20 years	11 to 20 years
A	Park Royal Road west	Site released from SIL. New homes capacity reflecting development management information	Homes: 0 Economic floorspace: 0 sqm	Homes: 15 Economic floorspace: 0 sqm	N/A new site	0 to 5 years
B	5 to 7 Park Royal Road	Site released from SIL. New homes and non-resi floorspace capacity	Homes: 0 Economic floorspace: 0 sqm	Homes: 60 Economic floorspace: 200 sqm	N/A new site	6 to 10 years

Figure 1 – Location of sites proposed for modification



2.10. As a result of these site modifications other modifications have been required within the PSMDLP (2021). These include changes to:

- a) Infrastructure. There are modified infrastructure requirements to support the delivery of the new development sites within the PSMDLP (2021). This includes, inter alia, revised transport infrastructure, open space requirements, social infrastructure and utilities provision. These new infrastructure requirements have been referenced as appropriate within the PSMDLP (2021). The PSMDLP (2021) is supported by an updated Infrastructure Delivery Plan (IDP), which sets out all the area's infrastructure requirements in further detail and provides a breakdown on their location, cost, phasing, funding source and any funding that has already been committed (see paragraphs 4.5 to 4.15 for further details on the IDP).
- b) Town centres. With Old Oak North now re-instated as SIL, the previous alignment for Old Oak Major Town Centre is no longer deliverable. There remains a need to deliver a similar quantum of town centre uses to meet the needs of residents and workers. The modifications to the draft Local Plan therefore continue to identify the need for a new major town centre, but modifications have been made to the location for its delivery. Its previous alignment remains through Acton Wells and Old Oak South, but instead of extending into Old Oak North, the centre is now shown as extending through Atlas Junction and into Channel Gate. This alignment will better serve existing and planned residential neighbourhoods and is well served by bus services between Harlesden and North Acton. The Neighbourhood Centre designation for Atlas Junction has been removed as this has now been subsumed within Old Oak Major Town Centre. With the orientation of the northern portion of Old Oak Major Town Centre now moving west, amendments to the cluster policies along Scrubs Lane have been made to support small scale walk-to town centre uses. This provision will provide services for the community along Scrubs Lane and employees within Old Oak North while complementing the wider town centre hierarchy.

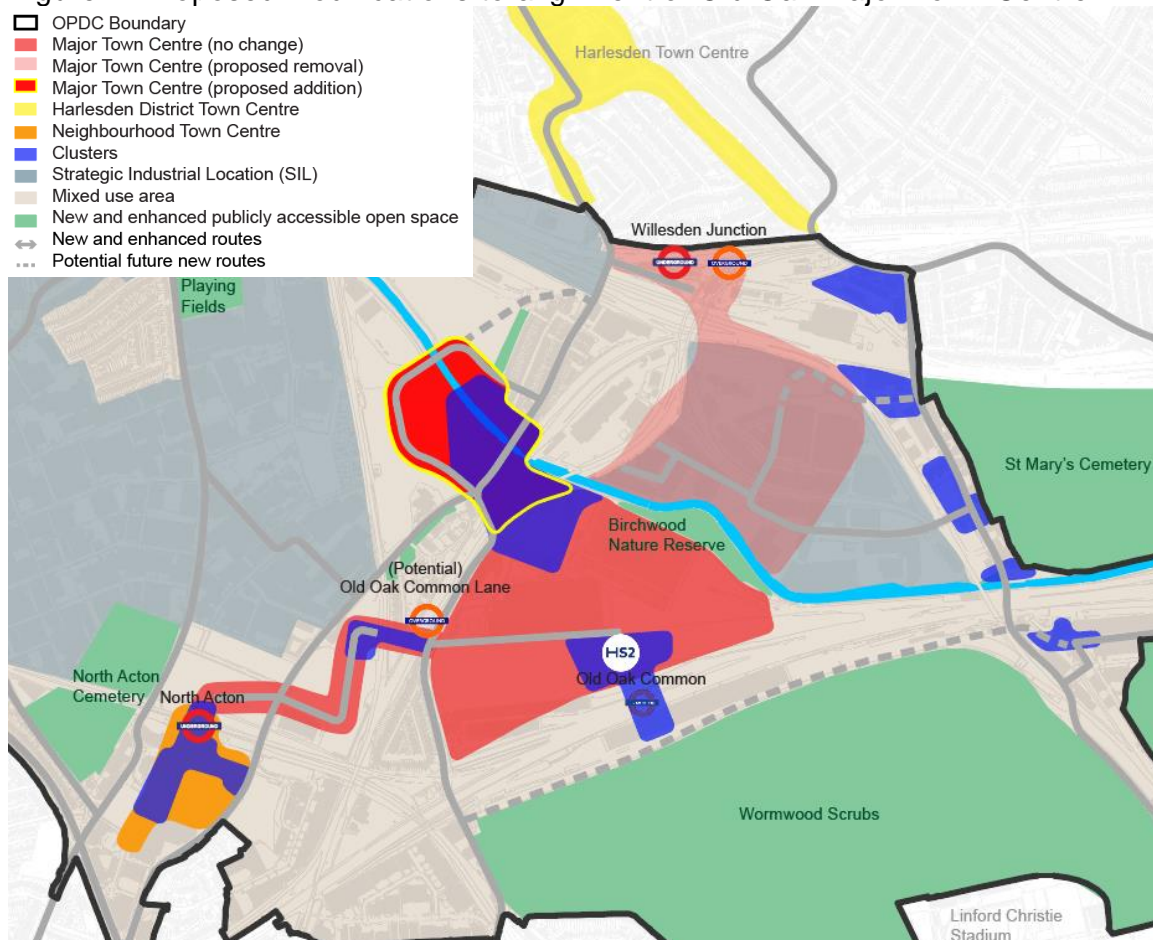
2.11. We believe that our modifications in response to your interim findings will, as a whole, support a more deliverable plan for the Old Oak and Park Royal area and will continue our ambitions to deliver a high-quality part of London. The re-introduction of industrial designations in Old Oak North will enable landowners there to deliver on their significant ambitions for industrial intensification, helping to better meet London's industrial floorspace needs and providing thousands of new jobs, with employment and training opportunities for local people.

