

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

Michael Mulhern
OPDC
City Hall
The Queen's Walk
LONDON
SE1 2AA

Our ref: LDF40/LDD01/CG01
Date: 11 September 2017

Dear Mr Mulhern,

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

RE: Old Oak Park Royal Development Corporation Local Plan - Regulation 19 Consultation

Thank you for consulting the Mayor of London on the Old Oak Park Royal Development Corporation Local Plan Regulation 19 consultation. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has delegated authority to me to respond and his representations are set out below. These representations include comments from Transport for London (TfL), which the Mayor supports and are included in this letter. Detailed comments from TfL which should also be read as part of this response are attached as an Annex.

On 22 March 2016, the Mayor provided comments on the Regulation 18 stage of the Old Oak Park Royal Development Corporation Local Plan. This was followed by further correspondence dated 05 April 2016 regarding the role of the draft Plan in addressing wider strategic housing need.

The Mayor is pleased to see that the OPDC has produced a draft Local Plan that builds on the aspirations and principles set out at Regulation 18 stage and that effort has been made to ensure his comments have been taken into consideration. However, after careful consideration of the OPDC's draft Local Plan, and whilst supporting many aspects of the Plan, the Mayor is of the opinion that the support for town centre uses in the Strategic Industrial Location as set out in draft policy TCC1 is not in conformity with the London Plan. Detailed comments on this issue and other matters are set out below. GLA officers are keen to work with the OPDC to resolve any outstanding issues.

Overall Strategy

The Mayor welcomes the positively planned approach set out in the draft Local Plan and its support for strategic and local infrastructure. The draft Local Plan's approach of allocating a significant amount of land for new housing and employment over the period 2018-2038 is welcomed. The Plan also identifies development opportunities beyond the plan period.

The quantum of development allocated for the plan period is 22,350 new homes and 67,900 jobs (the jobs figure in draft policy SP5 appears to supersede that on page 12 under Economic Growth). This housing figure is below the minimum guideline of 25,500 new homes set out for Old Oak Common and Park Royal Opportunity Areas in Annex 1 of the London Plan, however the draft Local Plan

envisages capacity for a further 4550 new homes beyond 2038. The draft Plan also identifies the capacity to deliver a further 1,800 jobs beyond the plan period.

The Mayor understands that the OPDC is doing further work that will refine these minimum delivery figures and that there is an evolving understanding of land availability, developer interest, anticipated progress with HS2 and other rail infrastructure and phasing of delivery.

Housing

Draft policy H1 sets a target of delivering 1110 new homes per year, with a total of 22,350 over the plan period. This is below the minimum guideline set in London Plan Annex 1 for the two Opportunity Areas of Old Oak Common and Park Royal. The Local Plan acknowledges the delivery issues of the major rail infrastructure and associated phasing of land availability and includes provision that over a slightly longer timeframe, the capacity set in the London Plan will be exceeded.

The OPDC has been inputting into the London SHLAA and will have a formal housing target published in the new draft London Plan, based on this process. TfL has requested that references to the Elizabeth line depot site coming forward for development during the Local Plan period be removed as any redevelopment proposals will only come forward in the longer term and will still be required to provide for operational purposes. The removal of this site will not affect the OPDC's ability to deliver its housing numbers within the short term (0-10 years) as this site has been identified in the London SHLAA as delivering homes in 10-20 years and is proposed for mainly commercial rather than residential development.

The inclusion of a strategic 50% affordable housing target in draft Policy H2 is welcome, however the proposed Plan should specifically include the 35% (without public subsidy) threshold as well as the 50% threshold for public land, as set out in the Mayor's Housing SPG. The reference to starting negotiations with a 50% affordable housing target (para 8.16) does not fully accord with approach set out in Mayor's Housing SPG. Especially as, later in the supporting text, the 50% requirement is open to negotiation and does not provide the certainty or clarity needed to influence land values. The presence of abnormal site constraints would be expected to impact land values and the cost should not necessarily be born through a reduction in planning obligations.

Strategic Industrial Land

The draft Local Plan proposes to de-designate a significant area (87 hectares) of Strategic Industrial Land to support the redevelopment of new homes and jobs as identified in Annex 1 of the London Plan. Whilst this runs generally contrary to London Plan policy 4.4, in this instance the release of SIL is accepted as an integral aspect of the Old Oak Common Opportunity Area and the development of a new neighbourhood based around the new public transport infrastructure that will be delivered at this location. The extent of the proposed release is broadly consistent with the identified potential pipeline in the GLA's Industrial Land Supply and Economy study (2016) and the GLA's Industrial Land Demand Study (2017). Much of this land is surplus railway infrastructure land.

There exist a number of industrial uses within the areas proposed for SIL de-designation. The Mayor would wish to be assured that capacity has been identified and satisfactory relocation arrangements put in place to accommodate any uses/businesses that would be affected. Sites within the OPDC area are a first preference (either as part of development proposals or within the retained SIL), or alternatively elsewhere within the boroughs of Hammersmith & Fulham (H&F), Ealing and Brent. A sequential approach along these lines has been adopted in Policy E1 b)ii) and is supported although it could be strengthened – see comments on draft policy E1 below.

