

Old Oak and Park Royal Development Corporation Consultation Statement August 2025

Revisions to the Adopted Planning Obligations Supplementary Planning Document (SPD)

1. Introduction

- 1.1 The Consultation Statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 to support the adoption of the revised Planning Obligations Supplementary Planning Document (SPD).
- 1.2 In accordance with the Regulations, this consultation statement sets out:
 - who was consulted during the preparation of the SPD,
 - how they were consulted,
 - a summary of the main issues raised during the consultation,
 - how those issues have been addressed in the adopted SPD.

2. Public Consultation Process

- 2.1 In May 2025, OPDC's Planning Committee unanimously approved public consultation on proposed revisions to the adopted Planning Obligations SPD alongside the public consultation on community priorities for Neighbourhood CIL (NCIL). Public consultation took place between 16 June 2025 and midnight on 28 July 2025.
- 2.2 The SPD and supporting documents were published on OPDC's dedicated consultation platform (link) and hard copies were provided in the following local venues:
 - OPDC offices, One West Point, 7 Portal Way, North Acton, W3 6RT,
 - Harlesden Library, Craven Park Road, Harlesden, NW10 8SE,
 - The Collective, Old Oak Lane, NW1 6FF.
- 2.3 Public notices were published in local newspapers and emails were sent out to contacts on OPDC's consultation database, which included public authorities, developers and landowners, interest groups, residents' groups, and residents. A consultation leaflet summarising the proposed changes was distributed to 18,000 addresses in the local area.
- 2.4 Three drop-in sessions and one online question and answer session were held during the consultation so that stakeholders could find out more about the SPD, speak to OPDC officers and find out how to respond to the public consultation. The events held were as follows:
 - The Lab at Oaklands Rise, Old Oak from 10am to 2pm on Saturday 21 June 2025;
 - The Woodward Building, Victoria Road, North Acton from 3:30pm to 7:30pm on Thursday 3 July 2025;
 - Project Space, Excelsior Studios, 17 to 19 Sunbeam Road, Park Royal from 3:30pm to 7:30pm on Wednesday 9 July 2025;
 - Online event on Zoom from 6pm to 7pm on Tuesday 15 July 2025.
- 2.5 Comments on the SPD were able to be provided by email and post and stakeholders were also provided with a telephone number and email address in order to ask OPDC officers and questions ahead of submitting a formal response to the public consultation.

3. Public Consultation Responses

- 3.1 Consultation responses to the draft SPD were received from 10 stakeholders, comprising 63 individual issues. Table 1 below sets out who raised the issue, the issue, and a response from OPDC. If an amendment to the SPD has been made, an amendment reference has been included which corresponds Modifications Statement which can be found on OPDC's website with the other SPD documents.

4. Consultation on the SEA Screening

- 4.1 As part of the process for developing the revised Planning Obligations SPD, an assessment of the requirement for a Strategic Environmental Assessment (SEA) was needed. Screening consultations were undertaken to enable the Environmental Bodies as specified in section 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 to provide comment on the appropriateness of the screening process and its conclusion for this proposed SPDs.
- 4.2 Those bodies are:
- Natural England,
 - Historic England, and the
 - Environment Agency.
- 4.3 Other bodies were specifically invited to comment:
- London Boroughs of Brent, Ealing, and Hammersmith and Fulham,
 - Greater London Authority.
- 4.4 The screening consultation period ran from 4 February 2025 to midnight on 11 March 2025.
- 4.5 Historic England and Natural England responded to the SEA screening stating that they had no comments to make on the consultation or that they did not consider an assessment was required.
- 4.6 OPDC's Determination Statement for the SPD (which can be viewed on OPDC's website along with the other SPD documents) confirms that the SPD will not change or introduce new planning policy over and above the Local Plan and, whilst there may be some environmental effects, these have already been covered in principle in the Integrated Impact Assessment of the Local Plan.

Table 1: Public consultation comments and OPDC responses on the Revised Planning Obligations SPD

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
1	Historic England		OB9B	Thank you for the opportunity to comment on the above consultation document. Our response is limited to one section – the OB9B is currently titled Heritage at Risk contribution. We would suggest that this is misleading, given the text box and supporting text both make clear that contributions to heritage assets not on the Heritage at Risk register are also eligible. As a result, it would be clearer if this was instead headed ‘Supporting heritage and heritage at risk’.	Change proposed. It is the case that contributions may also be sought from schemes located within, or within a setting of, heritage assets not on the national Heritage at Risk Register. For clarity the obligation will be titled "Supporting heritage and heritage at risk".
2	Historic England			I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.	Noted.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
3	Natural England			Thank you for your consultation request on the above dated and received by Natural England on 16th June 2025. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. Natural England does not have any specific comments on the Planning Obligations Supplementary Planning Document for Ealing, Brent and Hammersmith & Fulham.	Noted.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
4	Natural England			The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.	Noted.
5	Natural England			A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.	Noted. A Strategic Environmental Assessment (SEA) screening consultation took place from 4 February 2025 to 11 March 2025. Natural England responded to the SEA screening consultation, agreeing that an SEA is not required. This and responses from other statutory bodies has been reflected in the Strategic Environmental Assessment Screening and Determination Statement published alongside the draft SPD.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
6	Network Rail			Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order). Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered.	Noted.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
7	Network Rail			<p>With regards to the policy Network Rail would comment that:</p> <ol style="list-style-type: none"> 1. That the council are to ensure that works by statutory undertakers in relation to their operational business should be exempt. 2. Having railway infrastructure and passenger facilities included on reg 123 lists (or the equivalent). 	<p>No change proposed. Rights granted to Statutory Undertakers by the General Permitted Development Order (GPDO) allow specific types of development to proceed without planning permission, provided they meet specific criteria. It is not considered necessary to repeat this within the SPD. OPDC's Infrastructure Delivery Plan includes a range of projects related to railway infrastructure.</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
8	Savills	Ark Data Centres	General	Established in 2005, Ark develops and operates secure and efficient purpose-built data centres. Ark acquired the former Renault Site at Concord Road in September 2020. Planning permission was granted for the redevelopment of the site to deliver a data centre campus (to be known as Alliance Park) in November 2023 (ref. 22/0059/FUMOPDC) with a subsequent Section 73 application to amend the design and the wording of a number of conditions approved in December 2024 (ref. 24/0141/VAROPDC). Park Royal is in a data centre availability zone and, whilst Ark does not have control of any land beyond Alliance Park at present, clearly them delivering additional data centre floorspace within Park Royal cannot be discounted. The Old Oak and Park Royal Development Corporation (OPDC) consulted on a Draft Planning Obligations Supplementary Planning Document (SPD) in late 2022 to which Ark provided their comments on and are now consulting on an updated Draft version of the SPD. From Ark's	Noted.

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				<p>experience of progressing Alliance Park through the planning process there are a small number of comments that Ark wish to make so that the SPD can function as effectively and be as clear as possible. There are set out below:</p>	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
9	Savills	Ark Data Centres	OB3C Provision of Publicly Accessible Open Space on Site	This objective requires that, if a scheme includes publicly accessible open space, a Section 106 agreement ensures that public access is unrestricted save for essential maintenance. Ark's Alliance Park scheme includes the provision of a publicly accessible pocket park but, due to the inherent security requirements of data centres and the potential security threat of having a publicly accessible area of land adjacent to it, the Section 106 agreement includes a clause that allows Ark to restrict public access during nighttime and when the UK terror level is 'High'. It is suggested that the SPD recognises that there may be cases where unrestricted access to publicly accessible open space is not viable and allows for this matter to be considered on an application by application basis.	No change proposed. OB3C a.iii permits restrictions for the purposes of essential maintenance and upkeep at defined periods of time. This would include instances such as during nighttime and when the UK terror level is 'High'.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
10	Savills	Ark Data Centres	OB6A: Carbon Offset Contribution	<p>This objective follows the requirements of the London Plan with regards to achieving net zero and carbon offsetting. There are however two points which Ark wish to make. Firstly, Ark highlight the need for energy procurement strategies to be considered in how the net zero target is achieved. Ark procure, and have done for a number of years, Renewable Energy Guarantee of Origin (REGO)- backed energy. This is energy that is entirely from renewable energy sources. The argument against its inclusion as being net zero has been that there is no additionality associated with the purchasing of REGO-backed energy in that it does not directly result in renewable energy being generated. Ark suggest that this is the wrong approach given that the purchasing of REGO backed energy drives the de-carbonisation of the grid. Put another way, the purchasing of REGO-backed energy drives new and additional renewable energy generation to meet the demand for REGO backed power and,</p>	<p>Noted. OPDC notes Ark's long-standing use of Renewable Energy Guarantee of Origin (REGO)-backed electricity, and your view that such procurement contributes to the decarbonisation of the grid by stimulating demand for renewable electricity. We also acknowledge the argument that REGO-backed energy should be recognised as contributing to net zero targets due to its market signal and role in increasing renewable generation.</p> <p>However, in line with the London Plan Policy SI2 and supporting GLA Energy Guidance, OPDC's current approach reflects the position that REGO-backed energy does not demonstrate 'additionality' as it does not guarantee that new renewable energy capacity is being delivered as a result of its purchase. As such, REGO-backed electricity is not currently accepted as an alternative to onsite carbon reduction or financial contributions to the carbon offset fund.</p>

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				ultimately, the proportion of power that is renewable increasing.	While we understand and appreciate Ark's position and agree that market-based mechanisms have a role in decarbonisation, the SPD must remain consistent with the strategic policies and evidence base of the London Plan and GLA guidance.

