



OLD OAK INTERIM NEIGHBOURHOOD FORUM

Dear Cabinet member,

August 28th 2017

Report on Cabinet Agenda September 4th on the application for designation of an Old Oak neighbourhood area and forum

We are contacting you in advance of the Cabinet meeting on 4th September to express our serious misgivings about the content and officer recommendations in the above report.

Our forum includes residents of LB Ealing and RB Kensington & Chelsea, as well as LBHF. But please recognise that residents talk to one another across borough boundaries.

The near 200 responses to the OPDC/LBHF consultation on our designation application show that residents and businesses want the chance to help to shape the massive changes being planned for this part of London.

We are very surprised to see that LBHF officers are aligning with their counterparts at OPDC in taking a negative and defensive stance towards a neighbourhood forum and plan for Old Oak.

We would have thought that the Council would want to support an initiative aimed at integrating existing communities in and on the borders of the OPDC area, with new development? The Development Corporation lacks democratic accountability. Why would the Council want to stifle the contribution of local people to the planning of this major regeneration area?

Your decisions on 4th September will be remembered at future Borough, GLA and Parliamentary elections. Blocking an opportunity for local people to have more say in the process seems contrary to all the Council stands for.

We feel strongly that you are not being given the full context for our proposals, nor sound advice on how neighbourhood planning works. The officer report to Cabinet does not explain to you

- These decisions relate to a single designation application which should lead OPDC and LBHF to designate a single neighbourhood area. No explanation or justification is given in the Cabinet report as to why LBHF appears to be proposing a separate neighbourhood area, thereby doubling potential public expenditure on support to separate forums and administration of two sets of examinations and referendums?
- Decisions to vary the boundary of a neighbourhood area proposed in a designation application, and to 'refuse' to allow a neighbourhood forum the opportunity to prepare a neighbourhood plan for that area, are far from the norm. Reasons given for 'refusing' the Old Oak neighbourhood forum designation are inadequate.

- Areas as large and complex as the 275 hectares proposed for an Old Oak neighbourhood area have been designated in London (at e.g. Highgate, Kennington/Vauxhall/Oval, and Norwood). In Westminster, 75% of the borough has been designated as neighbourhood areas
- Just because landowners and developers are asking for their own sites to be excluded from a neighbourhood area boundary, the Council does not have to go along with these requests. Other London boroughs do not take this line.
- If at a future date a valid application is made (by the Old Oak Friends and Residents Association or others) for designation of a separate area and forum for the Old Oak Estate alone, and if this receives positive support at public consultation stage, the Council would have discretion to vary its August 2017 decision on the neighbourhood boundary and on forum designation. (This was the route followed by LB Camden, when a 'competing' proposal for a North Camden Forum emerged at a late stage in the designation process (and was not subsequently pursued). We consider this route to be consistent with the Act and with Paragraph 039 of National Planning Practice Guidance Paragraph (Reference ID: 41-039-20161116), whereas the Council's proposed way forward is not.
- There have been over 350 referendums held on neighbourhood plans across England and 6 in London, with 75% of all local planning authorities now involved.
- RBKC is facing the huge consequences of a breakdown in trust between decision-makers and North Kensington residents, on planning and regeneration issues. Why would you want as similar disconnect to grow in North Hammersmith?

OPDC officers have agreed to include with the agenda papers for its own Planning Committee and Board a set of comments from the Old Oak Interim Forum on the various consultation responses submitted by statutory bodies and landowners, during the May/June consultation. A schedule of these comments is attached along with a note of detailed queries on the content of the officer report to Cabinet.

Please read also the consultation responses from those residents who want to contribute to a neighbourhood plan for Old Oak, and who will be disappointed at the Council's reaction to the proposals set out in our designation application. How many individuals respond to consultations on the Council's own Local Plan? Why rebuff this level of public interest in planning the future of the north of the Borough?

We ask that the current officer report is withdrawn from the agenda and that LBHF decisions on designation await consideration of the Old Oak Neighbourhood Forum designation application by OPDC Planning Committee and OPDC Board on September 6th and 12th respectively. OPDC is the 'lead authority' for this application.

We urge Cabinet members to think long and hard before the relevant LBHF decisions are made. The 2014 Labour manifesto for the borough acknowledged that *'the planning system is broken'* and promised to *'reform planning and give residents new powers'*. Parliament introduced neighbourhood planning with these same aims in mind.

Why should residents of College Park and Woodmans Mews be denied the chance to work with their neighbours in the Ealing parts of the OPDC area, in exercising the powers granted by the 2011 Localism Act?

Why is the Council proposing to designate a separate small neighbourhood area from that due to be designated by OPDC? Why would it want to 'refuse' designation of an Old Oak Neighbourhood Forum? What has the Council to fear from local people putting together a neighbourhood plan?

Mark Walker, Chair Interim Old Oak neighbourhood Forum
Henry Peterson, Adviser to the Old Oak Interim Neighbourhood Forum

ANNEXE A

LBHF REPORT ON DETERMINING THE APPLICATION FOR AN OLD OAK NEIGHBOURHOOD AREA AND FORUM – CONCERNS OF THE OLD OAK INTERIM NEIGHBOURHOOD FORUM

1. Recommendation 2.1 is not clear. It reads '*To designate the area identified in green and to refuse the areas in red in Figure 2*'. Is this area 'in green' to be designated as part of a wider Old Oak neighbourhood area (which is what the designation application seeks)? Or is the Council thinking that it can designate a self-contained and unnamed neighbourhood area separate from that which the OPDC is expected to designate on September 12th?
2. The recommendation to Cabinet is premature and should follow after and not before the OPDC decisions on designation are made (the OPDC being the lead authority in handling the application).
3. Where a cross-boundary designation application is made, the legislation states '*The power to designate an area as a neighbourhood area under section 61G is exercisable by two or more local planning authorities in England if the area falls within the areas of those authorities*' (61L(1)). This power is intended to be exercised jointly, with the two or more authorities involved considering the appropriateness of the area which is the subject of the designation application. While paragraph 5.3 of the Cabinet report refers to discussion between OPDC and LBHF, it offers no explanation of what area OPDC intends to designate or any information on the rationale to be pursued by OPDC in relation to the remainder of the originally proposed area.
4. The number of supportive consultation responses to the OONF application was very high in comparison to other designation applications in London to date. 82% of total responses (on LBHF figures at 4.18 of the Cabinet report) supported the original proposals. Most consultation exercises on designation lead to 20-50 responses. The Harlesden neighbourhood area was designated by LB Brent and OPDC on the basis of 5 responses.
5. Designation by LBHF is part of a joint decision-making exercise, and is not a separate or self-contained matter. Paragraph 1.3 of the Cabinet report says that '*The Council is only responsible for deciding the area located within LBHF planning control*'. We do not think this is correct. We consider the Act and National Planning Practice Guidance requires both local planning authorities to work together and to use their designation powers to make a joint determination of a single application for a neighbourhood area, and not separate decisions on separate areas within their own boundaries. Hence the wording referring to the power to designate *a neighbourhood area*, in the singular, in section 61L(1) of the Act as quoted above.
6. A local authority '*may designate only one organisation or body as a neighbourhood forum for each neighbourhood area*' (Section 61F(7)(b) of the Act). If the Council is intending to designate the Old

Oak Estate as a separate neighbourhood area from the Old Oak neighbourhood area due to be designated by OPDC, this would then rule out the possibility of the Old Oak Neighbourhood Forum being the body with responsibility for neighbourhood plan preparation in relation to the estate.

7. Paragraph 5.21 of the Cabinet report fails to recognise this consequence, in stating that 'refusal' of the application for designation of the old Oak Neighbourhood Forum '*does not preclude a new neighbourhood forum group being formed and application being made in the future or indeed any other organisation or body making an application to be designated as the neighbourhood forum for the Old Oak Neighbourhood Area.*

8. The irony is that such a 'refusal' **would** preclude (as a result of 61F(7)(B) of the Act) preparation of a neighbourhood plan which includes coverage of the Old Oak estate, by the one and only body which has worked up designation proposals over the past 18 months and has submitted a formal application. We do not see this as an acceptable or legitimate outcome on a designation application which has received such strong public support.

9. There is no plausible reason for the Council to designate a neighbourhood area with a boundary a few hundred yards from that due to be designated by OPDC on September 12th. **A single application should lead to a single neighbourhood area, and not two. There is no justification for doubling the costs to the public purse by adding requirements to administer two independent examinations of two draft plans and holding two referendums.** This fact is not mentioned in the Director of Finance comments at paragraph 8 of the Cabinet report.

10. Similarly, there is no good reason for a Council decision to 'refuse' designation of a neighbourhood forum which has received 82% support in a public consultation exercise. There has been no suggestion in the consultation responses, from either landowners or from residents, that the Old Oak Interim Neighbourhood Forum fails to meet the statutory criteria for designation. Compliance with these criteria was checked prior to OPDC and LBHF publishing the application for consultation.

11. The sole justification given in the officer report for 'refusal' of designation of the Old Oak Neighbourhood Forum is that the number of forum members listed in the application, who are resident or working within the boundary recommended for LBHF designation, has fallen below the statutory minimum of 21 persons. This is hardly surprising, given that LBHF seems intent on designating (as a separate neighbourhood area) only a small part of the 275 hectare area originally applied for.

12. It appears that officers are recommending a neighbourhood area separate from that due to be designated by OPDC simply to provide a basis for refusing designation of the forum.

