

7 September 2017

Local Plan Consultation  
Old Oak and Park Royal Development Corporation  
City Hall  
Queen's Walk  
London  
SE1 2AA

Dear Sir / Madam,

## **Representations to the OPDC Local Plan Revised Draft for Regulation 19 Consultation 29 June 2017**

We write to you on behalf of our Client, Diageo, with representations to the Revised Draft for the Regulation 19 Consultation OPDC Local Plan.

As you are aware, Diageo has interest in land within the 'First Central' area and is keen to bring forward new development accordingly. The purpose of this representation is to seek to re-establish the principle of residential use on a site hereafter referred to as the 'Twyford Abbey Road site'.

This representation describes two sites to which Diageo have interest, describes the Local Plan's approach to these two sites, and the changes since the 2016 Draft Local Plan, and sets out Diageo's comments on the current draft. Finally, it lists a series of amendments that Diageo would like to be incorporated into the next iteration of the OPDC Local Plan.

The section below sets out the two sites which this representation seeks to address in the context of the revised Local Plan. A Site Location Plan is included in Appendix A.

### **Site Descriptions**

There are two sites which will be discussed in these representations. The first, the 'Twyford Abbey Road site' comprises the existing area of open space to the north of the First Central development, bounded by Lakeside Drive to the south, Twyford Abbey Road to the north, Bodiam Way to the east and the railway to the west. The second, the 'Lakeside Drive site', comprises a strip of land bounding Lakeside Drive to the east and the Industrial area (designated as a SIL) to the east. Again, it is a grassed area containing semi-mature trees and shrubs.

The Twyford Abbey Road site is mainly grassed with some trees lining the edges and footpaths cutting through and a sports pitch located in the north-eastern corner. It is surrounded by residential development to the north which is predominantly two-storey houses and south of the site which is part six, part eight storey residential flats and a residential led mixed use scheme to the east which is part three, part four storeys in height fronting Twyford Abbey Road and eight storeys to the Lakeside Drive frontage. To the west of the site is protected natural space designated as a Wildlife Corridor and a Grade II SINC ('Diageo Lake and Coronation Gardens'). The site has a PTAL rating of 3 and has a bus stop nearby.

The Lakeside Drive site has eight storey residential flats in the First Central site to the west of the site at the northern section. A planning application (reference 17/0076/FUMOPDC) is currently with the OPDC for the Fairview scheme to the west of the site at the southern section of the site which proposes a residential led mixed use scheme with buildings up to 27 storeys in height. On the eastern boundary is the Origin Business Park which contains a number of warehouse buildings. The site has a PTAL ranging between 1a and 3.

From an online review neither site appears to have any planning history although both are surrounded by recent and pipeline developments including the First Central and Fairview schemes. Both sites are considered to be underutilised in their present state, and given the context of their location.

Diageo are keen to bring forward further development in the First Central Area, and have identified Site 1, as a suitable development site for the provision of new residential dwellings. This is in keeping with its proximity to the existing residential development at First Central, and the residential character of the surrounding area.

However, it is understood that the current draft version of the OPDC Local Plan does not promote the Twyford Abbey Road site for development, but does promote the Lakeside Drive site for development, as part of Site Allocation 27 'First Central' and as part of the Brewery Cluster (draft Policy P4C1). The Lakeside Drive site is promoted in the plan as contributing towards the delivery of 1,200 residential units, 8,000 sqm commercial floorspace and 400 new jobs within the First Central site allocation, whilst Policy P4C1 'Brewery Cluster' restricts provision of residential uses adjacent to the SIL and seeks the delivery of appropriate employment uses along Lakeside Drive.

## **Draft Local Plan's Approach to the Sites**

The OPDC Revised Draft Local Plan includes changes in relation to the two sites which have occurred between the first draft issued in February 2016 and the current revised draft issued in June 2017. The key changes are noted in relation to each site below.