The Mayor is satisfied with the spatial elements of the SIL consolidation which maintains the majority of the Park Royal SIL (central/west) and de-designates the eastern parts around the new H52/CR1 interchange and around North Acton. The key consideration is to what extent can the retained parts of SIL in Park Royal be intensified for industrial development and provide capacity for any displaced business uses in the areas of SIL to be de-designated. For example, do any of the site allocations (page 50) link to intensification of industrial uses in SIL? The Plan should set out how the intensification of SIL will happen if it is not linked to these site allocations. The approach should be informed by OPDC's intensification study that looks at the industrial potential in Park Royal.

Park Royal is not London's leading location for business as stated on page 80, that is the role of the CAZ. The Vision in V1 "Park Royal West will remain as London's leading location for large, medium and small businesses" should be caveated as 'industrial' businesses.

To support the remaining SIL, draft policy E1 requires no net loss of industrial floorspace. This will be an important aspect of achieving the required increase in the number of jobs across Park Royal and Old Oak Common. To achieve no net loss of floorspace, alongside a significant loss of SIL will require an intensification of employment uses and floorspace on the remaining SIL sites. This means that the Local Plan must continue to protect the remaining SIL and promote the intensification of uses. Policy E1 achieves the protection element of this and the Park Royal Intensification Study, which is part of the Evidence Base for the Plan, provides a range of tools that should promote the intensification of those remaining SIL areas.

Policy E1 b)ii) (page 229) which sets out a sequential approach to support the relocation of businesses affected by SIL de-designation should be strengthened. Applicants only need to demonstrate that suitable premises exist elsewhere, rather than ensure that satisfactory arrangements are put in place to support relocation. The risk with the current proposed wording is that all applicants might simply point to the same site leading to double counting of capacity to accommodate displaced businesses.

Proposed policy TCC1 part (e) (page 241) is not in conformity with the London Plan. It allows for the introduction of town centre uses in SIL and will lead to the incremental erosion of SIL. The supporting text refers only to manufacturing businesses in Park Royal selling their produce on their premises. The Mayor would have no objection if the overarching policy limited the approach to cover these ancillary sales. The town centres elsewhere in the OPDC area will provide sufficient capacity to accommodate town centre uses.

Places and Destinations

The Mayor supports the ambitions for Old Oak High Street to become a major town centre and this is supported by the evidence produced. The Mayor will consider including Old Oak High Street as an emerging or potential major town centre in his draft London Plan.

The Mayor welcomes the positively planned approach to the provision on green infrastructure and open space as well as physical and social infrastructure.

Old Oak North and Old Oak South

These areas will be the focus of major land use change and will be at the heart of the redevelopment of the Opportunity Area. The areas are focused on new transport infrastructure which will radically change the public transport accessibility of this part of London and will create new public transport

links around London and to other parts of the country. Therefore, in line with London Plan policy 3.4 and the Mayor's Housing SPG it is appropriate that land is developed to a high density to maximise this accessibility and tall buildings will be appropriate in these areas.

Wormwood Scrubs

This is one of the most important open spaces in the Local Plan area. Given that the local area will become home to many new residents, workers and visitors, it is appropriate that access to Wormwood Scrubs is improved and increased and that the open space provides a wide range of appropriate uses and green infrastructure functions, as supported by London Plan Policy 2:18. Some care will be required in order to ensure that there are no adverse impacts on biodiversity, as required by London Plan policy 7.19.

Town Centre

The draft Local Plan (page 241) identifies a potential new major town centre centred around Old Oak and includes linear corridors that link with Harlesden District town centre and a neighbourhood centre at North Acton. The Mayor is supportive in principle of a new town centre at this location and will review the evidence to support a new centre of a major scale in our work on the London Plan town centre network review.

The Mayor supports OPDC's aim to ensure vibrant high streets by protecting public houses (draft policy TCC7) and by managing the overconcentration of betting shops, pawnbrokers, payday loan stores and games arcades. He also supports the approach to limiting the proximity of hot food takeaways to schools and managing their overconcentration in order to support Brent, Ealing and H&F's Health and Wellbeing Strategies to reduce levels of childhood obesity in the area. OPDC's proposed policy TCC2 is consistent with policy 3.2 and 4.8 of the London Plan.

The Mayor welcomes the draft Plan's aim to provide a high quality cultural offer in the OPDC area and a cultural quarter in Old Oak. The development of Cultural Strategy could be useful in ensuring the OPDC has a long-term vision for culture over the area's development period. Draft policy TCC3 references the former Mayor's Cultural Strategy, which is now out of date.

The Mayor is supportive of the draft Plan's vision to deliver a thriving night time economy and culture for the area and the inclusion of the 'agent of change' principle. In addition to the Mayor's Culture and the Night Time Economy Supplementary Planning Guidance, the supporting text could also reference the Mayor's 24-hour London vision which sets out the his plan to turn London into a leading 24-hour global city and focuses on building a night-time culture which:

- promotes culture and leisure for all ages and interests
- increases opening hours
- ensures safety for residents, visitors and night-time workers
- works closely with boroughs and the police to create a balanced and sustainable night time offer

As stated above, proposed policy TCC1 part (e) (page 241) is not in conformity with the London Plan.

Visitor accommodation

It is recommended that the reference to London overall need for 40,000 new hotel bedrooms in the policy TCC10 (page 257) is removed as it doesn't relate specifically to the OPDC area and may soon

be out of date. New evidence for the emerging draft London Plan suggests this figure will increase. The reference could be retained in supporting text in paragraph 10.69.

