Industrial Land Review
Addendum April 2018

1 Introduction

1.1 An Industrial Land Review (ILR) Study was first published in February 2016 as part of the consultation on OPDC's Regulation 18 Draft Local Plan. The ILR was subsequently updated through an Addendum, published in June 2017 for consultation to support the Regulation 19(1) Revised Draft Local Plan. The 2017 Addendum considered comments received as part of the Regulation 18 Draft Local Plan consultation, and responded to specific concerns raised about recommendations to adjust the Strategic Industrial Location (SIL) boundary on land parcel E3.19.

1.2 This 2018 Addendum has been prepared to update the ILR and supersede the previously published Addendum. Updates are necessary in order to take into account additional responses to the Regulation 19(1) Revised Draft Local Plan consultation and an updated planning policy context and associated requirements. The 2018 Addendum is being used to support the Regulation 19(2) Second Revised Draft Local Plan. More information on updates since the last publication of the ILR is provided below.

2 Updates since the 2017 Addendum

London Plan

2.1 The Mayor's London Plan sets out the strategic approach to promoting and managing Strategic Industrial Location (SIL). SILs are given strategic protection in the London Plan because their scale and relatively homogenous character means they can accommodate activities which elsewhere might raise tensions with other land uses.

2.2 The current London Plan (2016) policy 2.17D expects local planning authorities to identify SIL boundaries and develop local policies based on clear and robust assessments of need to protect their function, to enhance their attractiveness and competitiveness for broad industrial type activities, including access improvements.

2.3 The Mayor published the Draft New London Plan for consultation in December 2017. Up to date evidence supporting the Draft New London Plan on the supply and demand of industrial land in London[1] shows an accelerated loss of industrial land to other uses with 105ha per annum being lost between 2010-2015, against a predicted loss of 37ha per annum. Conversely, research indicates that there will be ongoing net demand for industrial land expected at least up to 2041.

2.4 Policy E4 in the Draft New London Plan seeks to introduce stronger protection by setting out the objective for no net loss of industrial floorspace capacity across London. Local planning authorities have been categorised in terms of how they should be managing industrial capacity to ensure no net loss is achieved. OPDC is identified in the 'provide capacity' category for industrial space, which means that additional industrial capacity must be provided within the OPDC area.

2.5 No net loss of industrial floorspace capacity is expected to be achieved through one or more of the following:

- Intensification
- Co-location

[1] London Industrial Land Demand Study, 2017; London Industrial Land Supply and Economy Study, 2015

- Substitution

OPDC's Local Plan

2.6 The Revised Draft Local Plan was published for public consultation in June 2017, supported by the ILR and 2017 Addendum. The SIL boundary was one of the key issues raised as part of this consultation and some next steps were agreed by OPDC's Board in November 2017 (see Figure 1). This Addendum takes this action forward and considers whether a change in approach to the SIL boundary is acceptable. The submission of the Local Plan will be accompanied by the Statement of Consultation providing a detailed set of consultation issues and officers' responses to these issues.

Figure 1: Revised draft Local Plan key consultation issues

Key Issue	Raised by	Next steps (proposed on 7th November 2017)
Further land should be de-designated from Strategic Industrial Location (Old Park Royal, Twyford Tip) to allow for more mixed-use development.	Various local community groups and some Landowners	Review the new London Plan consultation that is expected later in 2017 and consider any implications as a result and if there needs to be a change to our proposed approach. If not, continue approach to safeguarding SIL.

Park Royal Development Framework Principles

2.7 OPDC commissioned a Park Royal Development Framework Principles supporting study in February 2018. This has sought to reconcile issues or recommendations related to Park Royal Centre that are currently spread across a number of the Local Plan supporting studies. The outputs from this work include recommendations for land use designations, an assessment of suitable sites for expansion of the town centre and a revised town centre/SIL boundary. It confirms a recommendation for land parcel E3.19 which was previously covered in the 2017 Addendum. This Addendum does not duplicate this assessment but it does reflect the revised boundary for the Park Royal Centre neighbourhood centre and SIL in diagrams throughout this report. For more information on the justification for these boundary changes please refer to the Park Royal Development Framework Principles supporting study.

3 Demonstrating no net loss

3.1 The London Plan (2016) and the Old Oak and Park Royal Opportunity Area Framework (2015) established the principle of redevelopment in the OPDC area by identifying Old Oak and Park Royal as Opportunity Areas, with targets to deliver 1,500 homes and 10,000 additional jobs in Park Royal and 55,000 new jobs and 24,000 new homes to capitalise on the public transport improvements envisaged in Old Oak. Principle L1 in the Opportunity Area Framework (OAPF) proposes that SIL (in Old Oak) is consolidated into Park Royal, and that the official de-designation process for SIL would be dealt with through OPDC's Local Plan.

3.2 To facilitate comprehensive development in Old Oak, OPDC's emerging Local Plan has proposed changes to the SIL boundary and the de-designation of 87ha of SIL. Existing industrial floorspace will need to redeveloped in order to deliver the new homes and jobs in Old Oak.

3.3 As mentioned in section 2, the Draft New London Plan sets the objective for no net loss of industrial floorspace capacity across London, and a net gain of floorspace with the OPDC area. Given the strategic scale of proposed SIL de-designation, OPDC's approach is to demonstrate no net loss of industrial floorspace at the strategic level as part of a plan led process and through OPDC's Local Plan.

3.4 The main Local Plan mechanisms for achieving this are:

- ***Industrial intensification in Park Royal*** – intensifying existing land and sites for broad industrial type activities on remaining designated SIL in Park Royal.
- ***Co-location in Old Oak in areas outside of designated SIL*** - co-locating floorspace for broad industrial type activities that are compatible with the new high density mixed use development in Old Oak and other locations within the OPDC area outside of SIL.

3.5 The rest of section 3 is dedicated to:

- confirming the industrial land baseline against which to assess no net loss
- quantifying additional industrial capacity due to be delivered through a combination of industrial intensification and co-location that could ensure no net loss is achieved.

Industrial floorspace baseline

3.6 The spatial scenarios in the ILR (chapter 7) set out baseline figures for industrial and non-industrial floorspace for the area proposed for SIL de-designation based on Figure 30 of the report.

3.7 This baseline included sites which were already de-designated from SIL by virtue of changes confirmed in the adopted Ealing Core Strategy (2013). Therefore, these sites have been removed for the purposes of this assessment. Other sites have also been excluded and the reasons for this are set out in a note on assumptions included in Appendix 1, Table 1. Figure 2 confirms the quantum of existing industrial floorspace, taking into account these updates.