13. We have made clear to LBHF planning officers at a meeting on 17th August and in a letter of 25th August that the Council should follow the precedent of LB Camden and designate the Old Oak Estate as part of a single wider neighbourhood area including Wells House Road, Midland Terrace/Shafesbury Gardens, the TITRA area and the Wesley Estate. **In response to the application, it should be the Old Oak Neighbourhood Forum that is designated at this time as the forum responsible for preparing a neighbourhood plan in this single neighbourhood area.**

14. Following notification by OPDC in early August that the OPDC Planning Committee and Board would be recommended to designate a much reduced area from that applied for, the Old Oak Interim Neighbourhood Forum provided both OPDC and LBHF with an updated Forum membership

list. This includes 45 individuals who either live or work (or are a councillor) within the boundary expected to be designated by OPDC on September 12, combined with the Old Oak estate.

15. Any failure to meet the 21 person requirement for a valid neighbourhood forum therefore only arises if LBHF persists in an intention to create a wholly separate neighbourhood area, for which no forum is being designated and the Old Oak Neighbourhood Forum is being 'refused'. For reasons stated above, we consider such a set of decisions to be contrary to legislation and guidance.

16. The statement in paragraph 3.3 of the report that the existing interim forum is '*therefore not reflective of the area designated*' carries no weight, as the 'area designated' bears no relation to that proposed in the original designation application. The Forum's membership at the time of that application (April 2017) included a representative proportion of residents from the Old Oak Estate. The updated list of 45 individuals recently submitted to OPDC and LBHF does likewise. Only by moving the goalposts in terms of the boundary at a very late stage in the designation process can LBHF officers claim that membership is '*not reflective of the area designated.*'

17. It seems likely that planning officers have taken comfort from the fact that a 2012 cross-boundary application for a St Quintin and Woodlands neighbourhood area and forum, which included in its proposed boundary an area of LBHF to the east of Wood Lane, was determined by the Council's previous administration by designating a reduced and separate neighbourhood area and 'refusing' designation of the StQW Forum. The circumstances were very different on that occasion, in terms of the level of support in the consultation exercise. These decisions were made in the early years of neighbourhood planning, at a time when DCLG felt unable to give definitive advice on the handling of cross-boundary applications.

18. Paragraph 5.5 of the Cabinet report refers to this previous episode and states *The Council has designated one neighbourhood area in the borough – the St. Quintin and Woodland's Neighbourhood Area in 2013. This designated area can be seen at Appendix C.* This statement is incorrect in that the Council maintained at the time that it had designated a separate (and unnamed) neighbourhood area covering Eynham Road and surrounding streets. RB Kensington & Chelsea designated the remaining part of the proposed cross-boundary area for which a neighbourhood plan was prepared, was successful at referendum in 2016, and now forms part of the development plan for that Borough. We cannot see Appendix C on the Cabinet agenda.

19. No progress has since been made on a neighbourhood plan for the unnamed area designated by LBHF in 2013. This is one of several reasons why the Old Oak Interim Neighbourhood Forum has concerns at a similar route being recommended by LBHF officers in relation to the designation application now before LBHF Cabinet. The legislation is not intended to allow local planning authorities to 'sterilise' areas by designating them while refusing designation of the 'qualifying body' which made the application.

20. Paragraph 4.19 of the Cabinet report analyses the location of respondents to the consultation and states '*To the south-west, residents of the Old Oak Estate were largely in favour of revising the boundaries to exclude their estate from the proposed Neighbourhood Area*'. We have seen no evidence to support this statement. It is correct that a collective response from the Old Oak Friends and Residents Association made the case for a separate 'Old Oak Village' neighbourhood area. It is not clear that the number of individual respondents from the Old Oak Estate who supported this OOFRA view outweighed those residents who supported the original proposed boundary.

21. OPDC asked respondents for postcode data, but has not published this in its schedule of consultation responses (which differs from that included in the Cabinet agenda papers). Hence it is

not possible for the Interim Forum to be precise on figures. But it would seem from the LBHF schedule that only a small handful of individual respondents from the Old Oak Estate favoured the 'separate' neighbourhood and a similar number favoured the original wider boundary. Three residents are shown as having submitted views which are either undecided or where two contradictory responses have been submitted.

22. Paragraph 42 of the report states *The Old Oak Friends and Residents Association made up of 34 residents located in the Old Oak Estate area requested for a revised boundary and identified that they would like to establish their own Neighbourhood Forum. A number of the respondents living outside of the area boundary, also expressed support for the Old Oak Friends and Residents Association aspiration.* We asked OPDC some time ago whether the identical responses numbered 139-169 in their published schedule reflected individual responses of names taken from a membership list and have yet to receive a reply. These responses do not appear on the LBHF list and our understanding is that they represent a single 'group response' similar to those submitted by the Hammersmith Society, the Island Triangle Residents Association, and the Wells House Road Residents Association.

23. We do not question that there are some Old Oak Estate residents who would prefer there to be a separate neighbourhood designated, potentially including additional streets between DuCane Road and the A40. It is not clear that the 34 residents identified as members of the Old Oak Friends and Residents all hold a preference for a separate area, or all support the OOFRA position that Wormwood Scrubs and Linford Christie Stadium should be excluded from the boundary of any neighbourhood area. Other consultation respondents specifically referred to the importance of **including** both these areas within the originally proposed Old Oak neighbourhood boundary.

24. In any event, the extent of support for the separate 'Old Oak Village neighbourhood' can readily be tested via the submission of a formal designation application by the Old Oak Friends and Residents Association, a 6 week consultation on such an application, and subsequent determination by LBHF. As explained above, given support for such a proposal LBHF would at that stage have discretion (under paragraph 039 of NPPG) to vary its decisions on the current designation application from the Old Oak Interim Neighbourhood Forum and to designate a new and separate area and forum. **Attempting to jump to this stage on September 4th we believe to be contrary to DCLG guidance and open to challenge on several grounds, including that of unnecessarily doubling public costs of LPA neighbourhood plan administration as well as maladministration of a designation application.**

'Appropriateness' of a neighbourhood area

25. Paragraph 5.5 of the Cabinet report starts by stating *The PPG sets out the following considerations for determining the boundary of a neighbourhood area.* This is a misrepresentation of paragraph 033 of National Planning Practice Guidance which in fact states *The following **could be** considerations when deciding the boundaries of a neighbourhood area* (our emphasis). The difference in wording is important. These 'considerations' are not presented as an exhaustive list of requirements. They are possible factors that could be taken into account along with others.

26. As is proving to be the case with OPDC planning officers, the LBHF officer analysis of the 'appropriateness' of the wider area proposed by the Old Oak Interim Forum places heavy reliance on the fourth of these possible 'considerations' which reads *'the physical appearance or characteristics of the neighbourhood, for example buildings may be of a consistent scale or style'.*

27. In concluding that the Old Oak Estate is an 'appropriate' area for designation for neighbourhood planning purposes, whereas the remaining LBHF parts of the original area proposed by the Interim Forum are not, the officer report follows a tortuous and (in our view) unsustainable route.

28, Paragraph 5.8 refers to the GLA 2014 *Supplementary Planning Guidance on Character and Context*. This SPG presents itself as being useful to neighbourhood forums but does not claim to be a guide to neighbourhood planning nor a basis for assessing appropriateness of neighbourhood areas.

29. The report then proceeds with an analysis at paragraph 5.9 of the different 'characters' of parts of the 275 hectare area proposed as an Old Oak neighbourhood area.

30. This leads on to the 'reasons for refusal' statement at 5.11, justifying removal several of the LBHF parts of the originally proposed Old Oak neighbourhood area. These include Little Wormwood Scrubs, Linford Christie stadium, the ARK Burlington Danes Academy and Upper Latymer Playing Fields. Also excluded are Woodman Mews and the Network Housing flats at St Quintin View (28 North Pole Road).

31. This paragraph states *In terms of the character of the area for the purposes of a neighbourhood plan, officers consider that the area consists of distinctive parcels of land that have distinct uses which do not easily translate into a cohesive neighbourhood area. The range of land uses are common in a metropolitan area however in relation to the guidance these sites are independent of each other when looked at as a whole.*

32. We struggle to construe this statement, especially the last sentence. As a justification for denying several hundred households the opportunity to be part of preparing a neighbourhood plan, it is unconvincing.

33. We are not aware of guidance of any form that suggests that neighbourhood areas must be uniform or consistent in the 'character' or land uses included within a designated boundary. The reality of the 350 neighbourhood plans 'made' to date across England is quite the reverse. In rural areas, neighbourhood areas (usually based on parish boundaries) include everything from small towns to agricultural land. In London, no one could suggest that the Highgate, Kentish Town, Spitalfields, or Vauxhall/Nine Elms Battersea neighbourhood areas do not contain a wide range of uses and every type of urban built form.

34. At a time when residents of College Park and of Wells House Road, occupying very similar late Victorian terraces, are expressing a wish to work together in an effort to ensure their successful integration within a new and regenerated 'Old Oak', it seems perverse for the Council to be refusing designation of the former area on the grounds that *these sites are independent of each other when looked at as a whole*. The need for all of these residential enclaves to become part of an integrated new city area is precisely the original driver of the efforts of the Old Oak Interim Neighbourhood Forum over the past two years.

