

Old Oak and Park Royal Local Plan Examination

Hearing Statement in response to Matter 17: SIL

This Written Statement has been produced by Turley on behalf of Ashia Centur Limited in response to Matter 17 'Whether the inclusion or exclusion of land from SIL is justified'

1. Ashia Centur Limited consider that the Plan would not be effective and is therefore unsound as due consideration has not been given to the fact that an implemented consent exists for comprehensive redevelopment of their site for a wide mix of uses. The extant planning permission (92/0009) has been confirmed through the grant of a Lawful Development Certificate. Subsequent High Court and Court of Appeal challenges brought by LB Brent were dismissed.
2. OPDC's supporting evidence suggests that the level of contamination and associated clearance costs would indicate an industrial use being the most deliverable use. This is supported by a Report prepared by CBRC 'The Land at Abbey Road Development Options Appraisal Report'. It is noted that this not been submitted as part of the evidence base to the EIP. The Report is a desktop exercise and not a substitute for formal valuation purposes in accordance with the RICS 'Red Book'. The various scenarios appraised by CBRE which cover different land uses rely on assumptions that are easily challengeable in terms of floor space, quantum, scale, costs and likely market values.
3. An industrial use is not the only deliverable use on the site. It is the case however that the continued designation of the site as SIL in the draft Local Plan significantly increases risk by frustrating funding of the extant permission.
4. The site does not contribute towards the provision of industrial uses within the Opportunity Area – this has been the case for the past 25 years.
5. The site's removal from the Park Royal SIL (Broad Location) would not compromise the integrity or delivery of the remaining SIL land and neither does the extant permission prejudice the successful operation of neighbouring industrial uses within the Park Royal SIL. The site is located at the western extremity of the Opportunity Area and Park Royal SIL and is not a key integrated site within the SIL. The site is bound to the west by the North Circular Road, Abbey Road to the north and canal to the south and it therefore forms an independent island site that is not linked with the remaining SIL.
6. The site with its extant consent and mix of uses including retail, hotel, cultural, leisure and sui generis uses will act as a buffer / transition zone between the traditional, noisy and dirty industrial activities found to the east / south in the SIL and the mixed use character to the north and west, including substantial areas of residential beyond the North Circular Road. The land uses being implemented by the extant consent, whilst being significant employment generators in their own right, are complimentary to both the industrial uses in the main SIL and the mixed-use character to the north and west.

7. The site is considered to be similar in character to the Brewery Cluster as designated within the draft Local Plan as an Opportunity Site (Number 27). It is considered that both sites share a number of similar attributes:
 - a. The Brewery Cluster is focussed around a key point of entry into the industrial area from Park Royal and Hanger Lane rail stations, whereas our client's site is a key point of entry from the north west from Stonebridge Underground and Overground Stations;
 - b. Both sites can provide a transition zone between more traditional dirty and noisy industrial uses in the heart of the SIL and more neighbourly employment generating uses at these fringe gateway sites;
 - c. Both sites can meet a need for a mix of uses as identified within our client's commercial report (submitted separately in the coming weeks) and as evidenced within the draft Local Plan which notes on page 86 that:

"Park Royal as a whole currently suffers from a lack of facilities for businesses and employees, with only one nursery, two gyms, four hotels and no conference facilities. This presents a problem when trying to attract businesses into Park Royal, with some other industrial estates having more facilities available for staff and businesses. Therefore, introducing these uses could help create a more sustainable neighbourhood, with services being closer to where people live and work. However, any town centre uses would need to be small-scale 'walk-to' facilities, to complement the surrounding town centre hierarchy."

8. The site is clear and is in the single ownership of Ashia Centur Limited and does not require any further land assembly. Most sites within the OPDC are in multiple ownership and deliverability is complex.
9. It is concluded that the inclusion of our client's site within the SIL within the Plan is not justified and that the Plan is therefore unsound.
10. This can be remedied and the Plan made sound by excluding the site from the SIL boundary and identifying the site as an employment led, mixed use development site suitable for the following SIL compatible uses:

Extant consent site use:

- Small and larger scale retail uses (Class A1-A5)
- Class C1 hotel (including ancillary health club and conference facilities)
- Class D1 cultural / exhibition centre
- Class D2 leisure uses including cinema
- Sui generis uses including casino, theatre, nightclub and television centre
- Class B1a Office
- Class B1b Research and Development

- Class B1c Light industrial

Additional uses that are considered appropriate and complementary to the approved uses include:

- Larger scale Class A retail uses (A1-A5)
- Class B1a Office
- Class B1b Research and Development
- Class B1c Light industrial