Figure 2: Old Oak[2] Industrial Baseline
OPDC update (2018)

	Floorspace (sqm)
Industrial	
A General industry	84,898
B Light industry	61,031
C Warehouses	60,419
D Open storage	2,041
E Self storage	7,597
I Waste management	23,294
K Vacant industrial	16,555
Total industrial	**255,835**

[2] Based on boundary shown in Figure 30 of ILR.

Industrial Intensification in Park Royal

3.8 The Park Royal industrial area is an attractive location for businesses with many competitive advantages, including its proximity to Central Location, Heathrow and access to strategic road networks such as the A40 and A406.

3.9 Given the London-wide loss of industrial land and the proposal to de-designate SIL in Old Oak, it is becoming increasingly important to protect existing industrial land in Park Royal and ensure that development proposals, are making the best use of land and are suitably intensifying industrial activities. The Mayor's London Plan also sets out a target for delivering an additional 10,000 jobs in Park Royal, therefore an uplift in employment also needs to be considered.

3.10 OPDC commissioned the Park Royal Intensification Study to develop design typologies that are deliverable and commercially viable and to provide a robust analysis of the likely uplift in floorspace and employment densities that intensified typologies could achieve across Park Royal. The Study identified opportunities to deliver intensification in Park Royal through:

- Vertical extension
- Horizontal extension
- Infill
- Internal subdivision
- New provision on vacant land
- Comprehensive redevelopment

3.11 Design principles to help achieve intensification also include the stacking of uses or multi storey development and these are supported by policy in the Regulation 19(2) Second Revised Draft Local Plan. The Intensification Study develops design typologies, building on precedents from around the world. The GLA's Intensification Primer (2017) also includes useful examples of intensification.

3.12 A number of potential intensification sites were identified in the Park Royal SIL area (see Figure 3). If intensified, these sites could achieve an uplift in floorspace and employment capacity and provide a significant source of additional capacity.

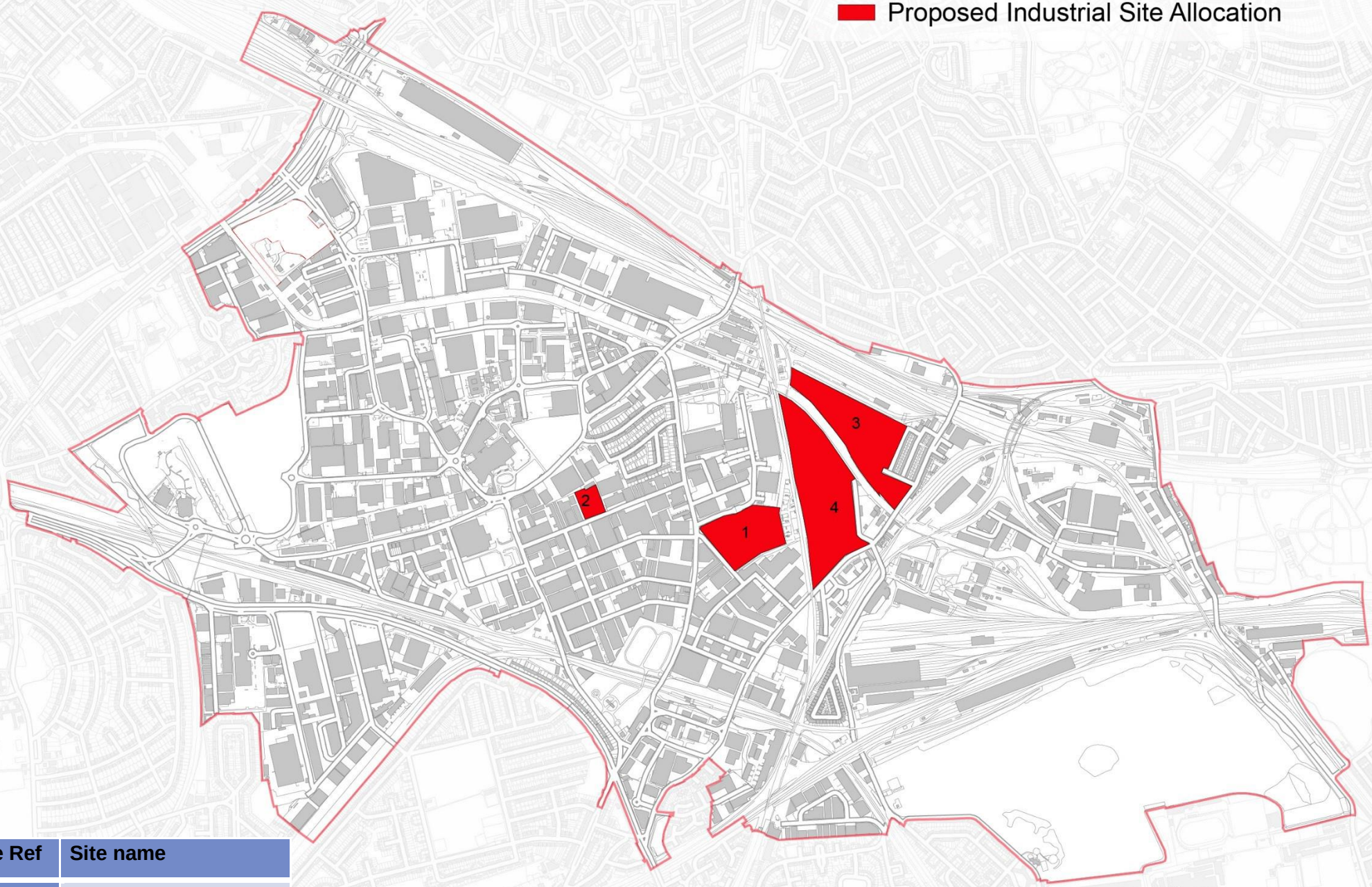
3.13 In response to consultation responses received on the previous Revised Draft Local Plan, the updated Second Revised Draft Local Plan includes new site allocations for industrial intensification sites (shown in Figure 4). This will help to provide greater clarity about OPDC's support for the intensification on these sites and the minimum quantum of industrial floorspace expected to be delivered. The introduction of site allocations will ensure that development is optimised and appropriately contributes to OPDC's industrial floorspace provision and jobs targets in Park Royal. Further information on these site allocations is set out in OPDC's Development Capacity Study (2018) supporting study. The most notable contributor to capacity is the Channel Gate area which can deliver 124,000sqm (see Figure 5).