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11	Savills	Ark Data Centres	OB6A: Carbon Offset Contribution	<p>The second point is that, where a financial contribution is payable for carbon offsetting, either this payment should be made prior to occupation of the development or, if it to be paid earlier, there needs to be mechanisms for review.</p> <p>Data centre design is evolving rapidly and it is therefore critical that the calculation exercise is undertaken as late as possible in the construction process to reflect technological advances to ensure that the correct level of offset is calculated.</p>	<p>Noted. OPDC notes Ark's position that, due to the evolving nature of data centre design and energy efficiency technologies, it is important that the carbon offsetting calculation be undertaken as late as possible in the development process.</p> <p>The SPD (para 4.63) sets out that carbon offset payments are secured through Section 106 agreements and calculated based on assessment of the completed development. This aligns with the approach supported by the GLA Energy Planning Guidance, which allows for final carbon offset contributions to be confirmed following construction to reflect as-built performance, including any efficiency gains made during the build process. As per your concern raised, this is the latest stage as possible in the construction process.</p> <p>To note, there has been no changes proposed to OB6A: Carbon Offset Contribution payment timeline in the Draft</p>

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					Revised Planning Obligations SPD (May 2025) compared to the 2024 version.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
12	Savills	Ark Data Centres	OB6A: Carbon Offset Contribution	Whilst inherently Ark's design process seeks to reduce waste heat to ensure the most efficient operation, Ark's data centres do create waste heat and Ark recognise that the export and re-use of waste heat from data centres by other land uses is an attractive proposition. That said, the challenge with managing the export of waste heat from data centres to a district heat network through the planning process by either planning conditions and / or obligations is one of timing. There needs to be a district heat network already in place for the data centre to connect into and there also needs to be willing and connected recipients to the district heat network that have a demand for heat at that time. The heat that is exported from the data centre needs to be of a sufficient grade where it is usable by the recipient (following its export and transfer) and the period where waste heat is exported needs to be the time where waste head is in demand (something that is not ordinarily the case for data centres given that more waste heat is generated	No change proposed. OPDC is working with relevant stakeholders to examine the best way in which to deliver these projects, including the potential to capture excess heat from existing and proposed data centres in the area to provide heat to areas of new mixed use development.

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				when the weather is warmer and ultimately the lower demand for waste heat less). Cases must be avoided where developers are required to install onsite district heating infrastructure to which is unlikely to be used in the absence of either an existing or committed plan to deliver a network.	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
13	Savills	Ark Data Centres	OB7B: Employment, Training and Skills and Local Supply Chain Contributions and OB7C: Local Labour, Skills and Employment Strategy and Management Plan	<p>This objective has three parts. Part A sets requirements for local employment, apprenticeships, and local construction expenditure, Part B sets a requirement for financial contributions to support local supply chain initiatives, and Part C sets a framework for financial contributions in lieu if the Part A requirements cannot be satisfied. Ark has concern with Parts A(i) and A(iii), as well as the associated framework for financial contribution under Part C. Data centre design and construction is inherently complex such that Ark's Alliance Park project incorporates a modular build approach whereby much of the actual structure and the data halls themselves are manufactured offsite and assembled onsite. There are huge advantages of this associated with the construction timeline, quantum of embodied carbon, and amenity disturbance during construction. The effect is that generally much of the construction workforce is employed through sub-contractors rather than by Ark directly.</p>	<p>Noted. Part a(i) relates to local labour supply targets for the demolition, construction and fit stages of development. The consultation included amendments to Part a(i) to:</p> <ul style="list-style-type: none"> - remove 20% target (but retains target based on floorspace/units). - clarify the proportion of apprenticeships that should be new. - provide more flexibility by considering other pathways to employment instead of a single focus on work placements. <p>Para 4.77 states that "OPDC will consider information related to specific development proposals, where this is provided during the planning application stage to agree and secure an appropriate contribution". Applicants are encouraged to share and clearly communicate the s106 obligations as part of the procurement exercise to select a main contractor. As such, no changes are proposed to Part a(i).</p> <p>Part a(iii) had a minor</p>

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					<p>amendment that was typographical. OPDC recognise that there might be particular challenges linked to highly specialised building typologies. Changes are proposed to Part a(iii) to capture more opportunities to support the local supply chain.</p> <p>Changes are proposed to Part c to clarify that contributions are only payable under Part c when reasonable endeavours have not been demonstrated.</p>

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14	Savills	Ark Data Centres	OB7B: Employment, Training and Skills and Local Supply Chain Contributions and OB7C: Local Labour, Skills and Employment Strategy and Management Plan	Together, these policies set a requirement for the provision of affordable workspace, setting a preference for this to be onsite but also a route of paying a financial contribution if it can be demonstrated that this is not possible after being tested. The security requirements of data centres means that the provision of onsite affordable workspace to be occupied by a third party separate from Ark's tenants is not compatible with the security requirements for a modern data centre. The importance of data centres being secure facilities where access is heavily controlled at all times is reflected in their designation as Critical National Infrastructure in September 2024. A data centre developed by Ark incorporates a series of security measures, both to get past the secure fence line and into a building and it is not clear how this high level of onsite security that is required could be maintained if a third party required access. Onsite provision therefore becomes a tokenistic effort of looking to make provision outside of the secure	No change proposed. This section of the document was not subject to amendments. As per OPDC's previous response to this point, OPDC does not agree that data halls should be exempt and only the office space should be taken into account. Offices can only be ancillary to the main data centre (Class B8) employment use, and the office space is only required to serve the data halls; it would not exist without them. The same situation would apply to a conventional warehouse use where parts of the floor space are accessed only infrequently (this could apply to an archive storage use for example). The SPD guidance is informed by the recommendations in the 2022 Affordable Workspace Study.

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				<p>fence line, resulting in an arrangement where sites capable of accommodating data centres are not developed as efficiently as they could be, something that is particularly important given the limited locations suitable for data centres. To that end, Ark support that the SPD includes mechanisms where a formula based financial contribution can be made rather than provision made onsite. This needs to reflect that the majority of the floorspace within a data centre is the white space and associated mechanism and electrical plant, both of which inherently are not the day to day workspace of any employees, instead being accessed on an infrequent basis for either regular maintenance or for essential repair work. This inherently differs to office, commercial, or conventional industrial floorspace where the interiors of those buildings are inherently the workplace of its employees. For data centres, such a financial contribution should only relate to the office and administrative areas of a development.</p>	

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15	Canal & River Trust			Thank you for this recent consultation. I can confirm that the Canal & River Trust have no comments to make on the proposed changes, which do not appear to affect the Grand Union Canal or its towpath.	Noted.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
16	Ealing Council			<p>Please see below Ealing Council's response to the OPDC Planning Obligations SPD consultation. We have welcomed the opportunity to review the proposed amendments and look forward to continued joint working with OPDC to ensure this new SPD delivers tangible benefits for Ealing's residents and businesses.</p> <p>Devolving allocation of employment and skills s106</p> <ul style="list-style-type: none"> • Following a cabinet decision, Ealing Council published the OPDC Legacy Framework, which outlined a deliverable to 'Devolve the allocation of the employment and skills s106 generated by OPDC to the LBE / OPDC RED group, rather than POAG, to ensure this funding is spent effectively, noting that it is not geographically bound to the OPDC area'. • Council and OPDC officers have already engaged on how this deliverable can be met, however, agreement has not yet been reached. This Planning Obligations SPD Consultation now 	<p>No change proposed. OPDC was set up by the Mayor of London to deliver transformational regeneration within Old Oak and Park Royal across parts of three boroughs in West London. OPDC has developed an Economic Vision, to be followed by its Economic Development Strategy, and s106 is a key mechanism by which OPDC will be delivering the long-term approach, activities and programmes to support local people into sustainable employment. This approach will deliver benefits to residents and businesses across London Borough of Ealing but also to the other two host boroughs within the OPDC area, Brent and Hammersmith & Fulham. OPDC will collaborate closely with the three boroughs on delivering jobs/skills/business initiatives within the OPDC area, work that will be led by OPDC's Inclusive Growth Team. However, it is not proposed to formally devolve allocation of s106 to London Borough of Ealing. The allocation of Section 106 contributions will</p>

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				<p>provides an opportunity to formalise an approach that works for both organisations, who have the shared objective of growing the local economy and supporting Ealing's residents into jobs.</p> <ul style="list-style-type: none"> • The council has acknowledged the OPDC's concerns around the 100% devolution of employment and skills s106, and in the interests of partnership, collaboration and pragmatism the council would instead offer a significant compromise. Guided by s106 data and evidence in the attached, the Planning Obligations SPD is fully enabled to devolve 25% of the employment and skills s106 already banked/to be banked within the borough of Ealing (under the control of the OPDC) to Ealing Council. The OPDC would retain 75% in their full control. • The s106 data and evidence supporting the 25% also fortuitously mirrors the logic of a conventional SCIL/NCIL split – whereby 75% would remain with OPDC for more strategic delivery 	<p>be coordinated through OPDC's Planning Obligations Advisory Group (POAG) which has representation from all three host boroughs including the London Borough of Ealing. As was set out in the OPDC's response to the Ealing Legacy Framework, OPDC will not be providing % of its annual s106 to individual boroughs. OPDC's Inclusive Growth team is working closely with colleagues in Ealing's Regeneration, Economy and Skills department on a number of projects that will seek to draw down Section 106 funding via the established mechanism of the Planning Obligations Advisory Group (POAG).</p>

