

Industrial Land Review Addendum

LOCAL PLAN
SUPPORTING STUDY



Document Title	Industrial Land Review Addendum (2021)		
Lead Author	OPDC		
Purpose of the Study	Study considers the approach to Strategic Industrial Location (SIL) designations outlined in the Inspector's Interim Findings report (10 th September 2019). It makes recommendations for modifications related to the retention and release SIL sites in order to demonstrate general conformity with the London Plan with respect to meeting demands for housing and industrial capacity.		
Key outputs	 It sets out: an alternative approach to the retention and release of SIL sites an updated calculation to demonstrate no net loss of industrial floorspace capacity 		
Key recommendations	 The Study proposes a modified SIL boundary. New changes include: retaining the SIL designation in Old Oak North de-designating land on Channel Gate, and small parcels of land on Park Royal Road and School Rd/Victoria Rd. It also demonstrates the potential for a net gain of 250,428sqm of 		
Key changes made since submission	industrial floorspace capacity across the Local Plan period. This work includes an amended boundary for SIL and includes an updated calculation to demonstrate no net loss of industrial floorspace capacity.		
Relations to other studies	This new Addendum supersedes the previous 2018 Addendum and the recommendations related to the SIL boundary in the Industrial Land Review. Outputs from this study have been used to inform the Development Capacity Study and Industrial Land Review (addendum)		
Relevant Local Plan Policies and Chapters	 Policy SP5 (Resilient Economy) Place policies P2 (Old Oak North), P4 (Park Royal West), P5 (Old Park Royal) P9 (Channel Gate) and P10 (Scrubs Lane) Policy E1 (Protecting, Strengthening & Intensifying the Strategic Industrial Location) and Policy E2 (Employment Sites Outside SIL) 		

1. Background

- 1.1 The Planning Inspector examining the OPDC Local Plan issued Interim Findings related to the viability of development within Old Oak North on 10th September 2019. These Interim Findings identified that rapidly increasing industrial land values, coupled with infrastructure and policy requirements rendered parts of Old Oak North unviable and therefore undeliverable during the 20 year Local Plan period. The Inspector invited OPDC to prepare main modifications to remove Site Allocations 2 (Cargiant) and 3 (Triangle Business Centre) from the draft Local Plan, but to continue with the de-designation of the Strategic Industrial Location (SIL). Through submissions to the Inspector, Cargiant has confirmed their intention to remain in the area indefinitely and their wish to expand and intensify their current operation. As part of the Interim Findings and through subsequent correspondence, the Inspector has encouraged OPDC and Cargiant to work proactively to reach a mutually agreeable resolution in respect of the policies for Old Oak North.
- 1.2 The purpose of this report is to:
 - a) consider the approach to SIL outlined in the 10th September 2019 Interim Findings;
 - b) support the preparation of post submission modifications to address issues arising from the Interim Findings as part of the OPDC's Local Plan examination process; and
 - demonstrate how proposed post submission modifications to OPDC Local Plan would maintain general conformity with the Mayor of London's London Plan with respect to meeting demands for housing and industrial capacity.
- 1.3 The structure of the report has been influenced by the need to reflect on the Interim findings and associated impacts. Therefore, part of the early focus of the report is related to housing. However, the report also looks at how SIL will contribute towards meeting industrial needs. Section 5 of this report has been prepared to consider the potential to deliver a net gain in industrial floorspace capacity in order to help meet demand.

2. Consideration of the Interim Findings

Updates since the publication of the Interim Findings

- 2.1 There has been a material change in circumstances since the Interim Findings were published. Cargiant's decision to remain in situ rather than relocate, combined with the Planning Inspector's interim findings, meant that OPDC was unable to satisfy three key conditions associated with the provisional award of £250m from the Housing Infrastructure Fund (HIF)¹. This instigated a period of internal review and dialogue with a number of parties, including Homes England, the Ministry of Housing, Communities and Local Government (MHCLG), OPDC board members, the Greater London Authority (GLA) and others, to determine potential next steps.
- 2.2 On 30th January 2020, OPDC Board formally agreed to request, via the Mayor of London, the withdrawal of OPDC's HIF bid. The decision was reached on the basis that it was no longer appropriate or necessary to pursue HIF, given that it was provisionally awarded to support land acquisition and infrastructure needs for development that the Interim Findings found to be no longer viable. As a consequence, Old Oak North will now not benefit from planned infrastructure investment associated with the HIF bid and the prospects of sites within Old Oak North, including parts of site allocation 2 and 3, coming forward for residential led mixed use development is further diminished. Therefore, the wider impact of the withdrawal of HIF funding on sites in Old Oak North must be taken into account as part of our consideration of the Interim Findings, as well as further consultation with Cargiant and other relevant landowners. This assessment with regards to this is detailed below.

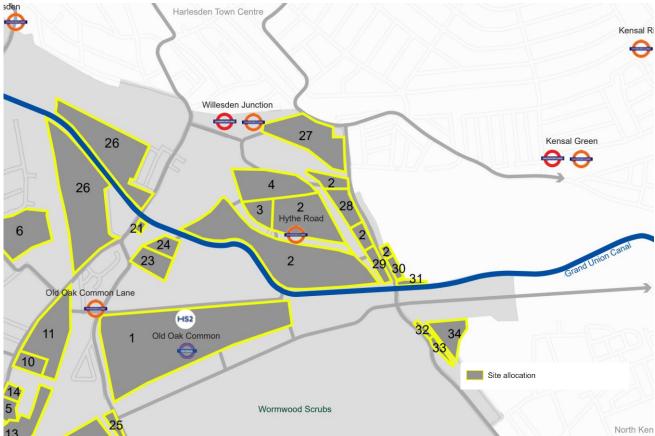
Impacts on site allocation 2

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¹ The Housing Infrastructure Fund was a government capital grant programme set up to help deliver new homes in England. Funding was awarded to local authorities on a highly competitive basis, providing grant funding for new infrastructure that will unlock new homes in the areas of greatest housing demand. OPDC was provisionally awarded £250million from the Housing Infrastructure Fund in 2019.

2.3 Site allocation 2 comprises 5 land parcels (see figure 1). Two large sites north and south of Hythe Road within Old Oak North form part of land that Cargiant identify as part of their operational land holdings (hereafter referred to as Cargiant Old Oak North sites). There are also three smaller sites to the east of the West London railway line, located along Scrubs Lane, owned and in part operationally used by Cargiant (hereafter referred to as Cargiant Scrubs Lane sites). The Inspector invited OPDC to prepare main modifications to remove Site Allocations 2 and 3 from the draft Local Plan, but to continue with the de-designation of the Strategic Industrial Location (SIL). The approach set out in the Interim Findings and the change in circumstances is considered for the Cargiant Old Oak North and Cargiant Scrubs Lane sites in turn.

Figure 1: Site allocations



Cargiant Old Oak North sites

- 2.4 The withdrawal of HIF funding has a direct impact on the Cargiant sites within Old Oak North. Without the new infrastructure planned as part of the HIF funding package, such as new transport infrastructure, utilities and social facilities, the Old Oak North sites (show in purple outline in Figure 2) will not be capable of supporting new housing. The Interim Findings propose the de-designation of SIL on the basis that the development capacity could still come forward after the Local Plan period. However, the withdrawal of the HIF funding will negatively impact on the viability and the prospects of this site coming forward for housing in the much longer term (beyond the plan period). Therefore, the deliverability of these sites for housing is extremely unlikely and cannot be demonstrated.
- 2.5 OPDC has continued to engage with Cargiant in relation to the Cargiant Old Oak North sites Cargiant has confirmed that they are seeking to remain on and intensify these sites. A new supporting study, the Old Oak North Intensification Study, has been prepared to assess the potential for industrial intensification on this land. This demonstrates that there is significant potential to deliver an uplift in industrial floorspace capacity.

- 2.6 As a result of this engagement and new information, OPDC considers that the retention of SIL on the Cargiant Old Oak North sites would be the most effective and justified approach for the following reasons:
 - the negative impact that the withdrawal of HIF has on the longer term deliverability of the Cargiant Old Oak North sites;
 - the fact that Cargiant still wish remain and intensify these sites;
 - this alternative strategy (to retain SIL) would deliver other policy objectives seeking to meet demand for industrial floorspace and support opportunities for industrial intensification. New evidence (Old Oak North Intensification Study) demonstrates the significant potential to achieve an uplift in industrial floorspace capacity; and
 - removing the SIL designation would make it more challenging to set out a clear and effective
 policy framework in the Local Plan that can support future industrial intensification and support
 Cargiant to remain a "flourishing business" in the area.
- 2.7 In light of the above, OPDC propose to retain the Cargiant Old Oak North sites as SIL.

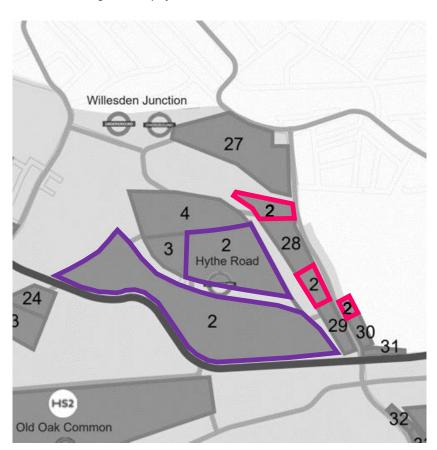


Figure 2: Map of Old Oak North and Scrubs Lane sites

Cargiant Scrubs Lane sites

2.8 The three Scrubs Lane sites owned by Cargiant (shown in pink outline in Figure 2) are separate from each other and the two Hythe Road sites that make up site allocation 2. Given their spatial relationship, the Scrubs Lane sites could come forward independently as discrete proposals, subject to operational uses on these sites being appropriately reprovided within Old Oak North. In terms of site context, the Scrubs Lane sites would be contiguous with other sites on Scrubs Lane which would continue to be de-designated from SIL and allocated for residential led development within OPDC's draft Local Plan.

