

	<p style="text-align: center;">Executive 16th June 2008</p> <p style="text-align: center;">Report from the Director of Environment and Culture</p>
<p style="text-align: right;">Wards Affected: ALL</p>	
<p>Park Royal Opportunity Area Planning Framework Public Consultation Draft</p>	

Forward Plan Ref: E&C-08/09-004

1.0 Summary

- 1.1 The GLA has published the Park Royal Opportunity Area Planning Framework (OAPF) for Park Royal. It is a non-statutory planning document that addresses the land use pressures facing the estate while exploiting its capacity for employment growth. It was prepared by partnership working between members of the Park Royal Partnership, including Brent Officers.

2.0 Recommendations

- 2.1 To agree the comments on the OAPF as set out in the 'Comments to the Mayor' sections of this report and instruct officers to send those to the Mayor of London.

3.0 Detail

The OAPF Process Explained

- 3.1 Park Royal is designated within the London Plan 2004 (and subsequent Further Alterations published this year) and the West London Sub-Regional Development Framework as an Opportunity Area, meaning that it can accommodate "typically more than 5,000 jobs and/or 2500 homes". It is estimated that there is the capacity for around 11000 new jobs to be created by growth within Park Royal. London Plan (further alterations) Policy 5F.2 of the London Plan states that Opportunity Area Planning Frameworks should inform Development Plan Documents (parts of LDFs) and other strategies and initiatives.

- 3.2 The Park Royal Partnership (PRP) has prepared the OAPF and the public consultation version is included at Appendix 1. Comments are now being sought on the document. Following the consultation, the GLA will decide whether it is happy with the document as it is or make changes. Because of the recent change in administration at the GLA, it is also possible that more substantial revisions could be made and the document could then be subject to further consultation.
- 3.3 The PRP comprises of the London Boroughs of Brent, Ealing and Hammersmith and Fulham; The London Development Agency and local businesses to support and secure the area as an industrial and business area. A steering group of key stakeholders comprising the Boroughs, the London Development Agency (LDA), the Greater London Authority (GLA), Transport for London (TfL) and the Park Royal Partnership (PRP) has been preparing the document.
- 3.4 The OAPF is a non-statutory planning document, derived from the London Plan and further alterations and consistent with related Supplementary Planning Guidance and the West London Sub-Regional Development Framework. Once adopted, it will need to be taken into account by the Council in preparing its Development Plan Documents (since otherwise the Council would not be complying with Policy 5F.2 of the London Plan referred to above). It would also have some weight in determining planning applications in view of the terms of policy 5F.2. Accordingly, officers are proposing to use the OAPF as a basis to produce an Area Action Plan for Park Royal- this will be a Local Development Framework Document.
- 3.5 As the Area Action Plan will not be adopted for some years, the OAPF is a useful staging post to update the Council's view on the planning strategy and individual sites for the Park Royal area. The document was endorsed by the former Mayor of London for consultation in April 2008 and following this the framework will be issued as Mayoral guidance, as amended in the light of responses.

Public Consultation

- 3.6 The OAPF is a Mayor of London document and as such the process of consultation will be managed by the GLA and representations will be received by the Mayor of London's Office.
- 3.7 Council officers have contributed to the preparation of the OAPF so that the priorities and strategic objectives of the Council are reflected within the document, as supported by the draft Local Development Framework Core Strategy and Site Specific Allocations. Although the Council is required to review its draft LDF documents, it intends to continue to reflect the provisions related to Park Royal.
- 3.8 The process of consultation and the endorsement of local planning authorities mean that the framework will be a material consideration for planning applications of a strategic scale, for individual identified sites and for making decisions on the wider planning of the area.