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				<p>linked to the OPDC Economic Development Strategy and 25% for the council to focus on more grassroots / localised projects targeted at the most vulnerable. This 25% can only be practically delivered by the council who have well established Work Ealing and Learn Ealing services.</p> <ul style="list-style-type: none"> • As the cost-of-living crisis persist and worsens, there is an increasing urgency and demand upon the council to invest this s106 quickly through its well established service delivery mechanisms. • The council notes the OPDC's concern about how this approach would align with their Planning Obligations Advisory Group (POAG), however practical solutions to that can be readily explored and agreed. This should not be considered a significant barrier, particularly in the context of supporting Ealing's communities. 	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
17	Ealing Council			<p>London Living Wage</p> <ul style="list-style-type: none"> • We would support a greater emphasis on the London Living Wage throughout, including: All workforce opportunities for local people will be paid London Living Wage as a minimum and that the workforce provider will be expected to secure London Living Wage accreditation. 	No change proposed. The SPD states that reasonable endeavours should be used to pay employees the London Living Wage.
18	Ealing Council			<p>Split across host boroughs</p> <ul style="list-style-type: none"> • Rather than employment and training opportunities being allocated to people from the local area (i.e. across the 3 host boroughs), we request that these opportunities are allocated to residents of the host borough within which the development is taking place. This should apply to both onsite and offsite contributions. 	No change proposed. Requiring that employment and training opportunities are the benefit of residents of LBHF, LBB and LBE enables us to set ambitious targets to maximise local economic benefits. For instance, it gives us scope to require at least 20% local employment at the end user stage, enabling benefits to be shared among a wider labour market, but which is nonetheless local to the area being regenerated. It should also be noted that many of OPDC's development sites sit close to borough boundaries.

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19	Ealing Council			<p>Apprentice starts</p> <ul style="list-style-type: none"> • Rather than only 50% of apprentice starts being 'new' apprentices – we would support this being increased to all apprentice starts, to align with Ealing Council's approach across the rest of the borough. 	<p>No change proposed. At least 50% of the workforce opportunities will be new apprentices. The other opportunities will be a range of other pathways to employment. This is in line with OPDC's Economic Vision. This approach will deliver benefits to residents and businesses across London Borough of Ealing but also to the other two host boroughs within the OPDC area.</p>

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20	SEGRO			<p>We write to submit representations to the proposed changes to the Old Oak and Park Royal Development Corporation (OPDC) Planning Obligations Supplementary Planning Document (SPD).</p> <p>Executive Summary: We have a number of concerns with the proposed changes to the Planning Obligations SPD:</p> <ol style="list-style-type: none"> 1.Frequent policy change has a negative impact on investor certainty/confidence and also creates consultation fatigue for those who try to positively engage. 2.More onerous policy requirements which add time, complexity, risk and cost to development are very unwelcome during the challenging economic circumstances at this time. 3.The change to operational job targets is not highlighted as such in the consultation so only the eagle-eyed will know to respond to this proposal. This is misleading. 4.We actively encourage and support our customers to seek employment from our local 	Noted. Detailed responses are provided under refs 23-38

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				<p>communities, but it is important these targets are realistic.</p> <p>5. We support the use of reasonable endeavours to maximise local employment in new buildings and their construction, but applying financial penalties for not achieving them is inappropriate in practical terms, as well as being highly questionable in planning terms.</p>	

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21	SEGRO			<p>SEGRO is a UK Real Estate Investment Trust (REIT), listed on the London Stock Exchange and Euronext Paris, and is a leading owner, manager and developer of modern warehouses and industrial property. SEGRO owns or manages 10.8 million square metres of space serving customers from a wide range of industry sectors. For over 100 years SEGRO has been creating the space that enables extraordinary things to happen. SEGRO has a long track record of delivering industrial space in Park Royal and today managed 4.9 million square feet of floorspace across 14 estates, which accommodates 200 businesses, including Brakes, Royal Mail, Japan Centre, John Lewis, and Ocado. SEGRO is also working in partnership with Pure DC to deliver a new state of the art data centre at Premier Park.</p>	Noted.

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22	SEGRO			<p>A commitment to be a force for societal and environmental good is integral to SEGRO's purpose and strategy. The Responsible SEGRO framework focuses on three long-term priorities where the company can make the greatest impact: Championing Low-Carbon Growth, Investing in Local Communities and Environments and Nurturing Talent. Our Community Investment Plans (CIPs) provide a strategic framework for delivering educational, employability, and environmental initiatives tailored to the needs of local communities. These plans are centred on three core objectives: supporting young people and those facing disadvantage into employment, driving local economic growth, and enhancing biodiversity and the natural environment. Our CIPs are not related to specific developments or secured by s106 agreement, they are voluntary commitments creating social value for our local communities. Since 2020, through our partnership with Spark!, in OPDC boroughs we have helped to</p>	Noted.

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				<p>broaden aspirations and career pathways through:</p> <ul style="list-style-type: none"> •Delivering in-school careers workshops to over 700 students •Facilitated 191 workplace insight visits for students •Provided 1-1 mentoring to 107 students <p>These activities have benefitted from direct involvement of SEGRO employees and our advisors/supply chain. Over the past four years, our collaboration with Action West London, we have engaged 387 individuals across OPDC boroughs, delivering employability training that has led to 169 short course completions and supported 209 people into work.</p>	

