

OPDC DRAFT LOCAL PLAN - CONSULTATION RESPONSE FROM THE INTERIM OLD OAK NEIGHBOURHOOD FORUM

Background

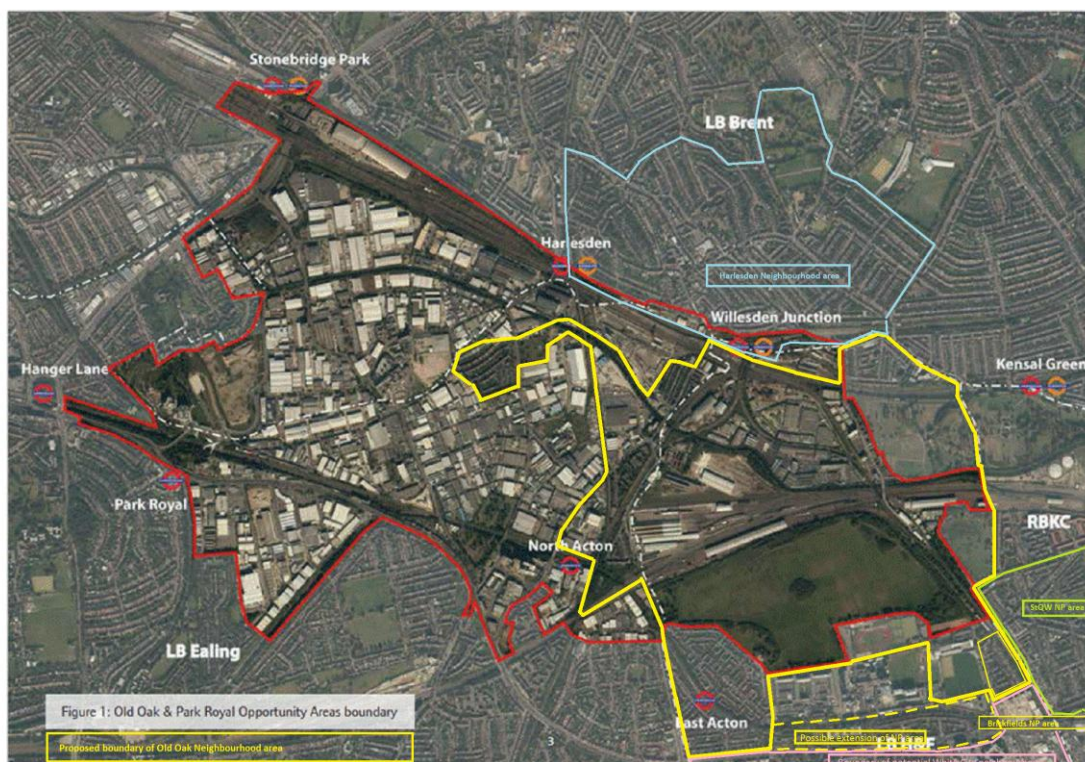
The interim Old Oak neighbourhood forum is made up of a group of residents associations, individual residents, and businesses within and on the borders of the Old Oak part of the OPDC area. This group has come together over the past six months, and follows on from joint work by local residents on responses to the HS2 Bill. The wider network created by the Grand Union Alliance in 2014 has also provided a valuable opportunity for these separate bodies and organisations to work together.

A map of the boundary envisaged for an Old Oak neighbourhood forum and neighbourhood plan is shown below (yellow line). More information is set out in a draft 'designation application', which is being sent under separate cover to the OPDC and LB Hammersmith and Fulham. Further discussion with the OPDC on this draft designation application will follow.

While this consultation response concentrates more on Old Oak than on Park Royal, it includes material on Park Royal also.

The individuals making up the 'interim forum' are listed in the annex to this consultation response. A number are also responding on behalf of their residents associations, or as individuals, to the consultation on the OPDC Draft Local Plan.

In this response, we have used *italics* without quotation marks when citing the Draft Local Plan, *italics* with quotation marks when citing other sources.



Map 1 showing the boundary suggested for an Old Oak Neighbourhood Area (in yellow).

Introduction section of the OPDC Draft Local Plan

The opening section of the OPDC Draft Local Plan lays out the main parameters. The starting points for the Plan are

- proposals for the new HS2 and Crossrail interchange at Old Oak Common Station
- the potential of the UK's largest regeneration area, with over 135 hectares of developable land
- London Plan targets of a minimum of 24,000 homes and 55,000 jobs at Old Oak, and a further 10,000 jobs and 1,500 homes at Park Royal.

The Old Oak interim forum fully supports the principle of developing this part of London. Not only are there swathes of land lying under-utilised, but the existing pattern of development does not work well in many respects. The road network is congested and too often at virtual grid-lock. The public realm is worn and needs re-investment. The Grand Union Canal is an under-exploited resource, in terms of transport use, heritage value, and leisure. Existing residential communities in and around the OPDC area are in many cases isolated and poorly served with shops and amenities.

Hence this response is not based on resisting transformation of the area. Local people and businesses want to see forms of development and change that bring real improvement to quality of life, but which also learn from past experience of major regeneration opportunities in London and other major cities. We share the OPDC ambition that Old Oak should become a successful part of the capital, and an exemplar in terms of urban regeneration.

There is however a concern amongst existing residents and businesses over a potential gap between rhetoric and reality in the first version of the OPDC Local Plan. The foreword promises *not only a place to live and work, but one to visit and enjoy, time and again*. The policies speak of *world class* and *exemplary* architecture and design.

Yet when the wording of the Plan's *preferred policies* is unpicked, and the numbers are crunched on target densities and *optimising growth*, local anxiety has grown. The fear is that by the end of the Local Plan period in 2036, regeneration of the OPDC area will not be viewed as global city planning at its best and most forward-looking. We hope for more than a repeat version of recent development at Nine Elms/Battersea/Vauxhall, with some elements of Kings Cross and the Olympic Park thrown in.

The visual images, models and 'precedents' included in the Local Plan documents have contributed to this concern - perhaps unjustifiably, but this has been their impact. A common reaction to these published images of a new Old Oak has been *'is that really the best we can do, as a new part of this great city?'*

This consultation response seeks to be positive, and to make suggestions which will help the next version of the Local Plan to offer a more distinctive vision for Old Oak, and one responsive to 21st century patterns of life at all ages.

Over the past decade, much has been changing for this generation of young Londoners, in terms of their employment and housing prospects and how they are likely to spend the rest of their lives and their last years. We are not convinced that a new Old Oak, as pictured in the Draft Local Plan at Figures 25, 26, 28, 30, 34 and 36, is a vision of the future that resonates with them. Yet it is many of this generation who will be moving into the area in 2016 - 2036.

Three primary themes run through this consultation response:

- a wish for the Local Plan the plan to take more account of existing residential communities and businesses and encompass them within the plan, rather than working around/ignoring them.
- a concern that the indicative targets at Annexe 1 to the London Plan (the 24,000 homes and 55,000 jobs) are used as fixed parameters for the Local Plan, rather than being questioned and tested through options and alternative policies.
- a worry that too much is being decided too soon, for a place in which several large areas for development will not be available for a decade or more. We question whether the impact on a struggling local infrastructure (roads, sewers, utilities) of first stage development at Old Oak North should not be tested in practice, before finalising a plan based on very ambitious density targets for those parts of Old Oak that will not be built in the next decade?

The density issue

Annexe 1 of the London Plan states in relation to the Old Oak that *Provision of public transport infrastructure on this scale would drive substantial development which could yield 24,000 new homes and, subject to capacity and demand, up to 55,000 jobs and a variety of complementary and supporting uses.*

The Annexe also states *This Annex (which for the avoidance of doubt, forms part of the London Plan and therefore of the statutory development plan) is integral to policy 2.13 in Chapter 2, outlining how its broad principles should be applied to specific Opportunity and Intensification Areas including indicative estimates of employment capacity and **minimum guidelines** for new homes to 2031, subject to phasing.*

*These estimates and guidelines are derived from a range of sources including the London Employment Sites Database (employment) and the London Strategic Housing Land Availability Assessment (homes); **they will be tested through the preparation of planning frameworks and/or local development frameworks (our emphasis).***

In the text of the Draft Local Plan, there is little or no indication that the OPDC housing target is being treated as a *guideline*, or is being *tested* in terms of its detailed implications for each of the proposed 'Places' at Old Oak. No relevant policy options, other than a 'preferred policy' is offered. There is no suggestion in the Plan that consultation responses might lead to this housing target being revisited.

A Local Plan which takes a more evolutionary and incremental approach to future development, ensuring that the homes and jobs added in each five year period are sustainable in terms of adequate transport and community infrastructure, would make more sense to local people. A commitment to balance the pace of housing construction with that of the necessary related infrastructure would be welcomed. This balance has not always been achieved in previous major regeneration schemes in London.

This consultation response also argues that existing residential communities should be stitched with greater care into the fabric of a 'new Old Oak' than is proposed in the current Draft Plan.

Chapter 2 Spatial Vision and Objectives

In response to consultation question **QVO1**, we note that the current *Spatial Vision* for the OPDC area places the emphasis on *innovation and growth*, on *London's role as a global city*, and on a

London destination. Apart from the term *vibrant neighbourhoods* there is nothing to suggest an ambition to create a part of London in which families and individuals will be able to lead rich and fulfilled lives, at all stages in their lifetime. The vision does not feel people centred.

By contrast, those who designed the Old Oak Estate (staff at the London County Council, prior to the First World War) worked to a different vision in redeveloping this part of London. As described by the promoter of the 1909 Housing and Town Planning Act, this was *to provide a domestic condition for the people in which their physical health, their morals, their character and their whole social condition can be improved...The Bill aims in broad outline at, and hopes to secure, the home healthy, the house beautiful, the town pleasant, the city dignified, and the suburb salubrious. It seeks, and hopes to secure, more houses, better houses, prettier streets, so that the character of a great people, in towns and cities and in villages, can be still further improved and strengthened by the conditions under which they live*¹.



The Old Oak Estate, on the southern boundary of the OPDC area. Designed and built at a density of approx 100 dwellings per hectare.

Many who have looked at the visual images presented in the OPDC Draft Local Plan do not see a vision of '*the town pleasant, the city dignified*' or '*better houses, prettier streets*'. London at the start of the 20th century was under pressure to accommodate a growing population, yet the housing density of the Old Oak Estate is around one sixth of the highest density proposed in the OPDC Draft Local Plan. In the 21st century, the pressures for London's growth are similar and yet the response from a successor body to the London County Council is very different.

More emphasis throughout the Local Plan on people and their homes, as opposed to *driving growth* and national transport considerations would be welcomed by those who live in the area, on behalf of those who will be joining us as new residents and businesses.

On the '**Objectives**' set out in the Draft Plan, the wording of these has been discussed at several OPDC consultation sessions. In response to consultation question **QVO3**, our comments are below:

It has been noted that **Communities** comes last in a list of four overall objectives, with a HS2 station as the first, albeit that this running order may have no intended significance.

Under **Consolidating**, there is reference to *protecting* the Park Royal industrial area. As explained in more detail later in this response, we take the view that inflexible and restrictive planning policies in a 20 year Local Plan, with rigid designations and hard boundaries to industrial and employment zones, can have damaging consequences for the creation of sustainable communities.

Under **Creating** it is stated that a new Old Oak will need to be *flexible and adaptable* but there is limited evidence in the Draft Plan and its preferred policies as to how this will be achieved. Tall towers are an inherently inflexible built form.

¹ Quoted in Beattie, *A Revolution in London Housing*

Under **Communities** the reference to *lifetime communities* is welcomed, as well as the references to *health and wellbeing*. The issue here is whether other sections of the Draft Plan will help to achieve these outcomes.

Chapter 3 Overarching Spatial Policies

OSP1 on Optimising Growth is a key plank of the Draft Local Plan. It is stated at 3.7 that '*No reasonable alternative policy options have been identified, as an alternative would not be consistent with the NPPF or in general conformity with the Local Plan*'. The NPPF in fact asks local planning authorities '*to set out their own approach to housing density to reflect local circumstances*' (Para 47). The Draft Local Plan does not explain how or why an alternative policy to *optimising growth* would fail to be consistent with the NPPF? The 'golden thread' of the NPPF is development that is sustainable, balancing social, economic and environmental objectives. The term *optimising growth* does not appear in the NPPF.

As noted above, it is the London Plan and its Annexe 1 that sets ambitious growth targets for London's Opportunity Areas. The OPDC Development Capacity Study published as part of the evidence base for the Draft Local Plan *seeks to demonstrate how the draft Local Plan will deliver the London Plan minimum housing targets and indicative employment capacity for the area*. The study does not question or provide any justification for these targets, or explain why and when they became *minimum* targets. It simply translates them into a set of density requirements designed to achieve the required outcome.