### **1. Twyford Abbey Road Site**

The draft Local Plan issued for consultation in February 2016 had a number of figures which showed different policy indications:

- Figure 12 'Illustrative Masterplan' and Figure 39 'Park Royal' shows the site as Existing Residential;
- Figure 77 'Indicative phasing of housing delivery' indicates housing being delivered on site between 2022 and 2037 with Figure 138 'Indicative phasing' supporting this;
- Figure 10 'Key Diagram' showed the site as a Mix of Uses;
- Figure 64 'Proposed and existing open spaces' indicates that the site is not allocated as existing open space but is located within 400m of existing open space.

This version of the plan is supportive of the site for redevelopment, which Diageo are supportive of.

In the OPDC Revised Draft Local Plan June 2017 the site is no longer identified as a proposed residential site. Figure 3.4 'Land Uses' indicates the site as Mixed Use Area while Figures 3.11 'Open spaces' and 4.24 'Park Royal West' identify the site as open space.

A review of the consultation comments as summarised by the OPDC on the 2016 draft of the Local Plan indicates that no comments were made against a residential allocation on this site. Therefore Diageo express concern over this unexpected and unsupported change in approach to this site. Diageo are supportive of allocating the site for future residential development for reasons set out later in this letter.

## **2. Lakeside Drive Site**

The initial draft version of the Local Plan published in February 2016 showed the Lakeside Drive site as Industrial Use in all but two figures. Figure 77 'Indicative Phasing of Housing Delivery' and Figure 138 'Indicative Phasing' show the site as an existing residential area. Diageo made representations to the 2016 version of the draft Local Plan noting that the location of Lakeside Drive appears to be drawn incorrectly as it shows the road appearing in the Origin Business Park. The OPDC consultation response notes that this has been amended in the updated version of the plan. It is understood comments were also received from Workshop and Commonplace, which set out that the First Central area lacks social infrastructure and should be more connected, and that there may be opportunity for shops to be located here to cater for local workers.

The current revised draft Local Plan indicates a move towards a mixed use development on this site. Figure 3.4 'Land Use' indicates the site as mixed use area and Figure 3.16 'Development Phasing' indicates the site as coming forward for development in the next 0-5 years. The southern section of the site also sits within the Brewery Cluster as indicated in Figure 4.26. The associated Policy 4C1 'Brewery Cluster' indicates that the site should provide an active frontage which will be delivered through employment use, and that residential use will be restricted along the boundary with the SIL which starts at Origin Business Park to the east.

### **Twyford Abbey Road – Considerations for Residential Development Allocation**

Diageo supported the 2016 draft Local Plan's designation of the site as a potential residential development site. They are disappointed to see the removal of this site from the proposed housing delivery designation and the significant opportunity to deliver more housing than it offers through its proposed designation as open space. For the reasons below, the OPDC is requested to reconsider the designation of the site for housing and remove the open space designation, and amend the Local Plan to reflect this.

When compared to the Lakeside Drive site, Diageo consider that the Twyford Abbey Road site offers a significantly stronger opportunity to deliver housing and improve placemaking in the area through a comprehensive and coherently designed scheme improving layout and design providing a high quality development and surrounding environment. Accepting that future development would need to bring forward a sensitive design given the low rise residential area to the north of Twyford Abbey Road, this site is better situated to deliver housing and would provide a higher standard of residential amenity. The site would be complementary to the existing First Central Development to the south. With careful design, it would act as a buffer to blend the newer more dense development to the south with the low rise suburban area to the north of Twyford Abbey Road.

It is recognised that this site is currently designated in the Brent Local Plan as open space and contains a community area – the sports court. However, it is considered that this open space is underutilised and of poor quality. The current open space and communal provision is not of the quality or quantity that could not be sufficiently and appropriately re-provided in a new development on the site which included new high quality open and community space, and contributed to improvements to the remaining neighbouring open space, such as the adjacent Grade 1 SINC. Moreover, the First Central development already provides a significant quantum of high quality open space in the centre of the development comprising the Diageo Lake. Diageo acknowledge that development proposals would be required to re-provide play space and community space of a significantly higher quality if the site were to come forward for development.