- 2.9 With regards to the impact of the HIF withdrawal, these sites have less complex infrastructure requirements and, therefore, they were not as reliant on the HIF funding to support their deliverability. The Local Plan already recognises the significant potential for early development along Scrubs Lane, and other site allocations have already been taken forward for planning permission. OPDC therefore considers that the continued de-designation of SIL to support housing led delivery on the Scrubs Lane sites, would be the most effective and justified approach for the following reasons:
 - the Scrubs Lane sites remain a suitable location for residential led mixed use development;
 - the sites are deliverable within significant strategic infrastructure requirements; and
 - subject to the incorporation of operational uses associated with the Cargiant business within Old
 Oak North, the sites could be delivered within the Local Plan period and can make a significant
 contribution to housing targets and will therefore support continued general conformity with the
 London Plan.

2.10 Therefore, OPDC propose to continue with the de-designation of SIL on the Cargiant Scrubs Lane sites.

Impacts on site allocation 3

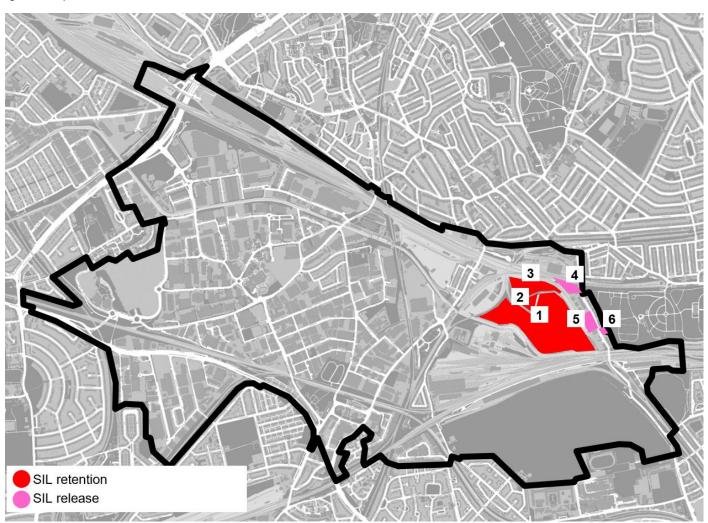
- 2.11 Site allocation 3 (The Triangle Business Centre) is held on a long lease (125 years from 1983) by Cargiant and the freehold owner is the London Borough of Hammersmith and Fulham (LBHF). The premises are sub-let and not occupied by Cargiant, but Cargiant use the access road as part of their operational land holdings.
- 2.12 The withdrawal of HIF funding has impacted on site allocation 3 in similar way to the Hythe Road sites. Without the new infrastructure planned as part of the HIF funding package, such as new transport infrastructure, utilities and social facilities, site allocation 3 will not be capable of supporting future housing development. Again, this means that with respect to the Interim Findings, the longer term deliverability of the site for housing (beyond the plan period) is even more unlikely.
- 2.13 OPDC considers that the retention of SIL on site allocation 3 would be the most effective and justified approach for the following reasons:
 - the negative impact of HIF withdrawal on the longer term deliverability of site allocation 3 for housing;
 - the re-instatement of SIL designations on site allocation 2 would make it more difficult to deliver a high quality of place and standard of residential accommodation;
 - Cargiant has a long term interest in the site and wish for the site to remain in operational use and where feasible, intensify industrial uses on the site;
 - this alternative strategy (to retain SIL) would deliver other policy objectives seeking to meet demand for industrial floorspace and support opportunities for industrial intensification. New evidence (Old Oak North Intensification Study) demonstrates the significant potential to achieve an uplift in industrial floorspace capacity; and
 - removing the SIL designation would make it more challenging to set out a clear and effective
 policy framework in the Local Plan that can support future industrial intensification and support
 Cargiant to remain a "flourishing business" in the area.
- 2.14 In light of the above, **OPDC propose to retain site allocation 3 (Triangle Business Centre) as SIL.**

Consequential Impacts on site allocation 4 (EMR)

2.15 If the above changes are made to site allocation 2 and 3, site allocation 4 (EMR) would be the only remaining site proposed for residential led mixed use development in Old Oak North. Therefore, there is a need to assess the consequential impacts of the proposed changes and whether the current proposals for site allocation 4 are still appropriate.

- 2.16 The first consideration is that site allocation 4 would have a very different context. It would be surrounded by the retained and intensified SIL on site allocation 2 (Hythe Road sites) and site allocation 3 to the east and south; the existing waste site at Old Oak Sidings to the west; and existing railways to the north and east, including the West Coast Mainline. These neighbouring uses would have a significant, cumulative impact on residential amenity that it would be extremely difficult to mitigate for through 'agent of change' design measures. Secondly, similar to site allocation 2 and 3, the withdrawal of the HIF funding means that site allocation 4 would not benefit from the planned infrastructure investment and therefore the supporting infrastructure would not be in place to meet the needs of the new residents.
- 2.17 Taking into account the above, it is OPDC's view that the retention of SIL on site allocation 4 would be the most effective and justified approach for the following reasons:
 - the site is no longer considered to be a suitable location for housing as it would be extremely
 challenging to deliver the high quality place making standards, supporting infrastructure and
 amenity requirements for this site;
 - this alternative strategy (to retain SIL) would deliver other policy objectives seeking to meet demand for industrial floorspace and support opportunities for industrial intensification. New evidence (Old Oak North Intensification Study) demonstrates the significant potential to achieve an uplift in industrial floorspace capacity; and
 - removing the SIL designation would make it more challenging to set out a clear and effective policy framework in the Local Plan that can support future industrial intensification.
- 2.18 Therefore, on this basis, OPDC propose to retain site allocation 4 (EMR) as SIL.
- 2.19 Figure 3 summarises the conclusions reached in this section of the report.

Figure 3: Proposed SIL retention and release



Map ref	Site	Map ref	Site	
1	Cargiant Old Oak North 4		Scrubs Lane (Prestige Cars)	
2	Triangle Business Centre 5		Scrubs Lane (Cumberland House)	
3	EMR	6	Scrubs Lane (Mitre House)	

Industrial intensification of Old Oak North sites

2.20 As referred to above, the potential to deliver an uplift in industrial capacity has been explored as part of the Old Oak North Intensification Study, a new supporting study for the Local Plan. In summary, the study has identified the following capacity:

Site	Floorspace (sqm) (NIA)
Cargiant Old Oak North	170,768
Triangle Business Centre	20,536
EMR	21,280
Total	212,584

2.21 More detail on how this affects the ability to achieve no net loss and additional capacity in the OPDC area is covered in section 5 of this report.

3. Meeting housing need and ensuring General Conformity

- 3.1 The change in approach for site allocations 2, 3 and 4 has a specific knock on impact in terms of housing capacity. The London Plan sets OPDC a target to deliver 13,670 homes over a ten-year housing period from 2019 to 2029. Site allocations 2, 3 and 4 contributed 3,571 homes towards OPDC's London Plan ten-year housing target. Part of site allocation 2 the three Cargiant Scrubs Lane sites will continue to be de-designated from SIL and be able to contribute towards the housing target. Officers have tested the potential development capacity that could be delivered on the three Scrubs Lane sites and consider that it is possible for these to deliver 600 homes across the total plan period. However, the other changes still result in a significant loss of housing capacity.
- 3.2 Old Oak and Park Royal was identified as an Opportunity Area in the London Plan in recognition of the massive potential for new homes and jobs and as a strategic opportunity for London. The lack of supply of new homes has played a significant role in London's housing crisis, and tackling this crisis is a key part of the Mayor's vision for good growth and the Publication London Plan. The OPDC area must play its part, as much as possible, in helping to meet London's housing needs.
- 3.3 The Planning for the Future paper² refers to a series of major publications and legislation that the Government is seeking to bring forward to support the delivery of more homes. The Secretary of State's letter to the Mayor of London on the Intend to Publish London Plan also echoes the importance of housing delivery, with reference to London. The letter directs changes to the London Plan to maximise the delivery of housing within London to meet the needs identified. Within this letter the Secretary of State refers to Old Oak as a key housing delivery site for meeting London's housing needs.
- 3.4 More recent statements made by the Prime Minister³ focus on the need to 'build, build, build' and, in doing so, to build back better, build back greener and build back faster. There is a clear emphasis on building more homes as well as investment in infrastructure projects that can support the economic recovery. We are mindful that with the impacts of COVID19, now more than ever before, there is a

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872091/Planning_for_the_Future.pdf

³ https://www.gov.uk/government/speeches/pm-economy-speech-30-june-2020

need to ensure that the Government's substantial investment in the HS2 Old Oak Common site, the Mayor's TfL funding for the Elizabeth Line and all the other funding support is matched by ambitious plans to deliver new homes and jobs in the OPDC area. Therefore, OPDC is clear that the Local Plan must continue to maximise and, wherever possible, accelerate opportunities as a priority.

3.5 In order to maintain general conformity with London Plan but also to maximise and accelerate the delivery of housing in London having regard to the Mayor's and Government's position, several mitigation steps have been taken to recover some of the housing capacity lost from Old Oak North within the 0-10 year London Plan period and across the total development period.

Mitigation steps

The following options have been explored to mitigate for the impact of the lost housing capacity:

- 1. Accelerated sites sites that could now come forward during the plan period
- 2. **Adjusted capacity sites** sites where the land use mix can be altered/updated which affects the residential capacity previously assumed in the Plan.