As noted by the Inspector in his 2014 report on the FALP², predictions of London's rapidly increasing population growth have no certainty. As he said *This revision has been driven partly by the realisation that the population of London has grown much faster than was anticipated in the 2011 London Plan. However, the extent to which this unexpected level of growth is structural or cyclical is unknown as is the ability of the Plan's existing strategies and philosophy to successfully accommodate the envisaged level of growth. In light of this a full review of the Plan will commence in 2015*.

In the view of the Old Oak interim forum, the OPDC Local Plan would benefit from acknowledgment under Policy OSP1 that all forecasts of demand for growth in jobs and homes in London are to an extent speculative, and subject to what happens in the global and national economy over the 20 year Plan period.

OSP2 on Land Use defines and maps the main land uses proposed in the Draft Local Plan. Again '*No reasonable alternative policy options have been identified*'.

The preferred policy option refers to *protecting and regenerating the Park Royal Industrial Estate* and establishes the basis for the more detailed policies for 'Place' P5 Park Royal.

While we support the approach of maintaining Park Royal as a key part of the London economy (in terms of manufacturing, services and distribution) blanket zoning policies are a blunt instrument. The boundaries between warehousing, distribution, and A class retail have become blurred. Heavy industry, with its impacts in terms of noise and nuisance, occupies a decreasing element of Park Royal.

² *Report on the Examination in Public into the Further Alterations to the London Plan*, Report to the Mayor, M A Thickett, November 2014

London Plan Policy 4.4. recognises that change is taking place in the type of activities that are '*crucial to sustaining the city's metabolism*' and which need planning protections to keep land values well below those of residential sites. It is widely accepted that the current London Plan concept of Strategic Industrial Locations (SIL) will need to be further refined as technological change and consumer needs and behaviours alter. Our further comments on proposed P5 Park Royal policies are set out below on page 19.

OSP 2 on Land Use defines fixed zones with hard boundaries for 'industrial uses' and 'mixed uses'. Within the Park Royal 'Place' (shown yellow in the map at Figure 10) the Wesley Estate and the TITRA railway cottages are left as isolated islands within this industrial zone. Midland Terrace/Shafesbury Gardens lies on its border. We suggest that an alternative approach to some of these land use zonings would achieve future development that is more sustainable, and which would better integrate existing communities within a 'new Old Oak'. More details are given in comments on each 'Place'.

While the wording of OSP2 Preferred Policy Option is not in itself problematic, were this to be linked to the map in Figure 13 of the Local Plan and applied rigidly in the determination of planning applications, in our view this could hold back sustainable development .

OSP3 on Connections and open spaces

The wording of this proposed policy option is general and aspirational, while unobjectionable. The language of '*development that celebrates the (named existing) open spaces*' is hard to understand. What is meant in practice by 'celebrate'?

Figure 16 continues to show a major green route entering the Scrubs, directly south of the proposed HS2/Crossrail station, as part of the 'green cross' concept in the Draft Local Plan. As has been discussed at many consultation sessions, this is not seen by local people as an appropriate location at which to provide access to the Scrubs. This is the location that supports most of the wildlife, and the recognised and valued 'wild' quality of the Scrubs. It is also not a sensible access point.

There is no significant pedestrian/cyclist desire line from the HS2 station or the southern end of 'Old Oak High Street', running directly north south across the Scrubs. This would be a 'route to nowhere'. The destinations directly across the Scrubs are limited to Wormwood Scrubs Prison, Hammersmith Hospital, Linford Christie Stadium and the Old Oak Estate. For a travelling public of 250,000 a day, for shoppers and visitors, and for residents of a new Old Oak, the number of trips to and from these locations will be limited.

A wide strip of railway land (Central Line and Paddington mainline) runs east west parallel to DuCane Road, and separates the OPDC area from other destinations further to the south. One footbridge and one subway provide the only north south routes across this barrier. Hence almost everyone wanting to travel from Old Oak Common Station and the 'High Street', to reach Shepherds Bush or East Acton (or vice versa) will continue to use Wood Lane or Old Oak Common Lane as at present.

This is why the southern limb of the 'Green Cross' shown at Figure 20 of the OPDC OAPF has never gathered support from local residents and consultees. Unless the Central Line was to be re-located, this is never likely to be a *primary movement route* (as it was labelled in the OAPF).

We argue that the Green Cross concept should be dropped from the Local Plan, as being a largely artificial construct which does not work in respect of the southern section of the 'cross'. We support the view of the Friends of Wormwood Scrubs that there is no need for a north south route

across the middle of the Scrubs, and that an eastern access point from the Cargiant site would make more sense.

On **OSP4 Densities and building heights**, consultation sessions and responses to current planning applications within the OPDC area have already shown these to be amongst the most contentious issues in the Draft Local Plan. This is unsurprising. Public debate on tall buildings in London has moved up the agenda following the 2014 New London Architecture analysis of 230 towers over 20 storeys in the planning pipeline (*London's Growing Up*), along with the more recent Skyline campaign. Latest figures from New London Architecture survey show a sharp increase to 436 such tall buildings. The risk of a glut of newly built residential towers, at Vauxhall/Battersea/Nine Elms and elsewhere, features increasingly in the press.

OSP4 sets out *suggested* density levels ranging from 600 housing units per hectare ('Highest density') down to 300 units per hectare (at 'sensitive edges'). These densities are derived from OPDC Development Capacity Study, which in turn uses the 24,000 London Plan housing target for Old Oak as a starting point for its calculations.

The Preferred Policy Option for OSP4 is to locate the highest density development around Old Oak Common Station, with high density around other rail stations and at 'key destinations'. This follows the London Plan principle of clustering high density housing at locations with high levels of public transport accessibility (PTAL).

As the Draft Plan acknowledges (paragraph 3.30) the 'high' and 'highest' densities identified for the OPDC area *'are likely to exceed the London Plan's density matrix'*. This would seem a certainty rather than a likelihood, given that the London Plan matrix sets a maximum of 215 – 405 units hectare for 'central' locations with the highest levels of public transport accessibility³.

There are respected architects and planners who argue that anything more than 350 units per hectare leads to unsatisfactory housing and should be resisted (e.g. *Superdensity the Sequel*⁴). London's move into the realms of 'super density' and 'hyper density' has been relatively sudden, and even a decade ago the planning environment was different. This does not bode well for a 20 year Local Plan and a 30 year regeneration project.

The London Plan's use of PTAL levels as the primary determinant of density levels, as compared with impact on views, heights of neighbouring buildings, and other factors, has also been questioned. So has the fact that densities in the London Plan matrix have been regularly exceeded in recent years on grounds of 'intensification' in Opportunity areas. Densities exceeding the London Plan matrix have been routinely justified by planning authorities and Design Review Panels on the basis that applications involved all achieve the *'highest standards of design'*. This reasoning has worn thin with the public, as the actual buildings rise from the ground.

As shown by the analysis in *London's Growing Up*⁵, Old Oak and Wormwood Scrubs are in a part of the London where to date there are very few tall buildings. North Acton has seen a recent cluster of towers. The 35 storey residential tower at Imperial West on Wood Lane has been granted permission but is not yet built. A second 32 storey tower on the south side of Westway was approved as part of the Helical Bar scheme for (the Brickfields Urban Community) but the site was subsequently sold on to Imperial College. Within Kensington and Chelsea, Trellick Tower (at 31

³ Draft Interim Housing Supplementary Planning Guidance, London Plan 2015, Mayor of London

⁴ *Superdensity the Sequel*, HTA, Levitt Bernstein and others

⁵ *London's Growing Up*, New London Architecture April 2015

storeys) is an exception. The Royal Borough maintains tough policies resisting tall buildings, and has always sought to protect London's western skyline and open views.

Hence it seems inevitable that proposals for very high densities, and a major new cluster of very tall residential towers at Old Oak, will become a focus for a wider debate across the capital on the merits and drawbacks of building upwards. This is already surfacing in responses from the public to planning applications for the Oaklands site, the Perfume Factory, and 'The Portal' in North Acton.

The current draft of the OPDC Local Plan does not explain in its text what levels of building height will be deemed acceptable in the 'highest' and 'high' density parts of the OPDC area. Local people can draw some conclusions from the images and photographs of 'precedents'. Paragraph 3.22 states, somewhat evasively, that *High density development does not directly equate to the delivery of tall buildings and can be delivered across a range of building heights. High density development can include tall buildings.*

This opaque language is not helpful in a public consultation exercise on the first draft of a Local Plan. **We ask that the next iteration of the document is upfront and honest, in stating what levels of acceptable building height, as well as what levels of density, are envisaged in different OPDC 'Places'.**

We believe that the proposed highest densities in the current Draft Local Plan cannot be achieved without residential towers of 40-60 storeys, changing forever this part of West London.

Explanation in the next version of the Local Plan needs to be in a language that the public can understand (i.e. giving a range defined in number of storeys and height in metres). The Draft Plan currently expresses no preference, or guidance for developers, on whether schemes using built forms based on high density low rise, or mansion blocks, would be deemed more acceptable than tall towers.

The London First publication *Redefining Density*⁶ proposes a review of the London Plan Density Matrix and supports higher densities to meet London's population growth. Yet the case studies in this document are for schemes which in terms of OPDC proposed density levels would be classed as 'medium' or 'lower densities'. Of these case studies, the recently completed housing at Silchester/More West, developed by Peabody, is close to the OPDC area and immediately adjacent to Latimer Road Underground Station (i.e. a location with high PTAL levels). This is the sort of form, scale and height of 'new development' that many residents in the OPDC area will assume is coming over the horizon at Old Oak. Yet the scheme (now built) is less than half the level defined as 'lower density' in the OPDC Draft Local Plan. Other examples in the London First publication are:

Embassy Gardens, Nine Elms 1,982 homes/6.07 hectares (326 homes/ha)

Chelsea Waterfront, 711 homes/4.58 ha (155 homes/ha)

Edgware Green, Edgware, 937 homes/11.5 hectares (81 homes/ha)

Silchester (More West), Kensington and Chelsea 112 homes and 852sqm of non-residential space/0.9 hectares (122 homes/ha)

St John's Hill, Wandsworth, 528 homes/2.29ha (231 homes/ha)

The images used in the Draft Plan (which were not included in the draft version of the plan discussed and approved by the OPDC Planning Committee and OPDC Board in January 2016) suggest a recognition that these are an inevitable consequence of the densities set by Policy OSP4.

⁶ *Redefining Density - making the best use of London's land to build more and better homes*, London First and Savills, September 2015

No alternative policy option is offered in 3.2.3 of the Draft Plan. Consultation questions **QOSP4a and 4b** ask for responses only on the narrow issue of 'sensitive edges' and whether some of those defined could accommodate higher densities.

In response to the consultation questions on Policy OSP4:

On **QOSP4a**, an immediate issue arises over the identification of a 'sensitive edge' on the map at Figure 18, in relation to the site of the proposed Oaklands Regeneration scheme (planning application currently under consideration by OPDC). This site, off Old Oak Common Lane and to the east of the Atlas Road roundabout is shown in Figures 18 as part 'sensitive edge' and part 'medium density'. Were the current application to be approved, it would lead to a 27 storey building located less than 100m from 3-4 storey buildings at Shaftesbury Gardens.

As such, this would set a precedent for development across the Old Oak area. The text in the Local Plan does not explain how the 'sensitive edges' shown at Figure 18 have been mapped. In many Local Plans, a density figure of 300 units per hectare would not be described as 'lower density' and 27 storey buildings so close to 3-4 storey buildings would not be seen as sufficiently 'sensitive';

In the current Draft Local Plan, the existing residential areas of Wells House Road is located next to the highest density (600 units per hectare) proposed buildings at, and potentially above, Old Oak Common Station. Shaftesbury Gardens is already at threat of the proposed Oaklands development. And the TITRA streets are located next to a HS2 construction compound, with the prospect of this becoming a long-term 'rail freight consolidation centre' (see paragraph 11.67 of Draft Local Plan).

Chapter 4 The Places

We welcome the fact that the Draft Local Plan is based on the identification of a series of 'places' with policies that can be consulted on and refined for each, as the Plan proceeds to finalisation. We also welcome the fact that the Plan adopts the principle of Lifetime Neighbourhoods.

This consultation response from the Old Oak interim forum suggests some revisions to the boundaries of several of the currently proposed 'Places' along with the addition of some further 'sub-places' or neighbourhoods. These ideas have emerged through discussion at OPDC consultation sessions and subsequent interchanges amongst the residents groups involved in the forum.