2.12. The revised land use designations for Old Oak North will also complement the mixed-use designations on surrounding sites. The modifications support the delivery of new and enhanced connections through and around Old Oak North to places within its hinterland, such as Willesden Junction and Scrubs Lane, which will remain well connected to Old Oak and the planned super-hub station. New industrial development in Old Oak North will provide opportunities for ancillary uses which will support place-making and provides services and amenities for local workers and residents.

2.13. All local planning authorities in London are made up of, and plan for, distinct areas with very different characters, indeed it is often a celebrated facet to London’s history, culture and place. Our policies will ensure that, in accordance with the agent of change principle, developments are appropriately designed to mitigate against impacts on or from adjacent uses.

2.14. The modifications to other sites to ensure that the Local Plan maintains general conformity with London Plan housing targets will ensure that the plan continues to effectively meet London’s critical need for housing. As you will be aware, the London Plan (2021) does not fully meet the Government’s housing targets for London and there will be a focus on ensuring that the reviewed London Plan meets these targets. This underlines the importance of projects such as Old Oak and Park Royal and the critical need for such strategically important regeneration areas to support London meeting national housing needs – a point underlined in the [Government’s response](#) to the local housing need proposals in December 2020.

Figure 2: Proposed modifications to alignment of Old Oak Major Town Centre



2. *Other modifications required to ensure general conformity with the Mayor's London Plan.*

- 2.15. OPDC's Submission Draft Local Plan (SDLP) was submitted to the Secretary of State in October 2018. OPDC officers had drafted the SDLP to ensure it was in general conformity with the draft new London Plan (2017). The new London Plan has subsequently undergone its Examination in Public and ministerial directions and as a consequence, some of the London Plan policies have been amended in the London Plan (2021). As requested, OPDC officers have reviewed the draft Local Plan policies and made adjustments, where required, to ensure that the PSMDLP is in general conformity with the London Plan 2021.
- 2.16. These modifications include updates to policies and related supporting text dealing with:
- Waste (Policy EU6)
 - Car parking (Policy T4)
 - Gypsy and Traveller Accommodation (Policy H8)
 - Strategic Industrial Location (Policy E1)
- 2.17. Where changes have made to ensure general conformity with the London Plan (2021) this has been highlighted in the 'reason' column of the Table of text modifications (Appendix B).
3. *Modifications to ensure that the draft Local Plan is aligned with the Government's changes to the Use Class Order introduced in September 2020.*
- 2.18. On 1 September 2020, amendments to use classes in the Town and Country Planning (Use Classes) Order 1987 came into effect. The amendments revoked some existing use classes and subsumed them into a new class E that includes:
- Display or retail sale of goods, other than hot food
 - Sale of food and drink for consumption (mostly) on the premises
 - Provision of:
 - o Financial services,
 - o Professional services (other than health or medical services), or
 - o Other appropriate services in a commercial, business or service locality
 - Indoor sport, recreation or fitness (not involving motorised vehicles or firearms)
 - Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
 - Creche, day nursery or day centre (not including a residential use)
 - Uses which can be carried out in a residential area without detriment to its amenity:
 - o Offices to carry out any operational or administrative functions,
 - o Research and development of products or processes
 - o Industrial processes
- 2.19. Modifications have been made to the Plan in light of the introduction of class E. The modifications principally focus on:

- removing references to use classes that have now been revoked and replacing them as appropriate throughout the document.
 - updates to policies in the Town Centres and Community Uses chapter, including the deletion of policy TCC3 (A-Class Uses).
 - updates to the definitions with the glossary.
4. *Modifications requested by the planning inspector during the examination in public, prior to the issuing of the interim findings in September 2019.*
- 2.20. Between November 2018 and August 2019, you requested that a series of modifications were considered and/or made to the draft Local Plan. These modifications primarily related to:
- Modifications to ensure that policies deal with requirements for development rather than procedures or documentation that should be submitted by applicants.
 - Modification to ensure that planning policies and figures are clearer and easier to interpret.
 - Amendments to address specific issues raised in the planning inspector's pre-hearing questions and representations at the examination hearings
- 2.21. These modifications are preceded by the code MINOR/PS/REF and MM(1-17)/PS/REF within the PSMDLP (2021) in Appendix A, Table of Text Modifications in Appendix B and Table of Figure Modifications in Appendix C. You have reviewed some of these already during the summer of 2019.
5. *Modifications made to the draft Local Plan, post Regulation 19 consultation but prior to submission of the draft Local Plan to the planning inspectorate in October 2018*
- 2.22. The PSMDLP (2021) also includes within it track changes that were made to the draft Local Plan following the Regulation 19 (2) public consultation in 14th June-30th July 2018 and submission to the Secretary of State on 4th October 2018. These modifications relate to modifications proposed by OPDC in response to representations made at the Regulation 19 (2) public consultation. These modifications were approved by our Board at its 28th September 2018 meeting, prior to submission of the draft Local Plan to the Secretary of State. These were submitted to you alongside the other submission documents. You can view the original table of these modifications [here](#). These modifications are preceded by the code MINOR/REF or MINOR/2/REF within the PSMDLP (2021) in Appendix A, Table of Text Modifications in Appendix B and Table of Figure Modifications in Appendix C. You will have already reviewed these modifications.

3. Accompanying evidence documents

- 3.1. Table 2 provides an overview of the new or updated supporting study documents that have been compiled to provide evidence to support the modifications contained within the PSMDLP (2021). The Summary of Supporting Studies document (Appendix D) provides an executive summary for each of these studies.

Table 2: PSMDLP Supporting Studies.

App.	Title	Purpose	Key outputs/ recommendations
E	Bus Strategy Update (2021)	Update the indicative bus network and capacity requirements over the course of the Local Plan period	Indicative network, infrastructure requirements, phasing and costings.
F	Channel Gate Development Framework Principles (2021)	Provide a local vision and place guidance specific to the Channel Gate Place	The place can deliver a minimum of 3,100 homes and 10,700 sqm economic floorspace Identifies need for infrastructure including 2 ha park, a new strategic road and town centre uses
G	Development Capacity Study Update (2021)	Identifies sites with development potential for housing and non-residential land uses and sets out an indicative housing trajectory for deliverable (0 to 5 years) and developable (6 to 20 years) sites.	Identifies development capacities for the plan period (2018-2038) of: <ul style="list-style-type: none"> • 19,850 new homes • 36,350 jobs • 871,350 sqm non-residential floorspace
H	Grand Union Canal Massing and Enclosure Statement Update (2021)	Establishes indicative heights/massing of development facing on to the Grand Union Canal outside of Strategic Industrial Locations.	Recommends a range of generally 6 to 8 storeys for sites facing on to the Grand Union Canal with increased heights and taller buildings at key crossing points.
I	Industrial Land Review Addendum (2021)	Sets out the evidence for SIL retention and release and confirms potential across the OPDC area for a net gain in industrial floorspace over the Local Plan period.	Re-instatement of SIL in Old Oak North. Release of SIL elsewhere to maintain general conformity with OPDC's London Plan housing targets. Demonstrates potential for a net additional 250,428sqm of industrial floorspace.
J	Infrastructure Delivery Plan (2021)	Identify the infrastructure required to support the regeneration of the area, its location, phasing and funding	Infrastructure requirements are estimated to cost £2.1 billion with a funding gap of £136 million to £202 million, depending on the level of planning contributions. There are however various funding sources of alternative funding available to address this funding gap.
K	Integrated Impact	Assesses the proposed modifications made to	The IIA assessment concludes that the proposed modifications