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23	SEGRO			<p>The SPD was adopted in 2023, changed in 2024 and is now proposed to change again in 2025. This frequent change in policy is unhelpful for investors certainty and confidence. SEGRO actively engages in consultations which impact upon our business, and our customers. We spend a lot of time and effort considering policy proposals and their potential implications for the industrial and logistics sector, and for the communities we operate in. It is disappointing to spend so much time consulting within our business, with customers, community partners and suppliers on these policies, for new changes to be proposed so soon after. While we appreciate proposed changes are no doubt very well intentioned, there is certainly a feeling of consultation fatigue. We urge OPDC to avoid or minimise policy change, especially in a very challenging time for investment and development.</p>	<p>No change proposed. The changes made in 2024 were directly as a result of the adoption of the Community Infrastructure Levy (CIL) Charging Schedule where OPDC removed planning obligations which will in the future be funded by CIL and not s106 contributions.</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
24	SEGRO			Economic circumstances for investment are very challenging, and this includes industrial development. Construction costs have increased dramatically, finance costs have increased too, and the risk of development is very high. Low economic growth and uncertainty is constraining activity levels for business occupiers taking industrial space at this time, which is another major barrier for new investment. These conditions are recognised in the Towards a New London Plan consultation, which states “The next London Plan will not increase the overall burden of planning policy requirements on development under the current circumstances”. The OPDC should consider taking this approach to changes to policy and guidance.	No change proposed. OPDC considered the economic challenges of development. For example, the changes to end use targets have been balanced with a lower support fee. We understand current economic circumstances, but we hope that by working with developers to create local benefits, and collaborating on investment in the short-, medium- and long-term skills development of a workforce, will aid productivity and drive growth.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
25	SEGRO			The consultation hasn't accurately identified the change to OB7B a.ii. It was only identified by SEGRO via a pre-application enquiry and would otherwise have been missed. We assume this was an error, but it affects the results of the consultation nonetheless.	Noted. Unfortunately, this was a typographical error in the SPD extract. However, draft revised SPD Appendix 1B which provided more details on the training and employment obligations contained in the draft SPD, showed the 30% target as a track change. The proposed change was also highlighted in other consultation material used in the 3 drop-in sessions and in the online question and answer session.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
26	SEGRO			<p>As explained in our introduction, SEGRO works with local charities, councils and other partners to help those seeking work in our local communities into employment. We do this through s106 agreement obligations in our new developments, and also through our long-term Community Investment Plans (CIP). Our CIP projects tend to focus on supporting members of the community who face unique challenges for accessing and retaining employment.</p> <p>Given our vast experience, we are well placed to comment on some of the great opportunities and also limitations for programmes aimed at maximising local employment.</p>	Noted.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
27	SEGRO			<p>Several key factors make the 30% threshold difficult to meet:</p> <ul style="list-style-type: none"> •Businesses often relocate with their existing staff, many of whom live outside the borough. These jobs are retained, not newly created, and therefore do not contribute to local hiring targets. •In a large and interconnected city like London, people regularly commute across borough boundaries. Employment patterns are not confined to local boroughs, making it difficult to source a large proportion of workers from one specific area. •Many long-term unemployed individuals face complex and entrenched barriers—including mental health challenges, low qualifications, limited work history, or lack of industry-specific skills. Helping these residents into sustainable employment requires intensive, targeted support and time, which can't be rushed or guaranteed within a single development cycle. <p>We are genuinely passionate about supporting unemployed people into work, and this is reflected in our direct funding and</p>	<p>Change proposed to revise the end use job target to 20% and balance this by amending the support fee to £1,850.</p> <p>Contributions will be sought to mitigate the impacts of development and negotiated on a case by case basis. Para 4.78 states: "In cases where new employment floorspace is being reprovided for an existing business within the OPDC area to relocate and no new end use jobs are being created as a result, alternative opportunities identified will be considered such as offering paid work placements and upskilling existing staff".</p> <p>OPDC's approach to setting a target for end use jobs is relatively standard - as evidenced by the examples given in the consultation response. The previous SPD had a % target, albeit based on a different metric. Setting a target provides a clear steer to applicants to support negotiations.</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				<p>delivery of Community Investment Plans such as those detailed in our introduction. These targeted interventions are already making a real impact. We have reviewed the targets proposed in the OPDC host boroughs.</p> <ul style="list-style-type: none"> •Brent = 20% target stated in the Planning Obligations SPD 2022. •Ealing = no existing or draft policy/guidance. Live experience indicates 20% is targeted in Employment and Skills Plans. •Hammersmith and Fulham = no existing or draft policy/guidance. A review of recent planning application decisions indicates 20% is targeted in Employment and Skills Plans. <p>From our own experience and from a review of other local policies, it is clear that a target of 30% is extremely high. A target of 20% would be more appropriate, while still remaining very ambitious and challenging for our customers.</p>	<p>People from the local area are those whose primary residences are in the boroughs of Brent, Ealing or Hammersmith and Fulham. The 3 borough catchment means that there is a wider geographical area to recruit labour from. To support this process, OPDC works with partners including the host boroughs, the West London Alliance, developers, and other stakeholders to coordinate activity and to work with developers to help them demonstrate reasonable endeavours have been made.</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
28	SEGRO			<p>SEGRO supports using reasonable endeavours to meet realistic targets for local employment, as this reflects our broader ambition to support our local communities to thrive. We are very concerned by a requirement to pay large penalties where targets are not met for a number of reasons which are summarised below. The penalties are unlikely to be effective Brent has a policy whereby penalties are only payable if reasonable endeavours have not been made. This appears to incentivise making reasonable endeavours. Whether or not the reasonable endeavours are successful in achieving local employment targets is then dependant on how effective the delivery partner – in that case Brent Works – is in finding and preparing suitable candidates. This seems both fair and effective. Ideally, as is our experience in Brent, the local delivery partner is very effective, meaning they then become a partner of choice for filling future vacancies. Paying a financial penalty even when reasonable endeavours are made</p>	<p>Change proposed. OPDC's intention is not to penalise parties if it can be demonstrated that reasonable endeavours have been made to achieve the targets. Changes are proposed to clarify this.</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				is not fair. The employer should be under no obligation to employ someone unsuitable for the role, and that is not something they can guarantee through engagement with the process. An outcome rather than process-led penalty is more likely to lead weaken the endeavours made, given the outcome (a local job) cannot be controlled. This then has the effect of making the whole activity more of a taxation than a positive obligation driving good behaviours.	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
29	SEGRO			<p>Industrial construction projects will be unfairly penalised</p> <p>For construction phase opportunities in the industrial sector specifically, there are inherent characteristics of the process which constrain the ability to accommodate apprenticeships and trainees on site. The appended construction programme illustrates a typical speculative industrial development. It shows these developments have a relatively short build period (usually 34-38 weeks) and lean workforces, with fewer than 10 permanent workers and small specialist trade teams who are on site for a few weeks at a time. This reflects the highly modular nature of industrial development, which utilises modern methods of construction more so than many other forms of development. A typical development is completed in just 9 months, whereas a standard apprenticeship lasts at least 12 months. This mismatch in timelines makes it difficult to provide a meaningful and sustained learning experience for</p>	<p>Noted. Para 4.77 states that: "OPDC recognises that different types of development and forms/methods of construction will affect construction periods and construction jobs. OPDC will consider information related to specific development proposals, where this is provided during the planning application stage to agree and secure an appropriate contribution". OPDC will consider approaches to apprenticeship delivery, and examples given in para 4.82 include:</p> <ul style="list-style-type: none"> » Apprentices being directly employed by the developer, main contractor and their supply chain subcontractors; and » Apprentices being employed directly by developer or main contractor and loaned out to subcontractors and salary costs re-charged to developer. A commitment by the developer and main contractor to contract with a Flexi-Job Training Agency (FJTA) to employ the apprentice directly and support them to move-on and in turn help

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				<p>apprentices within a single project. With such limited numbers of workers, bringing in large numbers of trainees raises serious issues around supervision, health and safety, and productivity. Sites simply aren't designed or resourced to accommodate the proposed figures expected, particularly when only a handful of experienced staff are available to mentor and manage them effectively. In the past to deliver on our local employment and inclusive growth objectives, we have implemented alternative strategies which better suit our construction processes and programmes. This has included funding construction cards and providing partial apprenticeships/traineeships. We are typically able to achieve c.5 opportunities as partial apprenticeships. Having shared apprentices across new developments in Park Royal could provide a solution for industrial developments. We would welcome the opportunity to discuss this and other options with</p>	<p>ensure completion of the apprenticeship qualification.</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				OPDC officers that work for our sector.	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
30	SEGRO			<p>The penalties are not proportionate</p> <p>Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) states that a planning obligation must be 'fairly and reasonably related in scale and kind to the development'.</p> <p>We will use a 10,000 sqm industrial building as an example to test the proportionality of this policy requirement. For context, this is the same size as our building at Rainsford Road in Park Royal, occupied by John Lewis.</p> <p>Construction phase</p> <p>Based on the measure of 1 job per 500sqm, this development would generate a requirement for 10 local apprentices and 10 other local job pathways.</p> <p>If the contractor failed to meet its targets, the maximum penalty would be £300,000 for apprentices and £250,000 for other roles, totalling £550,000.</p> <p>Operation phase</p> <p>Based on a blend of industrial and logistics jobs densities (1 job:50 sqm), this building might accommodate 200 jobs. If 30% of these need to be local, under the</p>	<p>Noted. The calculations in the consultation response assume that reasonable endeavours are not taken and the targets are not met in full. OPDC would hope in reality that this is not the case and SEGRO point to their experience of maximising employment opportunities in line with their business values/priorities.</p> <p>Changes are proposed to OB7B, Part c and supporting text, to clarify that contributions are only payable when reasonable endeavours have not been demonstrated.</p> <p>Regarding the potential for variation in the nature of roles, para 4.77 states that: OPDC will consider information related to specific development proposals, where this is provided during the planning application stage to agree and secure an appropriate contribution".</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				<p>draft policy the target is 60 jobs. The total penalty for these not being filled locally is £1,500,000, which to put it into context is more than the first year's rent, so it would be a huge cost burden for an incoming business. Any business taking modern commercial space in Park Royal will not be a startup business with an entirely new workforce and 100% job vacancies. It is probable that the business is either expanding – in which case there are likely to be some new roles created – or purely relocating without upsizing – in which case there may be no/very few vacancies. Assuming there are new roles/vacancies created, clearly we would want and expect to see some of those jobs occupied by local people, which would bring down the penalty. However as discussed, the number of new roles available will vary from business to business. The nature of available roles and their compatibility with skills of local and available workers will also vary business to business.</p>	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
31	SEGRO			<p>Other employment costs required by the policy</p> <p>The SPD also requires £6,400 to support supply chain opportunities, and a £1,500 support fee for all of the local employees targeted through construction and occupation of the building (total of 80 in this case). The total contribution is £126,400. Comparison with other boroughs</p> <p>For a development of c. 10,000 sqm, the following financial contributions would be anticipated in other boroughs:</p> <p>Ealing: £71,250 for employment and training projects, plus monitoring.</p> <p>Brent: £165,000 for local workforce support fees plus £300,000 max penalty if reasonable endeavours not taken (£5,000 per role missed).</p> <p>Hammersmith & Fulham: £168,000 for employment/skills and small business initiatives, £70,000 payment in lieu of apprentices (£7,000 per role).</p> <p>OPDC current SPD: £100,150 for employment/skills and small business initiatives.</p> <p>OPDC draft SPD: £126,400 for</p>	<p>Noted. The calculations in the consultation response assume that reasonable endeavours are not taken and the targets are not met in full. OPDC would hope in reality that this is not the case and SEGRO point to their experience of maximising employment opportunities in line with their business values/priorities.</p> <p>The obligations related to the use of local labour, skills and suppliers will contribute towards reducing overall commuting journeys, minimising vehicle mileage and associated emissions. Given these benefits, they form a key part of the measures required to mitigate transport and environmental impacts to make development acceptable. Changes are proposed to OB7B, Part c and supporting text, to clarify that contributions are only payable when reasonable endeavours have not been demonstrated.</p> <p>Excluding potential penalties, the comparison provided in the</p>