In relation to preferred **policy option OSP5**, sub paragraphs a-d are generally supported (the term 'celebrate' is used again in relation to existing features and heritage assets, and needs clarification as to what it means in terms of requirements on planning applicants?).

OSP5 d) encourages 'meanwhile' uses and is welcomed. The longevity of the construction programme for HS2 and Crossrail, and the logistics of the Cargiant relocation, are such that significant planning effort needs to go into ensuring that Old Oak retains existing activities and encourages new ones to arrive and to make use of sites and accommodation likely to be relatively low cost during a 2016-26 construction hiatus in the area.

We strongly support the proposal at paragraph 3.30 for developers to be required to include a 'meanwhile strategy'. The Hythe Road area currently houses an estimated 250-300 spaces for creatives/artists/makers. This includes the 55 studios under management by a single workspace provider at NW10 Studios & Northwest Studios, ABC Spaces, and Junction Space, along with the 12 ACAVA studios and approx 30 studios from other providers on Scrubs Lane.

The continued presence of this activity in the OPDC area will contribute vitality over the very long period of development at Old Oak. Section E4 of the Draft Plan on the provision of Open Workspace and affordable workshop/studio space is welcomed.

Sub-paragraph e) of OSP5 encourages 'catalyst' uses. The concept of 'catalyst' projects to encourage and accelerate development is one familiar to planners but less familiar to the public. Some might question whether it has been the fact that QPR football club has heavily promoted a stadium as a 'regeneration catalyst' that has led to this concept being so heavily featured in the OPDC OAPF and in the first draft Local Plan.

Those living in the area are more interested in long-term outcomes from the Local Plan that will create a part of London in which people will wish to live and work over many decades. Individual projects and schemes which might give an immediate boost to commercial development interest in an area are not necessarily the same thing. We would however support ideas of attracting to the area an enduring catalyst use in the form of a university or other higher education body (such as an art college).

We have found very little enthusiasm from residents living in the OPDC area for a football ground as a catalyst. As evidenced in other parts of London, football stadiums and their long-term future are subject to the vagaries of the success of individual clubs. Stadia also raise public concerns over the impact on match days, and on days on which a stadium is let for other uses. We do not see that Old Oak needs this particular form of catalyst, when the transport hub will anyway be bringing large numbers of people to the area.

A second concern is whether the construction costs of such a stadium would need to be financed from the increase in land values achieved through surrounding development. Finance achieved from such 'planning gain' (CIL and S106) will have huge demands placed on it, in terms of the costs of infrastructure for the HS2 and Crossrail station and other infrastructure (roads and bridges) needed to open up currently inaccessible parts of the area.

Costs of community infrastructure (schools health facilities, leisure and open space) will also need to be met. **We do not believe that a football stadium would be supported by more than a minority of local people as a regeneration 'catalyst', particularly if construction costs were to absorb significant CIL and S106 payments.**

The boundaries of OPDC 'Places'

The proposed boundaries of Places 1-10 are a helpful initial identification of sub-areas within the overall OPDC boundary. Responses and comments made by those attending the OPDC consultation sessions identified several amendments to these boundaries which could usefully be incorporated in the next iteration of the Plan. Suggested changes are set out below, in relation to each 'Place'.

Place P1 Old Oak South

This is identified as a 63 hectare area of predominantly operational railway infrastructure, while including the small residential community in the 19th century streets of the TITRA area. It includes major HS2 construction sites. The area also includes the proposed site for the HS2/Crossrail Old Oak Common Station, and is the proposed location for *'a significant proportion of Old Oak's total new commercial and retail space, alongside opportunities for catalyst uses, along with new high density housing all supported by a mix of open spaces and community infrastructure'*.

We would suggest that the proposed boundaries of this 'Place' be revisited and sub-divided. One such place (which could be called 'Old Oak Station'?) would be narrowed to focus on the station and its immediate surroundings. Delivery of a high quality station, set within its immediate surroundings is a key aspiration of the Local Plan, and merits detailed planning as a location in its own right.

Across Europe, major railway stations and their immediate surroundings vary greatly in terms of what they offer to tourists, visitors, businesses and neighbouring residents. Some add to quality of life for all. Others become locations for cheap hotels and tacky tourist shops. In London, Kings Cross/St Pancras is viewed as a success (particularly the restoration of St Pancras). The setting and immediate surroundings of Paddington and Waterloo are less successful. Combining the elements for success on what is now underused railway land will not be easy.

In relation to remaining parts of the proposed 'Old Oak South' and 'Old Oak West' Places, the currently suggested boundaries in the Draft Local Plan are seen by local people as unconvincing. These boundaries combine areas of different characteristics while at the same time creating an unnecessary divide between existing residential communities on the western side of the Scrubs.

Hence an alternative boundary is suggested in this response, as shown on Map 1 below.

This proposed 'New Place' (provisional title) is shown in the map below, with a boundary (thick orange line) superimposed over the OPDC boundary (red) and the proposed boundary for an Old Oak neighbourhood area (thin yellow). It is an area in which development is already underway and where improvements to public realm and level of amenities can be progressed in the first 5 years of the Local Plan period.



Map 2 suggested boundary (orange) for 'New Place' on western side of Wormwood Scrubs

This 'New Place' stitches together the existing residential communities in the area (Midland Terrace/Shafesbury Gardens, Wells House Road, and the TITRA streets) with the two major new developments at The Collective and at Oaklands. These are all outlined in pink on Map 2 above. The area includes the stretch of Victoria Road between Acton North and the Atlas roundabout (where Boden is located), and the area surrounding this roundabout, as a location which should be 'activated' in the next five years as a neighbourhood 'hub' by the arrival of new retail premises and other local amenities. This stretch of Victoria Road could become more of a neighbourhood 'high street'.

This area would offer scope for a set of bespoke Place policies that could have a positive impact early on in the life of the OPDC Local Plan, while also setting a clear framework for what should happen on the HS2 compounds at Atlas Road and Victoria Road when these are vacated and released for development.

For existing residents and businesses in the area, this alternative to the currently proposed boundaries for Places P1 and P9 makes more sense in terms of building on existing communities and enhancing their facilities and connections. Development at The Collective and Oaklands will add a resident population of 1,500 - 2,000 people in the next few years, to those already living in the TITRA area, Midland Terrace/Shafesbury Gardens and at Wells House Road.

These residents, and those at North Acton, will form an established nucleus for a new community the totality of which remains many years away. In terms of further residential development within the OPDC version of 'Old Oak South' much of the area is expected to come forward for development after 2026. **We would argue that it makes sense to consolidate, improve and enhance within this suggested 'New Place' during the early years of the OPDC Local Plan.**

In relation to **Preferred Policy Option P1**, the wording under **Land Uses** is seen as acceptable. Under the heading of **Density** the wording of sub-paragraph (j) (*Be mindful of existing residential communities at Wells House Road, Midland Terrace/Shafesbury Gardens, and the adjacent amenity and ecological open spaces of Wormwood Scrubs*) is seen by local people as a message to developers that the presence of these communities needs to be noted in Planning Statements but can otherwise be largely ignored. **A stronger policy statement would say that the OPDC will 'resist development which impacts adversely on these longstanding residential enclaves'. The same applies to P1 (k) albeit that this is more specific.**

Under **Preferred Policy P1 l), m), n)** the national priority being given the delivery of a HS2 and Crossrail station is understood and accepted by those living the area. On the sub- paragraph on *Streets* it is not clear why *24 hour pedestrian and cycle access* is required directly from Old Oak Common Station onto Wormwood Scrubs? To what end? As explained at page 6 above, passengers arriving at the station are unlikely to wish to travel directly southwards across the Scrubs. There are limited destinations in this direction and further progress for pedestrians or cyclists is largely blocked by the wide strip of land used by the Central Line/Paddington mainline.

On **Policy P1 t)** the Draft Plan gives no indication as to how '*better connections to Kensal Canalside Opportunity Area*' can be achieved. This would require either some form of personal transit system to and from Kensal to the HS2 station (a significant distance) or an extension of the existing Mitre Bridge Estate access road eastwards the Kensal OA. While the latter option has been considered by RBKC in the course of its Partial Review of its 2010 Local Plan, this would result in more traffic to and from North Kensington adding to that on the already congested Scrubs Lane.

If the RBKC ambition for a further Crossrail station at Kensal/Portobello is realised, this will help to ease pressure on the road network.

The commitment in **Policy P1u)** to specific forms of new health infrastructure is welcomed. However experience of other developments in the White City Opportunity Area has shown that such commitments in planning policies are of limited value unless given firm commitment from NHS England and the relevant Clinical Commissioning Group.

The statements in **Policy P1 v), w) and x)** are also viewed with a degree of scepticism. Sub paragraph v) refers to '*celebrating the unique character of Wormwood Scrubs and Grand Union Canal and associated nature reserve and supporting these in becoming accessible focal points for the area?* Again, what exactly does 'celebrating' mean in this context? We welcome the *more wild than tamed* description of a future Wormwood Scrubs at paragraph 4.163 of the Draft Plan.

The Draft Local Plan states that *the majority of Old Oak South is expected to come forward for development from 2026, with the area providing capacity for 6,000 homes and 46,000 jobs*. Is there an argument for the 2017 final version of the Local Plan focusing mainly on the co-ordination of infrastructure in the central area of the current 'Place P7' rather than attempting to plan in detail for forms of housing and employment space that may or may not be in demand in 10 years time?

In response to the specific consultation questions, our responses are:

On **QP1a**, a more gradual approach to detailed planning this area is suggested, concentrating initially on the HS2/Crossrail interchange and its immediate surroundings.

On **QP1b**, this seems premature at this stage, if detailed planning proposals are not likely to come forward before 2026.

On **QP1c**, were a major university to come forward as a potential catalyst (e.g. more of Imperial College re-locating from its South Kensington campus to consolidate at Imperial West/Old Oak) this would be a welcome catalyst.

On **QP1d**, we support the retention of the nature reserve at its existing location, and the embankment.

On **QP1e**, London Plan density targets could be achieved with lower densities for Old Oak South than those proposed in the Draft Local Plan, through allowing more mixed use (without loss of employment space) in Park Royal (see page 18 of this consultation response).

On **QP1f**, the eastern part of P1 Old Oak South currently includes the Mitre Bridge Industrial Estate (north of Little Wormwood Scrubs). There appears to be no mention of this in the text of the Preferred Policy Option. On OPDC models and images, this area is currently being shown as housing, at a relatively high density and with residential towers.

It is not clear why this comparatively modern and well designed industrial estate (dating from the 1980s) is being proposed for redevelopment as housing, whereas loss of industrial land to housing is strongly resisted in the Local Plan's proposals for Park Royal?

It would seem more sensible to treat this area, which is east of Wood Lane, as part of the Scrubs Lane Place. It is understood that the Scrubs Lane masterplan will include this area, which is welcomed.

Place P2 Old Oak North

The vision articulated for Old Oak North at 4.26-4.29 is broadly supported. Cargiant has been conducting a series of consultation sessions with local residents and businesses and has developed masterplan proposals that go a significant way to turning this vision into reality.

Preferred Policy Option P2a to P2v includes a detailed set of requirements for development in Old Oak North. These broadly accord with the present proposals from Cargiant and with the views expressed above. The fact that within the P2 area, sites are not being zoned or segregated into employment and residential use is welcomed.

We concur with the suggestion in 4.28 that *'the type of workspace'* in this area *'should provide a different offer from the large commercial spaces at old Oak South'*. Flexible units providing space for start ups and micro-businesses, can be successfully coupled with residential use. This area will be similar (in its distance from transport locations) to the Collective development at the Atlas Road roundabout and could provide a further useful test bed for this non-conventional form of housing and employment space.

In terms of social infrastructure, no mention is made in **P2v** of public open space or childrens play areas, although a 'new park' is referred to elsewhere in this section of the document.

Paragraph 4.46 refers to Old Oak South and appears to be misplaced in the document.

In response to the consultation questions, our comments would be

QP2a – Broadly yes

QP2b – attempting to identify further small scale neighbourhoods within Old Oak North is probably unnecessarily prescriptive at this stage in the development of a masterplan and planning application by Cargiant/London and Regional Properties.

QP2c – as for Old Oak South, a university (in addition to a museum, understood to be an annexe of the Science Museum) would be welcome as a catalyst. So would an arts centre which could be coupled with open workspace and studios for the sizable community of artists and makers already in the area (see page 9 above). There is some envy from local residents at the mix of catalyst uses which east London has managed to attract to the proposed Olympicopolis complex.