	Assessment (IIA) Addendum and Habitat Regulation Assessment (HRA) (2021)	the Local Plan that with regard to sustainability, health equalities and European habitat sites.	to the draft Local plan have, on the whole, resulted in positive changes to the IIA outcomes. The HRA assessment concludes that the modifications are unlikely to have any significant effects on the European habitats sites and an Appropriate Assessment is not required.
L	Old Oak North Intensification Study (2021)	Provide a local vision and place guidance specific to the Old Oak North Place	Capacity to deliver 212,584 sqm of industrial floorspace. Locations for enhanced pedestrian and cycle connectivity and active frontages to support place-making.
M	Preliminary Infrastructure Design and Costing Study (2021)	Provide preliminary designs and costs for infrastructure to inform OPDC's Infrastructure Delivery Plan.	Provides designs and costs for, inter alia, new roads, pedestrian and cycle and vehicular bridges, social infrastructure, public open spaces.
N	Scrubs Lane Development Framework Principles Update (2021)	Updates the local vision and place guidance specific to the Scrubs Lane Place.	Capacity to deliver 3,500 homes and 18,400sqm of economic floorspace. Designation of the new Mitre Way Cluster and delivery of Wormwood Scrubs Street providing an all modes connection to Kensal Canalside Opportunity Area.
O	Social Infrastructure Needs Study Update (2021)	Identify social infrastructure required to support the Old Oak and Park Royal population over the Local Plan period.	Need in the Local Plan period for one 3FE primary school (2031), health hub (2024), four super-nurseries, 2 community hubs and expansion of policy and ambulance facilities.
P	Strategic Site Allocations Viability Assessment (2021)	Assesses the viability of the 4 largest modified sites within the PSMDLP: Channel Gate, Cargiant, EMR and North Pole East Depot	The industrial site allocations (Cargiant and EMR) are viable. Channel Gate can viably deliver 25-35% affordable housing without grant and up to 40% with grant. North Pole East Depot can viably deliver 5-25% affordable housing without grant and up to 35% with grant.
Q	Tall Buildings Statement Update (2021)	Provides a definition for a tall building and appropriate locations for tall buildings	Locations for tall buildings have been modified: <ul style="list-style-type: none"> • 3 School Road / 99 Victoria Road is included as an appropriate location. • Hythe Road identified as an appropriate location for two

			<p>tall buildings (previously one tall building)</p> <ul style="list-style-type: none"> • Mitre Way Cluster identified as an appropriate location. • Channel Gate identified as an appropriate location. • Old Oak North SIL – identified as an appropriate location. • Old Oak South – area adjusted to reflect refined development site area.
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4. Demonstrating deliverability

4.1. There was a need for significant focus on the developability of the Cargiant site allocation in Old Oak North as part of the examination hearings in 2019.

4.2. Your interim findings focussed on:

- there being a lack of clarity about infrastructure costs and whether there would be sufficient planning contributions or other funding sources to support their delivery.
- The willingness of the landowner to bring forward the development site. Your findings concluded that Cargiant would not be a willing seller of Site Allocation 2 unless their relocation costs could be met as part of any viability assessment and that any appraisal would therefore need to factor in either Cargiant's relocation costs or extinction costs for the site to be developed during the Local Plan period. On the basis of the viability evidence put before you, you concluded that in either a relocation cost scenario or an extinguishment cost scenario, Site Allocation 2 would be unable to deliver any affordable housing.

4.3. There is therefore a clear need for us to demonstrate to you that our modified site allocations can contribute towards both our affordable housing and infrastructure policy requirements whilst also providing a sufficient profit incentive for a landowner/developer to bring their site forward. In turn, we will need to evidence that the infrastructure that is critical to deliver our Local Plan homes and jobs targets is fundable and deliverable. We should also demonstrate to you that there is in-principle support from landowners for the modified site, so that there is greater certainty that development aspirations outlined within the Local Plan will be brought forward.

4.4. We therefore wanted to set out how we have approached this as part of our modifications, focussing on:

- a) Infrastructure funding and delivery
- b) Viability of strategic sites
- c) Willingness of landowners

a) Infrastructure funding and delivery – the Infrastructure Delivery Plan (Appendix J)

- 4.5. The primary purpose of the Infrastructure Delivery Plan (IDP) update is to set out the revised infrastructure requirements related to the proposed modifications. The updated IDP has been informed by infrastructure requirements arising from the following updated supporting studies:
- The Bus Strategy Update (Appendix E)
 - Preliminary Infrastructure Design and Costing Study (Appendix M)
 - Social Infrastructure Needs Study (Appendix O)
- 4.6. Where relevant, project details have also been updated where additional information has become available on their status, design, delivery or overall nature since 2018.
- 4.7. In addition to identifying the revised infrastructure requirements, the IDP also includes a more detailed analysis of the anticipated costs and funding sources for all projects identified in the infrastructure schedule. This has enabled a more comprehensive assessment of the overall costs of infrastructure within the plan period, and the estimated funding gap. Additional analysis and commentary has also been included on the funding sources that may be utilised by OPDC to address the funding gap.
- 4.8. A summary of how the Infrastructure Schedule has been compiled is set out in Table 3.

