



OLD OAK NEIGHBOURHOOD FORUM RESPONSE TO OPDC REGULATION 19.2 DRAFT LOCAL PLAN

1.0 Context

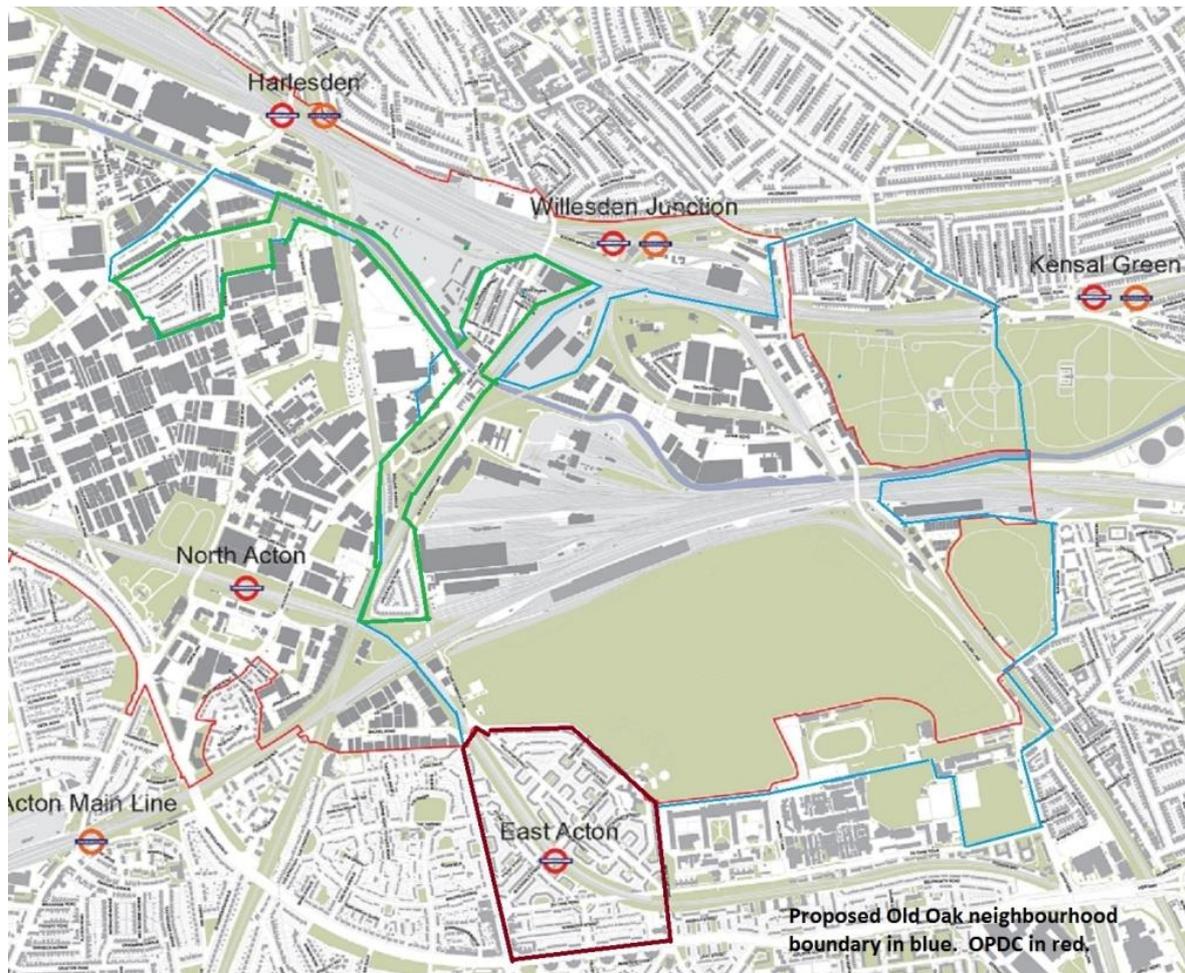
1.1 The Old Oak Neighbourhood Forum is made up of representatives from residents associations and community groups, and individual residents and businesses in the Old Oak area. The forum started meeting as an 'interim forum' in mid 2016, and has previously submitted comments on the Regulation 18 and 19.1 versions of the OPDC Draft Local Plans. We do not repeat below the points made in those submissions, and rely on assurances from OPDC that these will be considered by the Inspector at EIP stage.

1.2 In March 2017 the interim forum submitted a designation application to OPDC and LB Hammersmith & Fulham for a 275 hectare neighbourhood area, covering all of the eastern part of the OPDC area and the surrounding residential communities in College Park and the Old Oak Estate.