QP2d – a series of linked open spaces would seem to make more sense, given that Wormwood Scrubs will provide a large area of open space within a short distance. But these would need to be open spaces that are a) designed to be well suited to the UK climate and b) available to all. The success rate of such areas of public realm in new developments in the UK is not great, with many such spaces being windswept and poorly maintained. As discussed at consultation sessions, we would encourage looking at European precedents as well as successes in London.

QP2f – the indicative capacity for homes and jobs appears to match closely the intentions of Cargiant, with the number of new homes reduced from a previous 9,000 to 7,000. The Cargiant proposals (as seen so far) are not reliant on clusters of very tall buildings, although it is understood that one very tall tower is envisaged with a number at 20 storeys and more. It is not clear whether the lower densities proposed by Cargiant will come at a price of pushing higher densities (and hence taller towers) into other parts of the OPDC area.

QP2g – we have identified no further sites that would benefit from site specific policies.

QP2h – yes there are heritage buildings in Old Oak North that that should be considered for retention, particularly those close to the canal (and the Rolls Royce building). A Facebook page put together by local people includes photos of buildings in the OPDC area with some heritage value⁷

Place P3 Old Oak High Street

The vision for this 'Place' at 4.49 -4.52 of the Draft Local Plan is that of a '*destination for residents, workers and visitors*' and as a '*new major town centre*'.

The key question is whether this location will in fact attract people to come to the area not just to travel onwards but for other reasons. Even with a rail station with 250,000 travellers per day, it is not clear that a 1km long pedestrian route from Willesden Junction to Old Oak Common Station will achieve the level of footfall needed to attract major retailers and support intensive retail activity, along with entertainment venues, cafes and restaurants, at this location. The nearby Westfield centre at Shepherds Bush is on the Central and West London lines and is well established (and better located) in terms of attracting visitors and tourists from abroad.

Residents and visitors will also be within 12-15 minutes of Oxford Circus and Bond Street, as an alternative shopping and leisure experience.

The extent to which the area behind Kings Cross takes off as a 'destination' will give an indication of what could happen at Old Oak. Paddington is not seen as a draw for visitors. Waterloo has the advantage of the South Bank complex and close proximity to some of London's major tourist sites.

While the names proposed for parts of a major new development may not have huge significance, the name and design images shown by Cargiant of a new 'Old Oak Walk' have been better received by local people than those for OPDC's proposed 'Old Oak High Street'. The 'precedent' selected for use in the OAPF, of a 'high street' with the building heights and form of the Tottenham Court Road is not what most people envisage (or would necessarily be attracted to) as a welcoming 'high street'.

'Old Oak High Street' has been described at consultation sessions as being primarily as pedestrian and cycle route, and this is backed up by the visual images in the Draft Plan. The 'vision' at 4.49 to 5.52 is silent on the question of vehicle access and service arrangements for retail premises.

Paragraph 4.54 in the subsequent text makes clear that '*it may be necessary for all, or parts of the street, to be vehicular including public transport, servicing and private vehicle use*'. The next iteration of the Local Plan needs to provide more clarity. Oxford Street with buses, taxis and private vehicles crossing its intersections is very different environment from the likes of an Oxford Street confined to pedestrian and cycles (were this outcome ever to be achieved). Other cities in Europe and some in the UK have successful major shopping streets which are fully pedestrianised other than for out-of-hours servicing. This should be the ambition for Old Oak.

On the specific Preferred Policy Options for 'Old Oak High Street', those on Land Uses are generally supported. On Densities, the proposal in P3g) to '*recognise the High Street as a key destination with opportunities for high densities along its route...*' implies residential densities of 550 units per hectare built above what may well be double storey retail frontages. This would seem likely to lead to building heights far above those in Oxford Street and to create a canyon-like urban environment with overshadowing and little sunlight.

⁷ see at <https://www.facebook.com/OldOakParkRoyalCommunity/photos>

On Preferred Policy Option P3 on Streets, sub paragraphs i), j), and k), are supported. A policy l) 'to provide exemplary architecture that marks key destinations' may sound innocuous, but will be seen by many as no more than a means of justifying breaches of London Plan policy 7.7 on building heights and the London Plan density matrix. As local residents, we have learned to our cost about tall buildings being justified as 'landmarks'.

In response to the consultation questions:

On QP3a, the proposed densities are not supported (as is the case for other parts of the Local Plan). A serious attempt should be made to plan for a thoroughfare with limited vehicular access other than for buses, which are likely to be needed given the 1km length involved.

On QP3b the three proposed distinct character areas seem sensible although it is not clear why the area around Old Oak Common station should be very 'distinct' from the High Street? The area around the station needs careful planning, including designing out crime, so as to ensure that a high quality environment is maintained.

On QP3c we have no other specific land uses to identify.

Place P4 Grand Union Canal

Enhancement of the canal and its towpaths, as an important east west pedestrian and cycle route, a heritage asset, recreational facility, and transport route, represents one of the big opportunities from the development of the OPDC area.

Striking a balance between retaining the present valued qualities of this section of the canal and exploiting its full potential, will be a difficult task. Many of its present attractions (wildlife, peace and quiet, and casual moorings providing one of the last forms of genuinely affordable housing in inner London) seem likely to be lost given the scale and density of development planned for Old Oak. Some of these characteristics also have their downside (isolation and negative perceptions of risk of crime along the towpath).

The proposed vision of the Old Oak section of the canal includes a continuous walking and cycling route on both sides, and this is welcomed. So are proposals for a series of crossing points. Paragraph 4.65 states that *a string of waterside spaces will complement the canal's historic character providing a mix of spaces for events, relaxation, socialising and the night time economy along busier stretches.*

It is hard to see how these outcomes can easily be combined with 'High densities' at 'certain locations such as key destinations and focal points, specifically at the junction with Old Oak High Street' (paragraph 4.62). While the built form along a canalside can be both attractive and tightly built (in the manner of the Victorians) the combination of a canal and very tall towers is a very different prospect.

Achieving some consistency in the design and treatment of towpaths, through sections of the canal across three boroughs, will be important. The OPDC has the advantage of acting as planning authority for all three sections. RB Kensington and Chelsea need to be involved in some rethinking of planning policies for the stretch of canal from Mitre Bridge towards Little Venice. This stretch is not currently designated as a conservation area and is likely to come under pressure for development over the lifetime of the OPDC Local Plan.

The section of the canal at Mitre Bridge offers scope for creating a hub of activity linked to the buildings of the proposed Cumberland Park Conservation area. This location has potential for a set

of workshops and studios for artists, makers and creative entrepreneurs. This could be linked to a new set of residential and visitor moorings, managed in such a way as to remain accessible to lower income groups than the permanent moorings at e.g. Little Venice. Experience elsewhere in London suggests that such locations will attract cafes, restaurants and the potential for specialist market stalls, thereby becoming an attractive stopping off place for those walking or cycling along the towpath.

The Local Plan at paragraph 4.66 cites examples of canalside locations at Battlebridge Basin (LB Islington) and Hackney Wick (LB Hackney). It must be remembered that these combine substantial industrial heritage buildings with new developments of four to five storeys, as opposed to the residential towers likely to result from OPDC density policies. The same applies to Portobello Dock, where the canal crosses Ladbroke Grove in RBKC. Further eastwards, at Little Venice, Regents Park, Camden, St Pancras Lock, Granary Square, and the London Canal Museum, the canal is not dominated by very tall buildings on its banks. Paragraph 4.67 of the Local Plan says that development along the canal *'will be expected to be more restrained'*. But any such 'restraint' is relative to overall OPDC draft policies in which 405 units per hectare is described as a *'medium'* density.

In this context, Mitre Bridge, given its proximity to a newly defined conservation area at Cumberland Park and hence a 'sensitive edge', may prove to be one location on the canal where these examples from other parts of London canalside can more readily be drawn upon.

In response to the consultation questions:

On **QP4a**, the overall approach set out for the preferred policy option is broadly supported other than the sentence in sub-paragraph f) on density which currently states *'A mix of densities will be appropriate along the canal including lower and medium densities buy with some taller elements at key generations where they generate a moment of interest'*. Local residents see *'A moment of interest'* as 'planning speak' and a weak justification for additional building height.

On **QP4b**, yes a series of small scale neighbourhoods along the canal could usefully be identified. This response identifies our suggested Atlas Road hub' (including the Collective) and Mitre Bridge as two such smaller scale neighbourhoods.

On **QP4c**, we suggest a focused 'creative quarter' at Mitre Bridge, extending northwards to the Cumberland Park CA, with policies to encourage artists and makers, along with residential moorings, with potential for bespoke 'live/work' policies designed to retain in the OPDC area existing users of studio space along with current users of casual moorings.

On **QP4d**, our answer to this question is that development along the canal could *not* achieve densities higher than those suggested. Even at 'low' and 'medium' densities, these are already higher than existing development along comparable stretches of the canal in RBKC and Westminster.

Place P5 Park Royal

We support the continued role of Park Royal as a successful employment area, but question whether it is over-simplistic for the OPDC Local Plan to treat this area as an 'industrial estate'. As shown by the Park Royal Atlas, the range of activities on the estate is now very wide and 'industry' in the conventional sense no longer predominates.

In a London-wide context, the recent report *Growing London*⁸ states that *The London Plan indicates that, given a net decline in demand, there is scope to release 740 hectares between 2011 and 2031, an average of 37 per year. Despite this benchmark, we are currently releasing approximately 100 hectares per year. If a similar rate of release is maintained, the target release to 2031 will be reached by around 2018.*

The need to protect 'industrial land' in London is recognised. But as *Growing London* also recognises *'Advances in technology are continuing to change the nature of industry in London and our patterns of work. These changes are challenging traditional assumptions about 'dirty' industrial uses being a 'bad neighbour', or needing certain types of accommodation, like single-storey sheds or large yards. There is potential here for new, innovative typologies to emerge that test higher densities, sharing facilities, or different mixes of use'.*

At consultation sessions on the OPDC Local Plan, it has been clear that those living and working in the area have questions on whether London Plan policies for Strategic Industrial Land (SIL) are not too blunt an instrument, and inappropriate for a 2016-2036 timeframe.

The 'vision' in the current Draft Local Plan states that *'the residential pockets and open spaces will be better connected by safe and inviting routes to allow existing and future residents in those areas to access the range of new services available in Old Oak'*. Yet these 'residential pockets' remain in the Local Plan as small islands within a sea of 'strategic industrial land'.

London Plan Policy 2.1.7 on Strategic Industrial Locations (of which Park Royal is one) provides that *'Development proposals in SILs should be refused unless:*

- a they fall within the broad industrial type activities outlined in paragraph 2.79*
- b they are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework or borough development plan document*
- c the proposal is for employment workspace to meet identified needs for small and medium sized enterprises (SMEs) or new emerging industrial sectors; or*
- d the proposal is for small scale 'walk to' services for industrial occupiers such as workplace crèches or cafes.*

Residents living within and nearby to Park Royal find it hard to accept that this form of restrictive 'zoning' policy has improved the local environment or their quality of life over recent decades. Whereas the original major firms in the Park Royal area (e.g. Guinness) pursued the principle of providing community facilities for their staff and for local residents, locating these alongside their industrial premises, Park Royal is now largely devoid of any form of community infrastructure (GP surgeries, dentists, schools, social centres).

As pointed out in *Growing London*, many 'industrial' uses are no longer 'bad neighbours'. **There is scope for lessening proposed housing densities and building heights in the Old Oak part of the OPDC area through more intensive use of the land at Park Royal, currently developed at low density. This could be achieved without loss of employment floorspace.**

For one part of the Park Royal 'Place' (see below under 'Old Oak West') we would support an approach in the OPDC Local Plan that moves on from the rigid zoning of the current SIL designations,

⁸ *Growing London*, Mayors Design Advisory Group, 2016

combines certain recommendations from *London's Growing*, and goes a step further in encouraging mixed use. The relevant recommendations from *London's Growing* are:

1g. Champion the creation of affordable workspaces in new developments, and require their provision through policy in the London Plan. Develop a framework to define affordable workspace and eligibility criteria for access, which may include start-ups, social enterprises and artists.

1h. Pilot how light industry, including small-scale manufacturing and digital fabrication, might be incorporated in new residential areas and developments outside areas currently designated for industrial uses. This could include a programme of capital investment to support innovative building typologies and development models that successfully mix diverse uses.

The step further, mirroring 1h above, would be to allow residential use above commercial space within some of the SIL areas of Park Royal. Specifically, this approach is suggested for the area between the Atlas Road roundabout and the Wesley Estate as shown on Map 3 on page 25 of this response. This would link the currently isolated Wesley Estate (with its 230 houses) with the 'New Place' as shown on Map 2 of this response.

