

11th September 2017
Draft Repls September 2017



Local Plan Consultation
Old Oak and Park Royal Development Corporation
City Hall
The Queen's Walk
London
SE1 2AA

Neil Rowley
E: nrowley@savills.com
DL: +44 (0) 20 7409 5929
F: +44 (0)

By email only: localplan@opdc.london.gov.uk

33 Margaret Street
London W1G 0JD
T: +44 (0) 20 7499 8644
savills.com

Dear Sir / Madam

OPDC Local Plan Reg 19 consultation
Land at Boden House, 114-120 Victoria Road, London NW10 6NY

Please find below, on behalf of Osbourne Investments Limited and Quattro Holdings Limited, our representation to the OPDC revised draft Local Plan.

Site Context

Boden House is located on the east side of Victoria Road, north of the London Underground Central Line and west of the London Overground rail line. The site consists of Boden House which is a five storey 1970s office building, a warehouse building to the north of Boden House and a concrete batching yard to the east (see Site Location Plan enclosed).

The revised draft Local Plan identifies the site as falling within an area allocated for a mix of uses and suitable for high density development with tall building heights. The site is located on the primary route identified between North Acton and Old Oak Common stations. The site is located within the North Acton and Acton Wells sub area.

Generally we support the aims and vision of the OPDC and the regeneration of Park Royal. Our comments on various policies are set out below.

Policy P7: North Acton and Acton Wells - General

We support the vision for the North Acton and Acton Wells area.

We support the vision of Old Oak High Street. However, the planning of the route needs to minimise the amount of landtake required from surrounding development plots. The route needs to ensure that development on key sites, such as Boden House, is not compromised by land take for the new High Street reducing the proportions of the remaining plots such as to threaten their viability.

It would be helpful if Section (n) (Building Heights) was more specific about the potential location for taller buildings. This would ensure that the plan is positively prepared. Boden House meets the criteria set out in Section (n) as it is a key location on the Old Oak High Street. The Boden House site is entirely suitable for taller buildings and this should be made clear in Policy P7.

Error! AutoText entry not defined.
Error! AutoText entry not defined.

Site Allocations

Page 50 of the revised draft Local Plan suggests that Boden House could accommodate 300 dwellings and 7,600 sq m of commercial floorspace.

Our own masterplanning suggests that the site could accommodate 17,806 sq m of commercial floorspace and some 900 units.

Clearly our masterplanning is at a very early stage and will be subject to much collaboration and consultation. However, it would seem that the numbers put forward by the Local Plan (page 50) are very low and could justifiably be significantly higher, particularly in such a key location within the regeneration area. In the context of a significant housing shortage within London, it is important that the best possible use is made of such sites. This would ensure that the plan is positively prepared and consistent with national policy.

Elizabeth Line Spur

The rationale for the Elizabeth Line Spur is understood but it is not clear that the Spur is feasible, from a railway engineering point of view, or financially viable. The link is not safeguarded by either the Secretary of State for Transport or Transport for London as part of HS2 or Crossrail and the Development Corporation does not have the powers to safeguard land for the link itself. A link between High Speed 2 at Old Oak Common and the West Coast Main Line is not being taken forward as part of the HS2 Parliamentary Bill or Crossrail Act and should therefore not form part of the Draft Local Plan.

The Elizabeth Line Spur has the potential to cast quite a shadow over the development of the Boden House site. The landtake and construction site could take up a significant proportion of the site. It could stymie development for some time and threaten wider objectives such as the Old Oak High Street. The ODPC needs to quickly investigate the feasibility of this Spur and decide whether or not safeguarding is genuinely required.

Waste Site

Policy P7 p) safeguards the Quattro site (to the rear of Boden House) for “waste management purposes and other appropriate uses” following release of use for HS2 purposes. This is confirmed in Policy EU6.

However, it is not considered that the provision of a waste management site would be an appropriate use within the proposed vision for North Acton and Acton Wells. The site is adjacent to the Old Oak High Street, which is intended to create a high quality mixed use environment. Policy P7 calls for ‘high quality public realm supported by positive and active frontages’ and ‘high quality well-connected publicly accessible open spaces.’ It is not considered that waste management or similar uses is compatible with those objectives. It is likely to require a large building with frequent HGV access.

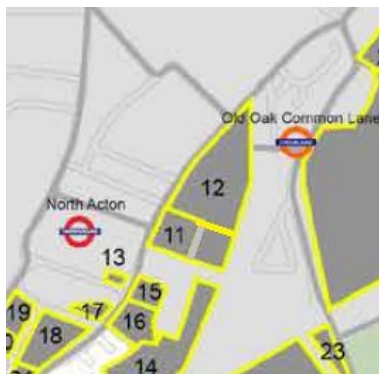
For those reasons we suggest that we investigate, with the OPDC, the relocation of the waste management use elsewhere in the area. This is suggested (in principle) by Policy EU6.

Policy P7 p) should therefore refer to the possibility of the waste site being relocated to ensure that the mix of uses in the vicinity of Old Oak High Street is compatible with the vision of a high quality environment. This would ensure that the plan is positively prepared and consistent with national policy.

Land Ownership

Figure 11.3 shows the ‘Shield’ site as within public ownership. This is not the case. HS2 has agreed to return the land shown on the attached plan to Osbourne Investments once the railway works are complete.

Figure 4.2 (site allocations) ought to better reflect the land ownership of the ‘Shield’ site as follows:



Summary

The Boden House site is in a highly sustainable and accessible location within the Old Oak Opportunity Area. The site is available for redevelopment for delivering a mix of uses on a key route within the area. Given the emerging development context and the strategic accessibility of the site, it is submitted that the highest density of development and tall building heights are appropriate and will enable the area to deliver the homes and jobs required.

We set out a number of reasons above why the Local Plan is currently considered to be unsound because certain policies (as set out above) are not positively prepared and not consistent with national policy. We request the following changes are made to address our concerns and to ensure the Local Plan is sound:

- Clarify within Policy P7 that the Boden House site is a suitable location for taller buildings;
- Increase the potential capacity of the Boden House site (our suggestion is could accommodate 17,000 sq m of commercial floorspace and some 900 units) (page 50);
- Quickly clarify the position on the Elizabeth Line Spur;
- Amend Policy P7 p) to refer to the possibility of the waste site being relocated to ensure that the mix of uses in the vicinity of Old Oak High Street is compatible with the vision of a high quality environment; and
- Clarify the various land ownership issues highlighted above.



We trust the enclosed will be taken into consideration in the Local Plan process and, on our client's behalf, reserve the right to make further comments at any future stage.

Yours faithfully,

Neil Rowley
Director

Enc. Site Location Plan