Table 3: Summary of Infrastructure Schedule

Overall Infrastructure Cost	Total cost of infrastructure of the infrastructure project based on the best available evidence. To support this, OPDC has prepared a Preliminary Infrastructure Design and Cost Study (PIDCS) (Appendix M) which has provided initial design and cost information on some key strategic infrastructure projects.
Delivered or Funding Committed	Projects that have been delivered, or where funding is either wholly or partly committed.
Desirable Infrastructure	Projects that are not considered to be required to support development capacity within the plan period, but which are generally supported and have been identified for safeguarding purposes.
Developer, Service Provider or Shared Cost	Costs, or parts of thereof, that will be funded by a developer through general development costs, by a relevant service provider, or jointly by other known funding sources.
Unfunded Infrastructure Cost	The cost of infrastructure which is considered necessary to deliver the growth identified within the Local Plan, and requires funding from either planning contributions or other funding sources

- 4.9. An overview of costs identified through the assessment of the infrastructure schedule is set out in the Table 4. This estimates the overall cost of infrastructure identified within the IDP to be £2.136 billion, while the total unfunded infrastructure cost is £347 million.

Table 4: Overview of Infrastructure Costs

Overall Infrastructure Cost	£ 2,136,320,000
Delivered or Funding Committed	£ 1,347,650,000
Desirable Infrastructure	£ 296,200,000
Developer, Service Provider or Shared Cost	£ 145,410,000
Necessary and Unfunded Infrastructure	£ 347,060,000

4.10. To determine how much of the unfunded infrastructure cost is likely to be addressed through planning contributions, and the resulting funding gap, three scenarios have been assessed. These scenarios are based on the average rate of S106 contributions secured by OPDC to date, and on potential future CIL income using OPDC's 2016 draft CIL charging schedule as a reference. These scenarios are set out in Table 5.

Table 5: Potential planning contributions and funding gap

	Average OPDC area Section 106 Rate	CIL with 50% Affordable Housing	CIL with 35% Affordable Housing
Planning Contributions	£ 145,173,908	£ 193,081,899	£ 211,495,445
Funding Gap	- £ 201,886,092	- £ 153,978,101	-£ 135,564,555

4.11. OPDC anticipates the planned development will result in between £145 million and £211 million being secured through planning contributions across the Local Plan period. When assessed against the identified unfunded infrastructure cost, this results in an estimated funding gap for the Local Plan of between £136 million and £202 million.

4.12. Assessment undertaken by OPDC identifies that the existing Gross Value Added (GVA) of the area is £2.1 billion per annum and that the development identified within the Local Plan has the potential to generate an additional £1.8 billion GVA per annum. On the basis of the benchmark fiscal parameters set out by the National Infrastructure Commission (NIC) in 2018 (as referenced in the Planning Inspectorate's report on the London Plan examination), this would provide the OPDC area with infrastructure spend between £21m and £39m per annum, which would be more than sufficient funding to address this infrastructure funding gap.

4.13. OPDC is currently working closely with MHCLG and Homes England with a view to a bid to the Government's new proposed National Home Building Fund (NHBF) which is anticipated to be launched later in 2021. Attached as an appendix to the IDP is a letter from Homes England which confirms that Homes England supports the new approach to regeneration in the OPDC area as set out in the proposed modifications and recognises that it will require public sector support for infrastructure funding and finance.

4.14. We have also identified a range of other funding sources which could be utilised to address the infrastructure funding gap, including:

- Retention of future business rates uplift through use of an Enterprise Zone or similar mechanisms working with the host local authorities and the GLA;

- Working with host Local Authorities to utilise the New Homes Bonus generated from housing delivered within the OPDC area to support investment in local infrastructure;
- The use of Affordable Housing Grant to support delivery of Local Plan affordable housing targets, helping to ensure development remains viable and is capable of contributing to infrastructure delivery; and
- Various smaller scale public funding sources which can be expected to be available through the plan period, of which OPDC has successfully made use of in the past.

4.15. In summary, it is reasonable to assume that infrastructure funding requirement identified through the IDP can and will be addressed.

b) Viability of strategic sites - Strategic Site Allocations Viability Assessment (Appendix P)

4.16. OPDC has undertaken a Strategic Site Allocations Viability Assessment (Appendix P) in accordance with the National Planning Policy Framework (NPPF) 2012. As set out in Planning Practice Guidance (PPG) paragraph 005 it is important to consider the specific circumstances of strategic sites that provide a significant proportion of planned supply. This is generally accepted to be at least 5% of supply. As a result, four specific sites have been assessed.