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Figure 3: Intensification Site Locations



Figure 4: Industrial site allocations



Site Ref	Site name
1	Bashley Road
2	40-54A Minerva Road
3	Channel Gate 1
4	Channel Gate 2

Figure 5: Floorspace capacity from intensification

	Site Area (ha)	Additional Floorspace (sqm)
Channel Gate	13.2	124,000
Bashley Road	3.8	33,400
Minerva Road	0.78	13,700
Other sites identified in the PRIS		262,000
Total		433,100

3.14 It is considered highly likely that a good proportion of the sites identified in Park Royal Intensification Study will be delivered when the following factors highlighted in OPDC's evidence base are taken into account:

- **Market signals are strong[3] -** indicated by low vacancy rate and high rental levels compared to the rest of London.
- **Viable to deliver[4]** - the proposition is likely to be viable and has been demonstrated to be viable for a number of case study sites in the area.
- **Future demand[5]** – there is projected demand from industrial sectors that is likely to be attracted to Park Royal, as well as net demand across London.
- **Policy support** – the Local Plan includes explicit support in the form of allocated sites to help provide greater certainty for landowners and expects all sites to contribute toward intensification where feasible.

3.15 There has been soft market testing with providers of industrial space and they have been receptive to, and positive about, delivering intensification within Park Royal. However, Figure 6 below illustrates the impacts if, in reality, some of the identified intensification sites do not come forward for development within the plan period.

Figure 6: Development Scenarios

	Additional Floorspace (sqm)
75% of sites come forward	324, 825
50% of sites come forward	216,550

3.16 These findings indicate that intensification of SIL in Park Royal alone, can help deliver the required amount of industrial floorspace to mitigate for losses in areas being de-designated from SIL as identified in Figure 2.

[3] OPDC Industrial Land Review, OPDC Park Royal Intensification Study
[4] OPDC Park Royal Intensification Study
[5] OPDC Future Employment Growth Sectors Study

Co-location in areas outside of SIL

3.17 The delivery of new homes and jobs in areas outside of SIL will mean that many existing industrial premises are likely to be redeveloped. This includes areas within Old Oak North and Old Oak South. OPDC's current Second Revised Draft Local Plan requires the re-provision of broad industrial type activities that are compatible with mixed use development (such as small offices, artist studios and some light industrial development) in locations outside of SIL.

3.18 OPDC's Development Capacity Study (2018) collates development information from a range of supporting studies for sites with development potential to deliver economic floorspace and sets out an indicative trajectory for deliverable (0 to 5 years) and developable (6 to 20 years) sites. The DCS identifies sites in Old Oak which have the potential to deliver economic floorspace including new industrial floorspace but also major new office and other types of commercial development. This demonstrates that a considerable amount of floorspace is planned within the Plan period and beyond.

Figure 7: New B use floorspace in areas outside of SIL

	New Floorspace (sqm)
DCS sites – B use classes (inclusive of B1, B2 and B8 uses)	314,600 – 627,000

3.19 The figure in the Figure 7 above does include major new office and other types of uses such as research and development facilities, therefore not all of this floorspace will contribute towards achieving no net loss of industrial floorspace. However, co-location of some industrial floorspace is expected to be on the basis that:

- **Policy support** - the Local Plan includes policy criteria in E2 which support proposals which co-locate industrial with other uses outside of SIL. Place policies P2 and P10 also provide specific support by directing industrial uses to suitable areas.
- **Viable to deliver –** the policies in the Local Plan have been subject to high level viability testing through the Whole Plan Viability Study.

Other sources of supply

3.20 The above figures do not take into account any additional industrial floorspace that is in the pipeline for delivery i.e. sites which already have planning permission and could help deliver a net increase in industrial floorspace in Park Royal. There is also likely to be development that comes forward on sites not identified in the Park Royal Intensification Study known as windfall sites. OPDC's Second Revised Draft Local Plan provides in principle support for industrial intensification so this pipeline should increase as the policies start to be implemented.

Summary conclusion

3.21 OPDC considers that, looking at the scenarios together (see Figures 5 and 7), the policies in the second revised draft Local Plan will ensure that intensification and co-location deliver a net increase in industrial floorspace.

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3.22 Policies in OPDC's Local Plan requiring/supporting intensification and co-location will ensure these opportunities are pursued as part of the planning process. In conjunction with this, OPDC's Park Royal Work Programme sets out a number of activities aimed at protecting, strengthening and intensifying Park Royal. A Park Royal Supplementary Planning Document will also be prepared to support the implementation of Local Plan policies. To facilitate intensification, OPDC will be liaising with local landowners/businesses and developers to raise awareness about and promote opportunities for industrial intensification. Key Performance Indicators for the Local Plan will also monitor the implementation of policies to confirm the amount of B use industrial floorspace being delivered in the OPDC area and check that the policies on intensification and co-location are working effectively.

4 Strategic Industrial Location boundary

Amendments to the SIL boundary

4.1 The current London Plan (2016) policy 2.17D expects local planning authorities to identify SIL boundaries and develop local policies based on clear and robust assessments of need to protect their function, to enhance their attractiveness and competitiveness for industrial type activities, including access improvements. As stated in paragraph 3.1, the principle of SIL de-designation has been accepted at the strategic level in the adopted OAPF (2015). The OAPF proposed that SIL was consolidated into Park Royal and provided an indicative SIL boundary. The de-designation necessitates a review and for a new detailed SIL boundary to be confirmed through OPDC's Local Plan.

4.2 A Policies Map with detailed boundaries for SIL (see Figure 8) was published alongside the Regulation 19(1) Revised Draft Local Plan for public consultation in June 2017. Comments were received requesting the de-designation of additional sites also marked on Figure 8. Comments related to these sites are summarised in Figure 9.

4.3 The ILR (2017) takes into account the redevelopment of Old Oak and therefore the release of SIL, but its recommendations included some adjustments to expand the SIL boundary in the Park Royal Centre Place. As discussed in paragraph 2.7, the Park Royal Development Framework Principles (2018) has looked at this part of the boundary separately and this Addendum does not duplicate this assessment.