Transport

Elizabeth line depot site -while TfL will work with the OPDC should any opportunities and funding arise sooner, the presumption must be that future commercial and residential development in conjunction with continuing operational use of the Elizabeth line depot site could only come forward in the longer term. With the exception of design and consents activity, this will be beyond the Local Plan period. This presumption needs to be reflected in the Strategic Policies, in site allocations for Old Oak South in the Places chapter and in the delivery programme. All references to the Elizabeth line depot site being delivered as part of the current Local Plan should therefore be removed.

The development of the design and business case for proposed new London Overground stations at Hythe Road and Old Oak Common Lane is taking place and final station proposals and arrangements will be dependent on the outcome of this work. The stations are not yet committed or funded and should be referred to as 'potential' new stations throughout the document. Joint work is examining what capacity and accessibility upgrade and connectivity measures are needed at North Acton and Willesden Junction Stations, and also to the North London and West London Lines line to accommodate the planned growth which may include new rail infrastructure and rolling stock. Rather than referring to a station square as the preferred design solution for all new or redeveloped stations, the wording should be more flexible to allow for alternative public realm solutions that may emerge from design and development work.

The positive references to Good Growth and Healthy Streets are welcomed. The Strategic Policies should also emphasise key Mayoral priorities related to this and set out in the draft Mayor's Transport Strategy including targets for mode shift, a restraint based approach to parking, the need to improve road user safety, accessibility and connectivity and to maximise permeability.

The Mayor supports the overall approach of limiting car parking and encouraging car free development as well as the proposed requirement for 80% passive provision for electric car parking spaces as well as 20% active provision.

The Mayor supports the proposed requirement for cycle parking facilities in accordance with London Cycling Design Standards that meet and where possible exceed the minimum standards set out in the London Plan.

Long term plans for the future bus network in the area should be developed in line with the recently produced Bus Strategy (Old Oak Park Royal - Indicative bus network and infrastructure requirements). It would be helpful if the OPDC worked closely with TfL to help to develop an interim phasing bus strategy to enable good public transport access to development as it is delivered over time. It is likely that there will need to be bus priority measures and these should be planned for as part of the strategy development work.

The Mayor supports the retention of both the SIL designation and the bus garage use on the site at Willesden Junction referred to in policy P8. The bus garage is important in maintaining the local bus network and providing well located capacity to help meet the demands from the significant growth taking place and planned in the area.

Any proposals for potential long-term redevelopment that affected operational rail facilities including train maintenance depots at Willesden and North Pole would need to take account of future

operational needs. Any de-designation of rail sites would be subject to standard rail industry procedures and consultation.

Further detailed comments from TfL can be found in the Annex.

Waste

Paragraph 5.80 of the London Plan requires MDCs to co-operate with the local borough to ensure that its apportionment requirements are met. The early work carried out for the OPDC's Waste Apportionment Study shows that the Old Oak Sidings (Powerday site) can meet LBHF's apportionment target. However, LBHF forms part of the Western Riverside Waste Planning Authority (WPA) which pools the boroughs' apportionments and the four Western Riverside WPA boroughs are working together to collectively meet apportionment.

The Mayor understands that the OPDC is working with the Western Riverside WPAs and other key stakeholders to test assumptions and work is underway to derive the exact waste throughput from the Old Oak Sidings site that can be counted towards meeting apportionment. The OPDC should work positively with the Western Riverside WPAs to consider the potential for any additional capacity to contribute towards meeting the wider pooled apportionment requirements.

Delivery & Implementation

The Plan's policies are generally at the forefront of sustainable design, environmental performance and providing a balanced land use approach. Proposed policy D11 attempts to balance the demands on the area and the priorities for London as a whole. The text rightly identifies affordable housing as a key priority for the Mayor, and as stated above, land values should reflect this key policy requirement.

Next stages

I hope that these comments can inform the Examination of the OPDC Local Plan. If you would like to discuss any of my representations in more detail, please contact Celeste Giusti (020 7983 4811) who will be happy to discuss any of the issues raised.

Yours sincerely,



Juliemma McLoughlin
Assistant Director - Planning

Cc Tony Devenish, Dr Onkar Sahota and Navin Shah, London Assembly Constituency Members
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL

Appendix 1 - Further detailed comments from Transport for London

Our ref: 17/3266

Transport for London
Group Planning

Windsor House
42 – 50 Victoria Street
London SW1H 0TL

To: OPDC Local Plan team
By email only

Phone 020 7222 5600
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www.TfL.gov.uk

29 August 2017

Old Oak and Park Royal draft Local Plan Reg. 19 consultation TfL comments

Transport for London (TfL) is working closely with OPDC in helping to plan for the Old Oak and Park Royal area. This has included joint work and funding of a large number of transport studies as well as advice in developing some of the draft transport policies for the Local Plan. Most recently there have been a number of officer and high level discussions on the emerging policy. We look forward to continuing this close working relationship to ensure that the provision of transport infrastructure, services and operations is integrated with the long-term development aspirations for the area.

The following representations provide comments from across TfL that reflect TfL's role as the strategic transport authority as the body responsible for preparing the Mayor's Transport Strategy and the transport elements of the London Plan together with planning and operating London's bus services, most rail services and cycle hire. A separate response is being prepared and submitted by TfL Commercial Development to address TfL's property and development interests in the area.