4.17. The results of the Strategic Sites Viability Assessment demonstrate the following:

- Site Allocation 2 Cargiant Old Oak North is viable at 20% profit on cost when measured against the identified benchmark land value.
- Site Allocation 4 EMR, either with or without the re-provision of waste uses on the site, is viable at 20% profit on cost when measured against the identified benchmark land value.
- Site Allocation 26 Channel Gate can viably deliver between 25% and 35% affordable housing without grant, dependant on the starting sales values achieved on the site. This can be increased up to at least 40% affordable housing with affordable housing grant.
- Site Allocation 40 North Pole East Depot South can viably deliver between 5% and 25% affordable housing without grant, depending on the starting sales values achieved on the site. This can be increased up to at least 35% affordable housing with affordable housing grant.

4.18. On the Channel Gate and North Pole East site assessments we have adopted a regeneration premium of 2% per annum over and above standard growth in accordance with the approach favoured in your Interim findings. However, we consider that this is a conservative assumption based on the updated 2019 CBRE “The Regeneration Effect” report highlighted in paragraph 4.3 of the Strategic Sites Viability Assessment. This identified that the average premium over and above the wider growth was 3.6% per annum (based on a range of 1.5% to 7.6% per annum) from the point of realisation.

4.19. The PSMDLP identifies that the tested site allocations are to be delivered from year 6 of the plan period, therefore the NPPF 2012 requires that such schemes are “developable”. The NPPF identifies in Footnote 12 that, “*to be considered*”

developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged”.

4.20. The Strategic Sites Viability Assessment clearly demonstrates that site allocations 2,4, 26 and 40 are “developable”.

4.21. Their developability is further underlined by the fact that key landowners have signed Statements of Common Ground with OPDC (see paras 4.25 and 5.1 below and Appendix S). These statements confirm agreement with the extent, timing and capacity of the strategic sites in the PSMDLP.

4.22. The terms of the new £4bn Affordable Housing Programme (AHP) means that there will be grant support available to deliver policy compliant levels of affordable housing. This funding is expected to support starts on site between 2021 and 2026, with completions by 2028 for most projects and some strategic sites completing in 2029. Given that the affordable housing funding programme has operated as a rolling programme for many decades, it is reasonable to assume this will continue for the remainder of the Local Plan period.

4.23. As one of London’s largest opportunity areas with the capacity to deliver 25,500 new homes, OPDC considers that it will be able to demonstrate a strong strategic case for funding to increase the delivery of affordable housing. OPDC is working with the GLA to establish an appropriate affordable housing funding settlement on this basis, as confirmed by a letter from GLA’s Housing and Land department (see Appendix T).

a) Willingness of landowners – Statements of Common Ground (Appendix S)

4.24. We have secured Statements of Common Ground with key landowners for the modified sites, setting out landowners in principle support for proposed land uses, capacity and phasing. These Statements of Common Ground are provided within Appendix R.

4.25. Table 6 provides a summary of the sites that are proposed to be modified and where Statements of Common Ground have been secured. Figure 1 identifies where these sites are located. Where sites have been modified to reflect factual updates resulting from planning permissions or resolutions to approve, Statements of Common Ground have not been sought.