Figure 9: Summary of responses

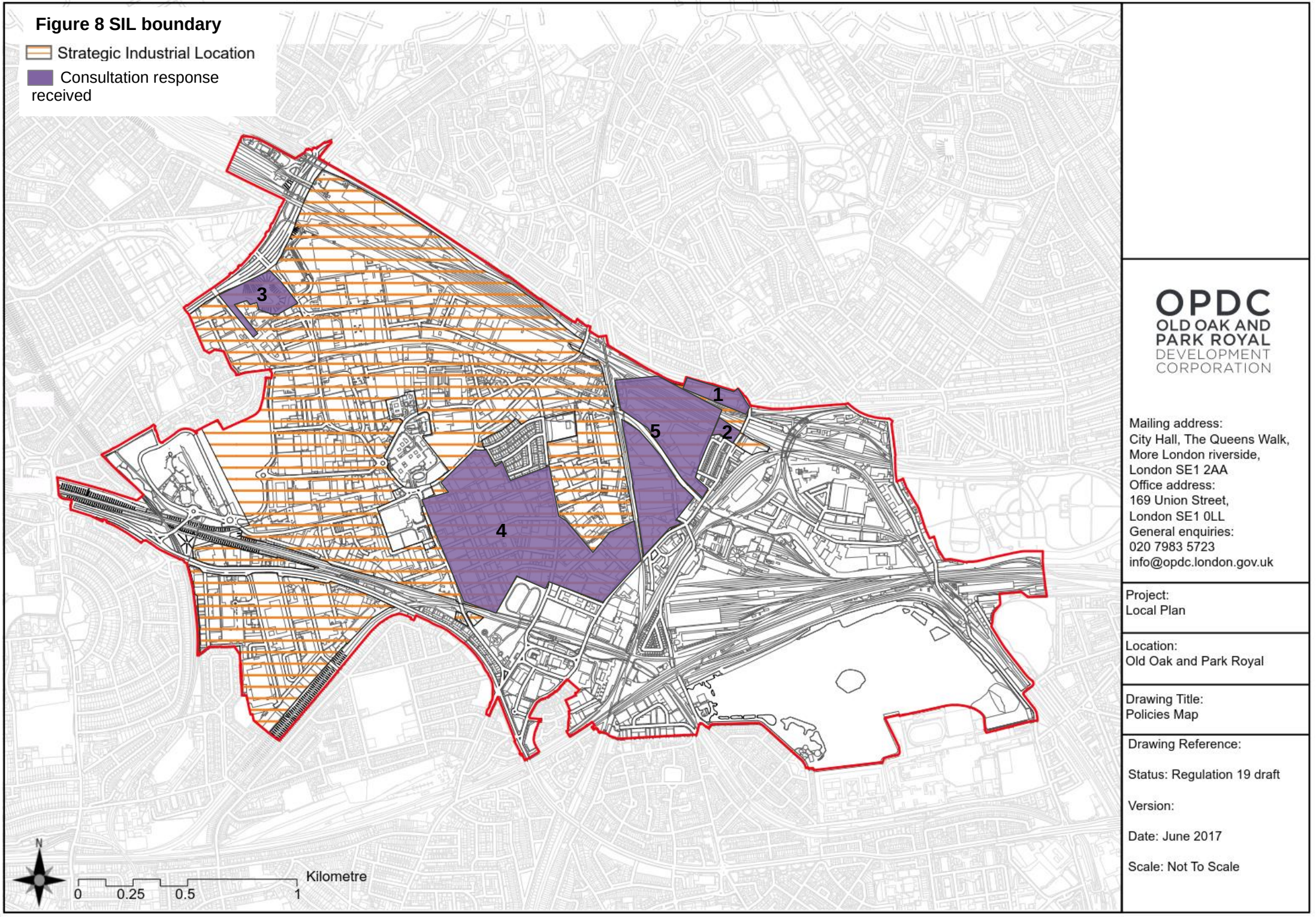
Site Reference	Site Name	Reasons for request for de-designation
Site 1	Willesden Bus Garage	• Site is isolated from rest of SIL • Site raises tensions with other land uses, including existing residential and town centre uses • Current site exits/entrances prevent good links between Old Oak and Harlesden • De-designation allow for site to be redeveloped in the long term if the bus depot could be satisfactorily relocated nearby. • loss of 1.2 hectares of SIL would not significantly impact industrial land supply
Site 2	Goodhall Street	• Comprehensive development would provide additional housing capacity, including affordable tenures and family housing

		• Comprehensive development would increase the number of jobs on the site • Comprehensive development would provide affordable workspace for SMEs • Comprehensive development would provide new public open space • Has similar context to Old Oak sites (in terms of public transport accessibility) which are proposed for de-designation • Low existing residential and employment densities do not take advantage of high PTAL • Site is not contiguous with SIL and is too small to be an identifiable industrial cluster (1036 sqm) • Not suitable for intensification due to proximity to residential, conservation area (will not appeal to industrial developers) • Not suitable for intensification as servicing yard space would be constrained • Installation of mezzanines or sub dividing units are unlikely to deliver significant intensification • Intensification is not viable on this site • Existing residential buildings are unfit/poor quality and need investment. Comprehensive development is required as enabling development required to cross subsidise and retain existing heritage building. • Existing employment uses can be relocated to available sites elsewhere in Park Royal • Alternative uses would be more compatible with sensitive uses and address design issues (active frontages)
Site 3	Twyford Tip	• The site should be removed from SIL to allow for delivery the extant planning permission.
Site 4	Old Park Royal	• The Old Park Royal area is well suited to carefully managed mixed use and therefore should be de-designated from SIL
Site 5	Channel Gate	• The designation of parts of the Channel Gate area as SIL is inflexible to changing economic needs, and in conflict with other objectives/sensitive uses.

4.4 The rest of this section is dedicated to confirming assessing whether further boundary changes are justified.

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Figure 8 SIL boundary



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Project:
Local Plan

Location:
Old Oak and Park Royal

Drawing Title:
Policies Map

Drawing Reference:

Status: Regulation 19 draft

Version:

Date: June 2017

Scale: Not To Scale

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Assessing further boundary changes

4.5 A consistent qualitative assessment of further boundary changes has been undertaken having regard to following areas of analysisin figure 10:

Figure 10: Areas of analysis

Site Area and Context	Notes for assessment
Whether the size of the site has the potential to provide significant space for additional industrial capacity.	
Whether existing neighbouring uses and relationship to sensitive receptors impact on the functioning of existing or future industrial activities.	Examples of existing sensitive receptors could be residential uses and schools.
SIL function	
Whether the site or uses meet (or has ability to meet) demonstrable local demand for industrial development and/or demand for strategic functions	This could include : • Potential for 24 hour working • Potential for in-situ business expansion • Potential for logistics/warehousing • Potential for waste management and recycling • Potential for utilities (including energy and water management) • Potential to accommodate land for transport functions • Vacancy – area (ha), floorspace (sqm), period of vacancy
Impacts on SIL	
Whether changing the designation would negatively impact the industrial character of the area or inhibit the operations of nearby industrial uses	This could include the relationship of site with rest of SIL land and uses
Whether the site supports strategically important clusters of industrial activity	This could include: • Potential to accommodate new emerging industries, innovation, research • Potential to provide lower cost industrial accommodation suitable for small, start-up, or lower-value industrial uses or other industrial related businesses important to the local economy • Potential to accommodate provision of industrial units for SMEs

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Opportunity to contribute towards optimising development of Old Oak based on improved PTAL levels.	
Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and optimise development taking advantage of improved high public transport accessibility.	