TfL previously provided a response to the first draft consultation in March 2016 and is pleased to note this response has been taken into account in the revised draft. The representations in the attached table focus on areas within the draft Local Plan that TfL either specifically supports or would like to see amended or updated. They reflect strategic transport policies in the London Plan, the recently published draft Mayor's Transport Strategy (MTS) and progress on transport projects in the area. A table follows in which the comments are presented in the order that they appear in the draft document. Key issues to highlight include the following points:

- While we will work with OPDC should any opportunities and funding arise sooner, the presumption must be that future commercial and residential development in conjunction with continuing operational use of the Elizabeth line depot site in reality could only come forward in the longer term. With the exception of design and consents activity, this will be beyond the Local Plan period. This presumption needs to be reflected in Strategic Policies, in site allocations for Old Oak South in the Places chapter and in the delivery programme. All references to the Elizabeth line depot site being delivered as part of the current Local Plan should therefore be removed.
- The development of the design and business case for proposed new London Overground stations at Hythe Road and Old Oak Common Lane is taking place and final station proposals and arrangements will be dependent on the outcome of this work. The stations are not yet committed or funded and should be referred to as 'potential' new stations throughout the document. Joint work is examining what capacity and accessibility upgrade and connectivity measures are needed at North Acton and Willesden Junction Stations and also to the North London and West London Lines line to accommodate the planned growth which may include new rail infrastructure and rolling stock." Rather

than referring to a station square as the preferred design solution for all new or redeveloped stations, the wording should be more flexible to allow for alternative public realm solutions that may emerge from design and development work

- Positive references to Good Growth and Healthy Streets are welcomed. The Strategic Policies should also emphasise key Mayoral priorities related to this and set out in the draft Mayor’s Transport Strategy including targets for mode shift, a restraint based approach to parking, the need to improve road user safety, accessibility and connectivity and to maximise permeability
- TfL supports the overall approach of limiting car parking and encouraging car free development. TfL also supports the requirement for 80% passive provision for electric car parking spaces as well as 20% active provision
- TfL supports the requirement for cycle parking facilities in accordance with London Cycling Design Standards that meet and where possible exceed the minimum standards set out in the London Plan
- Long term plans for the future bus network in the area should be developed in line with the recently produced Bus Strategy ('Old Oak Park Royal - Indicative bus network and infrastructure requirements'). It would be helpful if OPDC now worked closely with TfL to help to develop an interim phasing bus strategy to enable good public transport access to development as it is delivered over time. It is likely that there will need to be bus priority measures and these should be planned for as part of the strategy development work
- TfL supports the retention of both the SIL designation and the bus garage use on the site at Willesden Junction referred to in policy P8. The bus garage is important in maintaining the local bus network and providing well located capacity to help meet the demands from the significant growth taking place and planned in the area.
- Any proposals for potential long-term redevelopment that affected operational rail facilities including train maintenance depots at Willesden and North Pole would need to take account of future operational needs. Any de-designation of rail sites would be subject to standard rail industry procedures and consultation.

Chapter 1 – Introduction

| Section | Page (Paragraph) | Comment |
|---------|------------------|---|
| | P.7 (1.20/1.21) | TfL considers that the OPDC Place policies and Delivery and Implementation policies cover strategic matters, including existing and proposed transport infrastructure of both London-wide and national importance. TfL therefore welcomes that chapters 3, 4 and 11 will all form part of the OPDC’s strategic policies for the area. |

Chapter 2 – Strategic Vision

| Section | Page (Paragraph) | Comment |
|---------|-------------------|---|
| | P.12 (Figure 2.1) | Transit Oriented Development – The reference to new Hythe Road and Old Oak Common Stations is potentially misleading as these stations are not yet committed or funded. We are working with OPDC to assess the business case for them. They should be referred to as ‘potential’ new stations throughout the document |

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| | | <p>Health and Wellbeing – TfL would welcome a reference to the Healthy Streets approach and for this to be embedded in the planning, design and development of the area</p> <p>Managing traffic and construction - The scale of development in Old Oak will result in increased travel demand for all modes, including the car in addition to the construction challenges highlighted. TfL suggests that this challenge should be recognised, with a reference to MTS mode share targets and traffic reduction strategies to help minimise the use of private car in particular.</p> <p>Deliverability – While we will work with OPDC should any opportunities and funding arise sooner, the presumption must be that the depot could only be brought forward for development (whilst retaining operational uses) in the longer term. With the exception of design and consents activity, this will be beyond the Plan period. References to the Elizabeth Line depot site being delivered as part of the current Local Plan should therefore be removed.</p> |
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Chapter 3 - Strategic Policies