35. It is notable that OPDC officers are taking a similar line in arguing that differences in 'character areas' makes it inappropriate to designate much of the originally proposed Old Oak neighbourhood area. While it can be argued that the proposed boundary is not a wholly 'natural neighbourhood' in 2017, it is not clear why two local planning authorities should feel the need to go to such lengths to prevent local people from trying to help make it a successful and integrated neighbourhood, in twenty years time?

36. A final argument used in the Cabinet report for deeming much of the proposed area as 'inappropriate' for a neighbourhood plan is that areas such as Wormwood Scrubs and Linford Christie are of 'metropolitan' significance and serve a London-wide audience. Why then has Westminster City Council been willing to designate Knightsbridge, Mayfair and Marylebone -- all of which parts of the capital serve a global as well as a London-wide populace?

37. We suggest that it is time for LBHF to take a fresh look at what has been happening in terms of neighbourhood planning across London, and to make a reality of the paragraph 3.1 of the Cabinet report which states '*The Council is supportive of neighbourhood planning and communities being involved and engaged in the planning process*'.

38. Were the Cabinet to proceed to approve the recommendations from officers in the current report, the issues aired above will not go away. One way or another local people in and around Old Oak will continue to find ways to have their voices heard and to use a part of the English planning system designed and introduced for this purpose.

Old Oak Interim Neighbourhood Forum
August 2017

DESIGNATION APPLICATION FOR AN OLD OAK NEIGHBOURHOOD AREA AND FORUM COMMENTS FROM THE FORUM ON CONSULTATION RESPONSES

The Interim Old Oak Neighbourhood Forum would like to bring to the attention of the OPDC Planning Committee and OPDC Board some key points about the consultation exercise carried out by OPDC and LBHF in May/June 2017.

The number of responses was 229. Most designation applications in London have been decided on the basis of 20 to 50 responses, with some in single figures (e.g. the Harlesden neighbourhood area previously approved by OPDC).

On our analysis of these representations, there were 180 responses (79% of the total) supporting the proposed forum with 50% specifically referring to the proposed boundary. A further 16% want to see a separate neighbourhood forum and area designated for the Old Oak Estate.

Landowners and developers in the Old Oak area raised no objection to a neighbourhood forum, but asked that their own landholdings be removed from the neighbourhood boundary. Various justifications for such requests were made in their responses.

Statutory bodies submitted representations which were either neutral (while raising certain matters) or which were negative. The Interim Forum has commented below on all responses from landowners/developers and from statutory bodies. Some of these (in our view) show a serious lack of knowledge of how neighbourhood planning has become a mainstream element of the English planning system since the 2011 Localism Act (350 neighbourhood plans now adopted with 6 in London).

All draft neighbourhood plans to date have had 'modifications' made by independent examiners, to ensure compliance with the 'basic conditions' in the 2011 Act and 'general conformity' with the NPPF and the Local Plan of the relevant local planning authority. A handful of draft plans have been rejected at examination stage as having proposed policies which are over-restrictive.

We have been discussing with OPDC the idea of a neighbourhood plan for Old Oak since autumn 2015. Much work and many meetings in the community have gone into the process to date. The proposed boundary has been adjusted to remove HS2 compounds and the key EMR waste site.

A decision by OPDC Planning Committee and Board that the Old Oak area is largely 'inappropriate' for neighbourhood planning will send a message to Londoners that the Mayor of London, and the statutory bodies within the Mayoral family, are not willing to allow any serious level of public involvement in achieving 'Good Growth' and creating sustainable and successful regeneration in the capital.

'Engagement' of citizens through traditional processes of consultation on Local Plans and planning applications has its limits. Our national planning system is less than perfect, with a less than level playing field. Government and Parliament has recognised this, and has introduced (and since strengthened) the neighbourhood planning system. The framework is designed to add input and ideas, within carefully defined conditions and constraints.

For OPDC and LB Hammersmith & Fulham to seek to stifle such community input at birth will be a decision not forgotten by those living and working at Old Oak, and in the wider area, should OPDC fail to create the 'exemplary' and successful part of London that it has promised.

Consultation response	OONF comments
<p>Canal and River Trust (Steve Craddock)</p> <p>We note that the interim forum has provided an assessment of the proposed neighbourhood area against the national guidance for designating such areas set out in the NPPG. It is for the Corporation and Hammersmith & Fulham Council to determine whether the area proposed reflects settlement boundaries, catchment areas and similarities in physical appearance or characteristics, for example. We note that, in making such a decision, the Corporation and the Council are expected, in accordance with the NPPG, to avoid making assumptions about the neighbourhood plan or Order that will emerge (our emphasis).</p> <p>Notwithstanding this, the Trust welcomes the suggestion that the neighbourhood plan would be used to generate “ideas for the future of the Grand Union Canal and its towpaths, as a key recreational amenity, cycle/pedestrian route, and heritage and environmental asset to the area”. We hope and expect that the Grand Union Canal will be a key focus for the Local Plan, also. To achieve this aim, we believe that it is important to consider not only the canal itself but the development sites adjacent. These adjacent development sites can have a significant impact on the character and quality of place of the canal corridor. They should provide high quality, well designed places, offering natural surveillance and active uses that attract people to the waterway.</p> <p>The interim forum suggests that a number of HS2 construction compounds and other strategic sites have been removed from earlier proposals at the request of the OPDC. As a result, the proposed boundary includes an area where the canal and towpath is included but not the land adjacent. We believe that this will limit the ability of the neighbourhood plan to achieve its aim in relation to the Grand Union Canal in these areas, should any development come forward. It is important, therefore, that the Local Plan includes sound policies on protecting and enhancing the waterway corridor. It would not be appropriate for the Local Plan to delegate this issue to the Neighbourhood Plan as the policies will not apply to all sites that will impact on the canal corridor. We note that the interim forum recognises that the</p>	<p>OONF strongly endorse this comment. A number of the consultation responses covered in this note assert that an Old Oak NP will hinder or obstruct development in the area. There is no basis for such assertions, and the ‘general conformity’ principle coupled with independent examination requirements provide OPDC and LBHF with reassurance on this point.</p> <p>Similarly several of the consultation responses covered below make assumptions as to the scope and content of an Old Oak neighbourhood plan, portraying this as a probable protectionist or restrictive set of policies. NPPG guidance states <i>When a neighbourhood area is designated a local planning authority should avoid pre-judging what a qualifying body may subsequently decide to put in its draft neighbourhood plan or Order. It should not make assumptions about the neighbourhood plan or Order that will emerge from developing, testing and consulting on the draft neighbourhood plan or Order when designating a neighbourhood area.</i></p> <p>Paragraph: 035 Reference ID: 41-035-20161116</p> <p>OONF would welcome final discussions with OPDC on the precise neighbourhood boundary to be fixed alongside the Grand Union Canal in order to maximise opportunity for policies that enhance the waterway corridor through Old Oak. This is a part of the neighbourhood plan where the Interim Forum foresees scope for enlisting expert input from several London universities and other bodies.</p>

<p>regeneration of the Old Oak area is dependent on complex infrastructure requirements. Where this infrastructure involves or interacts with the Grand Union Canal, we consider it to be essential that there is clarity in the policy position and that this offers the appropriate policy protection to the waterway corridor.</p>	<p>OONF recognises the requirement for NP policies to ‘generally conform’ with ‘strategic policies’ in the OPDC Local Plan. Neighbourhood plan policies for the canal and canalside would either supplement or fine-tune OPDC policies in ways which meet this ‘basic condition’ as tested by an independent examiner.</p>
<p>Historic England (David English) Proposed Boundaries: Historic England notes that the proposed boundary of the Neighbourhood Area includes only parts of the Old Oak and Wormholt Conservation Area (Hammersmith and Fulham). We normally advocate that Neighbourhood Plans should respect pre-defined boundaries such as those for conservation areas. This is because the boundaries of conservation areas cover clearly defined character areas.</p> <p>As such respecting these boundaries in the plan making process is important in ensuring a consistent application of planning policies for the historic environment. This in turn will better protect local character and identity from piecemeal change. For these reasons we would encourage you to consider the possibility of amending your proposed boundaries so that they are more consistent with the existing conservation areas.</p> <p>We also note that the boundary of the Neighbourhood Area crosses the boundaries of two different local planning authorities Hammersmith and Fulham and OPDC (with conservation areas formerly designated by Ealing too). As such, the historic environment will not be, nor have been, considered under a single set of policies. This means that there are likely to be noticeable differences in the evidence bases and policies that the LPAs have developed and which you may later use to justify your policies. In order that your policies can be delivered it is important that they are supported by sufficient and robust evidence.</p>	<p>The conservation areas within the proposed OONF boundary are the Old Oak and Wormholt Estate CA, the Old Oak Lane CA (TITRA ‘railway cottages’) the LBHF section of the Grand Union Canal and the Cumberland Park CA (as recently designated by OPDC). While relevant, OONF does not feel that CA boundaries should be an overriding factor in deciding the neighbourhood boundary.</p> <p>OONF are familiar with the Old Oak Outline Historic Area Assessment, as prepared by English Heritage and which forms part of the evidence base for the OPDC Local Plan. It is very likely that an Old Oak Neighbourhood Plan will include a number of proposals for minor additions or adjustments to existing LBHF and former LB Ealing (and now OPDC) conservation policies. These will be worked up through local consultation involving the Hammersmith Society, the Hammersmith & Fulham Historic Buildings Group, and English Heritage.</p> <p>One of the significant merits of a neighbourhood plan is that it can include a suite of policies on conservation/heritage (and proposals for Article 4 Directions) which are bespoke to small areas and which refresh LPA conservation area profiles which may date back several decades. Such policies, developed through local consultation with residents in each area (and required to command majority support at referendum) are more likely to be adhered to as a result of active involvement from forum members once a NP is ‘made’. This process has taken place in the neighbouring St Quintin and Woodlands area, where the NP introduced new conservation policies for which English Heritage gave support at Regulation 14 and 16 consultation stages on the Draft Plan.</p>