The Content of the document

3.9 The Opportunity Area Framework has been sent to all Executive members under separate cover and copies lodged in the members' rooms. It is proposed that this report brings the key issues to members' attention. Members may wish to make additional comments on the plan proposals. This report covers the following issues within the OAPF:

- The Overall Strategy
- First Central Office Proposal and New Station Interchange
- Fast Bus
- S106 Standard Charge
- Tall buildings
- The future use of Twyford Tip
- Northfields Industrial Estate

3.10 By designating Park Royal as an Opportunity Area, the GLA believes that the estate is capable of accommodating employment growth by around 11000 new jobs. Therefore, the main thrust of the document is to continue to protect the bulk of the estate as Strategic Industrial Land (previously known as Strategic Employment Land). In particular the framework is seeking to develop and support growth in clusters of food production, television and media, and distribution and logistics. However, the document also addresses other important issues, including public transport and congestion, public realm improvements, tall buildings, services for employees and businesses, housing and pooling of s106 contributions.

The Overall OAPF Strategy

3.11 Park Royal continues to provide an important location of industrial, warehouse and service employment, often away from residential areas, to allow operation of noisy or 24 hour activities. The main thrust of the OAPF is to continue to give support to these employment activities. It also recognises that at key locations where transport facilities are good, known in the Document as the Gateways and the Heart of Park Royal, that these can accommodate a more mixed development including some residential development. The purpose of the document is to provide clarity so that it is clear where limited change will take place (at public transport interchanges) where residential development may secure wider benefits for Park Royal (see First Central Proposals for example) and where it will not compromise employment activities on the rest of the estate. The main thrust of the document is to continue to improve the environment and accessibility of the area to enhance, maintain and expand local jobs and industrial, warehousing and allied employment opportunities.

Comment to Mayor of London: Brent Council strongly supports the general thrust of the OAPF to secure land for long term industrial, business, and warehousing uses and developing the gateways for a wider range of uses where they provide overall benefit to the workings of Park Royal as a key employment area for the borough.

Main Issues and Sites

3.12 The First Central scheme received permission 10 years ago for over 100,000 m2 of office floorspace with a hotel and some residential and

community development on part of the former Guinness brewery and its playing fields. In the OAPF this is known as the Western Gateway. The residential element has been completed and 2 blocks of office floorspace have also been completed (only one is currently let). A condition of the permission was the completion of a new station on the Central line that would act as an interchange between the Central and Piccadilly Lines of the underground. This would assist the marketability of the office development and have the wider benefit of increasing the public transport accessibility of the area. The trigger for the station build out depended on the completion of the 3rd office block of the First Central scheme. Since the second block has not been let, the prospect of achieving the interchange station is remote. However the presence of the station interchange would no doubt increase the chance of finding occupiers for the First Central Office scheme. The costs of the station are such that the Office developers have no incentive to build the third block because of the costs of the station (approximate costs are £25m -£30m).

- 3.13 The cost of delivering the station interchange has increased dramatically, while the viability of the office proposal suffers due to the lack of public transport accessibility. To unlock this situation and to ultimately deliver public transport and employment benefits, officers have held preliminary discussions with First Central about the possibility of including further residential development to raise the development value required to complete the delivery of the interchange. The same employment floorspace as was permitted 10 years ago would still be required to be delivered within reconfigured 8 office block buildings on the site. (by either adding a floor or enlarging their footprint). The two former office blocks on the northern edge of the site would become residential blocks and the block immediately opposite the Diageo block would be mixed in use, with some residential development on upper floors.
- 3.14 This proposal was addressed within reports to Planning Committee and Executive referring to Omission Sites and Boundary Changes of proposed Site Specific Allocations on the 23rd of January 2008 and 11th of February 2008 respectively. This was approved by members. The proposal for around 500 units of residential development is thus contained within the OAPF.

Comment to Mayor of London: Brent Council strongly supports the mixed residential/office proposals on the First Central Site (Western Gateway chapter) as long as they directly deliver the new station interchange and such commitments are contained within appropriate planning obligations. Retention of the same amount of office floorspace is also supported

FastBus

- 3.15 The framework also supports the introduction of the FastBus system, an intended high speed bus link between Wembley Park and Acton Main Line station, via Stonebridge Park, the forthcoming interchange at Park Royal Station and Central Middlesex Hospital. Council officers support this as a deliverable means of significantly improving public transport provision to connect residents with employment opportunities and reducing the need to commute by car. The council has already secured bus lanes on the new

Rainsford Road Link and a contribution towards operating costs of any FastBus proposal. The intention is secure funds along the route to help secure road space and funds to implement it.