In response to the consultation questions:

On **QP5a**, we do not agree with the proposed approach of the preferred policy option, seeing it as overly prescriptive in continuing a rigid 'zoning' approach for nearly all parts of the Park Royal 'Place'. As outlined above, a more flexible approach encouraging intensification of mixed use, increasing both commercial and residential floorspace in parts of Park Royal, is seen as having overall benefits for the OPDC area.

On **QP5b**, the area including the Wesley Estate and the nearby south and north side of the canal is seen as having the potential for such mixed use, linking this to the proposed Atlas Road 'hub' and modified 'New Place' as proposed in Map 2 in this response. A transition zone between the modified 'New Place' suggested in this response, on the eastern side of the current Park Royal Place also has potential for mixed use, including the HS2 compounds at Victoria Road and Atlas Road when released by HS2. This area, and the proposed New Place, corresponds broadly with the 'innovation zone' suggested by Allies and Morrison in their take on the OPDC masterplan.

On **QP5d**, we do not see the case for extending the existing SIL area. As we see the future, more intense employment use of land at Park Royal is likely to result from market forces over the next 20 years, as logistics businesses move further out of the area towards the M25. Key industrial or light industrial uses which are vital to the Central London economy (such a lift engineering companies) could be protected by more tailored and bespoke policies than London Plan Policy 2.1.17 on Strategic Industrial Locations.

On **QP5e**, as explained above we consider that the new homes target for the Park Royal Place could be increased, though policies that allow for mixed use (with no loss of employment floorspace) on the eastern border of the currently defined Park Royal Place.

Place P6: Park Royal Centre

The interim Old Oak Forum includes residents groups in and around the Old Oak area, and we are conscious that other communities on the western edge of Park Royal will also have strong views on the merits of an intensified Park Royal Centre. Generally, the vision of a central hub for Park Royal is supported, especially if sections of Park Royal become more 'mixed use' than currently proposed in the Draft Local Plan, with increased residential density. Local residents and business employees

will need concentrated local service infrastructure in order not to travel outside Park Royal for shopping, restaurants, banking, and other services (GP, optician etc).

The future plans of Asda, and for the Central Middlesex Hospital, are clearly crucial to the future of a Park Royal Centre. To be viable, uses and activities within the centre will need to be geared predominantly to the business day and weekdays, and this will influence market demand for premises. There is some concern that public realm improvements could soak up very substantial S106 funds and CIL, on schemes which will not make a fundamental improvement to the attractiveness of the area. Park Royal will remain a predominantly employment/warehouse area with traffic problems that look unlikely to be solved through measures proposed in the Local Plan. Major investment in public realm may do not much to change its essential character.

Place P7: North Acton

Many of the major planning decisions for the North Acton 'Place' have already been made as part of the regeneration programme led by LB Ealing over the past decade. The Local Plan states that further development *'will progress in a comparable manner'*.

The basis on which LB Ealing remains the decision-maker on major as well as minor planning applications in Park Royal has not been made clear to local people. The OPDC scheme of delegation to LB Ealing⁹ briefly states this arrangement, but does not explain why it was entered into? Or how long this arrangement is intended to last? Many would prefer to see planning decisions on major applications at North Acton be taken by the OPDC, as elsewhere in the OPDC area.

Meanwhile it would seem that the die is more or less cast for North Acton. Local residents are far from impressed with the way that the area has been developed over the past decade, with its cluster of towers of student and PRS (private sector rented) housing, windswept public realm, and limited range of shops and facilities. We would support those policies in the Draft Local Plan that further development should contribute to the delivery of a health centre (policy p), improve the station (policy k), and connect North Acton to Old Oak West (policy o). The proposal to *'address issues created by the existing gyratory'* is also welcomed, although it is not clear how this would be achieved without a very costly new road layout.

In response to the consultation questions:

On **QP7a**, it is hard at present to see a realistic alternative policy approach for North Acton other than by LB Ealing taking a more robust approach to London Plan policy 7.7 limiting building heights.

On **QP7c**, we would endorse the comment at 4.125 of the Draft Local Plan that *'it will be important to deliver a broader mix of residential types. Given the amounts of student accommodation delivered, this may represent an over concentration'*. Local residents consider that an over-concentration has already happened.

The development focus at North Acton on PRS (private rented) schemes with smaller units is not welcomed locally. Such housing is aimed a market of younger and more transient households. Coupled with an over-concentration of student housing, this emphasis will not lead to stable long-term communities in this part of the OPDC area. We also ask that the Local Plan preserves the character of North Acton station and the buildings of historical interest such as Monarch House and Perfume Factory.

⁹ Old Oak and Park Royal Development Corporation – Scheme of Delegation for Planning Functions in the London Borough of Ealing, on OPDC website.

On QP7d, the indicative capacity of approximately 4,300 new homes and 4,000 jobs assumes 'high density' close to North Acton Station and on the 'sword' site. As set out at the start of this response, we do not support density levels of 600 units per hectare anywhere in the OPDC area, these being well above the levels in the London Plan density matrix and leading to residential towers of extreme height.

Place P8 Scrubs Lane

The 'vision' for this Place at 4.132 to 4.134 of the Draft Local Plan is generally supported and Scrubs Lane is long overdue for improvements to the local environment and public realm. The main concern within the area is from businesses at risk of having to re-locate as a result of increased land values and development pressures. There is also growing concern that uncertainty on future plans for the area has already led to businesses leaving Scrubs Lane, with resultant vacant premises having an adverse impact on the image of the area.

On the Preferred Policy Option, we would support P1a) on *delivering a range of flexible workspace typologies*, and P1b) on *delivering a mix of housing including well designed access to residential above ground floors*.

On density policies, the proposed policies reflect the proximity of existing conservation areas, and the proposed Cumberland Park CA. Policy P1f) proposed *taller elements* (i.e. high and medium density, on the western side of Scrubs Lane, north of the canal. This does not seem compatible with the 'vision' of Scrubs Lane as a *pleasant street, respectful of surrounding heritage assets with a high quality public realm* (4.132). London street forms do not normally have residential towers well above 20 storeys on one side, and a mix of heritage and medium rise mixed use development on the other.

Policy P8l) is to *deliver a continuous cycle route along the length of Scrubs Lane*. The existing road width would not seem sufficient to achieve this. An alternative option would be to devise a dedicated cycle route on the eastern border of the Scrubs and then via a route within the new development at Old Oak North. To the south, a good quality connection to the proposed East West Cycle Superhighway will be needed (assuming the Westway stretch of the Superhighway goes ahead as planned). The St Quintin and Woodlands Neighbourhood Plan includes some relevant policies to this effect.

In response to the consultation questions:

On QP8a, the Preferred Policy Option is supported subject to the detailed comments above

On QP8b, this response suggests (at page 17) policies to encourage a small 'creative hub' at Mitre Bridge that includes the Cumberland Park buildings, and which runs southwards to the canalside. For this location specific live/work policies could be developed, applying to a set of permanent moorings as well as to studio workspace.

On QP8c, on 'other land uses', this response queries whether the Mitre Bridge Industrial Estate is proposed to be redeveloped for housing use (under the Preferred Policy for Old Oak South) and also suggests that this area, east of Wood Lane, be included as part of the Scrubs Lane Place rather than the Old Oak South Place.

On QP8d, the current Draft Plan does not appear to set indicative capacity figures for the Scrubs Lane 'Place', hence no comment on this question.

Place P9 Old Oak West

As explained in this response (in the section on 'Old Oak South') the currently proposed boundaries of an Old Oak West and Old Oak South 'Places' are seen as in need of revision. An alternative suggested 'New Place' is shown on Map 2 above.

The remainder of the current Old Oak West, we would suggest, could more usefully be considered as part of a transition zone between the industrial/employment land of Park Royal and the new 'Old Oak'. A further alternative 'Place' is therefore proposed with a provisional title of 'Canalside Quarter'.

For this transitional area, this response argues that a significant element of mixed use should be allowed, ***provided that this does not reduce existing employment floorspace***. This would allow for office, studio and small workshop accommodation to be combined with residential above (or alongside on the same site).

A more flexible set of bespoke policies for this Place, as compared with those currently proposed for P5 Park Royal, would provide the financial incentive for owners of light industrial and warehouse premises in the north-east corner of Park Royal to consider refurbishment or redevelopment of outdated premises. This would take place on an incremental and gradual basis, as a result of the multiple ownerships involved. Significant parts this suggested Place are anyway due to be compulsorily purchased as HS2 compounds.

Bespoke policies, applying at a fine grain and street by street if necessary, would determine the amount of residential floorspace that could be brought forward via refurbishment/redevelopment. This would provide for control on building heights and in many cases might allow only 2-3 floors of residential, combined with the retention of the existing amount of employment floorspace.

Design guidelines on suitable typologies for mixed use, building lines, off-street parking, servicing bays, materials and fenestration could, over time, create a more coherent urban form for the area, But such guidelines should not be imposed prescriptively or in a way that inhibits development.

There would on many occasions be some issues over adjoining uses and the extent to which noise, odours, and other 'bad neighbour' issues inhibited the introduction of residential floorspace. Flats and studio apartments in such a mixed use area would not attract the very high residential values of newbuild properties in the centre of the new Old Oak. But they would provide housing for those at a stage in life seeking 'more affordable' accommodation to rent or buy and who have no problems with a scruffy, but vibrant, immediate environment.

The area suggested for such an approach is shown on Map 3 below. This includes parts of the current Old Oak West and parts of P5 Park Royal. It abuts onto the North Acton Place P7 as shown in the OPDC Local Plan, and onto the 'New Place' proposed in this consultation response.

This proposed Place stitches the Wesley Estate back into a mixed use residential area, with a new resident population building over time and attracting shops, convenience stores, and other facilities to the area. It exploits proximity to the canal. The Grand Union Arms and its immediate surroundings (including the moorings) give some idea of what is envisaged.

Flexible planning policies for such a 'Place' should extend to allowing any A, B or D class uses subject to controls over adverse environmental impacts (similar to those applying to flexible permitted development rights). The boundaries between a jeweller or craftsperson working in a studio (B1)

and selling their output onsite (A1) are continuing to blur in other parts of major cities, in a productive way.

Live/work policies (allowing residential use within B class property) should also be allowed. The reasons why boroughs such as RBKC do not use such policies (exploitation of a planning permission where the 'work' element of the permission swiftly disappears, or never happens) would have much less force in Park Royal than in Kensington, given the difference in residential values.

Elements of the Preferred Policy Option for Old Oak West in the Draft Local Plan could still apply to this alternative area. But it would be less of a 'business park' as per the Chiswick model, and more of an area such as found (and appreciated) in many European cities in which a more flexible planning regime allows for 'working neighbourhoods' in which people live and work in the same premises, and where workshop and light industrial use is giving way to 21st century makers, menders, recyclers and upcyclers, and creative entrepreneurs.

And, of primary importance, this would be an area where both living and working accommodation remained relatively cheap by London standards, as a result of retaining a physical environment in which the offshore property market has little or no interest.



Map 3

In the evolution from the status quo in this part of Park Royal to the vision of a 'Canalside quarter', this area could also provide lower cost accommodation for the army of construction workers required to build the new Old Oak. For the period 2016-25, planning applications for

redevelopment/refurbishment projects that include change of use from B class to part C class accommodation could be conditioned to require an element of accommodation for construction workers.

In response to the consultation questions

On **QP9a**, this response suggests alternative boundaries for the Old Oak West and Park Royal Places, as set out on the map above. Old Oak West is proposed as a transition zone with flexible planning policies, evolving into a 'live/work neighbourhood' (Canalside Quarter) with 'more affordable' commercial and residential accommodation, rather than a conventional business park.

On **QP9b**, see above

On **QP9c**, yes residential use should be allowed in addition to industrial/commercial

On **QP9d**, as argued above, conventional business park use is seen as a missed opportunity for building a sustainable community, more affordable to Londoners, in this part of the OPDC area.

on **QP9e**, a construction and freight consolidation centre at this location would further separate the Wesley Estate from the residential communities on the eastern side of the Scrubs and would not achieve transition between the heavier industrial uses in Park Royal and the new Old Oak,

On **QP9f**, under the proposals in this response, an alternative Old Oak West Place would deliver significantly more than 50 net additional homes, thereby reducing development pressure in other 'Places'.

QP9g, this response suggests a newly defined 'Canalside' Place, for which detailed policies should be developed to shape the balance of commercial and residential use, at a fine grain and on a street by street, or site by site, basis if necessary, achieved via a place-specific masterplan or neighbourhood plan.