<p>Network Rail (Colin Field)</p> <p>I have viewed the proposed boundary of and struggle to see how it would comply with the Government Guidance on Neighbourhood Planning particularly the section that explains “What could be considerations when deciding the boundaries of a neighbourhood area?”</p> <p>The Government Guidance suggests the following when deciding the boundaries of a neighbourhood area:</p> <ul style="list-style-type: none"> •village or settlement boundaries, which could reflect areas of planned expansion •the catchment area for walking to local services such as shops, primary schools, doctors’ surgery, parks or other facilities •the area where formal or informal networks of community based groups operate •the physical appearance or characteristics of the neighbourhood, for example buildings may be of a consistent scale or style •whether the area forms all or part of a coherent estate either for businesses or residents •whether the area is wholly or predominantly a business area •whether infrastructure or physical features define a natural boundary, for example a major road or railway line or waterway •the natural setting or features in an area •size of the population (living and working) in the area <p>Paragraph: 033 Reference ID: 41-033-20140306</p> <p>It is our view that the character of Network Rail’s land which is in use for a number of operational purposes including amongst others the stabling of trains, train maintenance, rail freight etc. is completely different in character and appearance to other nearby land. In addition a proportion the site is going to be subject to a new railway station for HS2 and a new station on the mainline railway to link GWML with HS2.</p>	<p>OONF notes that this is one of several consultation responses which focuses on the NPPG paragraph which lists ‘<i>considerations</i>’ that ‘<i>could</i>’ arise when deciding the boundaries of a neighbourhood area. And which then goes on to find reasons why a neighbourhood plan for Old Oak should not be allowed to proceed.</p> <p>OPDC planning officers have similarly placed great weight on these NPPG ‘consideration’ in forming their recommendations to Planning Committee and the Board.</p> <p>These NPPG ‘considerations’ were all addressed in the OONF designation application. They are not an exhaustive or comprehensive list, nor a set of criteria required to be met. As with the consultation response from the Mayor of London (see below) the author of this Network Rail response does not challenge the reasoning set out in the OONF application and appears to be interested only in finding grounds for objecting to the proposal for a neighbourhood plan for Old Oak.</p> <p>OONF agrees that that there is much Network Rail land in the proposed neighbourhood area. But to argue that such land is ‘different in character’ (with the implication that this should remain the case forever) is contrary to whole thrust of creating a coherent and successful new part of London. See e.g. Policy D2 on Railway Lands in the ‘made’ Kentish Town NP for an example of how a neighbourhood plan can address such issues.</p> <p>The author of the response seems unaware of the ‘excluded development’ provisions within that part of the Localism Act on neighbourhood plans. Compare with the more informed (and less negative) response from HS2.</p>

<p>We believe the proposed size, shape and boundary of the neighbourhood plan to include four separate areas of residential properties is inconsistent with other examples of neighbourhood plans we are consulted on and doesn't really relate to the rest of the locality. The railway operational land including permanent way (track) separates the four residential area which appear to have different characteristics in themselves.</p> <p>Notwithstanding these comments it is however likely that that once land is not required for operational railway purposes in the future Network Rail will commit to carrying on a full and comprehensive masterplanning exercise using specialist consultants and will carefully consider design and appropriate mixes of uses for future development as well as engaging with stakeholders in this development. Therefore in conclusion the site area and boundary as currently proposed doesn't accord with the government guidance when considering the boundaries of a neighbourhood plan. We therefore request that all Network Rail land is removed from this neighbourhood plan area.</p>	<p>Integration of these existing residential areas into the wider whole of a new Old Oak is one of the main themes of the OONF designation application.</p> <p>This request to remove all Network Rail from the neighbourhood area is similar to the consultation responses received from other landowners/developers. It is based on an assertion that '<i>our masterplan exercise using consultants</i>' will have all the right answers. The neighbourhood planning process has been taken up by over 2,000 communities across England not least because of a loss of public trust that bodies holding public land do have <i>all</i> the answers, when it comes to creating successful and sustainable communities.</p>
<p>Thames Valley Harriers (Tim Dye)</p> <p>I am writing as Chairman of Thames Valley Harriers (TVH). TVH is one of the UK's most successful athletics clubs. We operate out of Linford Christie Stadium (LCS), where we use the track and field facilities and where we have a clubhouse, on a site leased from the council. We have considered the proposed Neighbourhood Forum and Plan. We are very sympathetic to the objectives of the proposers. Nevertheless, we have concluded that we do not support the proposal for the Old Oak Neighbourhood Forum and Plan. The Scrubs in general and LCS in particular are obviously of great benefit to the local community as defined in the proposed Neighbourhood. Our membership is made up significantly of local people - many of whom come from within the proposed Neighbourhood area, but many also from the wider area of London and beyond. We are a club that competes nationally and internationally: the facility is of benefit to and is used by many people from beyond the proposed Neighbourhood area. As such, we do not think that it is appropriate for the Scrubs and LCS in particular to be included within it.</p>	<p>OONF met with Tim Dye in March 2016 at which time the club was supportive of the inclusion of the Linford Christie Stadium land within the proposed Old Oak neighbourhood boundary.</p> <p>The club is entitled to change its view, but it seems clear that the position set out in its recent consultation response is related to the current discussions between TVH and QPR Football Club on proposals for a 30,000 seat stadium on the Linford Christie site. OONF has to date expressed no view on these proposals, but they have not been welcomed by neighbouring residents of the Old Oak estate or other nearby areas.</p> <p>The fact that the athletics stadium is used by people beyond the immediate neighbourhood area is not seen as a sound reason for excluding the site from a neighbourhood area. Many neighbourhood plans in London (both 'made' and at draft stage) involve assets used, or locations visited, by a London and global audience (e.g. the Highgate Neighbourhood Plan which includes part of Hampstead Heath, Mayfair NP, Knightsbridge NP). TVH are lessees of the site, but with a short period remaining on their lease.</p>

	<p>Decisions on the future of the land occupied by the stadium lie largely in the hands of LBHF. OONF recognises that any neighbourhood plan proposals would need to be in general conformity with the recently completed new LBHF Local Plan.</p>
<p>Cargiant (Jonathan Smith DP9) Firstly, we would like to say that we support the formation of a Neighbourhood Forum. We have greatly welcomed the organisation of the local community groups through the GUA and have found it extremely useful to have so many community organisations and community leaders to talk with. We have liaised closely with the individuals and groups involved in the proposed Neighbourhood Forum and we were pleased to see specific praise for our approach and consultation activities in the application document.</p> <p>Since first launching the project in December 2014, the Old Oak Park team has carried out four phases of consultation and each has included a programme of exhibitions and separate meetings with key representatives of the local community. In fact we have held dozens of such meetings as we are committed to genuine engagement.</p> <p>Over 1,000 people have attended our events and we have made real changes to our designs as a direct result of the engagement and in response to the feedback received, including retaining the Rolls Royce building, introducing a new canal basin and prioritising high quality green and open spaces by reducing the number of homes. The result of all this consultation is a masterplan which is now fully advanced and once we have resolved the issues surrounding the funding and location of key infrastructure, our intention is to submit a planning application during 2018. However, we are writing to request that the proposed boundary be revised so that it does not include the Old Oak Park site. We are conscious that the OPDC is bringing forward its own Local Plan, which the Interim Neighbourhood Forum has contributed to. There will already therefore be a Local Plan out for consultation and our own Masterplan proposals which will see further consultation, both at pre-application stage and once the planning application is submitted. We believe it would be an unnecessary duplication</p>	<p>OONF feels that it has had a good relationship over the past 18 months with Cargiant/London and Regional Properties, and has welcomed their level of genuine engagement with local communities. We also recognise that their masterplan for Old Oak North is well advanced, and has been prepared in a form designed to meet the parameters of emerging OPDC Local Plan policies. Geoff Springer of London Regional Properties was willing to meet OONF representatives in June and to explain why his consultation response would be asking for Cargiant land to be removed from the proposed neighbourhood area.</p> <p>We have in turn explained to Cargiant/OPDC that given this background, and the fact that development of the Cargiant site will have less impact on neighbouring areas than in some parts of Old Oak, that an Old Oak Neighbourhood Plan would have less to say about Old Oak North than some other area amongst the OPDC 'Places'. We support the present Cargiant/LRP masterplan proposals for a viaduct to open up the site.</p> <p>There is an important community of artists and makers at Hythe Road. Identifying means of retaining affordable workspace in the area, facilitating meanwhile uses, and planning the future development of the western side of Scrubs Lane (the Light Factory and other premises not in Cargiant's ownerships) are all issues on which OONF feels that a neighbourhood plan could make a positive contribution. We feel strongly that for the area to develop into a successful community, over 20 years, retention of cultural life and creative activity in the area is essential.</p> <p>We do not accept the argument that neighbourhood plan preparation is a 'duplication of work'. The work on the OPDC Local Plan, and on the preparation of the Scrubs Lane Direction of Travel/Planning Framework is at Regulation 19 stage. Paragraph 185 of the NPPF states <i>Local planning</i></p>

of work to then have a separate Neighbourhood Plan being developed covering the same area, and that the Local Plan and masterplan planning application remains the best route for local community involvement going forward. Relevant guidance recognises that a Forum is just one way to ensure local community engagement, with Local Plans and direct pre-application engagement also representing valid routes where they offer genuine participation in the process. We believe that is the case here. In normal circumstances a local authority plan is often lacking detail or can be out of a date when a Neighbourhood Forum wishes to develop proposals for its area. However that is clearly not the case here, given the extremely detailed level of planning which is being undertaken by both the OPDC and ourselves, and the commitment to genuine local consultation. We do not have a view on the other areas proposed for the Neighbourhood Forum boundary, other than to note that our site differs considerably in character from some of the other areas within the boundary.