| Section | Page (Paragraph) | Comment |
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| SP1 | Page 17 - Figure 3.1 (Strategic Context) | The West London Line terminates at Willesden Junction. The labelling of local rail services alongside the West Coast Main Line to Watford Junction should be amended to read London Overground. |
| SP1 | Page 18 Paragraph 3.8 | Kensal Canalside – TfL’s concern is that a potential Elizabeth line station or one on the main line in this location would be extremely challenging to bring forward, both technically and in terms of value for money. Therefore other non-rail interventions may be more suitable for bringing forward development. You will be aware that the Royal Borough of Kensington and Chelsea has commissioned a study to consider the feasibility of this station which is due to report next year. The wording in the Plan should reflect these uncertainties. |
| SP1 | Page 19 - Figure 3.3 (Surrounding Context) | The inclusion of potential London Overground stations at Old Oak Common Lane and Hythe Road (but not the new HS2/Great Western Main Line (GWML)/Elizabeth line station) is potentially misleading because these stations do not form part of the existing transport infrastructure. |
| SP2 | P.20 | Transport is a key consideration of Good Growth. Transport principles of Good Growth are set out in the draft MTS (Chapter 5). A reference to transport principles of Good Growth should be included in the policy and the supporting text with cross-references to the transport chapter. |
| SP3 | P.22 | A requirement to support the Healthy Streets approach including adoption of the Healthy Streets Check and the importance of encouraging active and sustainable travel should be included as a core part of this policy. Cross references in the accompanying text |

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| | | should be made to policy T1 in the Transport chapter which also refers to the Streets Toolkit |
| SP6 / SP7 | P.29 & P.31 | The text referring to the High Street in this section and in the Places chapter should more closely reflect the recommendations in the strategic assessment carried out as part of the Public Realm, Walking and Cycling Strategy - i.e. that it is subject to a feasibility study. The wording in paragraph 3.53 refers to 'Atlas Junction station' – there is no station here so the wording needs to be amended to reflect that only North Acton is a station in this context. |
| SP7 | Page 31 (Policy) and Figure 3.9 Page 34 | Transport Hierarchy – The transport hierarchy implies that pedestrians and cyclists should be prioritised ahead of public transport. TfL would prefer this to emphasise that there should be priority for pedestrians, cyclists and buses in the overall strategy for roads to ensure consistency with the approach taken in the draft MTS, which sets an overall mode share target for sustainable modes. Supporting active modes is clearly a key priority but the MTS acknowledges that journey distance plays a role in mode choice and identifies public transport as the preferred transport mode for trips that are too long to walk or cycle. |
| SP7 | Page 31 | TfL recommends that the draft MTS policy for mode shift away from the car (including the target for an 80% non-car mode share) and a restraint based approach to car parking for new development (including encouragement of car free development) is incorporated in Strategic Policy SP7 with cross-reference to the transport section included. While mode shift and parking are referred to in Policy T4, TfL considers that these are <u>strategic</u> policy matters and thus should be accorded appropriate status in the Plan |
| SP7 | Page 31 (policy b iv) | TfL recommends that Policy b) part iv could be strengthened; beyond minimising the need for use of private vehicles, OPDC should actively discourage their use including through the respective Borough traffic reduction strategies, consistent with the draft MTS. |
| SP7 | Page 31 | TfL recommends that the need to improve road user safety, and accessibility should be included in Strategic Policy SP7 as these are key Mayoral priorities. Improvements to connectivity and maximising permeability whilst overcoming existing barriers to movements should also be included. |
| SP7 | Page 33 - Figure 3.8 | The key correctly identifies Elizabeth line as the name for services that will operate when Crossrail is complete but the notation on the map also needs to be updated |
| SP7 | Page 33 - Figure 3.8 | TfL recommends that link colour and terminology is used consistently for all images for easy reference. For example Grand Union Street is indicated in orange in Figure 3.8 and in grey on Figure 4.2 on p.52. |
| SP7 | Page 34 (Paragraph 3.70) | The implications of Park Road being available for use by all modes of traffic between Old Oak Common Lane and Scrubs Lane will need to be subject to further traffic modelling and assessment. It is likely to be necessary to introduce access restrictions and/or public transport priority measures to manage the amount of through vehicle traffic using this route. |

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| SP7 | Page 31 | The policy should additionally mention the important role of facilitating and managing efficient servicing and delivery activities in line with the draft MTS. Freight transport is important in sustaining the economic vitality of Park Royal and given the high construction activity in the OPDC area, specific measures that will help reduce both construction related freight and delivery and servicing vehicle km together should be facilitated and promoted in Strategic Policy SP7 with a cross reference to Policy T7 in the transport chapter |
| SP10 | Page 45 Paragraph 3.102 | As noted above, future commercial and residential development in conjunction with continuing operational use of the Elizabeth line depot site in reality could only come forward beyond the current Local Plan period. While the longer term aspiration is understood, references to the Elizabeth Line depot site being delivered as part of the current Local Plan should therefore be removed. Figure 3.16 (Development Phasing) would also need to be amended to show that delivery of the depot site cannot be assured within the current Local Plan period. |

Chapter 4 – Places

| Section | Page (Paragraph) | Comment |
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| P1 | Pages 52 – 58 (Policy, Figure 4.3 and Supporting Text) | <p>The policy and supporting text needs to recognise that redevelopment of the Elizabeth line depot site is a long-term scheme, and it will take significant resource and investment to deliver, the timing of which will be beyond the Plan period. References to the Elizabeth Line depot site being delivered as part of the current Local Plan should therefore be removed. However, policies to facilitate this in the longer term will be important, if it is to be feasible.</p> <p>Any future redevelopment on the depot site will need to be both viable and deliverable, which may impact on the end uses that can be provided. The site cannot be considered in isolation and has to work as part of a long-term holistic strategy. To support this longer term aspiration, policies should ensure that proposals for neighbouring sites coming forward in advance of the redevelopment of the depot site should not preclude development of it or sterilise it and indeed where possible create opportunities for its appropriate and comprehensive development.</p> <p>It should be acknowledged in the policy that the delivery of Old Oak South is still subject to further feasibility work, including to determine whether the Elizabeth Line depot can be brought forward for development in the longer term along with continuing operational use. TfL suggests that the text in OOS.3 be amended to read: <i>'OPDC is working closely with TfL to identify and assess potential options for the future of the Elizabeth line depot and siding site to enable the delivery of homes and jobs in the longer-term, beyond the current Plan period.'</i></p> |