Place P10 Wormwood Scrubs

Overall, we support the views of the Friends of Wormwood Scrubs that the Local Plan should stick to the principle of *retaining Wormwood Scrubs as a public space more wild than tamed*.

As explained above (page 6) we see no purpose in an access point to the Scrubs directly south of Old Oak Common Station, this being 'a route to nowhere' for train travellers. We support the case for an access point further to the east.

Wormwood Scrubs provides well used sports pitches as well as wilder areas and a designated Local Nature Reserve. We support the recognition given in the Draft Local Plan on the need for sensitive planning policies for this Metropolitan Open Space. As pointed out by FOWWS it is hard to see how this can aim be achieved when the *sensitive edge* of the northern boundary of the Scrubs is to be confronted with the *highest density* towers located at Old Oak Common Station.

The basis of the continuing MoD rights over the Scrubs needs to be explained in the Local Plan, so that the public have a chance to assess their merits. It is not clear what current purpose these rights have? In the past, the existence of these rights has inhibited various plans and proposals to diversify the use of the Scrubs, such as the introduction of more trees.

Given problems of drainage, coupled with the potential biodiversity value of artificial lakes or ponds, these latter options should be explored in the next iteration of the Local Plan.

In terms of cycle routes, we see a stronger case (as compared with FOWWS) for a dedicated cycle route on the eastern border of the Scrubs and close to Scrubs Lane. This is because of the scope for linking such a cycle route southwards through to Latimer Road and the proposed Westway section of the East West Cycle Superhighway. To the north of the Scrubs there may be scope for continuing such a route via cantilevered route on the railway bridge at Mitre Bridge, thus keeping cyclists off a busy Scrubs Lane.

Chapter 5 Sustainable development

Preferred Policy SD1 reflects the NPPF requirement for a positive approach to planning, approving applications without delay unless material considerations indicate otherwise.

As such, there is little or no scope for variation to this policy, and the Old Oak interim forum has no comments to make in response to consultation questions **QSDa, QSDb, and QSDc**.

D1: Strategic policy for design

The preferred policy option asks that all proposals *demonstrate to delivery of exemplar world class architectural and landscape design quality*. Review of applications by the Place Review Group (managed on behalf of the OPDC by CABE at the Design Council) and adherence to principles in the GLA Character and Context SPG, are seen as the means of achieving this ambitious outcome.

Experience of developments across London demonstrates that 'exemplar' architecture is hard to achieve at the very high density levels proposed for Old Oak. For many of the public, the precedents and examples of schemes cited in the OPDC Development Capacity Study are not '*exemplar world class design*'. A more realistic and honest Policy D1 might state *Proposals will be supported where they demonstrate the best architectural and landscape design achievable within the constraints of density levels and estimated housing and employment targets set for each of the Places defined in this Local Plan*.

D2: Streets and Public Realm

Preferred policy option D2 is similarly ambitious in seeking *exemplary* design. It includes a series of sub-paragraphs which may need some refinement:

D2b)ii requires proposals to *contribute to connecting places together*. The manner of such connection needs to be spelt out, as to many applicants and developers this wording may signal 'more roads for more vehicles'. Given that the OPDC Draft Policy T7 limits car parking to 0.2 spaces per unit and is intended to promote a modal shift away from cars, less vehicle connectivity between neighbourhoods and 'Places', rather than more, may be what is needed. Carefully planned zonal access to different neighbourhoods may be required, to discourage through traffic.

D2b)vi requires proposals to *support wayfinding*. 'Wayfinding' as a concept used by urban planners is understood to refer to the user experience of orientation and choosing a path within the built environment. In a world in which a growing number of the public carry a GPS enabled phone on their person, the traditional importance given by planners to 'wayfinding' needs reassessment. Far fewer people find themselves lost or disorientated in a city, as compared with a decade ago. Too often the 'wayfinding' concept is used by developers (and accepted by the planning profession) as a false justification for the commercial gains achieved through 'landmark' tall buildings.

On D2c) a separate policy controlling outdoor advertising is welcomed. Outdoor advertising on the A40 approaching/leaving London and along the Westway has become a major blight on West

London. The current draft policy could benefit by being tightened. The major outdoor advertising companies take a cynical approach to each and every possible location, and are willing to expend large sums in pursuing planning appeals.

D3: Open Space

Preferred policy option D3 is welcomed as a generic policy. Specific comments on open space have been included in certain of the 'Places' sections of this response. D3iii) requiring the delivery of temporary open space is likely to prove important given the lengthy timeframe for development of the OPDC area.

Two of the larger open spaces within the OPDC area, as shown 64, are cemeteries. The extent to which these areas provide attractive and usable open space for leisure use is questionable. St Mary's Cemetery (shown as *existing open local space* in Figure 64 of the Draft Local Plan has only two entrances in use, within limited opening hours. Both are on the Harrow Road, some distance to the east of the OPDC area. The gate on Scrubs Lane is locked and not in use. It is questionable for the Local Plan to refer to (and show on maps) this area as 'open local space' that serves residents of the OPDC area.

D4 New Buildings

This section of the Draft Plan is important in terms of the ultimate success of Old Oak as a sustainable new part of London. Paragraph 6.33 explains that London Plan policies direct tall and large buildings towards Opportunity Areas, and gives the current London plan definition of 'tall'. The paragraph does not provide the currently applied threshold for referral of planning applications to the Mayor. This is understood to be buildings above 20 storeys.

The preferred policy option D4c) sets out criteria which proposals for tall building will be required to meet, including the customary '*highest standards of design*' and the subjectively interpretable '*delivery of a visually engaging and coherent skyline*'.

The Draft Plan does not include, in this first iteration, a separate Tall Buildings Strategy such as was prepared for the Vauxhall/Nine Elms Battersea OAPF¹⁰. This detailed document set parameters for tall buildings within various clusters in the Opportunity Area. For Vauxhall, buildings of 150m to 180m (the Vauxhall Tower) '*could be supported*'. For the Albert Embankment the strategy stated that '*Tall buildings should generally be no more than 80–90m in height*'.

It seems clear from the density levels set in the OPDC Local Plan Policy OSP4 that similar building heights are being contemplated for Old Oak. But this is not made clear in the Draft Plan document. The public are left to make guesses based in models and images shown. A residential tower of 180m will be around 70 storeys high. While London's new very tall buildings have their supporters, Old Oak and West London generally are parts of the capital that have hitherto been very largely free of them. This situation has been achieved only through the consistent application of robust planning policies by the relevant boroughs.

It is a very big decision for London as a whole to abandon this approach to the western skyline of the capital, and one that needs London-wide as well as local debate.

In response to the consultation questions

¹⁰ Vauxhall Nine Elms Battersea Opportunity Area Planning Framework, Chapter 8 Tall Buildings Strategy, Mayor of London

On **QD4a** the preferred policy option D4c) should be explicit on the height parameters for buildings in different 'Places' in the Old Oak area. It is not sufficient for the 'Place' policies in the Draft Plan simply to refer back to the density levels set by OSP4, when these give no indication of resultant building heights. This is the introduction of planning policies by stealth. A detailed Tall Buildings Strategy should be published as part of the Autumn 2016 second draft of the Plan.

On **QD4b** the proposed viewing locations for local views at Figure 70 (which will be presumably be used when assessing applications) do not include points in the existing residential communities in and around Old Oak (apart from 2 points shown in the TITRA area). None are shown at Wells House Road, Midland Terrace/Shaftebury Gardens, the Old Oak Estate, College Park or the Eynham Road area.

D5 Alterations and extensions

On preferred policy option **D5b**, this currently includes a set of requirements to be applied to alterations to existing shopfronts and (unusually in the Draft Local Plan) an 'alternative policy option' is offered (which is that of providing no guidance).

We suggest that in Park Royal, and in the Canalside Quarter 'Place' put forward in this consultation response, that this alternative policy option should apply. The imposition of planning policies for shopfront alterations in these parts of the OPDC area would lead to development management and enforcement resource disproportionate to the results that would be achieved. The same may apply to other parts of Park Royal. Commercial viability in the area will already be under stress as a result of huge construction activity. Over-prescriptive planning policies are likely to lead to increased vacancies of existing premises and to reinforce a cycle of economic decline.

D6 Heritage

The interim Old Oak Forum has already been working to identify remaining industrial and commercial buildings in Park Royal and Old Oak with heritage value. A process of Local Listing, using Historic England guidance, is seen as a more practical way forward as compared with blanket policies aimed at retaining elements of architectural interest (such as D5b referred to above).

On **QD6a** we support the designation of the Cumberland Factory Conservation Area (see also under comments on the Scrubs Lane 'Place').

D7: Amenity On consultation question **QD7a**, we would oppose the suggestion of relaxing or weakening policies on amenity for building users '*to accommodate higher densities*'. The fact that this question is asked confirms that the OPDC recognises that the density level of 600 units per hectare set by Policy OPS4 is incompatible with the '*highest standards of design*' in respect of issues such as overlooking, privacy, and sense of enclosure.

OPDC policies on amenity should be applied at least as rigorously as those within the Local Plans of LB Brent, Hammersmith & Fulham, and Ealing, as well as the London Plan, and should respect standards set by the BRE where these apply.

D8: Inclusive Design

The preferred policy option is supported.

Chapter 7 Housing

This important section of the Draft Local Plan is supported by four evidence base documents of which only two are available for this Regulation 18 consultation.

As noted above (page 3) the OPDC Development Capacity Study takes the London Plan minimum housing targets and indicative employment capacity for Old Oak as a 'given'. This in turn leads to the density levels enshrined in OPDC Policy OSP4 on densities and building heights. These far exceed the maximum London Plan Density Matrix figure of 215-405 housing units per hectare for 'Central' locations with maximum PTAL levels.

In answer to consultation questions **QHa, QHb, and QHc** we consider that the draft housing policies and justification statements in the Local Plan

- do not explain to the general public the implications for built form at Old Oak of the very high or 'super-density' levels proposed in the Draft Plan
- do not provide an adequate 'testing' of what are described in the London Plan Annex on Old Oak as 'estimates' and 'guidelines'. These figures do not appear to have been subject to detailed consideration by the Planning Inspector at the EIP on the Further Alterations to the London Plan, nor commented on in his report of November 2014.

The wording of preferred policy option **H1** is unobjectionable in itself, but becomes problematic in being linked to *other policies in this Local Plan*. (Paragraph 7.5 of the text accompanying text appears to be unfinished).

The same applies to preferred policy option **H2** on Housing Supply, and its link to the Development Capacity Study.

As explained in paragraphs 7.11 to 7.13 of the Local Plan the level of 'objectively assessed housing need' in the OPDC area has not been derived from the needs of the existing or nearby population. It is a set of figures based on the contribution that the area can make to housing London's growing population, and to *assessed need* across the full geographic area of the three boroughs within which the OPDC area sits.

Methodologies for preparing Housing Needs Assessments and Strategic Housing Market Assessments are to an extent prescribed by NPPF requirements. These studies use sets of assumptions developed by the planning and housing professions over many years. There is a case for arguing that their methodology (and validity of their results) becomes more questionable when applied to London's unique housing market.

In terms of household formation and the *assessed need* for housing in Old Oak, there are many other factors at play:

- statutory homelessness in the three boroughs has risen but not significantly
- the number of concealed families has risen by 93%, and multi adult households by around 17%, reflecting London's current extreme housing costs (by global and historic measures)
- overcrowding has increased, unsurprisingly, as a result of financial pressures forcing single and younger people to share (these pressures including changes to housing benefit)
- the impact of Right to Buy for Housing Association property, and the introduction of Starter Homes has yet to emerge (and is not factored in the OPDC SHMA)
- Old Oak (particularly North Acton) is seeing a flurry of PRS (privately rented sector) developments.

- It is estimated that 80% of rents in the OPDC area are becoming affordable only to higher income households¹¹

The Draft SHMA prepared for the OPDC by Opinion Research Services is a detailed and sophisticated analysis of its kind. But as the document itself acknowledges *'From a technical point of view, OPDC represents a challenging SHMA because at the time of the 2011 Census there were approximately 7,000 residents in the area and 2,800 households'*. Hence a choice has been made by the consultants to assess housing need across the three boroughs, and then to suggest figures of 44,800 affordable units (48%) and 44,400 market units (52%) as being required across all three boroughs over the 20 year OPDC Local plan period.

As the study from ORC states, SHMAs *'do not set a 'housing target' for the planning authority'*. It has been an OPDC decision to conclude that *the OPDC area could meet almost 25% of the housing market area's objectively assessed need over the next 20 years* (para 7.14). Whether this is the right outcome for the totality of the three boroughs concerned is a separate issue, not explored in the Local Plan.