We are a major regeneration site which will address strategic as well as local needs, compared to the established residential areas and areas of open space that the proposed boundary also encompasses. This is relevant to the statutory tests regarding the appropriate boundary for the Forum area, which the OPDC will no doubt need to consider.

However, our comments are driven by a positive belief that our engagement strategy to date is a successful model that we wish to continue throughout our planning process, and so for the reasons stated we do not believe it to be appropriate for the Forum area to cover the Old Oak Park site.

On Wednesday 7 June we met with representatives of the Old Oak Interim Neighbourhood Forum to express our support for the formation of the Forum and to explain our position on the boundary. At this meeting we committed to continuing our engagement and close working with the Forum going forward. We explained that if the Old Oak Park site is excluded from the Neighbourhood Forum boundary we would keep consulting with the Forum as if the site was in the boundary. Equally, if the Forum and area is designated as proposed, we will engage positively with the Forum to secure the best outcome for our site and for the area.

authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation. Hence there is already some concern that the very fine level of detail included in the OPDC Draft Local Plan does not reflect NPPF and NPPG guidance, given that proposals for an Old Oak neighbourhood plan were first put to OPDC back in autumn 2015.

The fact that OPDC has chosen to pursue a very detailed approach in its Local Plan should not be allowed to deny local people the ***'powerful set of tools' provided by Parliament to 'ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area'***.

(NPPG Paragraph 001 Reference ID: 41-001-20140306)

Taking account of all the above, we ask that the OPDC leaves this part of proposed Old Oak neighbourhood area within the designated boundary. If landowners/developers are routinely allowed to prevail on LPAs by having their own sites and landholdings excluded from a proposed neighbourhood area, on the basis that they will anyway consult adequately, this undermines the whole purpose of this new part of the English planning system.

We do not consider that Cargiant/LRP has anything to fear, and instead has the prospect of further constructive refinements to its own plans as well as long-term support from local people, as a result of being part of a designated Old Oak neighbourhood area.

<p>Transport for London (Karin Derstroff)</p> <p>Please note that the following comments represent the views of Transport for London (TfL), who is responsible for strategic transport co-ordination in Greater London. These comments are made entirely on a ‘without prejudice’ basis and represent TfL’s views on the specific neighbourhood area application, as well as wider protocol issues around TfL’s role in the Neighbourhood Planning process. You should not interpret them as indicating any subsequent Mayoral decision on any planning application based on any proposed scheme. Furthermore, these comments also do not necessarily represent the views of the Greater London Authority.</p> <p>Old Oak Area Application</p> <p>TfL recognizes the important role that neighbourhood planning plays in enabling local communities to shape and promote development in their area. Given its very nature, as a transport operator, employer and owner of land, assets and infrastructure across London, TfL has an interest in facilitating the neighbourhood planning process in Old Oak.</p> <p>However, the area submitted by the Interim Forum for designation covers a large and complex brownfield site and includes the existing East Acton station; the area for potential new London Overground stations at Hythe Road and Old Oak Common Lane; the proposed HS2 / Great West Mainline / Crossrail (Elizabeth Line) station; and the Crossrail depot.</p> <p>It therefore contains existing and proposed transport infrastructure of both London-wide and national importance, beyond the proposed neighbourhood area boundaries. The proposed infrastructure is technically complex to develop and TfL therefore has concerns that neighbourhood planning may not be the most appropriate process to shape the future of these major infrastructure sites, whilst ensuring these vital transport projects are deliverable and viable.</p> <p>In addition, TfL notes that part of the proposed neighbourhood plan area is brownfield land, which is currently used for commercial and industrial purposes, combined with a number of residential communities in North Hammersmith, lying on the edge of the OPDC boundary. Regeneration</p>	<p>OONF is not aware of any Government guidance that suggests that neighbourhood planning is inappropriate for brownfield land. NPPG paragraph 001 cited above states <i>Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area</i> (our emphasis).</p> <p>In relation to transport infrastructure, the OONF designation application makes clear that the interim forum recognises that national infrastructure projects (HS2, Crossrail) are ‘excluded development’. HS2 acknowledge this in their own consultation response below.</p> <p>The fact that parts of the proposed neighbourhood plan area are ‘used for industrial and commercial purposes’ is not a basis for arguing that a proposed neighbourhood area is inappropriate. Neighbourhood planning is</p>
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<p>aspirations for the area envisage the nature of Old Oak Central to change substantially, with higher residential and employment densities and changes in the nature of jobs. TfL therefore acknowledges that while some areas are indeed appropriate to be designated as neighbourhood plan areas, the proposed area in its entirety may not be due to inherent differences in character.</p> <p>This is not in accordance with the DCLG Neighbourhood Planning Practice guidance, which suggests the ‘physical appearance or characteristics’ of the neighbourhood as one of the criteria for assessing the suitability of a proposed neighbourhood planning area.</p> <p>In summary, while TfL recognises and supports Central government’s aspirations to enable local communities to shape their local area, TfL would like to express concerns with regards to the suggested boundary. TfL considers residential areas in the fringe of the plan area appropriate to form a neighbourhood forum and prepare a neighbourhood plan, yet it does not consider the proposed area in its entirety to be appropriate for the purposes of neighbourhood planning.</p> <p>TfL therefore advises that the boundary should be revised to designate a smaller plan area that excludes the areas of existing and proposed transport infrastructure, and the most technically challenging large development sites, in order to form a more coherent neighbourhood.</p> <p>TfL has been working with the OPDC and boroughs to develop the Old Oak and Park Royal Local Plan. To support this work, TfL has also carried out a Strategic Transport Study for Old Oak Common and is currently conducting a review of the surface links proposed to date.</p> <p>TfL would welcome the engagement with local community groups, however, it would like to avoid the neighbourhood forum undertaking separate work with regards to linkages that could repeat or duplicate activities undertaken or underway, as suggested in the application document.</p>	<p>not concerned only with residential areas, as this TfL response inaccurately implies.</p> <p>The OONF designation application addresses all the ‘<i>considerations</i>’ identified in NPPG that ‘<i>could</i>’ be taken into account in deciding the appropriateness of a neighbourhood area. ‘<i>Physical appearance or characteristics</i>’ is but one of them, and the list is clearly not intended to be exhaustive (See comment above and NPPG Paragraph: 033 Reference ID: 41-033-20140306).</p> <p>OONF notes with interest the overall negative tone of this consultation response, and the fact that TfL (as a single purpose Mayoral body) seemingly feels qualified to recommend a specific set of changes to the boundary of a proposed neighbourhood area. Transport issues play a relatively small part in neighbourhood planning (policies in which are limited to <i>the development and use of land</i>). We consider this TfL ‘advice’ on the boundary of an Oak neighbourhood to go beyond the brief and remit of TfL.</p> <p>The Strategic Transport Study would of course be one of many OPDC, GLA and LBHF evidence base documents used in the preparation of a neighbourhood plan.</p> <p>This comment is not understood. The designation application points out that having a neighbourhood forum the membership of which includes chairs and representatives from the residents associations and other community organisations in the area is a potential aid to simplified and</p>
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<p>TfL will need to consider how to maintain a dialogue with the community groups over the coming months and years, to ensure the local knowledge is captured as designs develop.</p>	<p>coherent community engagement, for all statutory bodies and developers working in the area. The forum is open and inclusive and would not intrude on any other linkages or relationships with the community that TfL (or others) may wish to keep.</p> <p>We would have hoped that TfL would have taken a more positive view of the potential of input from a neighbourhood forum made up of people who use the roads and public transport systems in the area on a daily basis. The existing problems of congested routes and low PTAL levels at Old Oak are a huge local concern, across the wider area. Proposals to add 24,500 new homes, with no fundamental changes to the principal road network, are already viewed with deep misgivings. For TfL to recommend a neighbourhood forum restricted to certain residential areas is seen as an over-defensive stance, reflecting reluctance to accept any questioning or reality-check by local people.</p>
<p>Mayor of London (Brienne Stolper)</p> <p>Thank you for consulting the Mayor of London on the designation of the Old Oak Neighbourhood Area. Please note that the following is an officer response only:</p> <p>National Planning Policy Guidance (NPPG) sets out detailed guidance on all aspects of neighbourhood planning including designating a neighbourhood area. Paragraph 33 sets out possible considerations when deciding boundaries of a neighbourhood area and includes:</p> <ul style="list-style-type: none"> • The physical appearance or characteristics of the neighbourhood, for example buildings may be of a consistent scale or style • Whether the area forms all or part of a coherent estate either for businesses or residents • Whether the area is wholly or predominantly a business area • Whether infrastructure or physical features define a natural boundary, for example a major road or railway line or waterway • The natural setting or features in an area <p>I am of the opinion that the area proposed for designation does not meet at</p>	<p>This response is acknowledged to be an ‘officer response only’. We suggest that to an impartial reader it comes across as being drafted by someone briefed to find objections to the neighbourhood boundary proposed by OONF. We would welcome knowing whether this and the TfL response above reflect an established Mayoral policy stance of negativity to neighbourhood planning in London – which has not been apparent to us to date – or antipathy to the specific proposal for Old Oak?</p> <p>These considerations are all listed and addressed in the designation application, and there is no attempt by the respondent to question or rebut what is stated there.</p> <p>The Mayor’s recently published Good Growth prospectus refers specifically to the potential of neighbourhood plans. It states <i>We want to see more Londoners actively engaged in the process of urban change, through projects that challenge the way we think about public space, ownership and civic responsibility to find new models that work for local places.</i></p>

least some of the guidelines above for the following reasons: Size of proposed area Although there is no guidance regarding the size of a neighbourhood plan area, the size proposed at around 270 ha is unprecedented and seems far larger than what would normally be considered a neighbourhood. The merits of designating such a large area are unclear. For example, the neighbouring St Quintin and Woodlands Neighbourhood Area is 42 ha in size and seems more in keeping with NPPG guidance.