Figure 4: Map of additional and/or accelerated sites

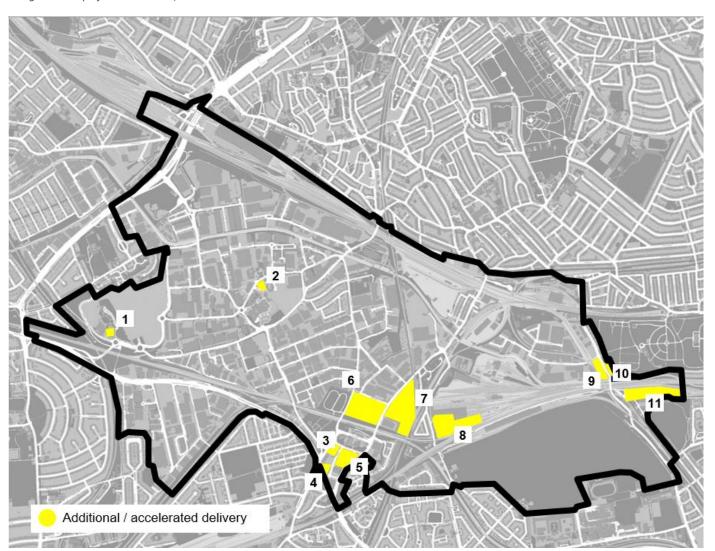


Table 1: Development capacity arising from additional/accelerated sites

Map ref	Site	Proposed delivery phase	Total number of homes	Notes
1	1 Lakeside Drive	0-10 years	300	New site. Recent engagement with the landowner has led to this site being identified as having potential to come forward within 0-10 target period.
2	Central Middlesex Hospital	0-10 years	158	New site. Planning permission has been granted.
3	4 Portal Way	0-10 years	702	New site. Planning permission has been granted.
4	6 Portal Way	0-10 years	651	Planning permission allows for additional units.
5	1 Portal Way	0-10 years	764	The site could come forward within the 0-10 year target period, which is earlier than expected.
6	Acton Wells West	0-10 years	555	Recent engagement with the landowner has identified potential for units to be delivered
7	Acton Wells East	0-20 years	1650	Recent engagement with the landowner has identified potential for additional units to be delivered
8	Old Oak Common Station ASD	11-20 years	100	Updated capacity based on recent landowner engagement
9	Mitre Yard	0-10 years	241	Planning permission allows for additional units.
10	North Kensington Gate South	0-10 years	206	Planning permission allows for additional units.
11	North Pole East Depot	0-10 years	750	Recent engagement with the landowner has led to North Pole East being identified as a site that will come forward earlier than expected.

3.6 Further detail on these sites are included in the Development Capacity Study (2021).

Remaining capacity gap

3.7 Despite attempts to mitigate the impact, a capacity gap of 1,194 homes remains during the 0-10 year London Plan housing target period and 2,919 homes across the total development period (see Table 4 below). This means that there is a need to find alternative sites for housing so that OPDC can maintain general conformity and maximise the delivery of housing in line with the London Plan targets. As the majority of the remaining land in the OPDC area is designated Strategic Industrial Location (SIL), the next step would be to consider additional SIL release.

Table 2: Impact of additional/accelerated sites capacity on housing capacity gap

London Plan targets		Updated capacity taking into account lost capacity on site allocations 2 (Old Oak North),3 and 4 and mitigation sites	Capacity gap (number of homes required to meet the London Plan targets)	
0-10 year 13,670		12,476	-1,194	
Total 25,500 development		22,581	-2,919	

4. Strategic Industrial Location boundary assessment

- 4.1 The Publication London Plan (policy E5) expects local planning authorities to identify detailed Strategic Industrial Location (SIL) boundaries in their Local Plans. The Old Oak and Park Royal Opportunity Area Framework (OAPF) set out a high level spatial guidance for the OPDC area. Principle L1 in the OAPF accepted that SIL in Old Oak could be de-designated on the basis that SIL is consolidated elsewhere. It also explained that the official de-designation process for SIL would be dealt with through OPDC's Local Plan. The Interim Findings and the impact of the withdrawal of the Housing Infrastructure Fund (HIF) mean that the OPDC Local Plan must deviate with the spatial aspects of this approach and retain the SIL designation on the majority of sites in Old Oak North. However, the in principle support for SIL de-designation and consolidation adopted in the OAPF (2015) and for the detailed boundary to be determined through the Local Plan can still be applied.
- 4.2 This section assesses opportunities for OPDC to meet its housing target through the release of sites from SIL. The potential to consolidate (intensify) SIL elsewhere in order to deliver a net uplift in industrial floorspace is covered in section 5 of this report.
- 4.3 The assessment area excludes:
 - existing SIL sites in Old Oak North affected by the Interim Findings. These sites have been considered in section 2, and the appropriate land use designation has already been discussed; and
 - existing SIL sites that are not affected by the Interim Findings and are already identified for
 release in the Submission Local Plan. These sites are excluded because they are still
 considered to be appropriate areas for release and are currently counting towards the housing
 targets in the Submission Local Plan.
- 4.4 Sites will be considered for release using a sequential approach that prioritises the most suitable sites and those which are viable/developable. If a site is suitable but not viable/ developable then the assessment steps will be repeated (as rounds 1, 2, 3 etc) and the next most suitable site will be selected if that is more deliverable. The assessment will select the minimum number of sites needed to confidently demonstrate that Mayoral housing targets can be met. This 'goal seek' approach to enough suitable and viable sites to meet the housing target.
- 4.5 OPDC has previously received representations requesting that certain sites be released from SIL in order to deliver new homes. The responses to these representations were reviewed and are included in Appendix B.

Step 1: High level sifting exercise

- 4.6 As a first step, a high level sifting assessment focuses on those areas that:
 - have the greatest access to a sustainable travel modes to ensure the accessible sites are prioritised and any future development opportunity can be optimised; and
 - are located on the edges of SIL and are contiguous with existing areas of non SIL land or land proposed for SIL release – to ensure the interface and impact on the wider SIL area is minimised.
- 4.7 Based on the above sifting criteria, 7 priority areas of search have been identified. Figure 5 shows that these are focussed around Victoria Road and small sites to the west of North Acton station. These areas of search are put forward for the next criteria based assessment stage (step 2).

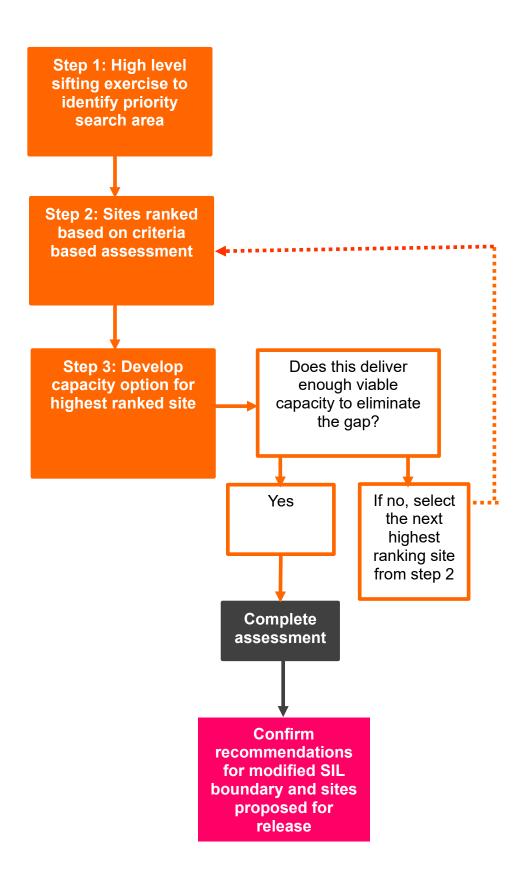
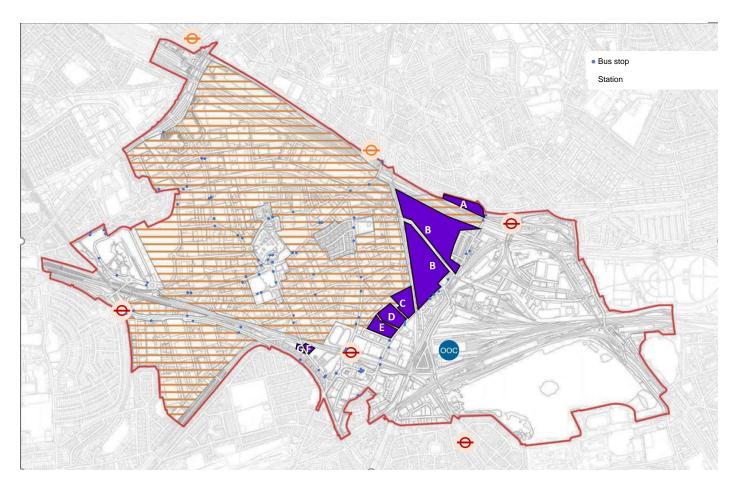


Figure 5: Map showing priority areas for assessment



Area ref	Area name
Α	Willesden Bus depot
В	Channel Gate
С	North of Chandos Road
D	South of Chandos Road
E	School Road
F	East of Park Royal Road
G	West of Park Royal Road

Criteria based assessment of priority areas

4.8 A criteria based qualitative assessment similar to the previous ILR 2018 Addendum is being used, although some amendments have been made to clarify the intent and application of the criteria (see Table 5).

Table 3: Site assessment criteria

Site context	Notes for assessment
Does the context impact or inhibit the ability of the site to accommodate SIL uses, operations and future industrial development?	 Taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. Existing neighbouring uses or proximity to sensitive receptors that could impact on the use of the site or capacity for future industrial development. Examples of existing sensitive receptors could be residential uses and schools.
Impact on strategic functions	This could include land for transport functions where the minfred tract
Would the redevelopment of the site affect a strategic function or important clusters of industrial activity?	This could include land for transport functions, waste or other infrastructure. This can take into account whether the impact could be mitigated
2. What are the surrounding	Taking into account:
sites? Would changing the designation negatively impact SIL?	 The relationship with the wider/surrounding sites and opportunities for mitigation
Optimising development in areas with improved PTAL levels.	
Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and optimise development taking advantage of existing or improved high public transport accessibility.	 Taking into account: whether the site is in close proximity to existing or planned public transport provision whether the site is contiguous with other development sites if the site offers other opportunities to optimise the quantum of development? i.e. is the site already cleared?
Suitability and availability of site for alternative uses	
Is the site suitable for alternative (residential led) uses?	 Taking into account: Does the site benefit from planning permission for alternative uses? Are there any issues that affect their suitability for the alternative use, taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas; environmental/amenity impacts experienced by would be occupiers and neighbouring areas.
Is the site available?	Taking into account: The PPG considers a site to be 'available' for development when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners (Paragraph:

020 Reference ID: 3-020- 20140306). Generally, this means that land is controlled by a landowner or a developer who has expressed an intention to develop, or the landowner has expressed an intention to sell.

