



Date: 18th September 2017

Old Oak and Park Royal Development Corporation  
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## Commercial Development

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

Dear Sir/Madam,

### **Old Oak and Park Royal draft Local Plan Reg. 19 consultation**

Thank you for consulting Transport for London (TfL) on the Old Oak and Park Royal draft Local Plan. The following comments represent the views of officers in TfL Commercial Development Planning Team (TfL CD) in its capacity as a significant landowner and are separate from any representations that may be made by TfL in its statutory role as the strategic transport authority for London.

TfL CD broadly supports the contents of the draft document. However, we have the following comments to make particularly in relation to the Elizabeth Line Depot for which TfL has the long leasehold:

#### ***Elizabeth Line Depot***

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. With the above in mind the following Policies and text should be amended to reflect this.

#### ***Site Allocations and Housing Supply***

Within the table on page 50 of the document, Site 10 Old Oak South (Elizabeth Line Depot and sidings and Old Oak Common Station and Surroundings) should be amended to reflect that no housing units of commercial floor space can be delivered on the Elizabeth Line Depot within the plan period. The site boundary as shown on Figure 4.2: Site Allocations should also be updated to reflect these changes.

#### ***Policy P1: Old Oak South***

Whilst TfL CD support the vision and principles set out within Policy P1, for reasons set out above, the Policy must take into consideration that the Elizabeth Line depot can only be bought forward for development in the longer term. The number of jobs and units set out within the Policy and supporting text must therefore be updated to reflect this.

Supporting text OOS.20 also identifies either Old Oak Common station site or Elizabeth Line Depot and sidings as the most appropriate site for delivery of a primary school. Whilst we recognise there may be a need for primary school provision across the OPDC area, alternative sites should be considered given the uncertainty and long term delivery of the Elizabeth Line Depot site. In addition, consideration should be given to the significant cost associated with the provision of a viable development platform needed to allow development of this nature to come forward above the depot

whilst, crucially, safeguarding the operational requirements of the depot. If deemed appropriate, a statement of common ground could be agreed.

### ***Policy P1C1: Old Oak Common Station Cluster***

We strongly support the policy wording in section M of Policy P1C1 which discusses the need for the station to be resilient and adaptable to respond to a changing context, including the Elizabeth Line Depot and sidings. However, we would like to ensure that no development on neighbouring sites precludes future development potential of the Elizabeth Line Depot and therefore suggest additional wording within this policy as follows: *“Any proposals which come forward in advance of the redevelopment of the depot site should not preclude development of the site and should seek to create opportunities for comprehensive redevelopment, in the interests of good planning and place-making”*.

As set out in Policy P1C1 we strongly support high density housing within the area. However, it should be made clear that any railway station development within the OPDC area (redeveloped or new) should provide the flexibility for high density development both over and around transport interchanges in the interests of optimising these sites and making more efficient and sustainable use of the increasingly limited developable land in London. To this end, there should be less focus on providing architecturally iconic or ‘feature’ standalone station buildings, as alluded to within policy P1C1 of the Local Plan, where these sites can provide greater provision of residential and commercial space while still acting as landmark buildings in area legibility terms.

### ***Policy P7 North Acton***

Policy P7 identifies the potential for tall buildings around North Acton Station. We support this policy approach. However, in the interests of clarity and in making the most efficient use of available land, we would like to amend the text as follows *“The area will see high quality tall buildings being delivered in appropriate locations, including the station site, with high density housing being the main land use along with new hotel and student accommodation”*.

### ***Coach facilities***

We note that very little reference has been made to coach provision in the OPDC area during the Plan period. *Policy T7: Car parking* makes provision for coach facilities, but this relates to ancillary coach parking and pick-up. However, consideration should also be given to the potential provision for a coach station facility or interchange in the OPDC area should this function be required on a London-wide basis in the future. Whilst the OPDC area is currently constrained in physical terms, it will provide excellent transport links to much of London and currently has good links to the highway network. Therefore, we believe appropriately located coach facilities would benefit local residents, address wider Mayoral objectives set out in the draft Mayor’s Transport Strategy (under proposal 72a) and, crucially, provide the opportunity for the intensification of land. The site of a coach station facility could be fully optimised through the provision of an appropriately designed over-facility-development to provide significant residential or employment floorspace for the OPDC area.

We therefore encourage you to consider the exploration of a coach station facility within the OPDC area, mindful of the over-facility opportunities that this could provide. We would be happy to meet with you to further discuss this matter.

### ***Concluding remarks***

TfL CD broadly welcomes the contents of the Local Plan. However, we would welcome the opportunity to meet further with you to discuss these policies in further detail and ensure that the matters we have raised are fully considered. I would appreciate if you could confirm receipt of this letter, should you have any queries, please do not hesitate to call me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A Price'.

**Adam Price**

Planning Advisor, Commercial Development

Cc:

**Richard Carr**, Principal Planner, TfL Borough Planning

**Patricia Cazes-Potgieter**, Planning Development Manager, Commercial Development

**Lucinda Turner**, Director of Spatial Planning