Character of the area

It is evident that the characteristics of the proposed area encompass many different types of uses, buildings and scales. This includes residential, Metropolitan Open Land (MOL), a cemetery and crematorium, industrial sites and large scale rail infrastructure. It is difficult to understand what characteristics tie these different land uses together as they are clearly extremely disparate and diverse in nature and cannot be considered consistent in style.

Even the residential areas are distinctly different in style, from Woodmans Mews, a classic post war estate to the pre First World War Old Oak Estate and the Victorian cottages of The Island Triangle.

It goes on to say

The Good Growth Fund could be used to support (inter alia) : Delivering actions, projects and development proposed in local neighbourhood plans

NPPG guidance does not suggest a preferred size for a neighbourhood area, or set any limitation on size. The claim that the proposed Old Oak neighbourhood area is 'unprecedented' at 275 hectares is simply wrong. In London, the Norwood Planning Assembly neighbourhood area (recently designated by LB Lambeth) has an area of 375 hectares and a resident population of around 35,000. The Highgate neighbourhood area (plan adopted by Camden July 2017) is nearer 500 hectares and has an 18,000 population. Kentish Town NP (adopted by LB Camden in 2017) deals with complex issues of an inner London environment, including railway land. Kennington Oval Vauxhall neighbourhood area includes part of a Mayoral Opportunity Areas and has a 31,000 population. The existing resident population of the proposed Old Oak neighbourhood area is 7,000. NPPG guidance states ***Electoral ward boundaries can be a useful starting point for discussions on the appropriate size of a neighbourhood area; these have an average population of about 5,500 residents (Paragraph: 033 Reference ID: 41-033-20140306)***. Old Oak is not an over-ambitious neighbourhood area.

NPPG advice does not suggest (let alone require) that neighbourhood areas have to be made up of similar building types. Inclusion of residential, employment, retail and open space is the norm. What ties the Old Oak area together is the commonality of 19th and early 20th century residential enclaves separated by road and rail infrastructure but with communities now connected through joint work on HS2 issues and via the interim forum.

In terms of built form, the common characteristics of these residential areas feature are that they are low rise and at densities reflecting London's historic development up until the 1980s.

Part of a coherent estate

Similar to above, it cannot be said that the proposed area forms all or part of a coherent estate either for businesses or residents. The proposed area includes businesses, residential, MOL and major rail infrastructure which, in my opinion is contrary to what could be considered all or part of a cohesive neighbourhood area.

One of the most puzzling aspects is that the residential area to the west of Old Oak Common Lane has not been included within the proposed boundary. It is similar in character to the east of Old Oak Common Lane and together they would form a contained and natural neighbourhood area in itself.

Boundary defined by infrastructure and natural or physical features:
There seems to be no logical reason for the proposed boundary. The proposed boundary cuts through St Mary's and Kensal Green Cemeteries, where it should either include or exclude the whole area, using the natural border of the cemeteries as a boundary; Wormwood Scrubs provides a natural boundary as do the railway tracks and canal but these have not been used as boundaries for the proposed neighbourhood area. There are areas that have been excluded to take account of HS2 construction compounds, however there does not seem to be much of a rationale for the proposed boundary other than trying to include residential areas on the fringe of the OPDC area.

Wormwood Scrubs and St Mary's Cemetery Wormwood Scrubs is designated as Metropolitan Open Land (MOL) and in the London Plan, MOL has the same protection as Green Belt land (see policy 7.17). In addition, Wormwood Scrubs is protected by the Wormwood Scrubs Act 1879, which gives rights to the public to enjoy it in perpetuity and it is therefore one of the most protected public open spaces in London. The inclusion of Wormwood Scrubs within the proposed boundary of the Old Oak

OONF assume that this refers to the residential streets off Long Drive and the Fairway? Inclusion of these streets was discussed at meeting of the forum in early 2016. The streets lie in LB Ealing rather than LBHF and outside the OPDC area. This would require involvement of a third LPA in designation and examination of a NP, and added layer of complexity which the forum was reluctant to take on.

The 'logical reason' for 'cutting through' the St Marys' and Kensal Cemeteries is that this is the borough boundary line between LBHF and RBKC. As with the case for any neighbourhood area, the proposed boundary is the outcome of many discussions and meetings of the interim forum, with OPDC, and with organisations in and around the proposed area. Several changes to the proposed boundary were made at the request of OPDC, to remove HS2 construction compounds and sites considered particularly 'strategic'. The outcome may not be a neat shape, but this is not a criterion or NPPG 'consideration' for designation.

Including the Kensal Cemetery would have involved a further LPA in the designation, examination, and referendum processes.

This comment suggests a view that neighbourhood planning is all about 'protecting' areas, which it is not. Neighbourhood plans are required by the basic conditions in the legislation to support sustainable development. Local people have views, as well as extensive knowledge and experience of use of Wormwood Scrubs over many decades. Such input would be of significant value in planning how the Scrubs should change over the next decades.

<p>neighbourhood area is therefore considered unnecessary as no development can take place and it already has the highest statutory protection.</p> <p>It is consequently hard to understand what purpose would be served by including Wormwood Scrubs within the neighbourhood boundary. Similarly, it is considered unnecessary to include St Mary's Cemetery, and part of Kensal Green Cemetery within the proposed boundary as cemeteries are protected against development through London Plan policy 7.23.</p>	<p>As above, neighbourhood plans are not about '<i>protection from development</i>'. Any over- restrictive policies will be modified at examination stage. A NP can contribute to the future of Wormwood Scrubs in many respects (bio-diversity policies, dealing with water runoff and drainage demands from Old Oak North, layout of footpaths and cycleways, bespoke heritage and conservation policies).</p> <p>Overall these GLA comments appear as poorly researched and aimed at finding reasons why a NP should not be allowed to happen at Old Oak. This is contrary to NPPF and NPPG guidance which asks LPAs to constructively engage with the community throughout the process. (Paragraph: 022 Reference ID: 41-022-20150209). OONF trusts these comments are not reflective of overall GLA views on neighbourhood planning in London, at elected member level.</p>
<p>HS2 Ltd (Bryan Ward)</p> <p>We have read the designation application documents and welcome the applicant's recognition of HS2 as a national infrastructure project and of the High Speed Rail (London-West Midlands) Act 2017 ("the Act"). The applicant's proposals recognise the planning powers conferred by the Act and acknowledges that proposals relating to works contained in the Act will be excluded from any provisions made/policy proposals in any Neighbourhood plan.</p> <p>However, we note that the character of the HS2 station site is different to the rest of the proposed area. Subject to the provisions outlined above, HS2 Ltd has no further comment to make on the proposed designation at this time, other than reiterating that any Neighbourhood Plan should not include policies or proposals relating to the HS2 safeguarded land area or works subject to the Act. Hs2 Ltd would welcome the opportunity to review the forthcoming iterations of any emerging Neighbourhood Plan information, and engaging with the applicants at an appropriate future point</p>	<p>OONF has recognised from the early stages of the Interim Forum that the HS2 station constitutes 'excluded development' for which policies cannot be brought forward via a neighbourhood plan.</p> <p>Adjustments to the proposed neighbourhood boundary have also been made to leave out the HS2 construction compounds over which HS2 will have control for the next ten years.</p> <p>This is not to suggest that an Old Oak neighbourhood plan will give not thought to the long term uses of these sites, and how they might best be integrated into a successful new part of the London from 2026 onwards.</p>

Owner of 151 Scrubs Lane (Adam McConaghy (CBRE))

The landowner is in general terms supportive of the document and welcomes the Forum as an opportunity to continue to strengthen their relationships within the community; we do however wish to submit representations regarding the extent of the proposed Neighbourhood Area, and the implications this may have on the effectiveness of the forthcoming Neighbourhood Plan.