4.9 The criteria based site assessments are provided in Appendix A of this report, and the summary results showing how the priority areas rank when assessed against the criteria are presented below.

Table 4: Summary assessment of priority areas

Area ref	Area name	Site context	Impact on strategic functions 1	Impact on strategic functions 2	Optimising development	Suitability and availability 1	Suitability and availability 2	Ranking or comments
A	Willesden bus depot	Medium potential for release	No potential for release	Medium potential for release	Low potential for release	No potential for release	No potential for release	N/A. Site ruled out based criteria with no potential for release
В	Channel Gate	Medium potential for release	Medium potential for release	High potential for release	High potential for release	High potential for release	High potential for release	1
С	North of Chandos Road	Low potential for release	High potential for release	Low potential for release	Medium potential for release	Medium potential for release	Low potential for release	=5
D	South of Chandos Road	Low potential for release	High potential for release	Low potential for release	Medium potential for release	Medium potential for release	Low potential for release	=5
E	School Road	Low potential for release	High potential for release	Medium potential for release	Medium potential for release	Medium potential for release	Medium potential for release	4
F	East of Park Royal Road	Medium potential for release	High potential for release	High potential for release	Low potential for release	Medium potential for release	Medium potential for release	3
G	West of Park Royal Road	Medium potential for release	High potential for release	High potential for release	Low potential for release	High potential for release	Medium potential for release	2

High potential for release		
Medium potential for release		
Low potential for release		
No potential for release		

4.10 Following the assessment process the next step is to develop a development capacity for the highest ranking site (Channel Gate) and to subject it to site specific viability testing if it may be considered as a strategic site.

Round 1 Assessment

4.11 Channel Gate is the highest ranking site. The Channel Gate site is considered by officers to be suitable and developable for housing and there is potential for this site to be released from SIL; the key reasons for this summarised below:

- It is a large site, the majority of which has been cleared of development and there are very few landowners (it is largely in public sector ownership) so it could be developed/planned comprehensively.
- It is separated from wider SIL and therefore the potential for negative impact is lower.
- Proximity/access to public transport
- It is adjacent to areas of land proposed to be de-designated from SIL on Goodhall Street which are also part of the wider regeneration of Old Oak. Residential uses would be compatible with existing residential uses to the east.
- The site is large enough that new/additional infrastructure could be provided on site including a sizeable new public open space. There are also significant opportunities for residential placemaking along the Grand Union Canal.
- 4.12 Officers have tested the potential development capacity that could be delivered on this site and consider that it is possible for a minimum 1,000 homes to be counted towards OPDC's 0-10 year London Plan target and a minimum 3,100 homes across the total plan period (see further information in the Channel Gate Development Framework Principles supporting study). Delivering this number of homes would mean that this site has the potential to be a strategic site for housing within the draft Local Plan. As such, a site specific viability assessment has been undertaken for this site and the findings of this assessment can be viewed in a separate supporting study to OPDC's modifications in response to the inspector's interim findings.

Does this deliver enough viable capacity to eliminate the gap?

4.13 Table 7 below demonstrates the impact this has on the capacity gap. This shows that this would not eliminate the 0-10 year housing capacity gap but it would eliminate the total development period capacity gap. As such another round of assessment is required, and the second highest ranking site must also be assessed.

Table 5: Impact of Channel Gate sites capacity on housing capacity gap

	0-10 years	Total development
Capacity Gap (see Table 4)	-1,194	-2,919
Channel Gate development capacity	1,000	3,100
Remaining capacity gap	-194	181

Round 2 assessment

- 4.14 West Park Royal Road (WPRR) and East of Park Royal Road (EPRR) rank second and third. They are not contiguous with other SIL sites. EPRR is designated as SIL. WPRR is currently not within SIL but was recommended for inclusion in the Industrial Land Review (2016), with the result that both sites would have been designated as SIL within OPDC's Local Plan as drafted. This assessment provides an opportunity to review the approach to WPRR. Given their consecutive ranking, the fact that these are small sites, their relationship to each other and the need for a consistent approach, they have been considered in the same (round 2) assessment round.
- 4.15 These sites are considered by officers to be suitable and developable for housing and there is potential for this site to be released from SIL with the key reasons for this summarised below:
 - Sites are bounded by railway lines to the north and not contiguous with other SIL sites, which minimises potential wider impacts. They are also bounded by open space and/or residential uses.
 - Proximity/access to public transport

- The western site is currently outside of the designated SIL area and planning permission has been granted which allows for the introduction of new homes on part of this site.
- 4.16 The potential development capacity that could be delivered across these sites is 75 homes in first ten years of the Plan.
- 4.17 As this site is considered suitable for development, there is potential for this site to be released from SII

Does this deliver enough viable capacity to eliminate the gap?

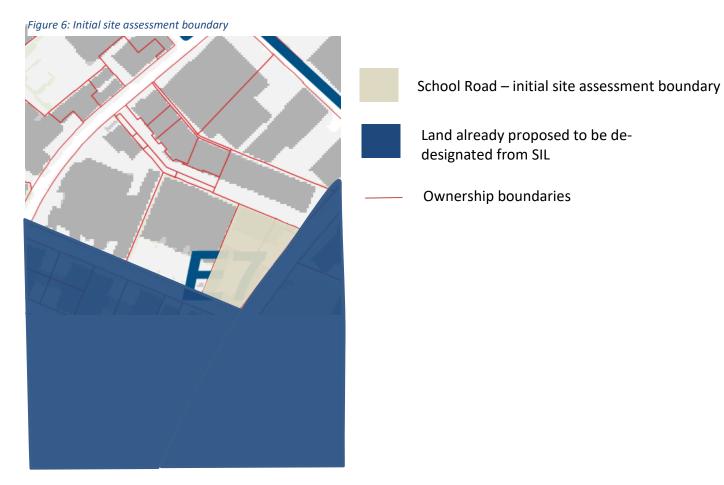
4.18 Table 8 below demonstrates the impact that these sites have on the capacity gap. This shows that they do not generate enough capacity to eliminate the 0-10 London Plan housing target capacity gap. Therefore, another round of assessment is required, and the third highest ranking site must also be assessed.

Table 6: Impact of Park Royal Rd sites capacity on housing capacity gap

	0-10 years	Total development
Capacity Gap (see Table 7)	-194	181
PRR development capacity	75	75
Remaining capacity gap	-119	256

Round 3 assessment

- 4.19 School Road is the next highest ranking area. This is a large area of search and not all of the area may be required. Therefore, a smaller site parcel has been selected first to see if that would be sufficient to fill the remaining capacity gap. The site selected for an initial site assessment has been prioritised because it is closer to the station and has a high interface with other areas that are already proposed for de-designation from SIL (see Figure 6 for initial site assessment boundary).
- 4.20 This site is considered by officers to be suitable and developable for housing and there is potential for this site to be released from SIL with the key reasons for this summarised below:
 - The site interfaces with land planned to be de-designated from SIL and developed for mixed use so it has the potential to contribute towards regeneration in Old Oak
 - Proximity/access to public transport



4.21 The potential development capacity that could be delivered on this individual site parcel is 250 homes in first ten years of the Plan. As this site is considered suitable and viable for development, there is potential for this site to be released from SIL.

Does this deliver enough viable capacity to eliminate the gap?

4.22 Table 7 shows that this does generate enough capacity to eliminate the total development period capacity gap and allows enough of a buffer to ensure that there is confidence that both the 0-10 and total development period targets can be met. As such, the assessment can be completed.

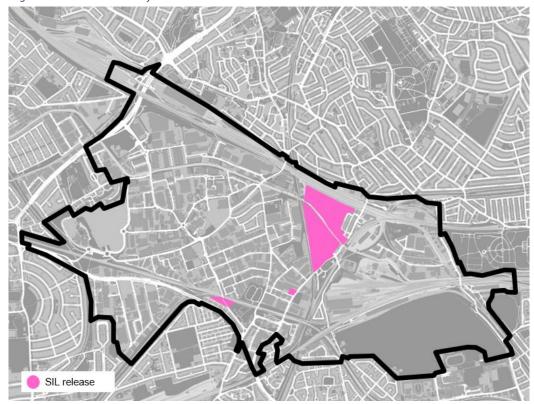
Table 7: Impact of School Rd site on housing capacity gap

	0-10 years	Total development
Capacity Gap (see Table 8)	-119	256
SR development capacity	250	250
Remaining capacity gap	131	506

Summary of the assessment results

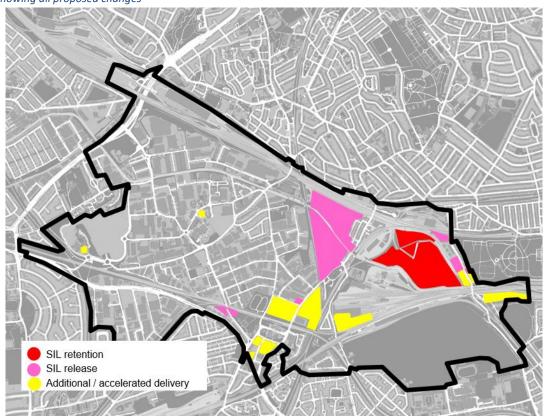
4.23 Three areas have been identified for additional SIL release (shown in Figure 7). Combined, these have the ability to plug the housing capacity gap and mean that the Local Plan can demonstrate general conformity with the London Plan. A map summary all of the proposed changes arising from the commentary and assessments in chapters 1, 2 and 3 is shown in Figure 8.