Diageo would also ask the OPDC to consider the viability challenges presented with bringing forward the Lakeside Drive site as a new development. The quality of the site is poor, it is long and narrow and has a tight relationship with the industrial area adjacent to the east. This severely constrains the ability to deliver a coherent and cohesive development proposal that provides suitable active frontages alongside access, car parking, amenity space and other necessary infrastructure. The quantum of development that is deliverable is not likely to overcome the costs of implementing a development on this site and providing SME units, Live/Work and other commercial units with residential use on upper levels particularly in the context of market demand.

Diageo consider that the Lakeside Drive site offers the opportunity within the same land ownership to deliver new and improved open space by re-providing the existing open space and community facilities located on the Twyford Abbey Road site. For this reason, Diageo do not support the current policy designations for either of the sites and set out their preference for the 2016 version of the Draft Local Plan.

## Propose Schedule of Changes to the draft OPDC Local Plan

Item (Page / Paragraph / Policy)	Proposed amendment
<p><b>Figure 2.2 'Key Diagram'</b></p> <p><b>Figure 3.4 'Land Uses'</b></p>	<p>Diageo considers that the Twyford Abbey Road should be included within the Residential Area shading on both of these diagrams.</p>
<p><b>Figure 3.11 'Open Spaces' and Policy EU1 'open Space'</b></p>	<p>Diageo recognises that the Twyford Abbey Road site is an existing open space as shown in Figure 3.11. Diageo considers that the Lakeside Drive site could provide new open space and could be shown on this diagram.</p> <p>The diagram should also indicate the existing open space around the Diageo lake within the First Central development.</p> <p>Diageo proposes that the wording of Policy EU1 is amended to justify the loss of underutilised open space.</p>
<p><b>Figure 3.16 'Development Planning'</b></p>	<p>Diageo request that the figure is amended to remove the designation of the Lakeside Drive site as a development site to be brought forward in the next 0-5 years. Diageo does not consider that this strip of land presents a viable opportunity for development.</p> <p>Diageo considers that the diagram should include the Twyford Abbey Road site as a 0-5 year development opportunity.</p>
<p><b>Figure 4.2 'Site Allocations'</b></p>	<p>Diageo request that the site allocation 27 is amended to not include the strip of land that comprises the Lakeside Drive site. This land is located on the east side of Lakeside Drive.</p> <p>Diageo request that a new site allocation is added to the Figure for residential development on the Twyford Abbey Road Site.</p>
<p><b>Figure 4.24 'Park Royal West Place'</b></p>	<p>Diageo request that the Twyford Abbey Road site is included within the 'existing residential neighbourhood designation'.</p>
<p><b>Figure 4.26 'Brewery Cluster'</b></p>	<p>Diageo request that the diagram is amended to show new open space provision and community facilities on the Lakeside Drive site (east of Lakeside Drive). This conforms to the objectives set out in Paragraphs PRW.13 and within Policy PC41 which supports delivery of new south/north walking and cycling routes.</p>
<p><b>Paragraph B.7</b></p>	<p>Diageo does not consider this site is a suitable or viable development opportunity. Diageo wish to see this paragraph omitted.</p>

## Summary and Conclusion

This letter has set out Diageo's preference for OPDC to accept the principle of residential development at the Twyford Abbey Road site. Diageo consider that the current draft of the Local Plan has significantly altered its approach to this site since the 2016 draft by removing its support for the principle of residential development on this site. Diageo consider that this is to the detriment of the wider masterplan for the area, and ignores the significant opportunity that the site represents to deliver housing in line with the Local Plan targets. Diageo ask the OPDC to reconsider this site for residential development, with the knowledge that new and improved open space and community facilities could be re-provided within a development on this site, or additionally at the Lakeside Drive site which Diageo consider is not a viable development opportunity.

We hope that the OPDC take due consideration of the representations made and their merit as set out above on behalf of Diageo. If you require any further information, please do not hesitate to contact my colleague Tabitha Lythe ([tlythe@deloitte.co.uk](mailto:tlythe@deloitte.co.uk) / +44 20 7007 3607).

Yours faithfully



**Mark Underwood**  
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## Appendix 1: Site Location Plan