4.6 Recommendations take into account the overall performance of sites in relation the areas of analysis in Figure 10. The assessments are provided in full in Appendix 2 of this report and summarised in paragraph 4.7 below. The assessment also includes the Ursula Lapp Estate site.

Summary conclusion

4.7 The final recommendations based on the assessments of these sites are set out in Figures 11 and 12 below.

Figure 11: Site recommendations

Site	Recommendation
Site 1 – Willesden Bus Garage	**Retain as SIL.** The bus garage is a SIL compliant use which needs to remain on this site unless alternative site provision can be found elsewhere.
Site 3 – Twyford Tip	**Retain as SIL.** SIL compliant uses are appropriate in this location. There is ongoing demand for industrial space and the site is one of the largest sites within the designated SIL boundary. OPDC's evidence base indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use.
Site 4 & 5 – Old Park Royal and Channel Gate	**Retain as SIL.** Site 4 is currently occupied with high density SIL activities. There is also a cluster of intensification opportunity sites in Old Park Royal. Site 5 is currently being used as a HS2 construction site, but has the potential to make a significant contribution to industrial intensification. The loss of this amount of SIL would have a major impact on and exacerbate industrial land supply issues.
Site 2 & 5 – Goodhall St and Ursula Lapp Estate	**Release from SIL.** The range of and functioning of SIL uses is more limited/constrained due to proximity to existing sensitive neighbouring uses. The site is separated from the rest of the Park Royal and Channel Gate SIL designation. Therefore there is minimal risk of further erosion of SIL or impact on other industrial operations beyond these sites. However, given the demand for industrial space, the loss of land must be

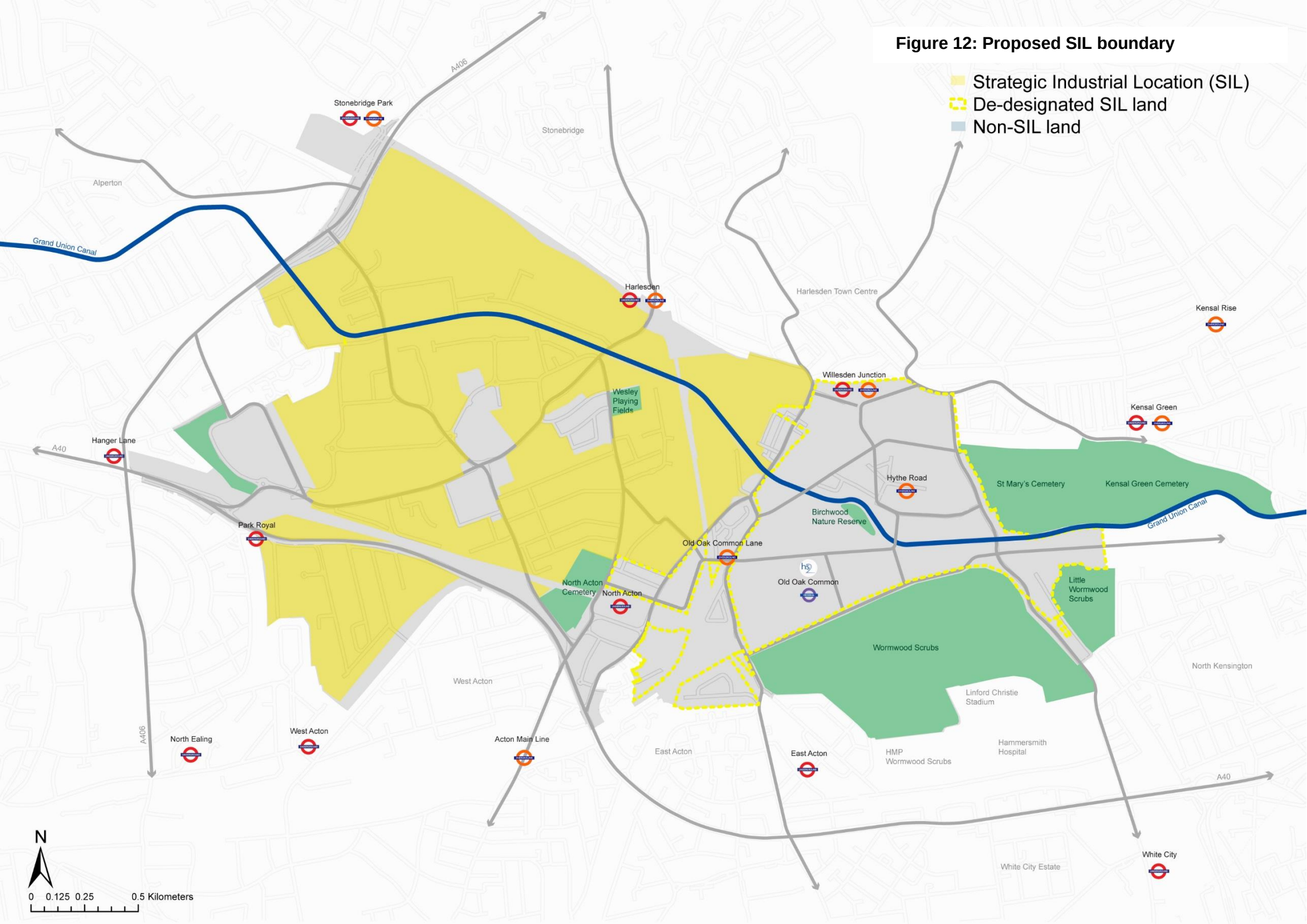
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	mitigated. Therefore, this recommendation is subject to policy requiring no net loss of industrial floorspace through co-location of industrial uses as part of any future development on these sites.

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Figure 12: Proposed SIL boundary



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APPENDIX 1 – INDUSTRIAL FLOORSPACE BASELINE

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Industrial floorspace baseline - Key Assumptions note

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

Category	Reason
Land for Rail	In the OPDC area, some of the land for rail sites/floorspace will be reconfigured to support delivery of new HS2 and Crossrail station and the railway function is being retained and enhanced within the Old Oak area. However, In line with the draft new London Plan, the principle of no net loss of floorspace capacity does not apply to other used for transport functions which are no longer required, such as railway depots.
Land used for utilities	The principle of no net loss of floorspace capacity does not apply to sites previously used for utilities infrastructure which are no longer required.
Non Industrial uses	The draft new London Plan only requires no net loss of industrial floorspace capacity.
Sites which are not proposed for redevelopment or being retained as SIL	Floorspace is being retained and therefore no net loss of floorspace scenario is not applicable.
Land which already benefits from planning consent.	The loss of industrial floorspace would have been accepted through the determination of the planning application.