The whole framework of *Objectively Assessed Need* (OAN) for housing, as identified within a *Housing Market Area* (HMA) is no more than one of many planning tools. The methodology creates figures which give an impression of scientific method, but which then need to be considered against a host of other factors that could help decide how much housing, and of what kind, should be built at Old Oak.

On consultation question QH2a, for the reasons explained above we consider the approach the OPDC is taking to objectively assessed housing need to be of questionable soundness. In our view, other questions need to be taken into account in determining a housing strategy for Old Oak.

These are 'commonsense' questions, raised by ordinary residents who have been attending the consultation sessions, rather than by professionals preparing the Draft Local Plan:

- would it not make sense to start creating new housing on the Old Oak/Park Royal border by well designed infill around existing small and isolated residential areas, adding to these enclaves the shops and amenities that people need (see the 'New Place' and 'Canalside Quarter' proposals in this response)?
- should development of the OPDC area proceed in 5 year stages, with a Local Plan updated for each phase and with close monitoring of the impact on a road network which is already grid-locked on a daily basis (let alone a network expected to service a transport interchange with 250,000 travellers a day?)
- what will be the result of building new housing unaffordable for most Londoners? Will this simply attract further offshore investment ('safety deposit boxes in the sky'). Should not London first digest the 430 towers, mainly residential, already in the planning pipeline?
- does it make sense to prepare a Local Plan, with relatively detailed housing site allocations, for those parts of the OPDC which will not come forward for development until 2026 (such as parts of 'Old Oak South')?

On consultation question QH2b and QH2c, we consider that there is scope for bringing forward further housing within the first 5 years of the Local Plan as part of mixed use development within the 'New Place' and 'Canalside Quarter' Places shown on Map 1 and Map 2 in this response.

Policy H3 on Housing Mix is supported.

¹¹ This and other estimates quoted above are from a Grand Union Alliance note on the OPDC Draft SMHA

The relevance of including Figure 80 in the Draft Local Plan is not understood? This shows the objectively assessed need of 1,200 homes of which 564 are affordable, but as explained at 7.13 and 7.14, the Draft Local Plan does not use these figures and instead reverts back to the target figure of 24,000 homes at Old Oak in the London Plan Annex.

On Policy H4, there is concern that the Government's Starter Home initiative will lead to developers at Old Oak focusing almost exclusively on 1 and 2 bed units at the £450,000 threshold.

On consultation question **QH4a**, the policy principles for affordable housing at paragraph 7.37 are supported.

In **QH4b**, in terms of the four options for an approach to affordable housing, we are not clear on whether option 4 is materially different from option 3. Option 3 (viability tested percentage) would seem the most realistic given the past experience of the three boroughs. The history of percentages achieved by each borough in previous years will provide some indication of targets to aim for. It will be hugely important for the OPDC, now to be the owner of the majority of public land in the area, to be transparent on land values.

On **QH4e**, we consider that whichever option is chosen, a review mechanism for the quantum of affordable housing agreed in a S106 should be used. House prices in the three boroughs have continued to outpace inflation, often by a significant margin.

On policy **H5 Existing Housing**, the preferred policy is supported. There are risks of an upsurge in applications for conversions of existing dwellings, turning houses into flats, as the impact of construction activity at Old Oak becomes felt.

On policy **H6 Housing in the Privately Rented Sector**, there is already concern that new developments in North Acton appear to be exclusively PRS. While recognising that owner-occupation is a disappearing prospect for most young Londoners, we worry that the dwelling-type now being provided by developers is over-concentrated on 1 and 2 bed flats and studios. Action by Government is needed to ensure that London can continue to provide affordable homes for families, and hence more stable and less transient communities.

PRS tenants remain at the mercy of landlords/building owners in terms of service charges, and residential towers are inherently expensive to maintain.

In response to the consultation questions:

On **QH6a**, yes OPDC should impose covenants or use S106 agreements to ensure an element of below market rate PRS housing, as part of this affordable housing strategy.

On **QH6b**, there should not be blanket policy mandating developments to be signed up to the London Rental Scheme, requiring arrangements for 'professionally managed stock' as this can inhibit self-management options in situations where 'professional management' turns out to be poor and over-priced.

Use of review periods, covenants, and required management strategies will place a long-term monitoring and enforcement burden on the OPDC, unless this function is devolved to the three Boroughs.

On **Policy H7: Housing with shared facilities**, we would simply note that non-conventional housing models are appearing which will fall within this category (e.g. the Collective) and that this part of the market may grow fast in the OPDC area. Policies need to cater for this, as well as for traditional

hostels and HMOs. The army of construction workers wishing to be in the area over the next decade should also be planned and catered for, to reduce the impact on an overstretched public transport system should such workers be forced to commute daily.

Policy H8: Specialist Housing is supported. Its requirements set a high bar for developers, in a sector where the market is currently struggling financially. We would support the OPDC holding discussions with local housing associations (Shepherds Bush HA, Family Mosaic, Hammersmith United Charities) to explore models of housing that better integrate health and social care, and which help to integrate different generations within a 'new Old Oak'. Imperial College could have a role to play in such discussions.

Policy H9: Gypsy and Traveller accommodation. We have no comments, other than to note that such accommodation in Hammersmith (the site under the Westway roundabout, shared with RBKC) has always been poorly located. The OPDC Local Plan should provide an opportunity for a better alternative.

Policy H10: Student accommodation. As noted earlier in this response, local long-term residents feel that there has already been an over-concentration of student accommodation in North Acton. The nature of student accommodation has changed significantly in London. What used to be a form of accommodation provided directly by universities and college has become a sub-set of the PRS market (and one that has been profitable). In many cases, tenants of such accommodation are no longer limited to one academic institution.

In the current London housing market, the boundaries between such accommodation, small 'studios' and 'shared housing with facilities' continues to blur. Concentrations of student housing can certainly create problems within an neighbourhood, but so can PRS housing marketed at 'young professionals'. The problems arise from a transient population with insufficient respect for neighbours in an area, and lacking a stake in its future.

On consultation **QH10b**, we would favour a policy which defines student housing more precisely and requires the accommodation to be available only to the academic body (or bodies) responsible for the development. This lessens the risk of management problems or student behaviours causing problems for neighbours. Commercial student accommodation available to 'any London graduate' is in effect little different from any PRS developments targeted at young Londoners.

Chapter 8 Employment

As explained in page 18 of this response, the Old Oak interim forum would welcome further consideration being given to the proposed policy E1b) of 'consolidating Strategic Industrial Land (SIL) at Park Royal.

The resultant restrictive land use policies, generally resisting A and D class uses along with any element of residential use, have in our view had adverse consequences over time for those living within and around the Park Royal area. Amenities and facilities needed by residents and employees have disappeared. Draft policy E1c)ii is *to contribute to the delivery of a range of industrial uses within Park Royal's SIL*. What happens if such 'industrial uses' are simply not materialising in 2026 and beyond?

We see a risk of an over prescriptive OPDC Local Plan inhibiting an urban environment (such as exists in other parts of London) where a multitude of economic activities can operate side by side.

Retailers, coffee shops, restaurants, bars, gyms and creches all provide employment, in addition to that provided by 'industry'.

London is very much a global city, and it needs areas where very small enterprises can start up and survive in cheap (if often scruffy) premises. In other parts of Europe, such parts of cities are more 'live/work' neighbourhoods, appealing to those who cannot afford (or do not wish) to spend significant income on travel costs and who would prefer to live 'above the shop' even if the local environment lacks the attractiveness or peace and quiet of a residential area.

Of the employment sectors prevalent in Park Royal (listed at 8.7 of the Local Plan) there are two which would in many instances be compatible with mixed use (prop houses and film studios, food manufacturing and wholesale). The former attracts media companies and 'creatives' working in set design, the latter micro businesses at the more artisan end of food production).

Hence the suggestion in this consultation response (see page 23) for a 'Canalside Quarter' in the north eastern part of the current Park Royal designated as SIL. As noted in the recent IPPR report *Starting Up*¹² *An increasing number of developers and property managers recognise the value of open workspaces. Open workspaces can provide rental income in hard-to-let areas, such as ground-floor spaces, and increase footfall to local shops and amenities. They can also offer substantial asset value, by making both individual developments and local areas more attractive, through regeneration effects and cultural spillovers. Some developers are including co-working spaces as part of 'live-and-work' communities to match their developments to the changing demands of the workforce* (our emphasis).

In response to consultation question **QE1a**, we would favour a more flexible approach to SIL in the parts of Park Royal offering prospects for successful mixed use, without loss of employment floorspace.

On Policy E2 Old Oak (Employment), we support the proposed policy. Less flexible approaches (such as floated in the 'policy options' on page 193 would seem potentially unhelpful pre 2026 by which time the OPDC Local Plan will have been reviewed.

On Policy E3 Park Royal, for reasons explained above and at page 18 of this response we consider that the retention and consolidation of the current SIL policy risks holding back sustainable development and reduces amenity and quality of life for existing and new residents within and bordering on the Park Royal area. We favour an option of not extending the SIL boundary and reducing it to allow for a mixed use area to emerge at the Canalside Quarter proposed in Map 3 in this response.

On Policy E4 Open Workspace, we strongly support this policy. It is clear from the London Enterprise Partnership Open Workspace Map¹³ that inner west London has seen much less of this form of development than north-east and south London, and that there is some catching up to do. This applies of office space, artists space, and makers space. The existing ArtWest grouping of studios at Hythe Road has already been mentioned in this response. The Ugli campus in Wood Lane has been a success. Given the scope for meanwhile uses and short leases, a proactive and flexible set of policies for Open Workspace would seem an essential feature of the Local Plan,

In response to the consultation questions

¹² *Starting Up*, IPPR March 2016

¹³ London Enterprise Partnership see at <https://lep.london/growthhub/workspaces>

On **QE4a**, we would support open workspaces in the 'New Place' and 'Canalside Quarter' areas as defined in Maps 1 and 2 in this response, and in old Oak North and at Scrubs Lane/Mitre Bridge.

On **QE4c**, we think that PRS developments in particular should be required to provide an element of open workspace, secured through 106 agreements.

On E5: Local access to employment and training, we support the preferred policy option.

Chapter 9 Town Centre Uses

On Policy TC5: Culture, sports and leisure facilities, the preferred policy option is acceptable to residents although it is hard to see how the OPDC could ensure sub-paragraph d) through planning policies (provide affordable access for local communities). As stated earlier in this response, local residents would welcome a cultural facility or academic body with an arts bias given that Imperial College are now providing a strong science, engineering and bio-technology presence on the area.

On Policy TC6: Visitor accommodation, we support the element of this policy providing for a range of visitor accommodation, over a range of affordabilities. While the high transport accessibility of Old Oak will encourage business hotels and conference facilities, those using such accommodation often barely connect with the surrounding neighbourhood and may contribute little to the area (in all senses of the word). If the OPDC area is to become an attractive destination in its own right, features such as canalside restaurants and artists markets need to feature as a draw for visitors, in addition to area's transport connectivity.

On Policy TC7: Evening night time economy, we would question the need for, or value of, a policy that gets into the detail of closing times for premises and is to be applied across the whole of the OPDC area. In response to consultation question QTC7a, we would suggest that differential policies for individual 'Places' may need to be developed in further iterations of the Local Plan. Those for the vicinity of the railway station are not a priority in the next 5 years.

The current Draft Plan recognises that policies to control the night-time economy are of greater importance at high densities, where noise and light impacts can destroy quality of life. This is one of the many reasons why the Old Oak interim forum considers the density levels proposed in Policy OSP4 to be incompatible with other stated aims of the Local Plan.

Chapter 10 Social Infrastructure

On Policy SI1: Strategic policy for social infrastructure, the preferred policy option is uncontentious and is supported (in preference to the suggested alternative policy option at page 237). As stated throughout this response, knitting together existing residents and employees and those on early sites is important.

On Policy SI2 Education it would be helpful of the second version of the Local plan showed the location of existing secondary schools in the three boroughs, and in Kensington and Chelsea where the newly opened Kensington Academy is closer geographically to the OPDC 'area of search' for an all through school than are the western parts of Park Royal.

There is local concern as to how future education provision in the OPDC area is to be planned, given Government policy for all schools to become academies with a much reduced role for local authorities. For a large new area of London, with existing problems of access to local schools, there has to be some agency looking ahead and ensuring that school provision comes onstream when needed. In the early years of the Local Plan, with mainly PRS housing marketed to a younger

generation, this may not be an immediate issue. But if families are to settle in the area and it is to become a Lifetime Neighbourhood, future schools need to be planned for rather than emerging as a response to the market.