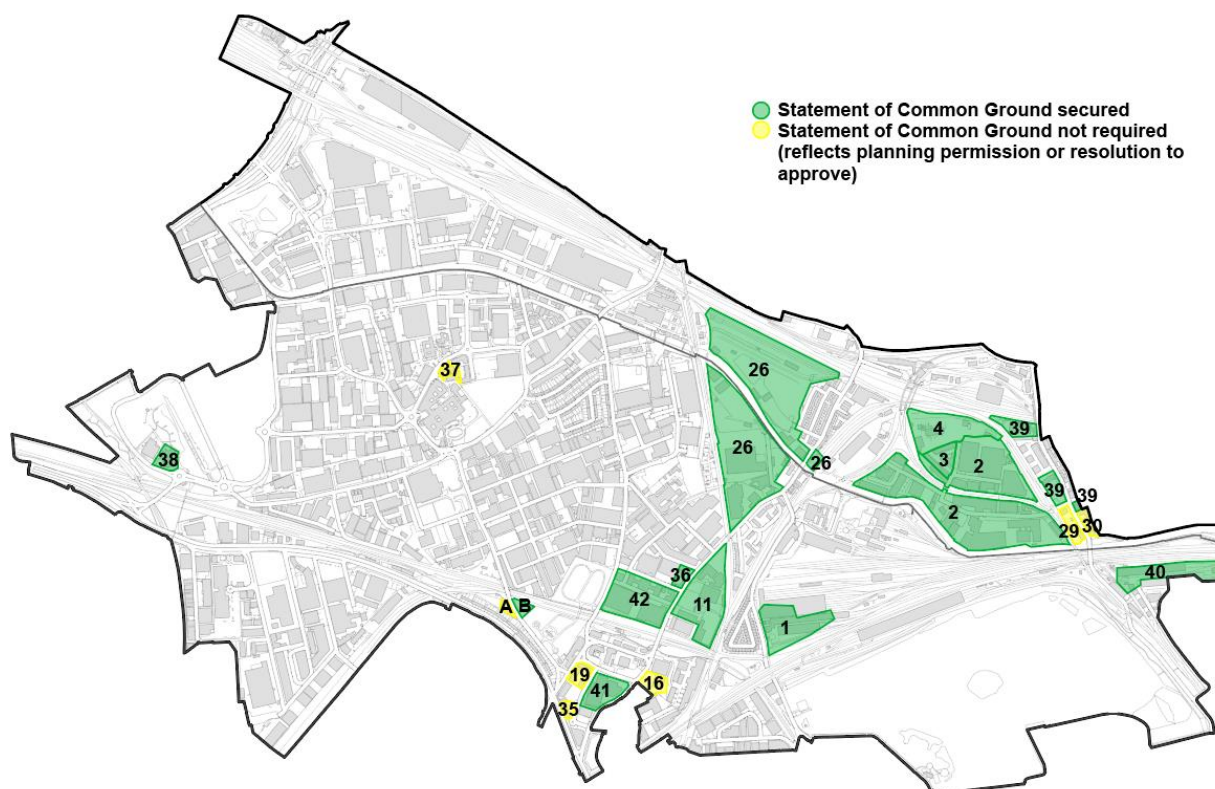
Table 6 – List of sites proposed for modification and Statements of Common Ground

	Site allocation	Modification summary	Statement of Common Ground secured?	Statement of Common Ground Signatory
1	Old Oak Common Station Adjacent Station Development site	Decreased homes capacity; increased no-residential floorspace capacity	Yes	HS2 Ltd

2	Cargiant Old Oak North	SIL retention for intensified industrial uses	Yes	Cargiant
3	Triangle Business Estate	SIL retention for intensified industrial uses	Yes	Cargiant
4	European Metal Recycling (EMR)	SIL retention for intensified industrial uses	Yes	Network Rail, Lancefield/NE MA
11	Acton Wells East	Increased homes capacity; decreased non-resi floorspace capacity. Phasing brought forward.	Yes	HS2 Ltd
16	Perfume Factory South	Increased homes capacity reflecting London Plan methodology for recording student bed places; Phasing brought forward to 0 to 5 year period	No. Factual development management update based on planning permission.	N/A
19	6 Portal Way (Portal West)	Increased homes capacity reflecting development management information; Phasing adjusted to reflect earlier delivery	No. Factual development management update based on planning permission.	N/A
26	Channel Gate	SIL release for housing-led mixed use development	Yes	HS2 Ltd, Network Rail, Tommy James, Eamon O'Loughlin, Lords Builders Merchants, 55 Victoria Road Ltd, Canal and River Trust
29	Mitre Yard	Increased homes capacity reflecting planning approval	No. Factual development management update based on planning permission.	N/A
30	North Kensington Gate South	Increased homes capacity reflecting planning approval	No. Factual development management	N/A

			update based on planning permission.	
35	4 Portal Way	New homes and jobs capacity reflecting development management information	No. Factual development management update based on planning permission.	N/A
36	3 School Road / 99 Victoria Road	Site released from SIL with new homes and non-resi floorspace capacity	Yes	Charlbury Group and Vivalda Group Plc N/A
37	Central Middlesex Hospital North East site	New homes capacity reflecting planning approval	No. Factual development management update based on planning permission.	N/A
38	1 Lakeside Drive	New homes and jobs capacity	Yes	Mapletree Investments
39	Cargiant Scrubs Lane	Increased homes capacity and decreased non-resi floorspace capacity	Yes	Cargiant
40	North Pole East Depot	Phasing brought forward to 0-10 year period. New homes and non-resi floorspace capacity	Yes	Department for Transport
41	1 Portal Way (Carphone Warehouse)	Phasing brought forward to 0-10 year period.	Yes	Imperial College London
42	Acton Wells West	Increased homes and non-resi floorspace capacity	Yes	HS2 Ltd
A	Park Royal Road west	Site released from SIL. New homes capacity reflecting development management information	No. Factual development management update based on planning permission.	No
B	5 to 7 Park Royal Road	Site released from SIL. New homes and non-resi floorspace capacity	Yes	Kenbar Holdings Ltd

