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Dear Sir/Madam

## **REVISED DRAFT LOCAL PLAN FOR THE OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION**

We write on behalf of our client, A40 Data Centre B.V an entity of PPHE Hotels Group to submit representations to the Old Oak and Park Royal Revised Draft Local Plan and its supporting evidence base.

PPHE Hotels owns, leases, develops, manages and franchises primarily full service fourstar deluxe and contemporary lifestyle hotels in major gateway cities and regional centres primarily in Europe. It is a leading hotel operator who operates 39 hotels across the world. Park Plaza currently operate at 628 Western Avenue adjacent to Park Royal underground station (to the south west) and situated to the north of Western Avenue (A40), between the Hanger Lane junction and the Concord (North Circular) junction.

We welcome the opportunity to make representations on the revised Draft Local Plan and we look forward to continued engagement throughout the Local Plan process.

This letter outlines a number of the key comments and observations which we would like to record on the current revised draft of the Local Plan mainly relating to the Park Royal Area where our Client's site is located.

### **Chapter 3: Strategic Policies**

We are supportive of the principles set out in Policy SP2 (Good Growth), particularly the reference made to new proposals supporting the delivery of the spatial vision by establishing high standards for sustainable development at appropriately high densities and delivering high standards of place making, urban design and architecture.

The supplementary text of SP2 in paragraph 3.13 outlines that *“high density in Park Royal will be different to in Old Oak, but OPDC's Park Royal Intensification Study demonstrates how the Park Royal Industrial Estate could be regenerated to increase floorspace and provide additional jobs, to support Mayoral targets to deliver an additional 10,000 jobs across the estate.”*



We think it is important to note that whilst the Intensification Study does demonstrate how Park Royal Estate could be regenerated to increase floorspace, this document largely focusses on increasing SIL floorspace by providing ‘multi typology’ SIL uses and it should be recognised that not all sites (particularly those which are of smaller footprints) may be suitable for SIL uses above two storeys.

In principle, we support the spatial policy SP9 which expands on SP2 and states that “*proposals should support the delivery of spatial vision by optimising development in a sustainable manner.*” We agree with the supplementary text outlined in 3.87 that the development of the area needs to be optimised to fully capture and realise benefits of regeneration and growth. These representations expand on this point further in the next section.

SP9 iii states that proposals should ensure appropriate standards of amenity. Supplementary text in paragraph 3.38 reinforces this by stating that the OPDC will set high standards for design quality and architecture. In addition, design quality means different things to different people, in particular around architectural treatment and building height. It should be noted that both design and conditions on planning permissions can control key amenity elements, such as noise pollution. Thus, in the right location and with the right design and planning controls SIL uses can be located next to or directly above or below non SIL uses.

#### **Chapter 4: P4 Park Royal West**

In principle, we are supportive of the intention for Park Royal to remain as London’s leading location for large, medium and small businesses. Whilst we agree that the area should continue to provide and protect a mixture of industrial uses, in the right location where sites that are providing SIL uses have been optimised, the OPDC should consider other complementary non-SIL uses to ‘optimise development’ as outlined in policy SP9.

Part b) of Policy P4 states that proposals should contribute “*towards 3,800 jobs by taking opportunities to intensify the use of sites, having regard to the locations and typologies identified in OPDC’s Park Royal Intensification Study.*” The Intensification Study page 35 under employment density states that “*where site conditions allow, stacking of small industrial spaces on larger spaces can maintain the ecology of businesses in Park Royal whilst growing the employment capacity of the area.*” We believe that this is an extremely important point. The OPDC need to take into account that in practice sites coming forward with smaller footprints are unlikely to be able to do this above 2 storeys because of the associated servicing and loading requirements. In addition, multi-typology buildings will require more substantial structures, additional requirements for passenger lifts, loading lifts and vehicle ramps required to service buildings which may deter potential developers/investors and tenants due to the potential costs associated with these additional requirements. The study itself *recognises* that “*in the UK, industrial developments of 2 storeys and above are still rare as it requires a very large site to achieve building cost economies of scale and very strong industrial rental values to cover the higher cost of building.*” Whilst this might be the emerging intention for Park Royal, it is our view that providing 2 or more storeys of industrial floorspace will not be achievable on sites, unless they are of considerable size. However, it should be taken into consideration that in gateway locations next to transport links, other non SIL uses (subject to design and townscape considerations) could be considered acceptable above these SIL uses. By doing this, you would be maximising SIL floorspace on site in locations well served by transport connections and providing additional uses on top that would not



jeopardise the SIL use but continue to generate employment which is a key driver for the OPDC in Park Royal.

PRW.5 on page 82 outlines that appropriate development which involve a more intensive use of land and deliver more jobs with SIL compliant uses will be supported in accordance with part b. As outlined above, we believe that where SIL uses are optimised on sites, other non SIL uses that could be provided above SIL uses should be considered in suitable gateway locations.

Part i) requires that new developments should contribute towards and/or delivering improvements which support public access into and/or the quality of existing green infrastructure assets, including green corridors along railways and green spaces along the A40. We continue to be supportive of this and agree with the comments in the draft Local Plan (page 86) that the Park Plaza hotel on Western Avenue provides active frontage, but a greater degree of surveillance is required along its length. Any development proposal on the remainder of the Western Avenue site will take this into account and look to deliver improvements where possible.

## **Chapter 9: Employment**

Policy E1 ii) outlines that new proposals for SIL uses should look to increase, or maintain employment densities. Supporting text in paragraph 9.8 states that “*where intensification of industrial land is not possible or appropriate, as a minimum, development proposals should not result in a net loss of jobs and should make appropriate re-provision of industrial floorspace.*” As outlined previously within these representations, there is an opportunity to further increase employment densities on sites which have re-provided or optimised the SIL floorspace on the site, other non SIL uses, such as office (B1) or hotel (C1) could be provided on site (in addition to the SIL) which increase employment density in line with point ii).

Policy E2 describes where new office floorspace will be supported, specifically referencing in town centre locations or where the requirements of the sequential test have been satisfied. As outlined within the Park Royal Intensification Study we recommend that within this policy, it is stated that within Strategic Industrial locations, “*where site conditions do not allow for viable multi-storey B2/B8 industrial typologies, introducing B1 office uses on upper levels...*” may be acceptable as this will help to maximise the capacity of sites, and create significant uplift in additional employment capacity.

## **Chapter 10: Town Centre and Community Uses**

We are strongly supportive of Policy TCC10 where proposals are supported for new and expansion of visitor accommodation close to public transport links. We agree with the supporting text in paragraph 10.69 which states that “*due to the OPDC area’s high public transport accessibility providing access to London and the rest of the UK, as well as its proximity to destinations such as West End and Heathrow, it is likely to be an attractive location for visitor accommodation.*”

We know that the hotel currently located at 628 Western Avenue is successful and is proving an attractive location for visitor accommodation, particularly in light of its close proximity to Park Royal underground station. The site is located within, but on the edge of the SIL designation and it is our view that this will continue to be an acceptable location for further hotel uses in addition to SIL uses.



We trust that our representations will be fully considered and taken into account as the preparation of the Local Plan continues. If you require any clarification on any matters, or wish to discuss our representations further, please do not hesitate to contact David Morris or Hannah Willcock of this office.

Yours faithfully,

**DP9 Ltd**