Promotion of the area as location for higher education uses is strongly supported. While the Imperial West campus is located nearby in Wood Lane, this is destined at present to have limited occupation by students as opposed to research staff, business enterprises, and college administration. The GradPad accommodation at Wood Lane Studios contributes little to the vitality or cultural life of the surrounding area as compared with e.g. the presence of Central St Martins/UAL at Kings Cross.

On Policy SI3: Health, the implications of NHS designation as 'Healthy New Town' need more explanation in the Local plan documentation. At present local residents remain very concerned over the consequences of the NHS Shaping a Healthier Future programme to reshape hospital and out of hospital health and care services in North West London (as consulted on in 2012). This has involved the closure of A&E facilities at Hammersmith Hospital on the southern boundary of the OPDC area. The future of Charing Cross Hospital in Hammersmith remains in doubt, with Hammersmith and Fulham Council strongly opposed to closure and sale of the land. Plans for the demolition of Ealing Hospital appear to have been reconsidered.

The preferred policy option for SI3 Health is supported, but with severe misgivings as to how hospital, ambulance and primary care services are expected to take to strain of a growing population in the OPDC area when existing services are struggling badly.

The prospect of establishment and growth of national and international health institutions in the OPDC area (**Policy SI3d**) is welcomed and the presence of Imperial College in the area offers opportunities. But this must be seen in a context in which Imperial Healthcare Trust is currently running a £25m deficit.

On Policy SI4: Community facilities, the preferred policy option is supported. But it must be recognised that the provision of *library space, post offices, police shops, youth space, adult learning, and community cafes* (as listed in Policy SI4) is not something that planning and land use policies can deliver unless other bodies have the resources to run such facilities.

While it may be desirable to locate such facilities at *key destination points within the OPDC area (SI14c)* the realities of London's development and property market is such that provision at such locations will come at a high cost in terms of demands on S106 and CIL contributions. A better and more spacious facility at a secondary location may sometimes prove a preferred option and the wording of Policy SI4 should not inhibit such choices.

On Policy SI5: Pubs, the preferred policy option is supported but on its own may not be sufficient to protect pubs. Experience of loss of pubs in London has shown that it is not difficult for pub owners to demonstrate loss of viability and/or failure in marketing a tenancy, if the owner's ultimate intention is conversion to residential.

With only three public houses in the entire OPDC area, stronger action may be needed to protect these. ACV status is a short-term help. RB Kensington and Chelsea has used Article 4 Directions, specific to individual pubs at threat, to remove Permitted Development Rights on change of use within the A class, given that this is often used as the route to convert a pub to a supermarket or other use.

Chapter 11 Transport

The Local Plan acknowledges that the starting point for its transport policies are *a congested strategic and local road network, limited access to public transport services and poor pedestrian and cycle environments* (page 252).

This context is one of the major reasons why the Old Oak interim forum questions the appropriateness for the OPDC area of a spatial policy based on Optimising Growth (Policy OSP1) and the extreme density levels flowing from London Plan housing and employment targets set for the area.

While connectivity and ease of movement for rail passengers will improve enormously, as the various stations come onstream, the capacity of the road network in the OPDC area is under strain already. Existing and future residents and employees will need to move around within the OPDC area, as well as travel to and from it by rail.

The Old Oak Strategic Transport Strategy¹⁴ accepts that Network Performance analysis *confirms that a number of roads and junctions have volumes of traffic that are close to or exceeding their capacity*. It also accepts that the Overground routes are already overcrowded, with resultant problems at North Acton Station. The 'interventions' recommended in the Strategy, and translated into policies in the Draft Local Plan, rely heavily on *restrictive parking standards for all land uses*, and a substantial modal shift away from the car towards cycling, walking, and use of public transport.

The transport section of the Draft Local Plan is seen by existing residents and businesses in the area as over-optimistic in its assumptions. Similar transport strategies have been published on the impact of development in the neighbouring White City Opportunity area. These (as well as those commissioned by individual developers) continue to include data and projections seeking to demonstrate that the transport network, and particularly the road network, will cope with extra demand.

Development in the White City Opportunity Area continues apace. The impact on traffic in Wood Lane/Scrubs Lane of 50,000 sq ft of further retail space at Westfield 2, the St James development, the Stanhope development at the former BBC Television Centre and the two large sites under development by Imperial College, has yet to make itself felt.

Trip generation by Cargiant in its existing incarnation is significant, but it is hard to believe this will not be exceeded once 7,000 new homes have been built at Old Oak North. A low ratio of 0.2 parking spaces per household will restrain car use, but will not stop many in the 7,000 new homes using a taxi to bring home their weekly shop.

Hence preferred policy option T1 (Strategic policy for transport) is supported by the interim Old Oak forum as an aspiration, but is seen as unachievable unless either the OPDC housing and employment targets are reduced, or a more radical set of changes to the road network are introduced.

On Policy T2 Walking, we support the proposed policy option. In response to consultation question QT2a, we welcome the fact that a north south walking route across the middle of the Scrubs is not proposed. As explained earlier in this response, this is not a primary 'desire line' for pedestrians.

¹⁴ Old Oak Strategic Transport Strategy, Local Plan Supporting Study, Mayor of London and TfL February 2014

A neighbourhood plan for Old Oak will provide a good vehicle for detailed consultation and refinement of walking routes.

On Policy T3 Cycling, we support the preferred policy option. Use by cyclists of the southern towpath to the Grand Union Canal already causes some conflict with pedestrians and will need careful design improvements.

In response to consultation question QT3a, we would suggest a segregated cycle route at the eastern border of Wormwood Scrubs, connecting with the Westway section of the East West Cycle Superhighway via North Pole Road and Latimer Road.

On Policy T4 Rail, we support the preferred policy option but argue for a second additional Overground station on the West London line at 'Western Circus'. This location is beneath the elevated Westway roundabout on Wood Lane, and has been proposed by the West London Line Group, and in the St Quintin and Woodlands Neighbourhood Plan. It would widen public transport options for existing residents in North Kensington (poorly served by rail, Underground or Overground) and for new residents in the White City OA, thereby relieving traffic on Wood Lane Scrubs Lane.

On Policy T6: Roads and Streets, we are concerned that the new street pattern shown in the Local Plan may create new problems. 'Grand Union Street' running east/west through Old Oak South is referred to as a 'street' but it is not clear whether it will be available as a through route for cars or limited to buses and cycles? In our view a through route is neither necessary nor welcome at this point.

Figure 32 also shows a 'main street' running east west on the northern boundary of Wormwood Scrubs? Is this intended as a through route, taking traffic off DuCane Road and the Harrow Road (both already congested at peak times)? If so, it would swiftly be filled with traffic and would harm the northern boundary of the Scrubs, as noted in the response from FOWWS, as well as restricting an eastern access point from Old Oak North to the Scrubs.

The RB Kensington and Chelsea 2015 Consolidated Local Plan includes two policies as sub-paragraphs of its Policy CR1 on the Street Network. We see both as worthy of consideration by the OPDC.

- require new streets to be built to adoptable standards
- resist the gating of existing streets and the development of new gated communities

On T7: Car parking, a policy of limiting car parking to 0.2 spaces per unit for residential development is a significantly tougher policy than that in RBKC¹⁵ (which requires new developments to be permit free while allowing between 1.0 place for the first 3 units and 0.5 thereafter, for off-street parking). In Hammersmith and Fulham, the 2015 Draft Local Plan proposes adoption of the parking standards in the London Plan (up to 1.0 space per unit even at the highest residential densities). While we support the OPDC aim of reducing reliance on cars, this policy will be an inevitable deterrent to housing developers. It is a further policy which appears to have flowed from the OPDC ambition to achieve very high residential density in an area with an already inadequate road network.

Differential parking standards are proposed for the Park Royal area. At present a significant proportion of the land in Park Royal is taken up by surface car parks. It is not clear how a

¹⁵ RB Kensington and Chelsea, Transport and Streets Supplementary Planning Document 2015

juxtaposition is going to be achieved between an area where parking is available to employees (and to those residents within Park Royal) and the new Old Oak where there is very little parking.

The consultation questions offered under Policy T7 do not address these issues.

On **Policy T8**, we oppose the suggestion that that the planned HS2 compound at Atlas Road is a suitable location for a long term rail freight consolidation centre. There are other locations further from existing residential communities which would be more suitable.

Chapter 12 Environment and Utilities

Strategic policy EU1 is welcomed, and the interim Old Oak Forum also welcomes the ambition for the OPDC area to become an exemplar on environmental sustainability. Policy EU1 would benefit from some 'success measures' that the public can readily understand and get behind.

On **Policy EU3**, local residents are well aware that the Counters Creek main drainage and sewerage system is inadequate for the growing demands placed on it, and that Thames Water Authority is still at the consultation stage on construction sites for a 5km Counters Creek storm relief sewer. The next version of the OPDC Local Plan needs to provide firm assurances that surface water flood risk in Old Oak and the surrounding area has been addressed.

On **Policy EU5d**, this should include the words 'make adequate provision for' and well as 'investigate'.

On **Policy EU7 Digital Communications**, we support the aim of achieving *exemplar digital communications infrastructure* in Park Royal and at Old Oak.

On **Policy EU10 Air Quality**, this has become a growing issue across London, given the capital's failure to meet required standards and data on the long-term health consequences of NO2 emissions. The scale of construction work (and the volume of construction traffic) envisaged for Old Oak over the next two decade is a cause of real local concern. North Kensington and Horn Lane Ealing saw peak levels of 9 in the mid March 2016 pollution episode¹⁶.

Chapter 13 Infrastructure provision

The interim Old Oak Forum welcomes the OPDC proposals for additional masterplans for Scrubs Lane and for Victoria Road, and hopes to have the opportunity to contribute to these via the neighbourhood planning process.

The decision in the March 2016 Budget to transfer public land in the OPDC area to the Corporation, coupled with the unusually high quantum of public land involved, provides an opportunity for the next stages of the Local plan to progress with maximum transparency and openness. The public across London will have a legitimate interest in seeing how the value of this land, much of coming forward for development for the first time, is exploited by the Corporation and its partner bodies.

The balance of resources released, as between expensive transport infrastructure, community infrastructure, and affordable housing will (we hope) be discussed and aired in an open fashion by the OPDC Board and Planning Committee. Levels of transparency on pre-application advice and viability assessments should also be an area in which the OPDC should act as an exemplar planning authority, setting new standards for all London Boroughs.

¹⁶ Kings College monitoring data at <https://www.londonair.org.uk/london/asp/PublicEpisodes.asp>

Annexe A: Membership of the Old Oak interim neighbourhood forum

Members living in the proposed neighbourhood area	Street address
Mark Walker	Stoke Place NW10 and Chair of The Island Site RA (TITRA)*
Darius Dzwigaj	Midland Terrace NW10
Ewa Cwirko- Godycka	Midland Terrace NW10
Tom Currie	Letchford Gardens NW10 and Chair of College Park RA (COPRA)
Sam Balch	Waldo Road, NW10 (College Park)
Nina Hall	Braybrook Street W12 (Old Oak Estate)
Clara Curry	Wells House Road NW10
Joanna Betts	Wells House Road NW10
Theresa McGee	Newark Crescent NW10 and Chair Wesley Estate RA
Austen Harris	Woodman Mews W12
Amanda Souter	Wells House Road NW10 and Chair of Wells House Road RA
Stewart Dalby	Wells House Road NW10
Lily Dalby Gray	Wells House Road NW10*
Marek Brzegowski	Midland Terrace, NW10
Wojtek Ruk	Midland Terrace NW10
Daniel Bicknell	Goodhall Street NW10
Linda Hartley	Goodhall Street NW10
Jane Abrahart	Braybrook Street W12 (Old Oak Estate)
Sarah Abrahart	Braybrook Estate W12 (Old Oak Estate)
Eleanor Botwright	Henchman Street W12 (Old Oak Estate)
Members working in the proposed neighbourhood area	
Sarah Christie	Development Director, The Collective (Old Oak Common Lane NW10)
Phil Tiffin	HR Manager, Boden
Chloe Fremantle	ACAVA studios , 17-19 Hythe road NW10
Eleanor Harrington	Community Involvement Officer, Old Oak Housing Association
Harry Audley	SOBUS Community Organiser, Old Oak
Rev Desmond Hall	Pentecostal City Mission, Scrubs Lane NW10
Jo Poole	Regents House studios, Hythe Road NW10
Renata Fernandez	ACAVA studios, 17-19 Hythe Road NW10
Marcus Blattmann	Lessor of 55 studios on Hythe Road Industrial Estate
Noah Fatimi	Capital Accountants, Scrubs Lane

Response drafted by Henry Peterson on behalf of the Old Oak interim neighbourhood forum