Comment to Mayor of London: Brent Council strongly supports the Fastbus Route and proposals for contributions from major developments along its route.

S106 Standard Charge

- 3.16 Building upon Brent Council's adoption of the Standard Charge Planning Obligations SPD, the framework encourages Brent, Ealing and Hammersmith and Fulham to voluntarily pool s106 contributions to fund major projects that benefit the estate, particularly for transportation and public realm improvements – this approach is supported by Local Government Circular 05/05. The framework proposes a Standard Charge of £25 per metre/2 of commercial floorspace and £3500 per bedroom of residential development. Instances where this approach may be particularly useful include future development at the First Central site –child yield generated from any residential is likely to impact upon Ealing, while the station interchange that must also be delivered is also in Ealing, even though the development itself is in Brent.
- 3.17 The framework proposes a public realm and open space strategy to significantly improve the environment within the estate, with particular emphasis on pedestrian movement, safety and the fear of crime. The document identifies particular locations that could benefit from a targeted approach to improvements, taking advantage of forthcoming development proposals. Much of the work would be funded through the use of S106 planning obligations, as set out above.

Comment to Mayor of London: Brent Council strongly supports the S106 Standard Charge Approach to improve the transport and environmental quality of the estate. It recommends that the OAPF adopts Brent's Charging Regime of £3000 per bedroom of residential development (i.e. £3000 for a one-bed flat, £6,000 for a two bed flat etc.) up rated annually in line with inflation, so that Brent can have a consistent approach inside and outside of Park Royal, where it has justified the £3000 standard charge in its own SPD.

Tall Buildings

- 3.18 The framework includes a short section on existing and proposed tall buildings in the estate. The document states that proposals should satisfy criteria in terms of design quality, relationship to context and public transport accessibility. The document notes that the completion of two blocks at the First Central site has introduced tall buildings to the Western Gateway, and links further development to the delivery of the planned interchange between the Piccadilly and Central Lines at Park Royal station, as discussed at paragraphs 3.24 to 3.27. The provision of tall buildings, including a taller feature building on the southern end of the development, by the new interchange station, would assist in bringing forward the station development. Your officers therefore recommend supporting tall buildings in this location.

Comment to Mayor of London: Brent Council supports the provision of taller buildings in the limited locations discussed in the OAPF where they do not adversely affect residential amenity, are well designed and contribute to securing wider objectives for the Park Royal area.

The future use of Twyford Tip

3.19 The Northern Gateway includes two sites in Brent of strategic importance along the North Circular Road. The framework notes that the Council considers that the former Twyford Tip site is suitable for waste related uses due to its proximity to the strategic road network and potential for freight movement along the canal. The document notes that permission was granted in 1993 for the Asia Sky proposal and that a recent appeal decision established that this had commenced and that therefore the owners have an extant permission. The history of Twyford Tip/Asian Sky is as follows:

1. Former household refuse tip –last tipped in the 1960's
2. Land contaminated but stabilising over time
3. Site sold to Asian Sky Properties in 1992
4. Granted Permission in 1993 for mixed use development-TV studios, hotel and other uses
5. 2007- Inspector's decision ruled that development had commenced but Council has made a High Court challenge to the decision
6. The owners of the site do not support the Site Specific Allocation in Brent's LDF nor the allocation in the OAPF. They are concerned that the continued presence of the West Waste transfer site in one corner of the former tip site is continuing to frustrate their development proposals. No significant building work has taken place for 15 years since a first consent was granted.

