

# Old Oak and Park Royal Development Corporation (OPDC)

# Local Plan Revised Draft for Regulation 19 Consultation, 29th June 2017

#### Representations by Queens Park Rangers Football Club and Stadium Capital Developments

We are instructed by Queens Park Rangers Football Club (QPR) and Stadium Capital Developments (SCD) to submit representations on their behalf in connection with the Old Oak and Park Royal Development Corporation (OPDC) Local Plan Revised Draft for Regulation 19 Consultation, published on 29<sup>th</sup> June 2017. These representations are set out below and follow the order of the Revised Draft Local Plan.

As the OPDC is aware, in a joint venture with Genesis, QPR and SCD have commenced the development of Oaklands, the first major scheme in the core regeneration area. QPR and SCD also have other significant land interests within Old Oak and are keen to continue working with the OPDC to bring these forward to deliver additional development at the earliest opportunity. It is in this context that these representations are made.

#### **Chapter 2 - Spatial Vision**

We support the overall spatial vision. However, we encourage the OPDC to continue working proactively with all interested parties to drive forward the regeneration and to ensure that available development opportunities are acknowledged and their potential realised at the earliest opportunity.

#### Figure 2.1: Opportunities and Challenges

We would make a number of comments and suggested amendments to Figure 2.1:

Transport Orientated Development – This rightly acknowledges the importance of making improvements to Willesden Junction Station; however, this should go further to note that the provision of a new bridge link between the Station and the regeneration area to the south, landing in the European Metals Recycling (EMR) site, will bring about both significant improvements in the PTAL rating of the regeneration area to the North of the Canal, and also facilitate the early delivery of a significant number of new homes and jobs in this location.



Grand Union Canal and Wormwood Scrubs – We support the reference to enhancing access to Wormwood Scrubs so that it can be enjoyed by more Londoners.

Deliverability – It is right that this section acknowledges the challenges for timely delivery; however, either here, or in the Opportunities section, it should be noted that early delivery of new housing and commercial space is being achieved at Oaklands, and there are other opportunities including at Oaklands North, along Scrubs Lane and at EMR (as referred to above) where additional early development could be achieved.

## Chapter 3 – Strategic Policies

## Policy SP1: Catalyst for Growth

The new Old Oak Common Station will be a catalyst for growth; however, this is some years off delivery. In the interim, there will be other developments that can have a catalytic effect. An example of this would be the delivery of a new bridge connection to an improved Willesden Junction Station. As noted, this would open up the regeneration area to the north of the Grand Union Canal, significantly improve the PTAL rating of the area and allow significant early new development of housing and commercial space. This potential for early interim catalysts for growth should be acknowledged in the Policy and the supporting text.

### Policy SP4: Thriving Communities

We support the aims of this Policy, but would encourage the OPDC to work with partners, including QPR and SCD, to deliver as much early development as possible.

#### Policy SP6: Places and Destinations

The supporting text of this Policy should acknowledge the early role the development of Oaklands will have in delivering regeneration and beginning the process of integrating new development with the existing community at Atlas Junction.



## Policy SP7: Connecting People and Places

The supporting text of this Policy should acknowledge the potential for the early delivery of a new bridge link from EMR to an improved Willesden Junction Station, which will provide an essential part of Old Oak High Street and act as a catalyst for early development in Old Oak North. Additionally, the development of Park Road, the first part of which will be delivered in conjunction with Oaklands, can be progressed through the continued development of Oaklands North and the delivery of a new bridge over the Grand Union Canal to open up development in Old Oak North.

## Policy SP10: Integrated Delivery

We note the OPDC's development trajectory referred to in this Policy and set out in Figure 3.16. We believe that through collaborative working with the OPDC and other key stakeholders, QPR and SCD can assist in improving this trajectory by bringing forward early development on the land within which they have interests.

The development of Oaklands North could come forward in the 0-5 year time frame. If the bridge links to Willesden Junction Station from EMR and the extension of Park Road from Oaklands over the Grand Union Canal are progressed, development in Old Oak North could also commence in the 0-5 year horizon. Furthermore, additional early development can be achieved along Scrubs Lane.

### **Chapter 4 - Places**

#### Site Allocations

The table should acknowledge that the development of Oaklands has commenced. Additionally, as referred to above, the EMR site is capable of greater and earlier delivery of new homes and other development.

### Policy P1: Old Oak South

The development of Oaklands delivers on the vision for Old Oak South and on the various aspects of the Policy. This includes the early delivery of new homes, commercial space, public open space and the first phase of Park Road. The fact that this development has now commenced should be acknowledged in the supporting text.



# Policy P2: Old Oak North

The Policy and supporting text should acknowledge that a new bridge link to an improved Willesden Junction Station can happen as an early phase of the regeneration, which will significantly improve the PTAL rating and, together with the extension of Park Road over the Grand Union Canal, open up Old Oak North for development to commence within the 0-5 year timeframe.

Careful consideration should be given to the environment created by the Old Oak sidings waste site and it needs to be designed and managed in such a manner to allow its successful integration with the new housing being developed.

Under points h) and i)x) of the Policy, acknowledgement should also be made that the EMR site could come forward for early development delivering significant numbers of new homes and jobs.

Point i)iii) should refer to the importance of the early delivery of the new bridge link from EMR to an improved Willesden Junction Station.

Point n) should acknowledge that it may be appropriate for taller development to be proposed near to the bridge to Willesden Junction Station.

OON.2. The supporting text needs to acknowledge that providing the new bridge connection to Willesden Junction Station will improve the PTAL level of the area and facilitate the early delivery of new housing and jobs. This also needs to be reflected in OON. 15.

# Policy P8: Old Oak Lane and Old Oak Common Lane

As referred to above, the development of Oaklands also delivers on the vision for Old Oak Lane and Old Oak Common Lane and on the various aspects of the Policy. This includes the early delivery of new homes, commercial space, public open space and the first phase of Park Road. The fact that this development has now commenced should be acknowledged in the supporting text, particularly at OOL.3. The continued development of Oaklands North could also come forward concurrently and add to the benefits arising.



# Policy P8C1: Atlas Junction Town Centre Cluster

The same points apply here as for Policy P8.

## Policy P10: Scrubs Lane

We support the vision for early delivery of new development along Scrubs Lane.

## Policy P11: Willesden Junction

We support the vision for Willesden Junction. However, we consider the station improvements and critically the delivery of a new bridge link to Old Oak North to the south should be a stated early priority for the Local Plan.

### Policy P12: Wormwood Scrubs

We support the aims of the policy to improve access to Wormwood Scrubs for all Londoners.

### **Chapter 8 - Housing**

#### **Policy H1: Housing Supply**

We encourage the OPDC to work with partners to identify opportunities to bring forward the early delivery of new housing. The delivery of Oaklands is a good example and QPR and SCD welcome the opportunity to work with the OPDC to bring forward their other land holdings in a similar manner.

#### **Summary**

QPR and SCD welcome the opportunity to discuss these representations with the OPDC and to continue to develop the successful working relationship that already exists between the parties.