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| P1 | Page 57 (OSS.12) | Surface Links from Old Oak Station to Old Oak South and North. TfL suggests that the text be amended to read: <i>'OPDC is working with TfL and HS2 to assess the feasibility and develop the designs and business case for the different bridge connections required to link the Old Oak station to the proposed Old Oak South and North development areas to the north of the depot and Grand Union Canal.'</i> |
| P1C1 | Page 62 | It is not clear what time period and future year the station demand figures described in paragraph OOC.7 represent. This needs to be made clear to allow comparison with other stations. |
| P2 | Page 63-68 (Policy, Figure 4.12 and Supporting Text) | Work by TfL in developing the design and business case for the potential new London Overground station at Hythe Road is still taking place. The draft Local Plan suggests some design solutions. However, the final station proposals and arrangements for the public realm will be developed through close working between TfL, OPDC and other stakeholders. As new London Overground stations are not yet committed or funded, wording should refer to a 'potential' new station at Hythe Road |
| P2C1 | Page 71-74 (Policy, Figure 4.18 and Supporting Text) | See comments under P2 above relating to a potential Hythe Road station which also apply here |
| P7 | Page 97-102 (Policy, Figure 4.32 and Supporting Text) | The policies and supporting text for North Acton station are broadly consistent with TfL's aspirations for the interchange. Improving the capacity and accessibility of North Acton Station is key to ensuring that growth in North Acton can be delivered in a sustainable manner. TfL suggests that the policy and supporting text should emphasise the importance of the station improvements in providing additional capacity and step free access and the delivery of associated pedestrian and cycle links between the station and development sites. This is the first place in the document that the potential Elizabeth line – West Coast Main Line (WCML) spur is mentioned. The text should explain what this scheme is to aid understanding using wording agreed with TfL. It should be noted that this potential connection would not be compatible with proposals being put forward by Chiltern Railways to operate a regular passenger service from northwest London and Buckinghamshire to Old Oak Common using the Wycombe Single line. |
| P7C1 | Page 103-104 (Policy, Figure 4.35 and Supporting Text) | See comments under P7 above relating to North Acton station which also apply here With reference to Policy e), the southern station square has not been built yet so should not be referred to as 'existing' and instead should be identified as potential. This is also relevant to paragraph NAT.4. |
| P7C2 | Page 105-106 (Policy, | Work by TfL in developing the design and business case for the potential new London Overground station at Old Oak Common |

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| | <p>Figure 4.36 and Supporting Text)</p> | <p>Lane is still taking place. The draft Local Plan suggests some design solutions. However, the final station proposals and arrangements for the public realm will be developed through close working between TfL, OPDC and other stakeholders.</p> <p>As new London Overground stations are not yet committed or funded, wording should refer to a 'potential' new station at Old Oak Common Lane</p> <p>Surface Links from Old Oak Common Station to North Acton. The wording should be amended to read: <i>'Work on the surface links from Old Oak Common Station to the potential Old Oak Common Lane station and onwards to North Acton are still the subject of ongoing design work and may change from indicative plan.'</i></p> <p>The delivery of a public route between Old Oak South and Acton Wells is challenging and TfL supports the reference in this policy that seeks to ensure the technical feasibility and viability of delivering this route.</p> |
| <p>P8</p> | <p>Page 107-111 (Policy, Figure 4.37 and Supporting Text)</p> | <p>TfL supports the retention of both the SIL designation and the bus garage use set out in P8 (c). The bus garage is important in maintaining the local bus network and providing well located capacity to help meet the demands from the significant growth taking place and planned in the area. It should be noted that the site is known as Willesden Junction bus garage rather than Harlesden bus depot</p> <p>As stated in OOL.5 there would need to be agreement with TfL that the site is no longer required for a bus garage or that an equivalent in terms of capacity, facilities, terms and location is agreed with TfL before the existing site could be considered for redevelopment for non-bus use.</p> <p>See comments under P7C2 above relating to a potential Old Oak Common Lane station which also apply here</p> |
| <p>P10</p> | <p>Page 119-123 (Policy, Figure 4.42 and Supporting Text)</p> | <p>TfL supports the intention to provide improved cycling facilities along Scrubs Lane to connect with the wider cycle network and strategic cycling routes such as quietways and the proposed cycle superhighway along the A40 corridor. A buses corridor study of Scrubs Lane is also underway and is investigating measures that could improve reliability and journey times along this corridor. It will be important that any changes to Scrubs Lane provide benefits to both cycling and buses and also pedestrians.</p> <p>Any proposals for potential long-term redevelopment that affected operational rail facilities including North Pole train maintenance depot would need to take account of future operational needs. The statement that North Pole depot will 'likely be available for development after the Plan period' in paragraph SL.19 does not appear to be justified by evidence, given the envisaged long term use of the depot by the rail industry.</p> |