Figure 3: Map of modified sites showing those with/without Statements of Common Ground



5. Stakeholder Engagement

5.1. OPDC officers have undertaken extensive engagement with a range of stakeholders to inform the modifications to the draft Local Plan. This has included the following stakeholder groups:

- Landowners. OPDC has approached and met with landowners affected by the proposed modifications to discuss the proposed modifications and to seek agreement in principle for any revisions to land use and associated development capacity and phasing. Statements of Common Ground have been agreed with key landowners (see Appendix S).
- Public bodies:
 - o OPDC has held regular meetings with officers from the London Boroughs of Brent, Ealing and Hammersmith and Fulham to share drafts of evidence documents and the proposed modifications to the draft Local Plan.
 - o GLA and TfL. Officers have discussed the proposed modifications and evidence with officers from the GLA and TfL, to ensure that the proposed modifications and approach to evidence ensure that OPDC maintain general conformity with the London Plan 2021. Statements of Common Ground have been agreed with both the GLA and TfL and are contained within Appendix S).

- Other public bodies. OPDC officers have also shared draft evidence and proposed modifications with other key public bodies, including the Royal Borough of Kensington and Chelsea, West London Alliance and the Environment Agency.
- Residents and community groups. OPDC officers undertook community engagement on the emerging draft Local Plan modifications from 24th November to 18th December 2020. This engagement was publicised on OPDC's website and social media channels alongside advertisements in local newspapers and social media. Emails were sent to stakeholders, including community groups and a leaflet was produced to explain the proposed modifications to the draft Local Plan. OPDC officers held two virtual community meetings, these were attended by 71 residents and interested parties and we also offered to meet individual resident groups to present the proposed modifications. Although this was not a formal consultation, OPDC invited community members to make comments on the proposed draft modifications. Many comments were made during the two community meetings and these were responded to during and after the meeting. Some other comments were also sent by email. These comments have been used to inform the development of evidence and proposed modifications to the draft Local Plan.

5.2. Following your consideration of our proposed modifications, the above stakeholders and others will be able to make representations as part of the statutory main modifications consultation.

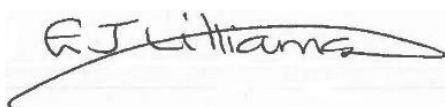
6. Next steps.

6.1. We are happy to answer any clarifications you may have regarding these submissions.

6.2. Community groups have already contacted us to make us aware that they have representations on our proposed modifications and have asked whether they are able to write to you now to make these points. It may therefore be helpful for you to set out the process you plan to follow in terms of hearing these representations so that we can inform stakeholders and publish these details on our website.

6.3. Once you are satisfied with the modifications and evidence, we will work positively with you to organise the commencement of the main modifications public consultation. There are Mayoral elections currently programmed for early May. Any main modifications consultation would therefore need to be timed to avoid commencing during the pre-election period. As a working assumption for now, we are therefore anticipating that a main modifications consultation may commence later in May but clearly this will need to be discussed further with you.

Yours sincerely



Emma Williamson
Director of Planning
Old Oak and Park Royal Development Corporation

Appendices

Appendices A-Q can be accessed via this weblink:

<https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-opdc/local-plan/submission-and-examination/opdc-post-submission-modified-draft-local-plan>

Appendix A: Post Submission Modified Draft Local Plan (2021)

Appendix B: Table of text modifications

Appendix C: Table of figure modifications

Appendix D: Summary of Supporting Studies (2021)

Appendix E: Bus Strategy Update (2021)

Appendix F: Channel Gate Development Framework Principles (2021)

Appendix G: Development Capacity Study Update (2021)

Appendix H: Grand Union Canal Massing and Enclosure Statement Update (2021)

Appendix I: Industrial Land Review Addendum (2021)

Appendix J: Infrastructure Delivery Plan (2021)

Appendix K: Integrated Impact Assessment Addendum and Habitat Regulation Assessment (2021)

Appendix L: Old Oak North Intensification Study (2021)

Appendix M: Preliminary Infrastructure Design and Costing Study (2021)

Appendix N: Scrubs Lane Development Framework Principles Update (2021)

Appendix O: Social Infrastructure Needs Study Update (2021)

Appendix P: Strategic Site Allocations Viability Assessment (2021)

Appendix Q: Tall Buildings Statement Update (2021)

Appendix R: Schedule of 2019 hearing actions (attached to email)

Appendix S: Schedule of Statements of Common Ground (attached to email)

Appendix T: GLA Housing and Land Letter (attached to email)