

## **CONSULTATION ON THE DRAFT LONDON PLAN**

### **RESPONSE FROM THE OLF OAK NEIGHBOURHOOD FORUM**

1. This response is submitted by the Old Oak Neighbourhood Forum. The Forum is at the early stages of preparing a neighbourhood plan for a part of the area for which the Old Oak and Park Royal Development Corporation has been the planning authority since April 2015.
2. The Forum was designated by the OPDC in February 2018, following two years of discussions with the OPDC and LB Hammersmith and Fulham. During this period, the 'interim forum' has been involved in the consultation exercises on the Regulation 18 and 19 versions of the Draft OPDC Local Plan. We submitted substantive responses to both consultations and continue to engage with OPDC officers. We also commented previously on *A City for All Londoners* as the forerunner to the new Draft London Plan.
3. The Forum has a membership of 52 members living or working in the designated Old Oak Neighbourhood Area, and a further 33 affiliated members living nearby but outside the designated boundary.

### **Overall view of the Draft London Plan**

4. The new Draft London Plan includes many policies which we support, and we have not commented on these below. The focus of this response relates to where we consider that changes and modifications to the current draft are needed.
5. We are disappointed that the current version says so little about neighbourhood planning. We had been hoping for a London Plan that gave more support for neighbourhood plan in London, rather than less, as compared with the current Plan prepared by the former Mayor of London.
6. Given commitments from the Mayor in other documents, on involving Londoners in his Good Growth agenda, we are surprised that the new Draft London Plan makes less reference to neighbourhood planning than the current Plan. We support the submission made by the London Neighbourhood Planning Network, suggesting additional material to remedy this situation.
7. We believe that neighbourhood planning has much to contribute to planning the future of London, in terms of:
  - Involvement and engagement of local people in ways that provide more meaningful outcomes than mere 'consultation', by introducing neighbourhood level policies and site allocations that acquire statutory force as part of Local Plans.
  - The use made of the in-depth knowledge of residents and businesses, on housing needs, the local job market, transport, social and community facilities, open spaces, heritage assets and all the characteristics of 'place' that are valued (or not valued) within each part of London

- Underpinning London-wide policies on use of land, and building consensus where there are inevitable choices and trade-offs to be made between e.g. housing density, building heights, and open space.

### **Good Growth Policies**

8. We support the concept of a set of strategic policies on Good Growth. On draft **Policy GG1** we support the proposal from Neighbourhood Planners London that this should include an additional sub paragraph ***Ensure greater involvement of Londoners in planning the future of their neighbourhoods, through widening and strengthening design review processes, early community engagement in major development proposals, and support for neighbourhood plans and place-specific design codes.***

### **Making the best use of land**

9. **Policy GG2** has inherent internal conflicts between and within its 4 clauses. *Understanding what is valued about existing places while also using this as a catalyst for growth and placemaking* is characteristic language of planners in suggesting to the public that the two objectives will always be compatible.
10. The difficult choices between intensification of parts of London, versus retaining quality of characteristics of neighbourhood and 'place' are already a battleground across the capital. London's citizens start at a disadvantage in not having the resources that developers can apply in arguing the case for proposals that frequently exceed in scale or ignore policy guidance.
11. Our experience of the development management functions of LB Ealing, the OPDC, and LB Hammersmith & Fulham is that 'intensification' wins almost every time against the views of locals as to what makes for a successful 'place'. Hence the need to strengthen the most devolved part of the planning system and to involve the public earlier and much more meaningfully in development proposals.

### **Delivering the Homes that Londoners need**

12. This proposed Good Growth **policy GG4** is at the heart of the new London Plan, with millions of Londoners praying that it can be made to succeed. We welcome the Draft Plan's emphasis on *reducing the likelihood of permissions being sought to sell on land at a higher value* and its affordable housing targets but do not see how these aims can be achieved without more fundamental intervention on land values and London's housebuilding market?
13. In terms of the identification and bringing forward of small housing sites, we see neighbourhood planning as an important tool in the Mayoral armoury and do not understand why the potential of this layer of London's planning system is almost entirely ignored in the current Draft.

### **Optimising Housing Density (D6) and Delivering Good Design Draft Policy (D2)**

14. The idea of abandoning the London Plan Density Matrix in favour of a 'design-led' and site-specific approach to housing density has some superficial attractions.