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				<p>local supply chain and local employment support plus £2,050,000 max penalty if targets missed, regardless of reasonable endeavours.</p> <p>It is clear from the above that these penalties do not meet the Regulation 122 tests of being fairly and reasonably related in scale and kind to the development.</p> <p>Notwithstanding this conclusion, it would be interesting to understand the basis for these significant penalties.</p>	<p>consultation response using SEGRO's assumptions shows that OPDC is proposing a considered approach when benchmarked against other host boroughs.</p> <p>The amount payable for under-delivery of the local jobs target (£25,000 per job) is based on paying London Living Wage (LLW) for 37 hours per week over a 12-month period of employment. For apprenticeships, the amount payable is based on paying National Living Wage (NLW) for 37 hours per week over a 12-month training period and average yearly training costs, which equates to £30,000 per apprenticeship not delivered on site. This approach was developed following engagement and benchmarking with a range of boroughs across London, including the 3 host boroughs, and a review of documents (where available).</p>

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32	SEGRO			<p>National Planning Policy Guidance states: "Policies for planning obligations should be set out in plans and examined in public. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land.</p> <p>...It is not appropriate for plan-makers to set out new formulaic approaches to planning obligations in supplementary planning documents or supporting evidence base documents, as these would not be subject to examination".</p> <p>It is our understanding that the Whole Plan Viability Study for the Local Plan (2017) has not accounted for costs of the magnitude proposed. It is therefore contrary to national policy guidance to introduce significant financial penalties into the Planning Obligations SPD.</p>	Changes are proposed to OB7B, Part c and supporting text, to clarify that contributions are only payable when reasonable endeavours have not been demonstrated.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
33	SEGRO			Why do the apprenticeships have to be new ones? What are contractors supposed to do with the existing apprentices? How will this work for short duration developments which rely on partial apprenticeships who complete their experience across more than one project?	<p>No change proposed. OB7B allows for 50% of the workforce opportunities to be for apprentices, with at least 50% of these being new apprentices. Allowing a mix will help to develop a pipeline of new entrants into a sector that is afflicted by skills shortages and an ageing workforce.</p> <p>Para 4.77 states that: "OPDC recognises that different types of development and forms/methods of construction will affect construction periods and construction jobs. OPDC will consider information related to specific development proposals, where this is provided during the planning application stage to agree and secure an appropriate contribution". OPDC will consider approaches to apprenticeship delivery, and examples given in para 4.82 include:</p> <p>»Apprentices being directly employed by the developer, main contractor and their supply chain subcontractors; and</p>

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					»Apprentices being employed directly by developer or main contractor and loaned out to subcontractors and salary costs re-charged to developer. A commitment by the developer and main contractor to contract with a Flexi-Job Training Agency (FJTA) to employ the apprentice directly and support them to move-on and in turn help ensure completion of the apprenticeship qualification.

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34	SEGRO			Why are targets based on gross employment rather than new opportunities? Should a company need to make part of its workforce redundant to locating in OPDC area?	<p>Noted. Contributions will be sought to mitigate the impacts of development and negotiated on a case by case basis. Para 4.78 states: "In cases where new employment floorspace is being reprovided for an existing business within the OPDC area to relocate and no new end use jobs are being created as a result, alternative opportunities identified will be considered such as offering paid work placements and upskilling existing staff.</p> <p>OPDC's approach to setting a target for end use jobs is relatively standard - as evidenced by the examples given in the consultation response. The previous SPD had a % target, albeit based on a different metric. Setting a target provides a clear steer to applicants to support negotiations.</p> <p>People from the local area are those whose primary residences are in the boroughs of Brent, Ealing or Hammersmith and Fulham. The 3 borough</p>

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					<p>catchment means that there is a wider geographical area to recruit labour from. To support this process, OPDC works with partners including the host boroughs, the West London Alliance, developers, and other stakeholders to coordinate activity and to work with developers to help them demonstrate reasonable endeavours have been made.</p>

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35	SEGRO			For specialist buildings like data centres, 10% spend locally is highly unrealistic and that will need to be reflected in the associated Local Labour, Skills and Employment Strategy and Management Plan.	Changes are proposed to OB7B, OB7C and supporting text to capture more opportunities to support the local supply chain and that this will be subject to reasonable endeavours.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
36	SEGRO			<p>As a landlord, we will not be obligating new tenants to employ from the 3 boroughs in our leases. We still need to explore the lawfulness of this as a s106 requirement, as it seems highly questionable. The bigger issue is the increasing challenge of retaining and attracting industrial businesses to stay/come to Park Royal. Competition from other industrial areas inside and outside of London is real, and there is a growing trend for businesses to look elsewhere (commonly Hounslow, Hillingdon, Slough and even Hemel Hempstead) to benefit from lower costs (labour, rent, business rates). Carrots (a well-run brokerage service) can be an effective tool in retaining and attracting business to Park Royal rather than sticks (penalties and obligations), which make a decision to locate elsewhere easier.</p>	<p>Noted. The previous SPD included text to highlight that the applicant should "communicate and pass down the LLSESMP requirements to contractors, sub-contractors and commercial tenants (i.e., written statements in contracts and tenancy agreements)". The latest amendments build on this by referring to the need for a robust approach to monitoring. The targets and financial contributions would be agreed through negotiation with the applicant. The commitments should be passed down and OPDC also asks for a named contact for the commercial tenants expected to occupy the development. This process means that OPDC can work with the future occupiers.</p> <p>To support this process, OPDC works with partners including the host boroughs, the West London Alliance, developers, and other stakeholders to coordinate activity and to work with developers to help them demonstrate reasonable</p>

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					endeavours have been made. Changes are proposed to OB7B, Part c and supporting text, to clarify that contributions are only payable when reasonable endeavours have not been demonstrated.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
37	SEGRO			What is the OPDC's Fairness, Inclusion and Respect D&I in construction initiative?	Change proposed to provide opportunities for other standards to be referenced/used provided that they meet equivalent OPDC standards.
38	SEGRO			Why is a biometric access system so important to OPDC? Is this commonplace across all types of construction site?	No change proposed. On larger sites, using a biometric system would make collating workforce data easier and more robust. Para 4.82 does allow other approaches to be agreed as per the following text: "The developer should use a biometric site access system to collect, monitor and report workforce data, unless agreed with the LPA".

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
39	SEGRO			<p>Key recommendations</p> <ul style="list-style-type: none"> •Avoid changing the guidance so regularly. Provide consistency and certainty instead. •Targets should remain based on opportunities/vacancies, not on gross job creation. •It must be acknowledged that projects with construction lasting less than 12 months will not deliver apprenticeships in the usual way. We would welcome the opportunity to agree a suitable alternative target than can be applied on a regular basis for these kinds of projects, rather than agreed on a project-by-project basis, which is uncertain and time consuming. •Apply an operational job target of 20% - still a highly challenging and ambitious target. •Remove proposed financial penalties. •Remove the expectation that business occupiers should be legally contracted to employ a specific number of local people by the developer. •Focus on carrots rather than sticks to incentivise local employment for business 	Noted. Detailed responses are provided under refs 23-38