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Table 1: Industrial baseline

ILR Site ID	ILR Site Name	Within SIL	Affected by redevelopment?	Redevelopment area	Site Area (m2)	Gross external building floor area (m2)	Estimated Plot Ratio	Gross external building floor area at 65% Plot ratio	Industrial floorspace to be reprovided	Land use category
E7.21	Vacant site without building	Yes	Yes	OOC	2018	1041	0.00	1312	1312	K Vacant industrial
E8.17	Victoria Industrial Estate	Yes	Yes	OOC	38407	16684	0.43	24964	24964	B Light industry
E9.01	Westway Estate	Yes	Yes	OOC	3181	5785	1.82	2067	5785	K Vacant industrial
E9.02	Westway Estate	Yes	Yes	OOC	2978	1842	0.62	1936	1936	C Warehouses
E9.03	Westway Estate	Yes	Yes	OOC	2895	3564	1.23	1881	3564	A General industry
E9.04	Westway Estate	Yes	Yes	OOC	2963	1479	0.50	1926	1926	C Warehouses
E9.05	Westway Estate	Yes	Yes	OOC	2482	1261	0.51	1614	1614	A General industry
E9.06	Westway Estate	Yes	Yes	OOC	2378	1443	0.61	1545	1545	C Warehouses
E9.07	Westway Estate	Yes	Yes	OOC	7263	3901	0.54	4721	4721	C Warehouses
E9.08	Westway Estate	Yes	Yes	OOC	3464	2396	0.69	2252	2396	K Vacant industrial
E9.09	Westway Estate	Yes	Yes	OOC	1340	951	0.71	871	951	C Warehouses
E9.10	Westway Estate	Yes	Yes	OOC	6814	4865	0.71	4429	4865	C Warehouses
E9.11	Westway Estate	Yes	Yes	OOC	3948	1921	0.49	2566	2566	C Warehouses

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ILR Site ID	ILR Site Name	Within SIL	Affected by redevelopment?	Redevelopment area	Site Area (m2)	Gross external building floor area (m2)	Estimated Plot Ratio	Gross external building floor area at 65% Plot ratio	Industrial floorspace to be reprovided	Land use category
E9.12	Brunel House	Yes	Yes	OOC	5034	5047	1.00	3272	5047	K Vacant industrial
E9.13	Westway Estate	Yes	Yes	OOC	3365	3051	0.91	2187	3051	C Warehouses
E9.14	Westway Estate	Yes	Yes	OOC	3381	43	0.00	2198	2198	A General industry
E9.15	Walking on Wood	Yes	Yes	OOC	1315	919	0.70	855	919	C Warehouses
E9.16	Westway Estate	Yes	Yes	OOC	2564	3464	1.35	1667	3464	C Warehouses
HF1.01	Triangle Business Park	Yes	Yes	OOC	11635	4468	0.38	7563	7563	B Light industry
HF1.02	Apex Industrial Estate	Yes	Yes	OOC	5765	2401	0.42	3747	3747	B Light industry
HF1.03	Gateway Trading Estate	Yes	Yes	OOC	15148	8807	0.58	9846	9846	B Light industry
HF1.04		Yes	No	OOC	4199	6176	1.47	2729	6176	B Light Industry
HF1.05		Yes	Yes	OOC	6179	6010	0.97	4017	6010	C Warehouses
HF1.06		Yes	Yes	OOC	3140	256	0.08	2041	2041	D Open Storage
HF1.07		Yes	Yes	OOC	6027	1006	0.17	3918	3918	A General industry
HF1.09		Yes	Yes	OOC	3010	1751	0.58	1956	1956	C Warehouses
HF1.10a	Hythe Road Industrial Estate	Yes	Yes	OOC	47568	33863	0.71	30919	33863	A General industry

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ILR Site ID	ILR Site Name	Within SIL	Affected by redevelopment?	Redevelopment area	Site Area (m2)	Gross external building floor area (m2)	Estimated Plot Ratio	Gross external building floor area at 65% Plot ratio	Industrial floorspace to be reprovided	Land use category
HF1.10b	Hythe Road Industrial Estate	Yes	Yes	OOC	12960	9468	0.73	8424	9468	C Warehouses
HF1.10c	Hythe Road Industrial Estate	Yes	Yes	OOC	57718	39741	0.69	37517	39741	A General industry
HF1.11	Regents House	Yes	Yes	OOC	1570	2397	1.53	1020	2397	C Warehouses
HF1.12		Yes	Yes	OOC	2797	2015	0.72	1818	2015	K Vacant Industrial
HF1.15		Yes	Yes	OOC	4620	725	0.16	3003	3003	C Warehouses
HF1.17		Yes	Yes	OOC	1379	395	0.29	896	896	B Light industry
HF1.19		Yes	Yes	OOC	5920	2548	0.43	3848	3848	C Warehouses
HF1.21		Yes	Yes	OOC	10342	7839	0.76	6723	7839	B Light industry
HF1.23		Yes	Yes	OOC	5473	7597	1.39	3557	7597	E Self Storage
HF1.24		Yes	Yes	OOC	11989	5753	0.48	7793	7793	C Warehouses
HF1.26		Yes	Yes	OOC	35837	2629	0.07	23294	23294	
								TOTAL	255835	

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APPENDIX 2 – SIL BOUNDARY SITE ANALYSIS FOR RELEASE

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Site 1: Willesden Bus Garage

Address: Station Road, Park Royal, London, NW10 4XB

Place: Old Oak Lane and Old Oak Common Lane

Planning history:

P/2003/0579 - Change of use from storage/distribution facility to bus depot, including bus parking, offices, servicing, and refuelling facility. Grant with conditions

P/2004/5677 - Change of use from storage/distribution to temporary bus parking (3 years). Grant with conditions

P/2008/3602 - Extension of Planning Permission P/2004/5677 (Granted 16/03/2005) for Change of use from rail freight depot (EWS) to bus parking. Extension of temporary permission from 3 years to permanent consent. Granted with Conditions

P/2010/2646 - Variation of condition 20 (Restriction of on-site buses) of planning permission ref P/2003/0579 dated 13/2/04 to allow an increase in the number of bus parking spaces from 68 to 74. Approved

P/2010/2652 - Variation of condition 13 (restriction of on-site buses) of planning permission ref: P/2008/3602 dated 19/02/2009 to allow an increase in the number of buses from 24 to 46. Approved

Current PTAL: 5-6a

Future PTAL: 5-6a





Site 1: Willesden Bus Garage

Red = Negative impact against criteria
Amber = Neutral impact against criteria
Green = Positive impact against criteria