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| P11 | Page 132-135 (Policy, Figure 4.50 and Supporting Text) | <p>The policies and supporting text for Willesden Junction are broadly consistent with TfL's aspirations for the interchange. Potential improvements at Willesden Junction station and in the surrounding area have been informed by the findings of the recent Willesden Junction station feasibility study and will need to be both viable and deliverable. They should take into account the needs of current and future transport operations and involve full consultation with relevant transport authorities and providers.</p> <p>Any proposals for potential long-term redevelopment that affected operational rail facilities including Willesden train maintenance depot would need to take account of future operational needs. Any de-designation of rail sites would be subject to standard rail industry procedures and consultation.</p> <p>It should be assumed that there will be a need to retain bus interchange and standing facilities on Station Approach at Willesden Junction, although in the long-term if a link suitable for buses is built over the WCML rail tracks, connecting Willesden Junction with the potential Hythe Road station and the Old Oak Common interchange station (such as the proposed High Street), bus standing at Station Approach may no longer be required.</p> |
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Chapter 5 – Design

| Section | Page (Paragraph) | Comment |
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| D2 | Page 143 Public Realm | The policy should refer to the public realm supporting the Healthy Streets approach and sustainable and active travel with cross referencing to policy T1 |

Chapter 7 - Transport

| Section | Page (Paragraph) | Comment |
|---------|--------------------------|---|
| T1 | Page 193 (e) | TfL suggests that this should read 'minimise and mitigate the impact...' |
| T1 | Page 193 (7.7) | It should be noted that the Healthy Streets Check tool is still undergoing development. Guidance contained in the TfL Streets Toolkit should also be used by developers and referred to in Transport Assessments |
| T2 | Page 196 (Figure 7.5) | This appears to omit certain streets and footpaths so it should either show all routes or be retitled as 'Strategic Walking Network' to indicate that it is not comprehensive and highlights what are considered the strategic routes |
| T3 | Page 197 | The wording in a) is potentially confusing and could be clarified by changing it to: 'deliver and/or contribute to new cycle infrastructure, including new superhighways, quietways and infrastructure identified in the IDP, ensuring that these connect |

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| | | into and support the wider, existing cycle network, such as the Grand Union Canal and National Cycle route 6.' |
| T3 | Page 197 | TfL supports the requirement for cycle parking facilities in accordance with London Cycling Design Standards that meet and where possible exceed the minimum standards set out in the London Plan. There is potential for a high cycle mode share to be achieved in the OPDC area and it is important that from the outset this is supported by a generous provision of well designed cycle parking that goes beyond minimum standards and anticipates future increases in demand |
| T3 | Page 197 | To ensure that any independent cycle hire operations are complementary to TfL Cycle Hire, the wording in point f) should be amended to: 'deliver and/or contribute towards the provision of cycle hire across Old Oak and Park Royal which may include complementary local cycle hire operations' |
| T3 | Page 198 (Figure 7.7) | Rather than simply showing 'routes signed for use' it would be more useful if the map could show where there is an aspiration to improve the infrastructure as part of the development of the area e.g. along Scrubs Lane, and how these improved routes would connect into strategic cycle infrastructure. The response to feedback received during the recent public consultation for the East-West Cycle Superhighway between Acton and Paddington has now been published. It has been confirmed that the Wood Lane to Acton section will continue to be developed along the route alignment consulted on with some changes to the detailed proposals. An update on the plans will be published later in 2017. |
| T4 | Page 200 | TfL supports the overall approach of limiting car parking and encouraging car free development. This should be the presumption. Where car parking is provided as part of a development, a Parking Design and Management Plan should be submitted |
| T4a | Page 200 | TfL welcomes the overall approach to promote modal shift away from the car in line with the draft MTS. TfL suggests that mode shift is included in the strategic policies with a cross-reference to Policy T4 |
| T4c | Page 200 | TfL supports OPDC's policy to promote 80% passive provision for electric car parking spaces as well as 20% active provision |
| T4 | Page 201 (7.35) | The last sentence should be amended to read 'OPDC will also work with TfL Taxi and Private Hire and other commercial operators such as car clubs...' |
| T4 | Page 201 (7.36) | As per proposal 72 of the draft MTS TfL is looking at options for new coach facilities that deliver the benefits of coaches as an affordable mode that reduces car dependence. We recognise that this needs to be balanced against their street presence and their impact on vulnerable road users. We want to work with stakeholders to investigate options to identify and incorporate new coach facilities that are well connected by public transport but offer appropriate highway links to the strategic road network and reduce coach kilometres travelled in London. The OPDC area offers the potential to be such a location being close to strategic highway corridors from the West and offering excellent onward public |