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				<p>occupiers.</p> <p>To summarise, while we have a number of key concerns with this guidance, we are very passionate about helping our local communities to prosper in the workplace and share the OPDC's objectives in this regard. We hope these representations are clear and welcome further discussion with officers.</p>	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
40	Lichfields	Prologis UK Limited		<p>This letter has been prepared by Lichfields and is submitted on behalf of our client, Prologis UK Limited ('Prologis'). It comprises a formal response to the Revised Planning Obligations Supplementary Planning Document ('SPD') consultation published by the Old Oak and Park Royal Development Corporation ('OPDC') which is open until Monday 28 July 2025. The consultation considers proposed changes to the Revised Planning Obligations SPD which was formally adopted by OPDC's Board in February 2024. In particular, the consultation focuses on changes relating to construction management, targets for employing local people and using local suppliers and guidance on what should be covered in a Local Labour, Skills, Employment Strategy and Management Plan. Prologis submitted representations to the previous iterations of the Planning Obligations SPD, including the consultation in November 2022 and the further consultation on the</p>	Noted.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				draft in November 2023. This response builds on, and where appropriate reiterates, the comments previously submitted by Prologis in relation to those consultations.	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
41	Lichfields	Prologis UK Limited		<p>Background</p> <p>Prologis is one of the largest developers of industrial logistics buildings within London and across the UK. The company currently owns five warehouse assets within OPDC, with the most recent acquisition being part of Western Avenue Business Park (c. 26,800sqm, leased to 21 mixed use logistics, industrial and retail occupiers). All of these assets are located within the industrial heartland of Park Royal. Where appropriate, Prologis will redevelop these sites to deliver world-class warehousing and logistics facilities to meet the growing needs of its customers and London as a whole. Whilst these sites are located within LB Brent, they are within the planning jurisdiction of OPDC for the purpose of determining new applications and therefore the guidance within the draft revised SPD will apply. Of particular relevance to Park Royal and London more widely, Prologis is seeking to bring forward multi-storey industrial developments and redevelopment/intensification</p>	Noted.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				<p>of assets in Park Royal to help meet the acute need for new distribution warehouse floorspace and make best use of the limited space available, as explicitly encouraged by the GLA and the London Plan (Policy E7). Indeed, Prologis has unrivalled knowledge of multi-storey logistics schemes globally and has been building multi storey warehouses elsewhere in the world since 2002, delivering 112 buildings totalling over 76 million sqm. Prologis has used this knowledge, alongside a significant amount of research and analysis of the UK commercial market, to inform the highly specialist and technical design of its London multi-storey concept. These representations are therefore prepared in the context of optimising density on sites and facilitating urban intensification through the delivery of innovative, multi-storey buildings.</p>	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
42	Lichfields	Prologis UK Limited		<p>Overarching Comments</p> <p>The Planning Obligations SPD was previously revised to take into account the draft OPDC Community Infrastructure Levy ('CIL') charging schedule. Prologis supported this approach in principle in removing those infrastructure elements that are now proposed to be funded directly through the draft CIL Charging Schedule rather than S106 contributions. This provides guidance and certainty to developers. Prologis engaged with OPDC in the preparation of the Draft CIL Charging Schedule and agreed a Statement of Common Ground in respect of amendments which related to multi-level industrial building. However, in respect of the remaining obligations and specifically those which are the subject of this current consultation, Prologis has significant concerns about the proposals and the impact these will have on the delivery of new developments within Park Royal. The following obligation-specific comments are made in this context, so as to ensure that the</p>	Noted.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				actual amounts (costs) of likely S106 and the requirements placed on developers are not onerous and do not adversely impact on the economic viability and delivery of new development in the ODPC area.	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
43	Lichfields	Prologis UK Limited	OB7B: Employment, training and skills and local supply chain contributions	<p>The principle of delivering local jobs in new industrial developments at all stages of the process is supported, and is something Prologis has experience in delivering on a number of major developments across London and the UK as a whole. However, Prologis considers that the requirements contained within this draft obligation are not practical for a number of reasons, as set out below. Operational Stage: Firstly, the revised wording to obligation OB7B requires that 'at least 30% of the on-site end / operational stage related job workforce, employ people from the local area.' It is proposed that this is a defined requirement (previously the obligation required 'a percentage') and a criteria has been added which requires each end use job to provide a minimum of 26 weeks employment. The obligation goes on to state that where this target is not met in full, a financial contribution of £25,000 per job is payable. Prologis objects to this obligation given considerable concern around the</p>	<p>Change proposed to revise the end use job target to 20% and balance this by amending the support fee to £1,850.</p> <p>The previous SPD included text to highlight that the applicant should "communicate and pass down the LLESMP requirements to contractors, sub contractors and commercial tenants (i.e., written statements in contracts and tenancy agreements)". The latest amendments build on this by referring to the need for a robust approach to monitoring. The targets and financial contributions would be agreed through negotiation with the applicant. The commitments should be passed down and OPDC also asks for a named contact for the commercial tenants expected to occupy the development. This process means that OPDC can work with the future occupiers.</p> <p>People from the local area are those whose primary residences are in the boroughs of Brent,</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				<p>impact that it would have on the feasibility and deliverability of new industrial development in Park Royal. Prologis is an owner of industrial buildings which are leased, in whole or part, to occupiers active in a wide range of sectors, including storage, distribution, retail, e-commerce, logistics, datacentres and manufacturing. The existing and potential occupiers of the new buildings developed by Prologis are mixed and varied and cover a wide range of business types. As a developer and owner, Prologis are not responsible for the people who will be employed in the industrial buildings it develops and do not have any control over who the occupiers of its buildings employ. To accord with this proposed obligation Prologis would have to include the requirement for 30% local employment within the leases of new occupiers along with associated monitoring and management. Because of the wide range of potential occupiers and the businesses and sectors within which they operate, not all</p>	<p>Ealing or Hammersmith and Fulham. The 3 borough catchment means that there is a wider geographical area to recruit labour from. To support this process, OPDC works with partners including the host boroughs, the West London Alliance, developers, and other stakeholders to coordinate activity and to work with developers to help them demonstrate reasonable endeavours have been made.</p> <p>The obligations related to the use of local labour, skills and suppliers will contribute towards reducing overall commuting journeys, minimising vehicle mileage and associated emissions. Given these benefits, they form a key part of the measures required to mitigate transport and environmental impacts to make development acceptable. Changes are proposed to OB7B, Part c and supporting text, to clarify that contributions are only payable</p>