The proposed Neighbourhood Area covers much of the eastern half of the Old Oak and Park Royal Development Corporation area, combined with a number of residential communities in North Hammersmith (London Borough of Hammersmith and Fulham). This is an extensive area for which a Local Plan is already forthcoming in the form of the OPDC Local Plan. It is stated at Paragraph 0.5 of the consultation document that the Old Oak Interim Neighbourhood Forum has already contributed to the preparation of the OPDC Local Plan, and as such have already influenced forthcoming policy within the wider area. We consider that any new Neighbourhood Plan for the area would be more effective if it was more focussed on areas which are directly occupied, used and enjoyed by the local community, given that an up-to-date Local Plan for the wider area is forthcoming and has been influenced already by the Neighbourhood Forum. The boundaries of the proposed Neighbourhood Forum are considered best drawn around existing neighbourhood and recreational areas.

To include strategic sites already identified within the wider OPDC framework, to which the Forum has been, and will continue to be, consulted on adds an additional layer of policy in respect of future development which has the potential to delay development and the strategic delivery of sites within this key regeneration and growth area.

Given the strategic nature of the OPDC area, it is considered strategic sites should be guided by the overarching OPDC policy, and not Neighbourhood Policy which, while an important and valuable part of the planning process, is by its very nature concerned primarily with local issues and the local community, and not strategic aspirations.

OONF response: As restated above, ***neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community (NPPF para 185)***. This new layer of the planning system is not intended to be limited to *'areas which are directly occupied, used and enjoyed by the local community'*. Nor are neighbourhood boundaries intended to be limited to *'existing neighbourhood and recreational areas'*. This is a misunderstanding of the neighbourhood planning framework

Inclusion of strategic sites within the proposed OONF boundary has been discussed with OPDC officers, and certain sites removed as a result. NPPG guidance states ***A neighbourhood area can include land allocated in a Local Plan as a strategic site. Where a proposed neighbourhood area includes such a site, those wishing to produce a neighbourhood plan or Order should discuss with the local planning authority the particular planning context and circumstances that may inform the local planning authority's decision on the area it will designate (NPPG Paragraph: 036***

<p>Given the geographical position of the sites at the edges of the proposed Neighbourhood Area boundary, we consider it is logical and sensible to adjust these boundaries to omit these sites, for the reasons we have detailed above.</p>	<p>Reference ID: 41-036-20140306). OONF will continue to discuss strategic sites with OPDC/LBHF throughout preparation of a neighbourhood plan.</p> <p>Special pleading by a landowner that their own site happens to lie <i>'on the edges of a proposed neighbourhood boundary'</i> is an insufficient planning ground for varying a proposed neighbourhood area. Scrubs Lane and College Park are a key 'Place' within the proposed Old Oak neighbourhood area.</p>
<p>Latymer Upper School (David Curtis-Donnelly) Latymer Upper School is landowner of approximately 8 acres of sports field at the southern tip of the proposed Old Oak Neighbourhood Area. The site is at the junction of Wood Lane and Du Cane Road. Recently we were made aware of the application and wish to make a representation on a number of issues. Firstly, we feel the Neighbourhood Forum has not taken reasonable steps to secure membership for each category required in Section 61 F(7)a. If we had been notified in good time, early in the process, we would have wished to be represented on the forum. Secondly, we feel the statement of why the designated area is appropriate is flawed and does not represent an established Neighbourhood as well as being disjointed and linked to the Old Oak Regeneration Area. Furthermore, we are of the opinion the formation of a Neighbourhood Forum is premature particularly in light of participation in OPDC and HS2. The area itself is both disjointed and in our opinion too large and would not truly represent local residents and businesses in the spirit of the Neighbourhood Forum Localism act. The boundary encompasses significant areas of open space and public facilities including a cemetery, the Scrubs and Linford Christie stadium. These facilities, as our own, benefit from a broad catchment far wider than the local area. All are protected by other planning policies such as Metropolitan Open Land act.</p>	<p>OONF understands that Latymer Upper School is part of the Latymer Foundation at Hammersmith, a foundation which goes back to 1624 and is a registered charity.</p> <p>Inclusion of the playing fields within the boundary of the proposed neighbourhood area is not intended to impact on the activities of the school. It is a recognition of the fact that the regeneration of the Old Oak area will have a significant effect on land values in this part of London and that all areas of existing open space in the area (highly valued by local people in terms of air quality and bio-diversity) may prove vulnerable to pressures for development.</p> <p>The interim forum considers that it has taken all necessary steps to ensure that membership meets the categories in section 61 F(7)a, which does not require membership by every landowner. Latymer School is very welcome to join the forum and its contribution on assessing and advising on future education provision in the Old Oak area would be valuable.</p> <p>Points on 'prematurity' of a neighbourhood plan, and on the catchment area of the Scrubs and Linford Christie have been addressed elsewhere on this schedule.</p>
<p>Queen's Park Rangers (Oliver Carr (Hepher-Grincell))</p>	<p>OONF response:</p>

Summary of Representations

- The area identified is not appropriate for a neighbourhood forum as it is not a recognised neighbourhood, rather a collection of more widely dispersed communities. The proposal is therefore not in accordance with National Planning Practice Guidance. A neighbourhood forum is not the best way for the voices of the various communities within them to be heard.

- If the Neighbourhood Forum does progress, then the area it covers should be more tightly drawn and limited to the existing residential areas, which are predominantly to the west of the Old Oak Regeneration Area. It is not appropriate for the Neighbourhood Forum to include the core Old Oak Regeneration Area (with its complex series of development and infrastructure issues) within its boundary.

It is also inappropriate to try and include the existing significant areas of Public Open Space or community facilities, as these serve all of London and not just the local communities.

- The Local Plans for both the OPDC and LBHF remain in draft therefore it is premature to seek to progress a Neighbourhood Plan at this time. We expand on these points below with reference to the sections within the designation document.

Executive Summary and Context

Whilst it is important that the local community continues to be consulted in connection with the emerging OPDC Local Plan, this has already been taking place effectively with the various resident's groups and in fact, elsewhere in the designation document (paragraphs 10.3 and 10.4) it states that these groups will continue to operate in their own right in any event.

The aims set out in paragraph 0.5 can be achieved through these established channels of engagement of with the OPDC (and LBHF) and the addition of a Neighbourhood Forum is unnecessary.

Contrary to the statement made in paragraph 0.8, we consider that a Neighbourhood Forum for Old Oak has the potential to cause delay and confrontation with the emerging Local Plan process. We also do not agree

As NPPG guidance acknowledges, there is no accepted definition of a '*recognised neighbourhood*' and OONF do not accept that QPR is best placed to judge how local residents perceive their own neighbourhood. The NPPG '*considerations*' which could be relevant to any designation decision are addressed in the OONF application.

The residential enclaves around Wormwood Scrubs are not '*widely dispersed*'. They share the same shops, social and community infrastructure and public transport links, much of which is seen by local people as insufficient or inadequate at present.

Many neighbourhood areas include open space and facilities such which serve a wider catchment area. In the City of Westminster, 75% of the borough has been designated as neighbourhood areas, including large numbers of facilities and amenities serving the capital as a whole. Westminster City Council has not found this to be '*inappropriate*'.

This point on '*prematurity*' of a neighbourhood plan is incorrect. See NPPG Paragraph: 009 Reference ID: 41-009-20160211 and response below.

The effectiveness of previous public consultation is for local people to assess, as well as for QPR to judge.

The designation application explains the intention that the Forum, as and when designated, will not comment on individual planning applications but will respond to consultations on OPDC Local Plans and SPDs (and any relevant LBHF development plan documents). The aim is to keep the focus of the forum as strategic and to leave existing residents associations to respond to planning applications in their immediate area.

If Government and Parliament had considered that the pre-existing English planning system provided sufficient opportunities for citizen involvement and engagement, neighbourhood planning would not have been introduced in 2011 and subsequently strengthened via the 2017 Act and other

with the comments made in paragraph 0.9 that the Neighbourhood Forum will offer an effective and focused means for future engagement.
Introduction

Regarding paragraph 1.4, the commentary on the OPDC plan provides sufficient a forum to engage and shape policy in the area. Most parts of the area are due to fundamentally change and it is pre-emptive to set a neighbourhood forum at this stage.

As to paragraph 1.5, fundamentally, the area identified is not one neighbourhood but rather a collection of different communities that do not readily connect. This is highlighted by the comments in paragraphs 10.3

and

10.4 that confirm that these communities will continue to act independently and lobby for their own points of interest. We do not consider that this accords with the National Planning Practice Guidance on neighbourhood forums.

As regards paragraph 1.6, **we agree with the view expressed by the OPDC Officers** (our emphasis) that it is not appropriate for a Neighbourhood Forum to seek to include such a large and nationally significant regeneration project. The scale and complexity of the development being proposed is beyond the scope of

Neighbourhood Planning.

Similarly, in paragraph 1.7, sustainable urban development that is supported by the public can be achieved with consistent engagement with the OPDC and consequently does not require a Neighbourhood Forum. It is also the case that the Local Community is directly represented on the OPDC Board.
Boundary and Size of the Proposed Area

measures.

No explanation is given by QPR for this assertion. Forum members have attended several QPR presentations and consultation sessions

As above. Why is it 'pre-emptive' to formally establish a neighbourhood forum when the Local Plan is at an advanced stage. NPPG states ***Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area. They can be developed before or at the same time as the local planning authority is producing its Local Plan*** (our emphasis) **NPPG Paragraph: 009 Reference ID: 41-009-20160211**). The Courts have made clear that a NP can be prepared and 'made' in advance of a new or updated Local Plan. In practice, this is neither intended nor likely to happen in the case of an Old Oak NP given that the OPDC Local Plan is scheduled for adoption in Spring 2018.