Figure 7: Map showing additional sites selected for SIL release



Map ref	Site
1	Channel Gate
2	School Road
3	Park Royal sites: (East of Park Royal Road and West of Park Royal Road)

Figure 8: Map showing all proposed changes



5. Meeting industrial floorspace needs.

- 5.1 OPDC's evidence identifies employment sectors, including industrial sectors, that are already performing well or growing and those which may wish to move into OPDC area in the future. Strategic evidence supporting the Publication London Plan establishes an ongoing net demand for industrial capacity until at least 2041, and highlights specific demand within the Park Royal/Heathrow property market area. Local planning authorities are expected to plan to meet needs and to be proactive and encourage the industrial intensification of SIL areas. Given this need, it is important for appropriate industrial use classes to be secured in order to ensure floorspace can permanently accommodate industrial uses, thereby maintaining and helping to achieve a gain of industrial floorspace capacity as well as protecting the function and integrity of SIL.
- 5.2 OPDC's contribution towards meeting industrial demand, is being demonstrated at the strategic level as part of a plan led process, through OPDC's Local Plan. The main mechanisms that OPDC will be applying to help provide additional industrial capacity within the plan area are:
 - Industrial intensification within the identified SIL boundary intensifying existing land and sites for broad industrial type activities on designated SIL sites, including sites proposed to be retained as SIL in Old Oak North.
 - Co-location in areas outside of identified SIL boundary co-locating floorspace for broad industrial type activities that are compatible with the new high density mixed-use development outside of SIL.
- 5.3 The 2018 Industrial Land Review (ILR) Addendum included calculations to demonstrate the amount of additional industrial capacity that could be delivered. This calculation now must be updated take into account the retention of SIL on the majority of Old Oak North and the release of other sites from SIL.
- 5.4 The rest of this section is dedicated to:
 - confirming the industrial land baseline against which to assess change
 - quantifying additional industrial capacity due to be delivered through a combination of industrial intensification and co-location.

Industrial baseline

5.5 The ILR includes figures for industrial floorspace across the OPDC area. This baseline included sites which have been de-designated from SIL by virtue of changes confirmed in the adopted Ealing Core Strategy (2013). Therefore, these sites have been removed for the purposes of this calculation. Other sites have also been excluded and the reasons for this are set out in the assumptions table in Appendix C. Based on these assumptions, the total amount of industrial floorspace in SIL affected by local plan proposals, including industrial floorspace proposed for release from SIL as a result of the modified Local Plan is 310,184sqm (NIA)⁴. This means that a potential loss of -310,184sqm needs to be factored into these calculations.

Industrial intensification in SIL

- 5.6 The Publication London Plan and the Submission Local Plan both encourage intensification in SIL. This policy requirement would apply to the sites being retained as SIL in Old Oak North, so a new study to assess the potential for industrial intensification has been undertaken. The Old Oak North Study supplements the Park Royal Industrial Intensification Study that was completed in 2017.
- 5.7 The Old Oak North Intensification Study assesses each site parcel and develops scenarios to test the potential capacity for industrial floorspace that could be delivered across Old Oak North SIL. The Park Royal Intensification Study (PRIS) covers the remaining SIL area. It identified viable case study sites and looked at other similar sites that could have potential for intensification. The 'other

⁴ Converted from -326,509sqm (GEA).

intensification sites identified in the PRIS' were identified on a theoretical basis for Park Royal SIL as a whole – some of the sites identified may not be delivered and other windfall sites not currently identified may come forward. Given the strategic intention behind calculating the figure it is difficult to disaggregate them. They are used here are high level net figures for the purposes of these strategic calculations. In reality, we are seeing sites coming forward, beyond the sites identified in the PRIS, and they include significant amounts of floorspace. Therefore, the indications so far continue to give us confidence in the deliverability of achieving this figure across Park Royal as a whole.

5.8 Combined, these intensification studies, identify a number of sites with the potential to deliver an uplift in industrial floorspace capacity. If intensified, these sites could provide 506,229sqm of industrial floorspace.

Bashley Road

Minerva

Other sites identified in PRIS

Old Oak North sites

Total

Floorspace (sqm) (NIA)

Borough

Host borough

30,100 Ealing

251,245 Brent/Ealing

251,245 Hammersmith and Fulham

Table 8: Identified potential for industrial intensification

- 5.9 It is considered highly likely that a good proportion of the sites identified in the Intensification Studies will be delivered when the following factors highlighted in OPDC's evidence base are taken into account:
 - Market signals are strong indicated by low vacancy rate and high rental levels compared to the rest of London.
 - Viable to deliver⁵ the proposition is likely to be viable and has been demonstrated to be viable for a number of case study sites in the area, and the presence of willing landowners in the OPDC area enhance the prospects for delivery within the plan period.
 - Future demand⁶ there is projected demand from industrial sectors that is likely to be attracted to the OPDC area, as well as net demand across London.
 - Policy support the Local Plan provides explicit support in the form of allocated sites to help provide greater certainty for landowners and expects all sites to contribute toward intensification where feasible.
- 5.10 There has been soft market testing with providers of industrial space and they have been receptive to, and positive about, delivering intensification within Park Royal. One of the draft site allocations Bashley Road- has already secured outline planning application for up to 60,000sqm. However, Table 11 below illustrates the impacts if, in reality, some of the identified intensification sites do not come forward for development within the plan period.

Table 9: Other hypothetical scenarios

	Floorspace (sqm)
75% of sites come forward	379,672
50% of sites come forward	253,115

Industrial development as part of mixed use development outside of SIL

5.11 OPDC's Development Capacity Study (2021) collates development information from a range of supporting studies for sites with development potential to deliver economic floorspace and sets out an indicative trajectory for deliverable (0 to 5 years) and developable (6 to 20 years) sites. The DCS

⁵ OPDC Park Royal Intensification Study, OPDC Old Oak North Intensification Study

⁶ OPDC Future Employment Growth Sectors Study

identifies sites that have the potential to deliver economic floorspace, including new industrial floorspace but also major new office and other types of commercial development. Based on information at time of writing, there is the potential for 54,383sqm of industrial floorspace to be delivered outside of SIL.

Table 10: Co-location potential outside of SIL

	Floorspace (sqm) (NIA)
Channel Gate	12,538
Scrubs Lane	13,466
Old Oak Lane and Old Oak Common Lane	7,379
North Acton and Acton Wells	9,890
Park Royal Centre	9,909
Park Royal West (First Central)	1,200
Total	54,383

- 5.12 The co-location of industrial floorspace is expected to be delivered on the basis that:
 - Policy support the Local Plan and London Plan include policy criteria to support this outside of SIL.
 - Viable to deliver the policies in the Local Plan have been subject to high level viability testing through the Whole Plan Viability Study.

Summary conclusion

5.13 OPDC considers that, looking at the scenarios together (see Tables 11 and 13), the proposed modifications will deliver a potential overall net uplift of 250,428sqm. Indicative figures are given per borough, however, there are limitations to the use/accuracy of this data. The borough figures include the 'other intensification sites identified in the PRIS'. It should be noted that these were identified on a theoretical basis for Park Royal SIL as a whole (see para 5.7). As the location of sites is not certain, the borough figures can only ever be highly indicative and therefore, the calculations for the whole of Park Royal SIL should be used instead.

Table 11: Summary table of no net loss calculation

	Floorspace (sqm)
Existing industrial floorspace within proposed SIL release area	-310184
Gain through industrial intensification in SIL	506229
Gain through co-location of industrial activities outside of SIL	54383
NET	250428

Table 12: Indicative breakdown by borough

	Floorspace (sqm)		
	Brent	Ealing	H&F
Existing industrial floorspace within proposed SIL release			
area	0	-166005	-144179
Gain through industrial intensification in SIL	111673	181973	212584
Gain through co-location of industrial activities outside of SIL	1200	39717	13466
NET	112873	55685	81871

APPENDICES

- A. Individual SIL site assessment tablesB. Response to previous representation suggestionsC. Industrial baseline

Appendix A: SIL boundary site assessments

Channel Gate

Site context	Notes for assessment	Assessment commentary	RAG
Does the context impact or inhibit the ability of the site to accommodate SIL uses, operations and future industrial development?	 Taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. Existing neighbouring uses or proximity to sensitive receptors that could impact on the use of the site or capacity for future industrial development. Examples of existing sensitive receptors could be residential uses and schools. 	 The site has been cleared and is currently being used as construction sites by HS2 It is bounded by residential uses to the east which could affect parts of the site in terms of future development The Grand Union Canal conservation area boundary runs through the centre of the site, which would need to be taken into account as part of future development There is potential for the site to deliver industrial intensification. The loss of this site could affect future capacity if additional floorspace cannot be delivered elsewhere. 	Medium potential for release
Impact on strategic functions			
Would the redevelopment of the site affect a strategic function or important clusters of industrial activity?	This could include: waste management and recycling utilities (including energy and water management) land for transport functions	 The site has been cleared and is currently being used as construction sites by HS2 Site includes Willesden Freight Terminal to the north of the site and bus depot to the south. Given the size of the site, there is potential for on-site mitigation (reprovision) to be explored. 	Medium potential for release
What are the surrounding sites? Would changing the designation negatively impact SIL?	Taking into account: The relationship with the wider/surrounding sites and opportunities for mitigation	The site is bounded by railway lines to the north and west. It is also largely separated from a pocket of land (Goodhall St) to the east by railway lines. The Goodhall St SIL site has also been assessed separately and is already proposed for release. Given this relationship to the rest of SIL, the potential for negative impact is lower.	High potential for release
Optimising development in areas with improved PTAL levels.			

Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and optimise development taking advantage of existing or improved high public transport accessibility.	whether the site is in close proximity to existing or planned public transport provision whether the site is contiguous with other development sites if the site offers other opportunities to optimise the quantum of development? i.e. is the site already cleared?	 It is a large site, the majority of which has been cleared of development and there is very few landowners so it could be developed/planned comprehensively. Site has access to bus routes along Victoria road and is within walking distance of Willesden Junction and the planned Old Oak Common stations It is adjacent to areas of land proposed to be dedesignated from SIL on Goodhall Street. 	High potential for release
Suitability and availability of site for alternative uses			
Is the site suitable for alternative (residential led) uses?	 Taking into account: Does the site benefit from planning permission for alternative uses? Are there any issues that affect their suitability for the alternative use, taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. 	 Site does not benefit from planning permission Residential uses would be compatible with existing residential uses to the east. The site is large enough that new/additional infrastructure could be provided on site including a sizeable new public open space. There are also significant opportunities for residential placemaking along the Grand Union Canal. The Grand Union Canal conservation area boundary runs through the centre of the site, which would need to be taken into account as part of future development 	High potential for release
Is the site available?	whether the landownership fragmented or consolidated? if the land controlled by a developer or landowner who has expressed an intention to develop their site?	Few landowners given the scale of the site. The majority of the site is controlled by HS2 (DfT), so it is in public sector ownership	High potential for release

Willesden Bus depot

Site context	Notes for assessment	Assessment commentary	RAG
Does the context impact or inhibit the ability of the site to accommodate SIL uses, operations and future industrial development?	 Taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. Existing neighbouring uses or proximity to sensitive receptors that could impact on the use of the site or capacity for future industrial development. Examples of existing sensitive receptors could be residential uses and schools. 	 The site already functions as a bus depot. There is a vacant building at the rear of the site which could be brought back into use delivering additional SIL capacity. Site is bounded by residential uses to the west, mixed town centre uses and residential to the north and east, and railway land abutting the site to the south. The site is accessed via the A4000 which is a high street environment rather than the residential streets to the north. 	Medium potential for release
Impact on strategic functions			
Would the redevelopment of the site affect a strategic function or important clusters of industrial activity?	This could include:	• The bus garage serves a specific strategic transport function. In line with the Mayor's 'Land for Industry and Transport SPG', the loss of bus garage should be resisted unless a suitable alternative site can be found or TfL formally agrees that the garage is no longer required. TfL has confirmed that there is an ongoing need for this function and demand for bus services will increase linked to the redevelopment of Old Oak. The bus operator has indicated that the current site employs circa 400 jobs and includes an on site training facility. Therefore this is a significant employment generator. It is unlikely that the depot could be appropriately reprovided on site (see comments below).	No potential for release
What are the surrounding sites? Would changing the designation negatively impact SIL?	Taking into account: The relationship with the wider/surrounding sites and opportunities for mitigation	The site is within a mixed character town centre environment. The site is separated from the wider SIL area by the railway lines and there are no operational buildings within SIL nearby. There is a vacant building at the rear of the site which, if	Medium potential for release

Optimising development in areas with		bought back into use, could be compromised if the bus garage which occupies the majority of the site is de-designated from SIL.	
improved PTAL levels.			
Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and optimise development taking advantage of existing or improved high public transport accessibility.	whether the site is in close proximity to existing or planned public transport provision whether the site is contiguous with other development sites if the site offers other opportunities to optimise the quantum of development? i.e. is the site already cleared?	This site is in close proximity to Willesden Junction station and has access to bus routes. It is not contiguous with other development sites	Low potential for release
Suitability and availability of site for alternative uses			
Is the site suitable for alternative (residential led) uses?	Taking into account:	Does not benefit from planning permission	No potential for release
led) uses?	 Does the site benefit from planning permission for alternative uses? Are there any issues that affect their suitability for the alternative use, taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. 	Given the need to retain the function of the bus garage, it is not considered that the site would be suitable for residential uses. The potential to mitigate the potential loss of the bus garage through co-location of this use as part of a mixed development is challenging as bus garages have very specific design related operational requirements, including 24 hour operations. This has been confirmed by TfL.	Tor release
Is the site available?	Taking into account: whether the landownership fragmented or consolidated? if the land controlled by a developer or landowner who has expressed an intention to develop their site?	The freeholder or operator have not indicated a desire to develop their site for housing	No potential for release

School Rd

Site context	Notes for assessment	Assessment commentary	RAG
Does the context impact or inhibit the ability of the site to accommodate SIL uses, operations and future industrial development?	 Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. Existing neighbouring uses or proximity to sensitive receptors that could impact on the use of the site or capacity for future industrial development. Examples of existing sensitive receptors could be residential uses and schools. 	 The site adjoins SIL on two sides. On other boundaries (east and south), the site faces land planned to be de-designated from SIL and developed for mixed use. There is 1 local heritage asset located within the site boundary The site could still function as SIL, but consideration would need to be given to the edges that have a relationship to land planned to be developed for mixed use. 	Low potential for release
Impact on strategic functions			
Would the redevelopment of the site affect a strategic function or important clusters of industrial activity?	This could include: waste management and recycling utilities (including energy and water management) land for transport functions 	No known strategic functions	High potential for release
What are the surrounding sites? Would changing the designation negatively impact SIL?	Taking into account:	It is on the edge of the SIL boundary. The site has SIL on two sides. On the other two boundaries (east and south), the site faces land planned to be dedesignated from SIL and developed for mixed use. Given that this site has less interfaces with SIL, it has the potential for a lower impact.	Medium potential for release
Optimising development in areas with improved PTAL levels.			
Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and optimise development taking	Taking into account:	 Site has access to bus routes along Victoria Road and is close to North Acton station. The next closest station would be the new Old Oak Common 	Medium potential for release

advantage of existing or improved high public transport accessibility.	 whether the site is in close proximity to existing or planned public transport provision whether the site is contiguous with other development sites if the site offers other opportunities to optimise the quantum of development? i.e. is the site already cleared? 	station with HS2 and Crossrail (Elizabeth line) services, providing access to new services • Part of the parcel is surrounded by land proposed to be de-designated from SIL (in the east and south) and also redeveloped. There is an opportunity for development to respond to the adjacent mixed use sites.	
Suitability and availability of site for alternative uses			
Is the site suitable for alternative (residential led) uses?	 Taking into account: Does the site benefit from planning permission for alternative uses? Are there any issues that affect their suitability for the alternative use, taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. 	 The site does not benefit from planning permission Remaining SIL may result in conflict with new incoming residential uses, mitigation would need to be explored Mitigation could be explored if there were any potential impacts on heritage assets There are no other known constraints 	Medium potential for release
Is the site available?	Taking into account: whether the landownership fragmented or consolidated? if the land controlled by a developer or landowner who has expressed an intention to develop their site?	There are a number of private landowners and one of these, has expressed an intention to develop their site for housing	Medium potential for release

South of Chandos Road

Site context	Notes for assessment	Assessment commentary	RAG

Does the context impact or inhibit the ability of the site to accommodate SIL uses, operations and future industrial development?	 Taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. Existing neighbouring uses or proximity to sensitive receptors that could impact on the use of the site or capacity for future industrial development. Examples of existing sensitive receptors could be residential uses and schools. 	 The site is contiguous with SIL boundary on three sides. On the remaining side, there is a limited interface with adjoining land to the east that is planned to be de-designated from SIL. One of the sites has been identified as having potential for industrial intensification in the Park Royal Intensification Study. The loss of this site could affect future capacity if additional floorspace cannot be delivered elsewhere. Given this site context, it could still function as SIL 	Low potential for release
Impact on strategic functions			
Would the redevelopment of the site affect a strategic function or important clusters of industrial activity?	This could include: waste management and recycling utilities (including energy and water management) land for transport functions	No known strategic functions	High potential for release
What are the surrounding sites? Would changing the designation negatively impact SIL?	Taking into account:	It is on the edge of the SIL boundary. On the eastern boundary, land is planned to be dedesignated from SIL, but the majority (3) of the boundary interfaces are contiguous with SIL. Given this relationship with SIL, there could be the potential for a greater impact.	Low potential for release
Optimising development in areas with			
improved PTAL levels. Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and optimise development taking advantage of existing or improved high public transport accessibility.	Taking into account: whether the site is in close proximity to existing or planned public transport provision whether the site is contiguous with other development sites if the site offers other opportunities to optimise the quantum of development? i.e. is the site already cleared?	Site has access to bus routes along Victoria Road and walking distance to North Acton station, although it is not as close as the School Road site. The next closest station would be the new Old Oak Common station with HS2 and Crossrail (Elizabeth line) services, providing access to new services To the east, there is a limited interface with land that is planned to be de-designated from SIL.	Medium potential for release

Suitability and availability of site for alternative uses			
Is the site suitable for alternative (residential led) uses?	 Taking into account: Does the site benefit from planning permission for alternative uses? Are there any issues that affect their suitability for the alternative use, taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. 	 These sites do not benefit from planning permission Remaining SIL may result in conflict with new incoming residential uses, mitigation would need to be explored There are no other known constraints 	ial for
Is the site available?	whether the landownership fragmented or consolidated? if the land controlled by a developer or landowner who has expressed an intention to develop their site?	Multiple freehold private landowners. Landowners have not expressed an intention to develop site for housing. Low potent for release.	

North of Chandos Road

Site context	Notes for assessment	Assessment commentary	RAG
Does the context impact or inhibit the ability of the site to accommodate SIL uses, operations and future industrial development?	 Taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. Existing neighbouring uses or proximity to sensitive receptors that could impact on the use of the site or capacity for future industrial development. Examples of existing sensitive receptors could be residential uses and schools. 	 The site is surrounded by SIL to the north and east, and a railway line to the north east. To the east, there is a limited interface with land that is planned to be de-designated from SIL. Given this site context, it could still function as SIL 	Low potential for release
Impact on strategic functions			
Would the redevelopment of the site affect a strategic function or important clusters of industrial activity?	This could include: waste management and recycling utilities (including energy and water management) land for transport functions 	No known strategic functions	High potential for release
What are the surrounding sites? Would changing the designation negatively impact wider/ surrounding SIL?	Taking into account: The relationship with the wider/surrounding sites and opportunities for mitigation	 It is on the edge of the SIL boundary. Two sides of the boundary interface with SIL and the site has a more direct relationship with SIL because the majority of its frontage/edges would be within SIL. The south eastern boundary adjoins land planned to be de-designated from SIL and it is separated from land to the north east by railway lines. To the north west, is the Bashley Road site allocation. The site is coming forward for significant multi storey industrial intensification. Given this relationship with SIL, there could be the potential for a greater impact. 	Low potential for release
Optimising development in areas with improved PTAL levels.			

Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and optimise development taking advantage of existing or improved high public transport accessibility.	whether the site is in close proximity to existing or planned public transport provision whether the site is contiguous with other development sites if the site offers other opportunities to optimise the quantum of development? i.e. is the site already cleared?	 Site has access to bus routes along Victoria road and is in walking distance of North Acton station although it is not as close as the School Road and South of Chandos Road sites. The next closest station would be the new Old Oak Common station with HS2 and Crossrail (Elizabeth line) services, providing access to new services The south eastern boundary adjoins land planned to be de-designated from SIL and it is separated from land to the north east by railway lines. 	Medium potential for release
Suitability and availability of site for alternative uses			
Is the site suitable for alternative (residential led) uses?	 Taking into account: Does the site benefit from planning permission for alternative uses? Are there any issues that affect their suitability for the alternative use, taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas; 	 These sites do not benefit from planning permission Retained SIL uses south, west and north may result in conflict with new incoming residential uses There are no other known constraints 	Medium potential for release
Is the site available?	 environmental/amenity impacts experienced by would be occupiers and neighbouring areas. Taking into account: whether the landownership fragmented or 	Multiple freehold private landowners. Landowners have not expressed an intention to develop their	Low potential
	 consolidated? if the land controlled by a developer or landowner who has expressed an intention to develop their site? 	site for residential uses. The landowner/agent for a large part of this area has recently consulted on plans to develop a data centre (https://chandosparkestate.co.uk/) which would take up the majority of this search area.	for release

East of Park Royal Road

Site context	Notes for assessment	Assessment commentary	RAG
Does the context impact or inhibit the ability of the site to accommodate SIL uses, operations and future industrial development?	 Taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. Existing neighbouring uses or proximity to sensitive receptors that could impact on the use of the site or capacity for future industrial development. Examples of existing sensitive receptors could be residential uses and schools. 	 Site is bounded by railway lines to the north and green space to the east. It could still function as SIL 	Medium potential for release
Impact on other strategic functions			
Would the redevelopment of the site affect a strategic function or important clusters of industrial activity?	This could include: waste management and recycling utilities (including energy and water management) land for transport functions	No known strategic functions	High potential for release
What are the surrounding sites? Would changing the designation negatively impact SIL?	Taking into account:	The site is bounded to the north by railway lines and green space to the east. It is opposite the west of Park Royal Road site (which is also being assessed) but it is otherwise a relatively isolated site. Given this relationship, it has the potential for a lower impact.	High potential for release
Optimising development in areas with improved PTAL levels.			

Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and optimise development taking advantage of existing or improved high public transport accessibility.	whether the site is in close proximity to existing or planned public transport provision whether the site is contiguous with other development sites if the site offers other opportunities to optimise the quantum of development? i.e. is the site already cleared?	Site has access to bus routes along Park Royal Road and North Acton station	Low potential for release
Suitability and availability of site for alternative uses			
Is the site suitable for alternative (residential led) uses?	Taking into account:	The site does not benefit from planning permission	Medium potential for
	 Does the site benefit from planning permission for alternative uses? 	 The site is adjacent to open space, but there are no other known constraints 	release
	Are there any issues that affect their suitability for the alternative use, taking into account:		
	 physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; 		
	 potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; 		
	 appropriateness and likely market attractiveness for the type of development proposed; 		
	 contribution to regeneration priority areas; 		
	 environmental/amenity impacts experienced by would be occupiers and neighbouring areas. 		
Is the site available?	Taking into account: whether the landownership fragmented or consolidated? if the land controlled by a developer or landowner who has expressed an intention to develop their site?	Site is in single private ownership.	Medium potential for release

West of Park Royal Road

Site context	Notes for assessment	Assessment commentary	RAG
Does the context impact or inhibit the ability of the site to accommodate SIL uses, operations and future industrial development?	 Taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. Existing neighbouring uses or proximity to sensitive receptors that could impact on the use of the site or capacity for future industrial development. Examples of existing sensitive receptors could be residential uses and schools. 	 The site is currently outside of the designated SIL area. The OPDC Industrial Land Review recommended that these sites be included within SIL and this is what was proposed in the Regulation 19(2) Draft Local Plan that was submitted for examination. Site is bounded by railway lines to the north and open space east and residential uses to the south. 	Medium potential for release
Impact on other strategic functions			
Would the redevelopment of the site affect a strategic function or important clusters of industrial activity?	This could include: waste management and recycling utilities (including energy and water management) land for transport functions	No known strategic functions	High potential for release
What are the surrounding sites? Would changing the designation negatively impact SIL?	Taking into account:	The site is bounded to the north by railway lines and open space east and residential uses to the south. It is opposite the east of Park Royal Road site (which is also being assessed) but it otherwise is a relatively isolated site. Given this relationship, it has the potential for a lower impact.	High potential for release
Optimising development in areas with improved PTAL levels.			
Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and optimise development taking	Taking into account: whether the site is in close proximity to existing or planned public transport provision	Site has access to bus routes along Park Royal Road and North Acton station	Low potential for release

advantage of existing or improved high public transport accessibility. Suitability and availability of site for alternative	 whether the site is contiguous with other development sites if the site offers other opportunities to optimise the quantum of development? i.e. is the site already cleared? 		
uses			
Is the site suitable for alternative (residential led) uses?	Taking into account:	The land to the west of Park Royal Road – planning - particular has been greated which allows for the	High potential for
ieu) uses!	 Does the site benefit from planning permission for alternative uses? 	permission has been granted which allows for the introduction of residential units on part of this site.	release
	Are there any issues that affect their suitability for the alternative use, taking into account:		
	 physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; 		
	 potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; 		
	 appropriateness and likely market attractiveness for the type of development proposed; 		
	 contribution to regeneration priority areas; 		
	 environmental/amenity impacts experienced by would be occupiers and neighbouring areas. 		
Is the site available?	Taking into account:	Planning application for part of the site suggests	Medium
	 whether the landownership fragmented or consolidated? 	willing landowner and developer present	potential for release
	 if the land controlled by a developer or landowner who has expressed an intention to develop their site? 		

Appendix B: Representation responses

Old Park Royal

Site context	Notes for assessment	Assessment commentary	RAG
Does the context impact or inhibit the ability of the site to accommodate SIL uses, operations and future industrial development?	 Taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. Existing neighbouring uses or proximity to sensitive receptors that could impact on the use of the site or capacity for future industrial development. Examples of existing sensitive receptors could be residential uses and schools. 	 Old Park Royal is currently occupied with broad industrial type activities. It is largely surrounded by SIL, with the exception of the interface with Wesley Estate and the town centre. There are local heritage buildings within this area, ongoing SIL use will not necessarily impact on these This area currently functions as SIL and could continue to do so. There is a cluster of intensification opportunity sites in Old Park Royal identified in the Park Royal Intensification Study. A planning application for multi storey industrial intensification has been submitted for Bashley Road site (one of the sites in the PRIS) 	No potential for release (limited release has been assessed within School Road)
Impact on strategic functions Would the redevelopment of the site affect a strategic function or important clusters of industrial activity?	This could include: waste management and recycling utilities (including energy and water management) land for transport functions	 Old Park Royal is 40ha which is a significant proportion of SIL. Old Park Royal is currently occupied with broad industrial type activities and home to a high concentration of small businesses and highest density of units. The site is an important cluster of high density SME industrial activity. The loss of such a significant supply of smaller units could undermine the attractiveness of Park Royal SIL location. There is a cluster of intensification opportunity sites in Old Park Royal identified in the Park Royal Intensification Study. A planning application for multi storey industrial intensification has been submitted for Bashley Road site (one of the sites in the PRIS) 	No potential for release (limited release has been assessed within School Road)

What are the surrounding sites? Would changing the designation negatively impact SIL?	Taking into account: • The relationship with the wider/surrounding sites and opportunities for mitigation Taking into account:	 This is a large area and it is largely surrounded by and contiguous with SIL. Old Park Royal has the highest density of industrial units. Wholesale release at this scale, in terms of both industrial floorspace/unit types and jobs, would have a significant negative impact on capacity and the functioning of SIL within Park Royal. There is a cluster of intensification opportunity sites in Old Park Royal identified in the Park Royal Intensification Study. A planning application for multi storey industrial intensification has been submitted for Bashley Road site (one of the sites in the PRIS) 	No potential for release (limited release has been assessed within School Road)
Optimising development in areas with improved PTAL levels.			
Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and optimise development taking advantage of existing or improved high public transport accessibility.	Taking into account: whether the site is in close proximity to existing or planned public transport provision whether the site is contiguous with other development sites if the site offers other opportunities to optimise the quantum of development? i.e. is the site already cleared?	 Variable access to public transport It is not contiguous with other key development sites 	No potential for release (limited release has been assessed within School Road)
Suitability and availability of site for alternative uses			
Is the site suitable for alternative (residential led) uses?	 Taking into account: Does the site benefit from planning permission for alternative uses? Are there any issues that affect their suitability for the alternative use, taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; 	 Does not have planning permission Potential for future occupiers to be impacted by ongoing SIL operations in the wider industrial area 	Low potential for release (limited release has been assessed within School Road)

	 contribution to regeneration priority areas; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. 		
Is the site available?	whether the landownership fragmented or consolidated? if the land controlled by a developer or landowner who has expressed an intention to develop their site?	Land has a complex and fragmented private ownership	No potential for release (limited release has been assessed within School Road)

Twyford Tip

Site context	Notes for assessment	Assessment commentary	RAG
Does the context impact or inhibit the ability of the site to accommodate SIL uses, operations and future industrial development?	 Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; environmental/amenity impacts experienced by would be occupiers and neighbouring areas. Existing neighbouring uses or proximity to sensitive receptors that could impact on the use of the site or capacity for future industrial development. Examples of existing sensitive receptors could be residential uses and schools. 	 The site is adjacent to and contiguous with an adjoining safeguarded waste site. It is also bounded by the A406 to the north east and the Grand Union Canal to the south west. Although the Grand Union Canal is a sensitive receptor, it is also recognised as having potential for freight transport. The site is bounded to the east by SIL comprising industrial uses. The site is a good location for industrial uses. It has excellent access to local and strategic transport routes and access to the canal provides potential for freight by water. There is potential for the site to deliver industrial intensification including multistorey industrial/waste uses reflecting its location and less sensitive adjacent uses to the north, east and south. 	No potential for release
Impact on strategic functions			