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				tenants will be able to achieve this for a range of reasons. As a requirement of the lease, it is likely to result in many occupiers not being able to commit to this which would impact on the commerciality and ultimately the feasibility of Park Royal as an industrial centre. In addition, the financial contribution of £25,000 per job which would be required where the target is not met is of significant concern. For the reasons set out above, it is very unlikely that all potential occupiers would be able to achieve the 30% target and where this is not met, the developer, such as Prologis, would be liable for the financial contribution. This contribution could be extremely significant on a large scheme and would greatly impact the viability of large multi-level industrial units which is contrary to the objectives of the London and Local Plans and could disincentivise developers bringing schemes forward. We are also acutely aware that rental levels in Park Royal and other prime industrial locations are becoming increasingly unattractive	<p>when reasonable endeavours have not been demonstrated.</p> <p>The amount payable for under-delivery of the local jobs target (£25,000 per job) is based on paying London Living Wage (LLW) for 37 hours per week over a 12-month period of employment. For apprenticeships, the amount payable is based on paying National Living Wage (NLW) for 37 hours per week over a 12-month training period and average yearly training costs, which equates to £30,000 per apprenticeship not delivered on site. This approach was developed following engagement and benchmarking with a range of boroughs across London, including the 3 host boroughs, and a review of documents (where available).</p> <p>The points raised in regarding Employment and Skills in the previous (November 2022)</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				to occupiers, with a clear trend in the market toward relocating out of core London locations to more affordable areas. The imposition of this additional employment obligation — particularly with its financial penalty — adds a further burden that exacerbates the viability challenges already faced in these locations. This risks making Park Royal even less competitive and less attractive to occupiers, undermining efforts to retain and grow employment and investment in one of London's key industrial centres. Further, whilst the SPD states that the financial contribution will be used to fund OPDC supporting applicants to find candidates from the local area, it is not clear how the figure of £25,000 has been arrived at and how this would compensate against the identified targets. For these reasons, Prologis consider that it is not appropriate to require targets for local employment for 'end use' jobs and this obligation should be removed. It is not clearly justified how this relates to London or Local Plan policy. In addition, it is not considered that	representation related to the capacity of the operation borough workforce, skills and training centres and the use of best/reasonable endeavours. Similar points have been made and responses have been provided under refs 44, 46, 47, 48.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				<p>this requirement meets the statutory tests in regulation 122 as they are not necessary to make the development acceptable or fairly and reasonably related. As an alternative, and as set out in the Prologis' previous representations in November 2023, it is considered more appropriate (necessary and reasonable) to require local employment targets on the demolition and construction stage as this is more within the control of the developer, however these must take into consideration the points made below. Appended to this letter is the previous representations, which sets out a suggested approach and alternative wording in respect of employment targets during the construction phase.</p>	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
44	Lichfields	Prologis UK Limited	OB7B: Employment, training and skills and local supply chain contributions	<p>Prologis also has significant concerns about the construction-related obligations proposed under OB7B, particularly those relating to fixed local employment targets and the imposition of steep financial penalties where those targets are not met. These provisions are not appropriate, reasonable, or practical for a developer like Prologis or a principal contractor. It is imperative that the definition of local employment is broadened to capture all new entrant opportunities – both within and outside of the local area. Our key objections are as follows:</p> <p>1. Developer and Contractor Lack Direct Control Over Construction Workforce Composition The requirement for 20% of demolition, construction, and fit-out jobs to be filled by local residents — calculated through specific workforce formulas — is fundamentally flawed in the context of how largescale industrial development is delivered. Developers such as Prologis operate via fixed-price contracts with principal</p>	<p>Noted. Part a(i) relates to local labour supply targets for the demolition, construction and fit out stages of development. The consultation included amendments to Part a(i) to:</p> <ul style="list-style-type: none"> - remove 20% target (but retains target based on floorspace/units). - clarify the proportion of apprenticeships that should be new. - provide more flexibility by considering other pathways to employment instead of a single focus on work placements. <p>Para 4.77 states that "OPDC will consider information related to specific development proposals, where this is provided during the planning application stage to agree and secure an appropriate contribution". Applicants are encouraged to share and clearly communicate the s106 obligations as part of the procurement exercise to select a main contractor. As such, no changes are proposed to Part a(i).</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				<p>contractors, who in turn rely on layered subcontracting chains. Neither Prologis nor its Tier 1 contractor can directly control or guarantee the employment choices of subcontractors. Imposing performance-related penalties in such a fragmented supply chain context is unworkable and unreasonable.</p>	<p>Changes are proposed to OB7B, Part c and supporting text, to clarify that contributions are only payable when reasonable endeavours have not been demonstrated.</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
45	Lichfields	Prologis UK Limited	OB7B: Employment, training and skills and local supply chain contributions	<p>2. Penalties Are Disproportionate and Financially Punitive</p> <p>The proposal to levy £25,000 per job and £30,000 per apprenticeship for any shortfall in the construction employment targets is grossly disproportionate. Even a modest 10-job shortfall would result in £250,000 in financial contributions, despite the use of “reasonable endeavours” to comply. These figures are not evidenced by any viability analysis or linked to the actual cost of providing offsite training. Such penalties distort development viability — especially for large, multi-phase or multi-level industrial schemes — and would act as a deterrent to investment in the OPDC area.</p>	<p>Changes are proposed to OB7B, Part c and supporting text, to clarify that contributions are only payable when reasonable endeavours have not been demonstrated.</p> <p>The amount payable for under-delivery of the local jobs target (£25,000 per job) is based on paying London Living Wage (LLW) for 37 hours per week over a 12-month period of employment. For apprenticeships, the amount payable is based on paying National Living Wage (NLW) for 37 hours per week over a 12-month training period and average yearly training costs, which equates to £30,000 per apprenticeship not delivered on site. This approach was developed following engagement and benchmarking with a range of boroughs across London, including the 3 host boroughs, and a review of documents (where available).</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
46	Lichfields	Prologis UK Limited	OB7B: Employment, training and skills and local supply chain contributions	<p>3. One-Size-Fits-All Targets Do Not Reflect Market or Construction Realities</p> <p>The approach assumes a uniform ability across all construction types and timelines to deliver fixed employment outputs. However, industrial developments frequently involve shorter construction programmes, higher reliance on automation, lower labour intensity, and pre-fabrication. For example, average construction programmes make it difficult to attract apprentices, as often specific trades are only on site for a 6-8 week period. All of these matters reduce on-site job opportunities relative to residential or mixed-use schemes. It is not appropriate to benchmark performance using housing-style metrics (e.g. 1 local opportunity per 500 sqm). This risks unfairly penalising industrial developers for systemic differences in build typologies.</p>	<p>Para 4.77 states that: "OPDC recognises that different types of development and forms/methods of construction will affect construction periods and construction jobs. OPDC will consider information related to specific development proposals, where this is provided during the planning application stage to agree and secure an appropriate contribution". OPDC will consider approaches to apprenticeship delivery, and examples given in para 4.82 include:</p> <p>»Apprentices being directly employed by the developer, main contractor and their supply chain subcontractors; and</p> <p>»Apprentices being employed directly by developer or main contractor and loaned out to subcontractors and salary costs re-charged to developer. A commitment by the developer and main contractor to contract with a Flexi-Job Training Agency (FJTA) to employ the apprentice directly and support them to move-on and in turn help ensure</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
					<p>completion of the apprenticeship qualification.</p> <p>Changes are proposed to OB7B, Part c and supporting text, to clarify that contributions are only payable when reasonable endeavours have not been demonstrated.</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
47	Lichfields	Prologis UK Limited	OB7B: Employment, training and skills and local supply chain contributions	<p>Recognising alternative training programmes</p> <p>To reiterate, Prologis is supportive in principle of the requirement for the delivery of skills training centres. Alternative training programmes should be welcomed to capture all apprenticeship, upskilling and training opportunities – both within and outside of the local area. Many developers operate their own employment and training procedures and the SPD does not recognise or take account of this. For example, Prologis has its own successful internal training programme – the Prologis Warehousing and Logistics and Training Programme (PWLTP) – which it is proposing to deliver locally. Prologis’ preference would therefore be to train through this programme, which has been demonstrated to be successful.</p>	<p>Change proposed to refer to alternative approaches. The current skills and training landscape is already highly fragmented and complex. In response to this, OPDC's priority is to work with partners including the host boroughs, the West London Alliance, developers, and other stakeholders to coordinate activity - reducing complexity and duplication; ensuring key objectives are met, including those related to Equity, Diversity, and Inclusion (EDI), and with clear oversight and monitoring to help demonstrate reasonable endeavours have been made. OPDC would have to consider what degree of flexibility might be permitted by exception on a case-by-case basis and changes have been made to the supporting text to clarify this.</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
48	Lichfields	Prologis UK Limited	OB7B: Employment, training and skills and local supply chain contributions	<p>The supporting text in the SPD confirms that delivery of on-site skills training centres or securing financial contributions towards this provision will be considered on a case-by-case basis. However, we consider that the SPD needs to go further to support this approach and as such we request that the following specific text is included for clarity and to allow the Council to take account of bespoke successful employment initiatives already run by developers within Park Royal: 'In instances where alternative training programmes are provided, a reduction in the required contribution can be applied to avoid double-counting. In addition, where skills training facilities are provided as part of a development, additional financial contributions will not be required.' This could be covered by a condition or specific S106 commitment which is directly related to a specific development.</p>	<p>Change proposed to refer to alternative approaches. The current skills and training landscape is already highly fragmented and complex. In response to this, OPDC's priority is to work with partners including the host boroughs, the West London Alliance, developers, and other stakeholders to coordinate activity - reducing complexity and duplication; ensuring key objectives are met, including those related to Equity, Diversity, and Inclusion (EDI), and with clear oversight and monitoring to help demonstrate reasonable endeavours have been made. OPDC would have to consider what degree of flexibility might be permitted by exception on a case-by-case basis and changes have been made to the supporting text to clarify this.</p> <p>In cases where in kind delivery of dedicated on-site skills training centres are considered appropriate, OPDC would take a view on whether other contributions are required to</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
					mitigate the impacts of development, and if they were they would be secured as additional financial contributions.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
49	Lichfields	Prologis UK Limited	OB7B: Employment, training and skills and local supply chain contributions	<p>Summary</p> <p>Overall, Prologis is supportive of the aims and objectives of the revised draft SPD and the focus on employment in the area. The principles for the delivery of objectives in accordance with host borough local plans and the London plan is recognised and supported. However, as set out above, the proposed revisions to the employment, training and skills obligations would create significant additional burden on the viability of schemes and impact on the feasibility of delivering new industrial space within Park Royal. Prologis objects to the current wording of the obligations, with significant revisions required to make the obligations workable. To be clear, Prologis is not against the objectives of the employment of local people and indeed takes steps to actively promote this within the construction on its schemes. However, the SPD's focus on 'end use' jobs is not feasible and would impact on the letability of new buildings in the area. The proposed obligation</p>	Noted. Responses to these are covered in detail under refs 40-48.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				<p>does not meet the necessary S106 tests and it not supported by London or Local Plan policy. We therefore request that the above amendments to Obligation OB7B are made to ensure that the strategic objectives of the OPDC can be fully realised. In addition, additional emphasis should be added to the SPD which allows for bespoke schemes which deliver the employment objectives of OPDC in other ways. Prologis would welcome the opportunity to work with OPDC in developing the SPD further prior to its finalisation and adoption, and would be happy to discuss the comments set out above in person.</p>	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
50	Arup	A data centre		<ul style="list-style-type: none"> • General comments: <ul style="list-style-type: none"> o The higher the financial obligations data centre developers pay under S106, the higher the development costs. This may deter data centre investment within OPDC in the future. 	No change proposed. OPDC has considered the economic challenges of development. For example, the changes to end use targets has been balanced with a lower support fee. We understand current economic circumstances, but we hope that by working with developers to create local benefits, and collaborating on investment in the short, medium and long term skills development of a workforce, will aid productivity and drive growth.
51	Arup	A data centre		<ul style="list-style-type: none"> o It would be useful if OPDC made it clear how S106 funds get spent. This would then help data centre developers to direct their own community engagement and public policy strategies to add tangible value in parallel with OPDC's S106 spending approach. 	Noted. OPDC produces an Infrastructure Funding Statement (IFS) annually which sets out how s106 contributions are spent. This is publicly available.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
52	Arup	A data centre		o It is suggested that OPDC establish a local labour framework with local schools and colleges that developers can be part of. This could have more tangible value and make it easier for developers to meet the local labour requirements.	Noted.
53	Arup	A data centre		<ul style="list-style-type: none"> • OB7B: Employment, training and skills and local supply chain contributions: o Regarding point (a), currently the definition of 'local labour' is dictated by postcode. Labour based slightly outside of 'local labour' postcodes is not considered to fulfil local labour requirements. It would be useful to have a more flexible definition of 'local labour' so that developers can show they have taken the best endeavours to recruit from 'local labour' postcodes but can also recruit from areas slightly beyond these postcodes if there is labour available. This increased flexibility would ensure the local community could still benefit from development without being restricted to those from 'local labour' postcodes. 	No change proposed. People from the local area are those whose primary residences are in the boroughs of Brent, Ealing or Hammersmith and Fulham. The three borough catchment means that there is a wider geographical area to recruit labour from. To support this process, OPDC works with partners including the host boroughs, the West London Alliance, developers, and other stakeholders to coordinate activity and to work with developers to help them demonstrate reasonable endeavours have been made.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
54	Arup	A data centre		o Regarding point (c), it is useful to have financial contributions to pay if data centre developers have taken reasonable endeavours but still cannot meet the local labour requirements.	Changes are proposed to OB7B, Part c and supporting text, to clarify that contributions are only payable when reasonable endeavours have not been demonstrated.
55	Arup	A data centre		o Further to the general comment above, it would be appreciated if there could be greater transparency regarding where these financial contributions would go as well.	Noted. OPDC produces an Infrastructure Funding Statement (IFS) annually which sets out how s106 contributions are spent. This is available publicly.
56	Arup	As data centre		<ul style="list-style-type: none"> • OB7D: Provision of affordable workspace: o This would be inappropriate for data centre developments. Apart from providing on-site affordable workspace separate to the data centre, it is not possible to charge affordable rent to data centre customers. It would also negatively impact investment return for data centre projects and may therefore deter investment within OPDC. 	No change proposed. This section of the document was not subject to amendments. The SPD guidance does not specify a use class for the affordable workspace. The SPD approach is informed by the recommendations in the 2022 Affordable Workspace Study.