The current policy has become so widely ignored by developers and London's planning authorities that this has lowered public trust in the planning system and has bred widespread cynicism across London. But we share the concerns of many residents associations and community groups that the draft policy will prove insufficiently robust in its operation to achieve Good Growth.

15. We do not see evidence of the capacity or expertise within LB Ealing's planning department to undertake the type of 'initial evaluation' of an area that draft **Policy D2** would require. Nor do local people have the confidence that a sophisticated 'plan led' process would result through which *The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses.*
16. Our experience of the planning permissions granted by LB Ealing at North Acton is that the results have created one of the least loved examples of 'regeneration' in London. In the case of the OPDC (a better resourced planning authority) Draft Local Plan policies and site allocations are being retro-fitted around developer-led site acquisitions and planning permissions already granted. This is the reverse of 'plan-led' development, and makes a mockery of consultation on a Local Plan.
17. On balance we consider that an updated form of Density Matrix should be retained in a new London plan, based on a wider range of factors that proximity to transport nodes. This would provide a limited basic safeguard against extreme overdevelopment of sites. It could be coupled with development capacity studies and masterplans in those areas where staff resources are available, and with increased public involvement. Neighbourhood plans could also play a part in setting localized policies and building heights. Where such studies identified the prospect of intensification over and above the London Plan matrix, this would be taken into account in determining applications.

### **Policy SD1 on Opportunity Areas**

18. The new Draft London Plan is premised on a set of assumptions of London's 'change and growth' which have been built into proposed policies with more certainty than they deserve. London's economic and demographic future is harder to forecast at this moment than for many years.
19. Our Forum recognises and accepts that a strategic plan for London should set broad parameters for change and development across specific parts of the city, and that Opportunity Areas and Growth Corridors are a means of doing this. But such an approach needs to command public confidence in the housing and job targets being set.
20. For the OPDC area, the target of 25,500 new homes shown at Figure 2.8 is (we believe) unrealistic and incompatible with Good Growth. The target of 24,000 new homes at Old Oak was underpinned with little evidence when first published within a single paragraph summary in Annexe 1 of the 2015 Further Alterations to the existing London Plan.

21. Subsequent iterations of the OPDC OAPF and OPDC Local Plan have continued to use this figure as if set in stone and have given no opportunity to the public to consider alternative options and densities for the OPDC area. The 25,500 homes figure became a minimum rather than a maximum target.
22. Subsequent work on the OPDC Local Plan, which our Forum has followed closely, has identified a growing number of fundamental infrastructure issues which make this target look increasingly unachievable. HS2 has made clear in its response to the Regulation 19 Draft OPDC Local Plan that its brief as set out in the HS2 Act is not compatible with several aspects of the original Mayoral 'vision' for a new Old Oak.
23. The OPDC Regulation 19 Local Plan is having undergo extensive revision, potentially leading to a third round of public consultation. Similar issues may be arising in relation to other major Opportunity Areas covered by London Plan Draft Policy SD1.
24. This suggests that a new London Plan needs to be drafted in a way that is more flexible and resilient to changing circumstances. The concept of plan-led development becomes a fiction in the eyes of the public if over-ambitious targets fall apart before the ink has dried on the document.
25. We suggest that a final version of the London Plan should pay greater recognition to the feedback coming from the many local groups, residents associations, and amenity societies closest to the ground. It should also recognize the potential scope of the neighbourhood planning framework for introducing greater responsiveness and flexibility into London's planning system.
26. Given the capital's 'housing crisis', London's citizens will increasingly react strongly to situations in which areas of brownfield land remain vacant or underused because a 'grand plan' for a major Opportunity Area grinds to a halt as a result of changed decisions (or lack of decisions) on major infrastructure projects and transport infrastructure. The OPDC area is vulnerable to such a scenario.
27. We ask that the new London Plan provides a statutory context in which there is greater recognition of the uncertainties that lie ahead, and which positively encourages use of neighbourhood plans in regeneration areas as well as established areas, as a means on of responding quickly to the need to policy change and updated site allocations.
28. A series of 'interim neighbourhood plans' setting policies and site allocations for 3-5 year periods may prove a useful solution in those parts of London where plans based on over-ambitious infrastructure plans prove unviable and risk creating long-term planning blight.