3.20 The owners of the Asia Sky site (former Twyford Tip) consider that they have commenced on site and can therefore build out their proposals. This is currently supported by an Inspector's decision but as explained above this is the subject of a High Court challenge by the Council. The owners have also previously claimed that the scheme for which permission was granted is not financially viable. Accordingly, there is some reasonable doubt over whether these proposals will come forward. Any amendments that increased retail uses to improve the viability of the development would be contrary to government guidance (PPS6) and would not fit into the council's LDF retail allocation policy. Your officers continue to consider that the site is suitable for waste related uses, for which there is a pressing need in west London. Should the Asia Sky proposal not materialise, this site should be considered for waste uses, a position that is supported by the GLA.

Comment to Mayor of London: Brent Council supports the allocation of the Asia Sky site (former Twyford Tip site) for waste related uses should the current permission not be implemented.

Northfields Industrial Estate

3.21 Northfield's Industrial Estate is a large employment area designated as a Strategic Industrial Location by the GLA within the London Plan (further alterations). This means that it is considered to be part of the strategic

reservoir of industrial land within London's economy. The framework notes that the Council prepared a Site Specific Allocation for this site which seeks employment led regeneration of the land and that accepts, in principle, a degree of enabling residential development.

- 3.22 The estate is now largely vacant, although this situation has accelerated considerably over the last 2 years. It is thought that the land owners will soon begin to demolish buildings so as to avoid empty buildings tax. Your officers recognise that there are some physical constraints on the site in terms of the topography and a water main that crosses the site. It may be that these constrain the ability of the estate to fulfil its potential in its current disposition. However, these are not insurmountable and arguably, a soon to be cleared site could be suitable for a traditional industrial employment use.
- 3.23 Previous drafts of the framework document reflected the owners' intention to redevelop the site for a large multi storey industrial complex, of the kind that can be found in so called 'Tiger' economies, and that has recently been completed at Hatton Cross, Heathrow.
- 3.24 More recently, officers have had discussions with the owners who have explained that they are now interested in developing a considerable number of homes on the site. Officers have maintained a position that they consider that any residential development to be enabling in nature subject to the satisfactory achievement of employment and sustainability based objectives, including:
- ⇒ New employment floorspace for a range of occupiers
 - ⇒ Space for small and medium sized enterprises
 - ⇒ Space for creative industries and artists
 - ⇒ Managed affordable/subsidised workspace
 - ⇒ Improved access vehicular access to the North Circular Road
 - ⇒ Re provision of existing businesses
 - ⇒ Relocation of businesses from elsewhere in Alperton to assist with the Councils wider regeneration objectives
 - ⇒ Renewable energy technology
- 3.24 The position of the framework broadly supports the statement included within the submission stage document of the LDF Site Specific Allocations document. Members of planning committee and Executive approved this wording for the purposes of public consultation.

Comment to Mayor of London: Brent Council supports the allocation of the Northfields industrial estate for employment uses but also supports a limited role for enabling residential development to assist in overcoming the difficulties associated with redevelopment of the current estate..

4.0 Financial Implications

- 4.1 The Planning Service has contributed £20,000 towards the preparation of the OAPF and the Employment Land and Premises Study. Further funds are not expected to be allocated.

5.0 Legal Implications

- 5.1 The OAPF is a non statutory document but as explained in the body of the report will need to be taken into account by the Council in preparing its Development Plan Documents and in determining planning applications.

6.0 Diversity Implications

- 6.1 The London Plan and Further Alterations are subject to an Equalities Impact Assessment (EQIA). This includes anticipating consequences of policies and projects on identified groups and making sure that, as far as possible, any negative consequences are eliminated or minimised and opportunities for promoting equality are maximised.
- 6.2 In addition, the sites that are identified within the OAPF are also identified within the Council's Preferred Options Site Specific Allocations document as part of the new Local Development Framework, which is also subject to EQIA

Background Papers

Park Royal Opportunity Area Planning Framework (OAPF) for Park Royal

Contact Officers

Any person wishing to inspect the above papers should contact:
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