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57	Arup	A data centre		Regarding point (f), an 80% discount is unreasonable. From a user programming perspective, this may also lead to affordable workspace users being in inappropriate areas within data centre developments.	No change proposed. This section of the document was not subject to amendments. The SPD guidance does not specify a use class for the affordable workspace. The SPD approach is informed by the recommendations in the 2022 Affordable Workspace Study.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
58	Deloitte LLP	Metropolitan Police		<p>This representation advocates for the expansion of the scoping of the Planning Obligations SPD to support the Metropolitan Police Service (MPS). This is crucial to address the escalating demand on operational policing resulting from London's housing targets and other development initiatives. Since 2022/23, the MPS has been entirely reliant on capital receipts and revenue contributions for capital expenditure due to the cessation of central government capital grants. Despite significant asset disposals since 2010 and restructuring efforts generating approximately £1.7 billion in savings, existing reserves are insufficient to maintain and enhance the level of policing required to ensure the safety and security of Londoners. MPS has successfully secured approximately £8 million in developer contributions since 2022, facilitating the delivery of c.50,000 homes and so despite case-by-case negotiation. The annual delivery of approximately 80,000 homes targeted by the London Plan necessitates a more</p>	Noted.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				robust and consistent approach. A consistent policy consideration of safety and security level as a result of new developments across London boroughs would achieve this, providing greater financial certainty and enabling the MPS to effectively plan and deliver its services. This will ensure the MPS can adequately respond to the increased demands placed upon it by the anticipated significant growth in housing and population.	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
59	Deloitte LLP	Metropolitan Police		MPS welcomes the opportunity to comment on the emerging Planning Obligations SPD, although we note the word “safety” only appears twice in relation to construction works and no reference is made to “security” or “police”. This does not seem to flow from the Infrastructure Delivery Plan dated June 2018 which identifies the need for three dedicated ward offices, as subsequently captured under ‘Policy TCC3: Social Infrastructure’ of the Local Plan dated June 2022.	The Infrastructure Delivery Plan (IDP) updated in 2021 identifies the need for three dedicated ward offices. Their location or timing has not yet been determined and OPDC will work with developers and the Metropolitan Police to ensure their timely delivery in the most appropriate locations.

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60	Deloitte LLP	Metropolitan Police		<p>This response focuses on maintaining the extent and quality of policing necessary to provide a safe and secure environment for all Londoner and visitors. Since 2010 and in light of financial pressures, the MPS has reduced the size of its estate from 620 to around 200 operational buildings to sustain officer numbers and fund its estate transformation by reallocating savings where needed. We estimate that, to deliver the required level of policing that London requires by 2034, the MPS needs to grow by c. 4,500 police officers to 38,000 and c.85,500 sqm in order to provide sufficient accommodation for these numbers (including specialist facilities such as custody suites and laboratories). The MPS faces a significant challenge: insufficient funding to support the capital infrastructure needs generated by new developments. Unlike other public services with dedicated capital funding programmes, the MPS relies on borrowing, which is primarily used to address urgent maintenance issues and replace</p>	<p>Noted. As set out above the IDP sets out the need for three dedicated ward offices and OPDC will be working with developers on the provision of these. OPDC would welcome continued dialogue on the requirements for the provision of these offices.</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				<p>essential equipment like vehicles due to budgetary constraints where over 90% is allocated to staffing. This funding limitation has been publicly acknowledged by the National Police Chiefs' Council. This situation is putting unsustainable pressure on MPS' reserves and its ability to maintain the existing level of service and estate, whilst responding to increasing demand from a growing population. In light of those challenges, the MPS has resolved to seek developer contributions to ensure that existing levels of service can be maintained as this growth takes place. To date, the MPS has reverted to negotiating developer contributions on a case-by-case basis based on the scale and type of development, noting that such approach is not just a simple result of financial constraints but a justified approach to mitigating direct impact from additional development. There is therefore a pressing need to acknowledge within planning policies the need to improve existing MPS infrastructure and support the</p>	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				growth in MPS infrastructure over the next 10 years.	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
.61	Deloitte LLP	Metropolitan Police		<p>Sections of the NPPF, and specifically Section 8 ‘Promoting health and safe communities’, puts emphasise on the need for planning policies and decision to achieve safe places, and that “that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion” (Paragraph 96). Paragraph 101 states that “to ensure faster delivery of other public service infrastructure such as health, blue light, library, adult education, university and criminal justice facilities, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development”. Paragraph 102 states that policies should be informed by “most up-to-date information available from the</p>	<p>Noted. OPDC’s Local Plan has a number of policies around creating safe environments and each planning application is assessed against these requirements.</p> <p>Designing out Crime Officers (DOCOs) routinely respond to all major planning applications where there is an opportunity to influence the built environment in order achieve sustainable reductions in crime, for example, avoiding unnecessary alleyways, secure and climb resistant fencing, public areas, car parking and private areas being well lit.</p>

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				<p>police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security". The NPPF recognises the importance to achieve safe places, notably through good design. It also recognises that local authorities should engage with public partners to ensure appropriate public service and infrastructure are in place.</p>	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
62	Deloitte LLP	Metropolitan Police		<p>Police servicing is essential to community cohesion as identified in paragraph 102 of the NPPF.</p> <p>It is under this mandate that MPS has developed a methodology to support S106 requests. The methodology used by MPS has been tested at numerous public inquiries nationally, with the result that there are now 12 Secretary of State and 24 Planning Inspectorate decisions supporting Section 106 contributions for police infrastructure. The request is directly related to the development and the direct policing impacts it will generate, based on an examination of demand levels in the Borough in which it is situated, adjacent areas and existing policing demands and deployment in relation to this. The methodology is in accordance with the statutory tests of CIL Regulation 122 by the High Court, Secretary of State and the Planning Inspectorate, whereby:</p> <ul style="list-style-type: none"> • it is necessary to make the development acceptable in planning terms – the lack of capacity in existing infrastructure 	Noted.

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				<p>to accommodate the population growth and associated demands occasioned by the development means that it is necessary for the application to offset its impact through appropriate contribution.</p> <ul style="list-style-type: none"> • it directly relates to the development – the contribution is wholly used to meet the direct impacts of the development to deploy the appropriate level of policing. • it is fairly and reasonably related in scale and kind to the development – the formula is directly linked to the size and type of development. <p>The MPS applies a methodology that has been used across the UK by other police services. The methodology has notably been qualified by a Planning Inspector as “no less realistic and robust [...] that the analysis of population data which is normally used to calculate the future demand for school places” (appeal ref. APP/K2420/W/15/3004910). The formula is informed by:</p> <ul style="list-style-type: none"> • GLA population census and growth predictions within the 	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
				<p>relevant Borough</p> <ul style="list-style-type: none"> • Number of additional residents based on unit types proposed in the development • Draw on existing police resource to, in turn, determine additional resource (and associated set-up, including equipment, premises and vehicles) required to serve the development <p>MPS has been relying on case-by-case negotiation at determination stage, as well as applicants' willingness to engage through design development, particularly in large regeneration projects to secure much needed funding. It is not a sustainable or fair approach to recognising the impact of development on MPS infrastructure – existing and additional policing demands.</p>	

Ref.	Organisation	On Behalf Of	Para/Figure/ Obligation Ref.	Comment	OPDC Response
63	Deloitte LLP	Metropolitan Police		We strongly encourage that the new Planning Obligations SPD explicitly requires applicants to consider and appropriately mitigate the impact of their proposals by engaging with MPS throughout design development and in preparing their submissions. We recommend that such consideration is captured under 'HOT 5: Social Infrastructure' or a new section with appropriate drafting leveraging information provided above.	No change proposed. Obligation OB5A deals specifically with securing the on-site provision of social infrastructure to support development. This social infrastructure required is identified in the Infrastructure Delivery Plan, including the three new ward police offices, the exact location of which is yet to be established. Part b sets out that where specific development sites to deliver facilities have not yet been identified, OPDC will work with applicants, the relevant service providers and other stakeholders to determine if a specific site is appropriate to deliver a new social infrastructure facility. Such discussions should be held early in the planning process to inform the schemes design and draft Heads of Terms on submission. OPDC will work with developers and the Metropolitan Police Service to secure the appropriate location. OPDC adopted a Community Infrastructure Levy (CIL) Charging Schedule in February 2024, and it is CIL rather than section 106 planning

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					<p>contributions that will be used to help fund the delivery of social infrastructure such as new policing facilities.</p> <p>Designing out Crime Officers (DOCOs) routinely respond to all major planning applications where there is an opportunity to influence the built environment in order achieve sustainable reductions in crime, for example, avoiding unnecessary alleyways, secure and climb resistant fencing, public areas, car parking and private areas being well lit. The Metropolitan Police Service may also comment on planning applications when development increases the need for policing, leading to a legitimate infrastructure requirement on the MPS and is encouraged to engage in pre application discussions with developers to ensure that any crime or safety risks are appropriately mitigated.</p>