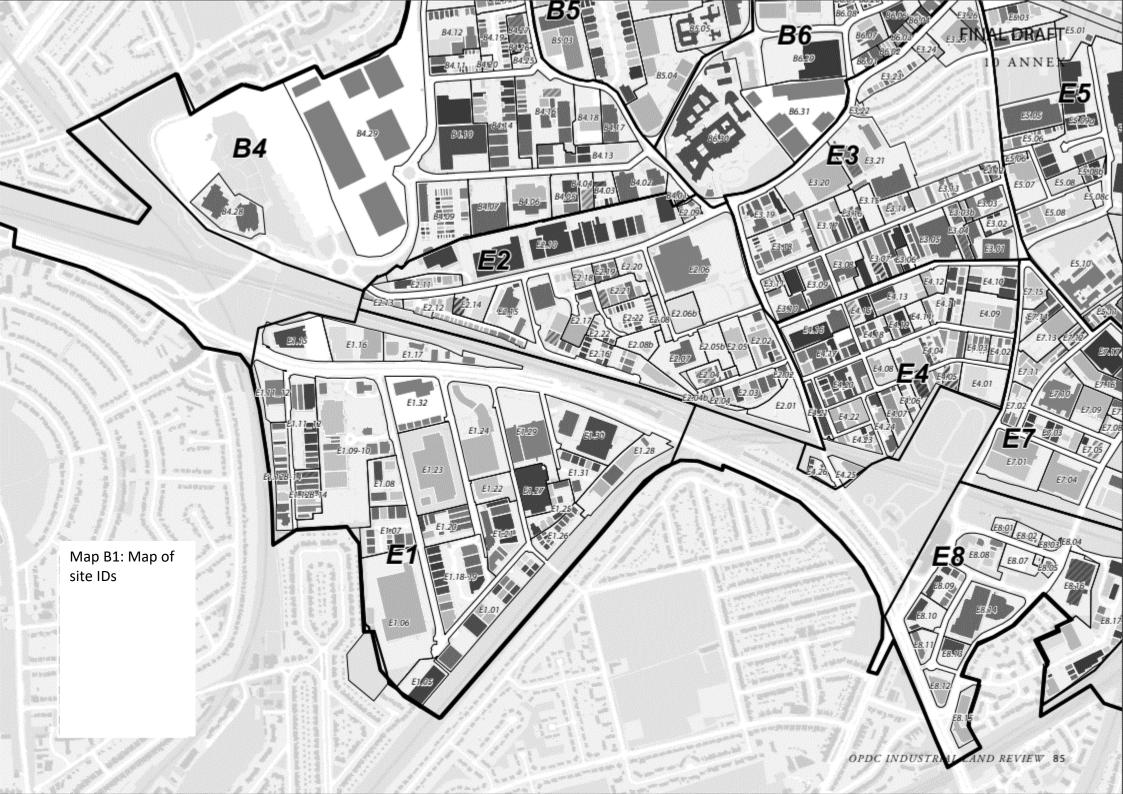
Would the redevelopment of the site affect a strategic function or important clusters of industrial activity?	This could include: waste management and recycling utilities (including energy and water management) land for transport functions	 The site is currently vacant land and not currently occupied for SIL uses. It is adjacent to and contiguous with a safeguarded waste site. Therefore, redevelopment may affect the ongoing operation of the waste site. 	Low potential for release
What are the surrounding sites? Would changing the designation negatively impact SIL?	Taking into account: The relationship with the wider/surrounding sites and opportunities for mitigation	The site is bounded by SIL, including a safeguarded waste site immediately adjoining the site boundary to the south. The site is also bounded to the east by SIL comprising industrial uses. Therefore its release could have an impact on adjacent SIL sites.	Low potential for release
Optimising development in areas with improved PTAL levels.			
Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and optimise development taking advantage of existing or improved high public transport accessibility.	whether the site is in close proximity to existing or planned public transport provision whether the site is contiguous with other development sites if the site offers other opportunities to optimise the quantum of development? i.e. is the site already cleared?	 Site has lesser access to public transport modes It is not contiguous with other development sites or land to be de-designated and therefore unable to contribute towards regeneration of Old Oak. 	No potential for release
Suitability and availability of site for alternative uses			
Is the site suitable for alternative (residential led) uses?	 Taking into account: Does the site benefit from planning permission for alternative uses? Are there any issues that affect their suitability for the alternative use, taking into account: physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas; 	The site does have an extant planning permission, but this is not for residential uses. OPDC's evidence base indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use.	Low potential for release

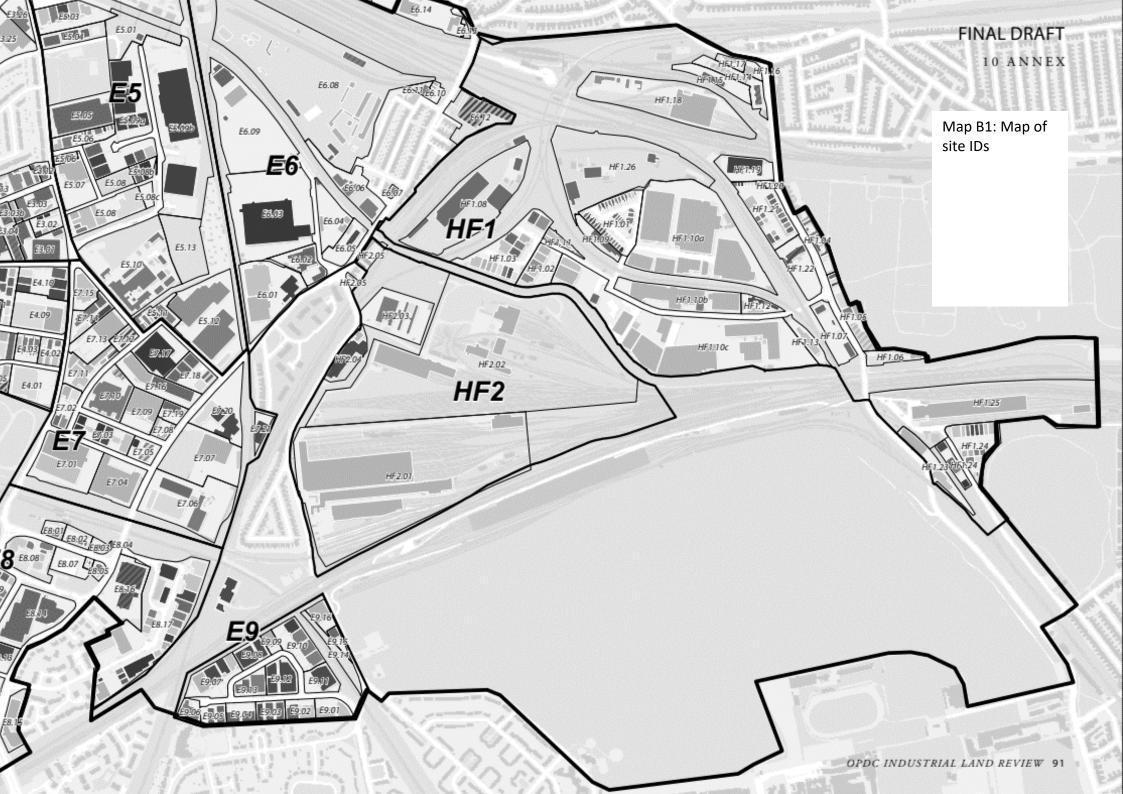
Is the site available?	environmental/amenity impacts experienced by would be occupiers and neighbouring areas. Taking into account: whether the landownership fragmented or consolidated? If the land controlled by a developer or landowner.	 Site is in single private ownership Representation received seeking the release of SIL on this site, however evidence base confirms that an industrial use is likely to be the most deliverable 	Medium potential for release
	 if the land controlled by a developer or landowner who has expressed an intention to develop their site? 	end use. Matter of SIL release was presented and discussed at the OPDC draft Local Plan examination hearings in April 2019.	

Appendix C: Industrial baseline

Only sites designated SIL upon the establishment of OPDC have been considered. Within this, the following categories have been excluded:

Excluded category	Reason
Land for Rail	Although Land for Rail sites are being dedesignated from SIL, the objectives of the Plan is to support delivery of new HS2 and Crossrail station and other existing stations are also being retained and enhanced within the Old Oak area.
Non Industrial uses	The calculation is measuring the net loss of industrial floorspace capacity.





No. No.	Borough	Site ID	Total site area (sqm)	Estimated building gross external floor area (sqm)	Plot ratio	Site land use categories
USE S.1.5 3736 0						√
BEE E. 12.5 E. 18.5 18.5 18.7 0.83 A. General industry	LBE					
BEE E4.25 2870	LBE	E3.16		1904	0.46	
BEE E. E. 10 27856 14954 0.54 0.56 A. General industry	LBE	E3.18 (part)		3578	0.83	A General industry
BE						
BEE E. 6.1.3 10.933 0 0.00 K Vacard Industrial BEE E. 6.01 15.258 10.766 0.71 A General Industry BEE E. 6.03 32118 11.332 0.35 C Warehouses 1.56 0.71 A General Industry BEE E. 6.03 32118 11.332 0.35 C Warehouses 1.56 C Warehouses 1.						
BEE						·
BEE E. E. C. S. S. S. S. S. S. S						
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BEE E.0.6 B.254 3928 0.48 C. Varehouses C. Vareh						-
BE	LBE	E6.04	6782	1018	0.15	A General industry
LBE	LBE	E6.06	8254	3928	0.48	C Warehouses
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