Site Area and Context	Commentary	
Whether the size of the site has the potential to provide significant space for additional industrial capacity.	The site is 1.6ha. Any loss of additional SIL land could exacerbate shortages in the industrial land supply. This could only be mitigated if no net loss could be achieved through intensification elsewhere or co-location on site.	
Whether existing neighbouring uses and relationship to sensitive receptors impact on the functioning of existing or future industrial activities.	Site is bounded by residential uses to the west, mixed town centre uses and residential to the north and east, and railway land abutting the site to the south. The site is accessed via the A4000 which is a high street environment rather than the residential streets to the north.	
SIL function		
Whether the site or uses meet (or has ability to meet) demonstrable local demand for industrial development and/or demand for strategic functions	The bus garage is a SIL compliant use but also, importantly, serves a specific strategic transport function. In line with the Mayor's 'Land for Industry and Transport SPG', the loss of bus garage should be resisted unless a suitable alternative site can be found or TfL formally agrees that the garage is no longer required. TfL has confirmed that there is an ongoing need for this function and demand for bus services will increase linked to the redevelopment of Old Oak. The bus operator has indicated that the current site employs circa 400 jobs and includes an on site training facility. Therefore this is a significant employment generator. Furthermore, there is a vacant building at the rear of the site which could be bought back into use delivering additional SIL capacity.	
Impacts on SIL		
Whether changing the designation would negatively impact the industrial character of the area or inhibit the operations of nearby industrial uses.	Site is within a mixed character town centre environment. The site is separated from the wider SIL area by the railway lines and there are no operational buildings within SIL nearby. There is a vacant building at the rear of the site which, if bought back into use, could be compromised if the bus garage which occupies the majority of the site is de-designated from SIL.	
Whether the site supports strategically important clusters of industrial activity		
Opportunity to contribute towards optimising development of Old Oak based on improved PTAL levels.		
Whether the site is in close proximity to, and able to contribute towards regeneration of Old	This site is in close proximity to Old Oak North, Old Oak South and Willesden Junction station. Given the need to retain the function of the bus garage, it is not	

Oak and optimise development taking advantage of improved high public transport accessibility.	considered that the site can contribute to the development of Old Oak. The potential to mitigate the potential loss of the bus garage through co-location of this use as part of a mixed development is challenging as bus garages have very specific design related operational requirements, including 24 hour operations. This has been confirmed by TfL.	

Recommendation: Retain as SIL. The bus garage is a SIL compliant use which needs to remain on this site unless alternative site provision can be found elsewhere.

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Site 2: Goodhall Street

Address: Goodhall Street, Park Royal, London, NW10 6TS

Place: Old Oak Lane and Old Oak Common Lane

Planning history:

N/A

Current PTAL: 4-6a

Future PTAL: 4-6b





Site 2: Goodhall Street

Red = Negative impact against criteria
Amber = Neutral impact against criteria
Green = Positive or no impact against criteria

Area of Analysis	Commentary	
Whether the size of the site has the potential to provide significant space for additional industrial capacity.	The site is 0.5ha which is relatively small when compared to the other sites. Any loss of additional SIL land could exacerbate shortages in the industrial land supply. This could be mitigated if no net loss could be achieved through intensification elsewhere or co-location on site.	
Whether existing neighbouring uses and relationship to sensitive receptors impact on the functioning of existing or future industrial activities.	Site is adjacent to a residential area which is also a conservation area. It also abuts railway land and SIL to the north and west. The site fronts onto Goodhall Street and the adjacent SIL site to the east (Ursula Lapp Estate). The site is accessed via a quiet residential road. Given this context, it would be more challenging for the site to have the potential for 24 hour working or bad neighbour uses. Ability to mitigate impacts may be more difficult on given the size of the site and close proximity to existing housing.	
SIL function		
Whether the site or uses meet (or has ability to meet) demonstrable local demand for industrial development and/or demand for strategic functions	The current uses on site include broad industrial type activities. The site includes small industrial units which may be suitable for SME businesses. However, given the immediate context, the range of SIL compliant uses that are/could be appropriate here are more limited and could be co-located as part of future development if the site were de-designated.	
Impacts on SIL		
Whether changing the designation would negatively impact the industrial character of the area or inhibit the operations of nearby industrial uses.	This interface with the SIL boundary is very limited and the site is separated from the wider SIL area by the railway lines. Therefore its release would not have a negative impact on adjacent SIL sites.	
Whether the site supports strategically important clusters of industrial activity		
Opportunity to contribute towards optimising development of Old Oak based on improved PTAL levels.		
Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and	The site is in close proximity to Old Oak North and Old Oak South. Redevelopment for a mix of uses would be compatible with the existing	

optimise development taking advantage of improved high public transport accessibility.	residential area and could contribute towards comprehensive development of the area.	

Recommendation: On initial assessment, it is considered that this site could be released from SIL with a policy recommendation to require co-location of industrial uses on site. However, de-designating this site would create an anomaly in the SIL boundary with the site opposite (referred to as the Ursula Lapp Estate site) becoming isolated from and not contiguous with the rest of SIL. As such, it is recommended that Site 2 is taken forward for assessment in conjunction with Ursula Lapp Estate site with potential outcomes being either to:

- **To retain both sites within SIL; or**
- **To de-designate both sites from SIL.**

DRAFT

Site 3: Twyford Tip

Address: Land south of Abbey Road

Place: Park Royal West

Planning history:

92/0009 - Removal of tipped spoil and erection of asian centre comprising hotel, television centre, social community and leisure facilities (including open space and canal footbridge) with service roads and car parking (outline application)

06/3594 - Certificate of Lawfulness for proposed removal of tipped soil and erection of Asian Centre comprising hotel, television centre, social community and leisure facilities (including open space and canal footbridge) with service roads and car parking. Appeal allowed.

Current PTAL: 1a–3

Future PTAL: 1a-3





Site 3: Twyford Tip

Red = Negative impact against criteria
Amber = Neutral impact against criteria
Green = Positive or no impact against criteria