No parish/town council or neighbourhood forum can (or should) restrict the right of any other organisation or individual to make their own representations on planning applications.

We are not clear why or how this view of OPDC officers has been 'expressed' and in what context, in advance of consideration of the designation application by the OPDC Planning Committee and Board? A neighbourhood plan may end up concentrating on a limited range of issue and its scope can be wide or narrow. The complexities and infrastructure challenges at Old Oak are fully recognised by OONF.

Sustainable urban development can also be made more successful through the early and close involvement of local people. One community representative on the OPDC Board is a very modest level of involvement. The 2016 OPDC Review made two relevant recommendations for the future: ***5.E. Support for business and community Board members must be provided to enable them to properly represent their constituent groups. Other regular forums outside the Board and Planning Committee should be developed to***

If a Neighbourhood Forum does progress, then the area it covers and its boundary need significant amendment. What has been proposed has been drawn in an arbitrary manner taking in a very large area that includes a series of smaller distinct communities and does not represent an established neighbourhood.

As stated, the OPDC Regeneration Area is of both London-wide and national significance. It raises a number of complex challenges that are not appropriate for a Neighbourhood Plan. The OPDC has been set up to take this forward and while it is appropriate for the local communities to be involved as proposals develop, **it is not appropriate for the Neighbourhood Forum to influence the process by including it within the Neighbourhood Boundary** (our emphasis).

The proposed boundary also contains many areas of significant existing open space and public facilities. These include St Mary's Cemetery, Little Wormwood Scrubs, Wormwood Scrubs and the Linford Christie Stadium. These are all existing public amenities or facilities that serve a wide catchment of London and beyond and not just the communities within the proposed Neighbourhood boundary. These areas are also already protected by existing planning policies such as Metropolitan Open Land and are within public control. It is therefore both unnecessary and inappropriate for these areas to be included. Therefore, we suggest that a more appropriate boundary would be drawn tightly around the existing residential areas that primarily lie to the west of the main Old Oak Regeneration area. Likely Scope of an Old Oak Neighbourhood Plan As regards the points made in paragraph

4.1, it is considered that residents in the various communities identified can make a contribution without the need for a Neighbourhood Forum and a Neighbourhood Plan. Paragraph 4.5 acknowledges the complexities and

allow the voice of business and the community to be heard and shape decision making.

5.G. The OPDC should adopt innovative practice on community engagement in the preplanning and master planning process, ensuring that decisions, pre-app discussions and advice are as transparent as possible.

As explained above the proposed Old oak boundary is far from arbitrary and results from 15 months of discussions with local people and with OPDC, as well as recognising borough boundaries.

The challenges of the area are fully recognised by OONF. To assert that a neighbourhood forum '*should not influence the process*' of planning within an area, whether it be a regeneration or opportunity area, is wholly contrary to whole thrust of the Localism Act and to NPPF paragraphs 184 and 185 and to NPPG advice.

As noted under the GLA response, neighbourhood planning is not all about 'protecting' open spaces or other public amenities. It is about adding value to the planning process through input at a very local level, whether this be via a parish/town council or neighbourhood forum.

We note with interest that this is one of several consultation responses which suggest that '*a more appropriate boundary*' would be around the residential areas to the west of the Scrubs/main regeneration area. This ignores the fact that the larger numbers of residents within the proposed boundary who seek a successful future for Old Oak lie to the south (Old Oak Estate) and to the north west (College Park).

Residents can make their contribution through both forms of engagement, and this is why neighbourhood planning is now a well established part of the planning system. As of early 2017, 8m of the population of England live in

uncertainties that surround the Old Oak Regeneration. If the Forum does proceed, the Neighbourhood Plan should focus on the existing residential communities as suggested, but this should be the limit of the Plan's influence.

Involvement of Local Businesses and with Developers

Paragraph 7.3 mentions the consultation held to date with QPR. QPR continue to pursue plans to relocate from Loftus Road and to progress other regeneration projects in the Old Oak area and will continue to engage with local communities in connection with these plans.

A Phased Approach to Neighbourhood Planning at Old Oak

As regards paragraph 8.1, it is our view that the formation of a Neighbourhood Forum and Plan as proposed will have the potential to obstruct, delay and complicate the Old Oak Regeneration. This is unnecessary and would be very unhelpful for what is already an extremely complex proposal. If the Forum does progress, its focus should only be in connection with the area identified in paragraph 8.3, namely the existing communities, and not the wider area.

The timing of the development of the proposed Plan is also premature as the OPDC's Local Plan is still at a relatively early stage. Any Neighbourhood Plan should be delayed until the overarching planning policy framework of the Local Plan has been confirmed. We consider that paragraph 12 is incorrect in that both the OPDC and LBHF provide residents with an appropriate forum to make a coherent contribution to the planning of the Old Oak area.

Further, it is not the case that if the proposed neighbourhood boundary was varied it would send out a negative signal. We consider that the opposite is true. A reduced boundary as we suggest would show that the neighbourhood planning was being focused on the existing communities, rather than seeking to over stretch its influence.

areas covered by neighbourhood plans and this number will have increased. As with other consultation responses from developers/with commercial interests the views expressed by QPR are understandable, if disappointing. The scope and influence of a neighbourhood plan depends on the outcome of independent examination and LPA final decisions to send a NP to referendum, within a defined statutory framework including the 'general conformity' requirement.

OONF response as above. It will be for the designated forum to decide the scope of a neighbourhood plan, which may range from the ambitious to the modest. No assumptions should be made at this stage on the scope and content of a neighbourhood plan (**NPPG Paragraph: 035 Reference ID: 41-035-20161116**)

The decision at this stage is on designation. This is an enabling step, and not the outcome of a draft NP at which point decisions are made by independent examiner and LPA on whether a draft plan should proceed to referendum.

The 'prematurity' point has been covered above. **NPPG Paragraph: 009 Reference ID: 41-009-20160211** is clear on the subject.

The proposal for a neighbourhood plan is about integrating existing residential areas within a much larger future community. Such a plan may well include proposals for educational, social, community, and cultural facilities. Its focus is not intended to be only on the 'existing communities'.

<p>Consultation on the Proposed Boundary of an Old Oak Neighbourhood Area: The Old Oak Regeneration Area is of London wide and National significance. The large areas of open space and leisure facilities formed by Wormwood Scrubs, Little Wormwood Scrubs, St. Mary's Cemetery, and the Linford Christie Stadium are there to serve all of London. Therefore, it is inappropriate for such a small number of local interest groups to decide whether these should be included.</p>	<p>The OPDC/LBHF six week consultation on the proposed boundary and forum was open to anyone to respond to. There are many parts of London, of <i>'local and national significance'</i> where neighbourhood boundaries have been proposed by forums, and have been designated following consultation both statutory and non-statutory. As pointed out above, 75% of the City of Westminster is designated as a series of neighbourhood areas. Draft neighbourhood plans, in e.g. Knightsbridge, and Mayfair include policies developed by forums which seek to balance the interests of residents against those of all Londoners and visitors from the UK and abroad. It is not <i>'inappropriate'</i> for local people to undertake such a role in the planning process. If and when an independent examiner concludes that a referendum on a draft plan should be conducted over a wider area than the neighbourhood boundary, the legislation provides for this.</p>
<p>Fruition Properties (DP9) Fruition properties owns the freehold of the Site which is currently occupied by the Pentecostal City Mission Church and a nursery. A planning application will be submitted shortly for the redevelopment of the Site to re-provide the existing uses along with residential and retail uses. This follows an extensive period of consultation which has included a stakeholder forum held on 13 December 2016 and a public exhibition held on 8 and 11 February 2017. Whilst the Site is within the Old Oak Common Opportunity Area (OOCOA), it is within both the London Borough of Brent (LBB) and London Borough of Hammersmith and Fulham (LBHF). The Area as proposed therefore dissects the Site with the LBHF portion falling within the proposed Area whilst the larger LBB portion falls outside of the Area. We do not object to the designation of a Neighbourhood Forum. However, we do question the suitability of the proposed Area give it only includes part of the Site. Given the Area does not include land in LBB we therefore request that the Area is amended to exclude the Site. Furthermore, the Site sits on the very edge of the proposed Area and it comprises a different land use, character and physical form to the remainder of the proposed Area which is predominantly industrial in nature, therefore, the proposed Area could be considered</p>	<p>OONF comment: this is a further example of planning consultants acting for a landowner/developer putting forward a case that the site in which they have an interest should be excluded from a neighbourhood area boundary.</p> <p>The argument that the site is <i>'on the edge'</i> of a proposed neighbourhood area has no planning justification as such. But in this instance the planning application for 2 Scrubs Lane is currently under consideration by OPDC and is likely to be determined within a matter of weeks.</p> <p>OONF accepts that the larger part of what is a small site lies on the LB Brent side of the boundary. The Old Oak neighbourhood area is not intended to cross this boundary, and for this reason OONF have no objection to the boundary being designated so as to exclude the whole of the site of 2 Scrubs Lane.</p>

inconsistent with the principles of what defines a coherent neighbourhood area; this requires consistency of scale of buildings, style of buildings, type of land use, grain, and nature and character. We wish to maintain a good relationship with all neighbouring residents and businesses including all members of the Forum and this has been reflected by the extensive public consultation exercise undertaken to date as part of the preparation of the redevelopment plans and we will continue to liaise during the course of the application once it is submitted