1.2 This designation application was determined by the OPDC Board on September 12th 2017. The Board chose to designate a much more limited 22 hectare area, as shown by the green boundary in the map below. Other parts of the area were deemed 'inappropriate' on various grounds including objections from landowners, differential characteristics, and the 'strategic' significance of certain sites.

1.3 In response to what had been a cross-boundary designation application, LB Hammersmith & Fulham designated a separate neighbourhood area the Old Oak Estate, shown in the brown boundary below. No organisation has subsequently come forward to apply for designation as a neighbourhood forum to prepare a neighbourhood plan for this 'orphan' neighbourhood area.

1.5. Following a further designation application for a forum to cover the limited 22 hectare area designated by OPDC, the Old Oak Neighbourhood Forum was finally designated by OPDC on 9th February 2018. See the map below for details of the neighbourhood boundaries approved by OPDC and LBHF.



1.6 The Forum continues to believe that an opportunity has been missed to exploit the potential of the neighbourhood planning framework in creating a successful new part of London at Old Oak. The OPDC Draft Local Plan has changed significantly during the period in which it has been drafted. Major physical, financial, and phasing constraints on regeneration of the area have had to be taken on board by OPDC planners. The outcome, as presented in the 19.2 version, has fundamental problems.

1.7 Our Forum tried very hard to persuade OPDC officers and the Corporation's Planning Committee, over many months of negotiations on our designation application, that approval to designation of the 275 hectare area we had proposed would bring benefits. Neighbourhood planning is not only the most localist layer of the English planning system. It is also potentially the most responsive to changed circumstances, involving processes and timescales which can bring new non-strategic planning policies into force over a shorter period than that required for revision of a Local Plan. It is also a process which ensures, through independent examination and a referendum, that policies are well evidenced and justified and command local support.

1.8 We foresee a future scenario at Old Oak in which many factors related to infrastructure costs, land values, transport proposals, and the state of London's commercial and residential property markets. will conspire to require early reconsideration of several core OPDC policies in the 19.2 Draft Local Plan (including the detailed site allocations in the Plan and their consequential housing densities). We believe that a large-scale neighbourhood plan, such as originally proposed, would have helped to provide a 'Plan B' for Old Oak that accommodated these changed circumstances, while also commanding greater local support than for the current OPDC version.

1.9 But this way forward is no longer on the table. On the contrary, we consider that that as a planning authority the OPDC has gone out of its way to shut down prospects for effective community-led planning of new neighbourhoods at Old Oak by drawing up detailed 'Place' policies as set out within Chapter 4 of the 19.2. Draft which get into a level of detail inappropriate for a Local Plan document.

1.10 The Corporation has further asserted that all such policies in the 'Place' chapters are 'strategic' rather than 'non-strategic' policies (see the statement at paragraph 1.2.3 of the 19.2 Draft). We do not believe that these policies meet the criteria for non-strategic policies as set out at NPPG paragraphs 075 and 076. **We consider this part of the 19.2 Draft to be contrary to the NPPF and as such unsound.**

2.0 The Forum's main objections to the Regulation 19.2 Local Plan

2.1 These have been set out in detail in our previous response to the 19.1 version.

2.2 On issues of proposed housing densities, we see nothing in the 19.2 version that justifies the density levels proposed, which are even more extreme than in the 19.1 Draft. We support the views of the Hammersmith Society, St Quintin and Woodlands Neighbourhood Forum, and Wells House Residents Association that these densities lack any substantive evidence base or justification and would introduce to London a set of building typologies which the public find unacceptable and which are damaging to health and quality of life. **We consider the relevant OPDC policies to be unsound.**

2.3 We share the widespread concerns that the density levels are premised on assumed future PTAL levels, for which the required public transport infrastructure (including new Overground stations at Old Oak Common lane and at Hythe Road) remain very uncertain.

2.4 We see the developments at North Acton in recent years as examples of 'regeneration' in London at its least successful. A new cluster of towers, with an over-concentration of student housing and 1-2 bed apartments and a dismal and windswept public realm, has raised concerns amongst local people that a similar pattern of 'more of the same' will arrive at Old Oak. The redeveloped area at North Acton lacks basic facilities, has little family housing, and no sense of a real community. The existing transport infrastructure (North Acton Underground) is already overloaded.

2.5 While decisions on major planning applications at North Acton have been delegated to LB Ealing, the OPDC as planning authority must accept ultimate responsibility for what has emerged at North Acton. This has been part of the OPDC area since April 2015. What has been built gives the public no confidence that a future Old Oak will prove to be a successful and sustainable new part of London.

2.6 The Old Oak Neighbourhood Forum wishes to be notified of the Examination in Public on the OPDC Regulation 19.2 Local Plan, and will wish to make oral representations.

Old Oak Neighbourhood Forum, July 2018

Contact the Forum chair Mark Walker at: markjonathanwalker@gmail.com