Site Area and Context	Commentary	
Whether the size of the site has the potential to provide significant space for additional industrial capacity.	The site is 5ha and is one of the largest sites in the SIL boundary. The site does have extant planning permission (granted in 1993) for mixed use development accompanied by a Lawful Development Certificate which confirms that the scheme has been commenced. However, works have not progressed and there does not appear to have been any site clearance works and no buildings have been erected. OPDC's evidence base indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use.	
Whether existing neighbouring uses and relationship to sensitive receptors impact on the functioning of existing or future industrial activities.	The site is surrounded by SIL, including a safeguarded waste site immediately adjoining the site boundary to the south and bounded by the A406 to the north east. To the west is the Grand Union Canal. Although the Grand Union Canal is a sensitive receptor, it is also recognised as having potential for freight transport.	
SIL function		
Whether the site or uses meet (or has ability to meet) demonstrable local demand for industrial development and/or demand for strategic functions	The site is currently vacant land and therefore not currently occupied for SIL uses. There is ongoing demand for industrial floorspace across Park Royal and the site is one of the largest vacant sites within the designated SIL boundary. The site is a good location for industrial uses good access to local and strategic transport routes. There is potential for the site to deliver industrial intensification including multi-storey industrial / waste uses reflecting its location and less sensitive adjacent uses to the north, east and south. OPDC's evidence base indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use.	
Impacts on SIL		
Whether changing the designation would negatively impact the industrial character of the area or inhibit the operations of nearby industrial uses.	The site is surrounded by SIL, including a safeguarded waste site immediately adjoining the site boundary to the south and bisected by the A406 on the north east. Therefore its release would have a negative impact on adjacent SIL sites.	
Whether the site supports strategically important clusters of industrial activity		

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Opportunity to contribute towards optimising development of Old Oak based on improved PTAL levels.		
Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and optimise development taking advantage of improved high public transport accessibility.	The site is not in close proximity to the Old Oak area and therefore would not contribute towards comprehensive development of the area.	

Recommendation: Retain as SIL. SIL compliant uses are appropriate in this location. There is ongoing demand for industrial space and the site is one of the largest vacant sites within the designated SIL boundary. OPDC's evidence base indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use.

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Site 4 & 5: Old Park Royal and Channel Gate



Site 4 & 5: Old Park Royal and Channel Gate

Red = Negative impact against criteria
Amber = Neutral impact against criteria
Green = Positive or no impact against criteria

Site Area and Context	Commentary	
Whether the size of the site has the potential to provide significant space for additional industrial capacity.	Old Park Royal is 40ha and Channel Gate is 13.2 ha which is a significant proportion of SIL. Therefore its release would have a significant negative impact on the land available and the functioning of SIL within Park Royal.	
Whether existing neighbouring uses and relationship to sensitive receptors impact on the functioning of existing or future industrial activities.	Both sites are mostly surrounded by SIL, with the exception of the Wesley Estate and the Bashley Road site to the north of Old Park Royal and The Island Triangle to the east of Channel Gate.	
SIL function		
Whether the site or uses meet (or has ability to meet) demonstrable local demand for industrial development and/or demand for strategic functions	Old Park Royal is currently occupied with broad industrial type activities and home to a high concentration of small businesses. There is a cluster of intensification opportunity sites in Old Park Royal identified in the Park Royal Intensification Study. Channel Gate is currently being used as a HS2 construction site, but has the potential to make the largest contribution to industrial intensification (see figure 5). If these opportunities were lost this is likely to exacerbate industrial land supply issues. Therefore it strongly meets local demand for industrial development.	
Impacts on SIL		
Whether changing the designation would negatively impact the industrial character of the area or inhibit the operations of nearby industrial uses.	Old Park Royal has the highest density of industrial units. The boundary between Park Royal Centre and SIL has been considered in the Park Royal Centre Development Framework, but wholesale release at this scale, in terms of both industrial floorspace and jobs, would have a significant negative impact on the wider SIL designation. If only parts of Channel Gate were released then this is highly likely to negatively impact on the remaining land. The Local Plan supports the establishment of an industrial innovation area which, given the scale of the site, has the potential to become a strategically important cluster of activity for industrial sectors within London's largest industrial estate.	
Whether the site supports strategically important clusters of industrial activity		
Opportunity to contribute towards optimising development of Old Oak based on improved PTAL levels.		
Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and optimise development taking advantage of improved high public transport accessibility.	A limited part of the Old Park Royal area is adjacent to the proposed mixed use area of Acton Wells which is separated from Old Oak North and South by railway infrastructure. A limited frontage of Channel Gate is adjacent to area of Old Oak. Therefore, a relatively small portion of SIL would contribute to the redevelopment of Old Oak North and Old Oak South.	

Recommendation: Retain as SIL. Site 4 is currently occupied with high density SIL activities and there is a cluster of intensification opportunity sites in Old Park Royal. Site 5 is currently being used as a HS2 construction site, but has the potential to make a significant contribution to industrial intensification. The loss of this amount of SIL would have a major impact on and exacerbate industrial land supply issues.

DRAFT

Site 5: Goodhall Street and Ursula Lapp Estate

Place: Old Oak Lane and Old Oak Common Lane

Planning history:

N/A

Current PTAL: 4-6a

Future PTAL: 4-6a





Site 5: Goodhall Street and Ursula Lapp Estate

Red = Negative impact against criteria
Amber = Neutral impact against criteria
Green = Positive or no impact against criteria

Site context	Commentary	
Site Area	The site is 1.6ha. Any loss of additional SIL land could exacerbate shortages in the industrial land supply. This could only be mitigated if no net loss could be achieved through intensification elsewhere or co-location on site.	
Existing Neighbouring uses and relationship to sensitive receptors	Site is adjacent to a residential area which is also a conservation area to the south. It also abuts railway land and SIL to the north and south/east. The interface with the rest of the SIL boundary is very limited and the site is effectively cut off from the wider SIL area and safeguarded Powerday waste site by railway lines. The site is accessed via a road adjacent to the residential area.	
SIL function		
Meets (or has ability to meet) demonstrable local demand for industrial development and/or demand for strategic functions	The current uses on site include broad industrial type activities and floorspace. The site includes small industrial units which may be suitable for SME businesses. However, given the immediate context, the range of SIL compliant uses that are/could be appropriate here are more limited and could be co-located as part of future development if the site were de-designated.	
Impacts on SIL		
Whether changing the designation would alter the industrial character of the area or inhibit the operations of nearby industrial uses or affect local or strategically important clusters of industrial activity	This interface with the SIL boundary is very limited and the site is effectively cut off from the wider SIL area by the railway lines.	
Opportunity to contribute towards delivery of Old Oak		
Whether the site is in close proximity to, and able to contribute towards regeneration of Old Oak and take advantage of high public transport accessibility.	The site is in close proximity to the Old Oak area and redevelopment for mixed uses would be compatible with the existing residential area and could contribute towards comprehensive development of the area.	

Recommendation: Release from SIL as the range of SIL uses is more limited/constrained due to neighbouring uses. The site is cut off from the rest of the SIL designation and therefore there is minimal risk of further erosion of SIL or impact on other industrial operations. The site has a high PTAL and could in principle support mixed use development, subject to mitigating impacts on adjacent sensitive uses and conservation area. Given the demand for industrial space, the loss of land must also be mitigated. Therefore, this recommendation is also subject to policy requiring no net loss of industrial floorspace through co-location of industrial uses as part of any future development on this site.

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