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| | | transport links. We'd like to work with OPDC to investigate this further. |
| T5 | Page 203 (Figure 7.11) | It should be clarified what rail improvements were assumed and whether improvements to bus services and frequencies in the area were included when assessing the future PTALs presented in Figure 7.11 |
| T5 | Page 204 (7.37) | Proposed Overground Stations/Line Upgrades: TfL suggests that the following sentence is included at the end of paragraph 7.37 for clarification: <i>"Work by TfL developing the design and business case for the proposed new London Overground stations at Hythe Road and Old Oak Common Lane is taking place and final station proposals and arrangements will be dependent on the outcome of this work. Joint work with TfL is also examining what capacity and accessibility upgrade and connectivity measures are needed at North Acton and Willesden Junction Stations and also to the North London and West London Lines line to accommodate the planned growth which may include new rail infrastructure and rolling stock."</i> |
| T5 | Page 204 (7.38) | Rather than referring to a station square as the preferred design solution for all new or redeveloped stations, the wording should be more flexible to allow for alternative public realm solutions that may emerge from design and development work. TfL suggests that 'station public realm and / or squares' would be more appropriate for the area around the new HS2/GWML/Elizabeth Line station at Old Oak Common. The need for flexibility also applies to the numerous references to station squares in the Places chapter. |
| T5 | Page 205 (Figure 7.12) | The notation on the map should make a distinction between existing and potential rail infrastructure. The potential Elizabeth line link to the WCML is labelled as such, but Old Oak Common Lane, Hythe Road and the new HS2/GWML/Elizabeth line station are shown on the map as if they were existing stations. This also applies to a number of other maps and references to London Overground stations e.g. figure 3.3 noted above. It should be noted that the potential Elizabeth line link to the WCML is not referred to in the draft MTS and is not seen as a priority by TfL. |
| T6 | Page 206 | This section should state explicitly that long term plans for the future bus network in the area will be developed in line with the recently produced Bus Strategy 'Old Oak Park Royal - Indicative bus network and infrastructure requirements'. It would be helpful if OPDC now worked closely with TfL to help to develop an interim phasing bus strategy to enable good public transport access to development as it is delivered over time. It is likely that there will need to be bus priority measures and these should be planned for as part of the strategy development work This section should also confirm a requirement for the new or improved highways that are shown on figure 7.14 to be designed to safely accommodate potential bus routes - with swept path analysis, operational requirements and the infrastructure changes |

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| | | identified in the Bus Strategy fully considered alongside design requirements for other modes. Policy T6a) should read 'facilitate, deliver and contribute to bus network and infrastructure, including ...' |
| T7 | Page 209 (7.59 – 7.63) | For consistency with TfL guidance and the main policy wording references in these paragraphs should be made to Construction Logistics Plans (or CLPs) |
| T7 | 7.65 | It may be useful to include a couple of examples e.g. Use of construction hoarding to display wayfinding information, including diversionary routes, across the site would be encouraged. Hoarding space could also be allocated to provide clear information on the construction plans, timescales, and state key contacts if people have any specific comments or concerns |

Chapter 11 – Delivery and Implementation

| Section | Page (Paragraph) | Comment |
|---------|--|---|
| DI.1 | Page 261 | TfL considers the delivery of necessary infrastructure to support sustainable growth in the OPDC area as challenging but essential and welcomes the approach that priorities for affordable housing will need to be balanced with the delivery of infrastructure requirements |
| DI.2 | Page 264-267 (Policy, Table 11.1 and Supporting Text) | <p>Old Oak South - Redevelopment of the Elizabeth line depot site is a long-term scheme, and as acknowledged in 11.23b it will be a complex site to deliver which will be beyond the Plan period. It will also take significant resource and investment. References to the Elizabeth Line depot site being delivered as part of the current Local Plan should therefore be removed. However, policies to facilitate this in the longer term will be important, if it is to be feasible.</p> <p>Any future redevelopment on the depot site will need to be both viable and deliverable, which may impact on the end uses that can be provided. The site cannot be considered in isolation and has to work as part of a long-term holistic strategy. To support this longer term aspiration, policies should ensure that proposals for neighbouring sites coming forward in advance of the redevelopment of the depot site should not preclude development of it or sterilise it and indeed where possible create opportunities for its appropriate and comprehensive development.</p> <p>A list of landowners in Old Oak South is provided but it would be useful to differentiate between freehold and leasehold interests. TfL holds a long lease on the Elizabeth line depot from Network Rail who has the freehold interest.</p> <p>Any proposals for potential long-term redevelopment that affected other operational rail facilities including North Pole train maintenance depot would need to take account of future operational needs.</p> |

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| DI.2 | Page 264-267 (Policy, Table 11.1 and Supporting Text) | <p>Willesden Junction - Potential improvements at Willesden Junction station and in the surrounding area should be informed by the findings of the recent Willesden Junction station feasibility study and will need to be both viable and deliverable. They should take into account the needs of current and future transport operations and involve full consultation with relevant transport authorities and providers.</p> <p>Any proposals for potential long-term redevelopment that affected operational rail facilities including Willesden train maintenance depot would need to take account of future operational needs. Any de-designation of rail sites would be subject to standard rail industry procedures and consultation.</p> <p>It should be assumed that there will be a need to retain bus interchange and standing facilities on Station Approach at Willesden Junction, although in the long-term if a link suitable for buses is built over the WCML rail tracks, connecting Willesden Junction with the potential Hythe Road station and the Old Oak Common interchange station (such as the proposed High Street), bus standing at Station Approach may no longer be required.</p> |
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TfL looks forward to continuing involvement in the next stages of the Local Plan process. In the meantime if you have any questions about this response please contact me using the details below.

Yours sincerely

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