

## OPDC DRAFT LOCAL PLAN

### HEARING STATEMENT FROM OLD OAK NEIGHBOURHOOD FORUM (REP 100)

#### MATTER 13

*Whether the inclusion or exclusion of land from SIL is justified (derived from the thirty-first Key Issues of table 5 of Key document 5 identified at Regulation 19(1) stage and the second identified in table 7 of Key document 5 at Regulation 19(2) stage and representations 2/P4/1 from Ashia Centur and 2/P8/14 from Grand Union Alliance and 2/P9/1 amongst others. At Regulation 18 stage, Midland Terrace RG and Old Oak Interim Forum sought greater release of SIL land and a number of organisations sought a buffer between industry and residential land. This matter and issue includes consideration of representations relating to individual sites).*

The OPDC's approach of applying rigid zoning to the demarcation of Strategic Industrial Land and OF separating employment areas from proposed residential sites is considered by the Old Oak Neighbourhood Forum to be outmoded.

We consider it to fail to have regard to NPPF (2012) guidance, Paragraph 8 states *Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. Paragraph 17 states as core planning principles*

- *promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions*
- *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable*

The NPPF 2018 paragraph 118 asks that local plans *d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).*

We fully recognise the importance of the Park Royal area as a location for industrial and employment use. We accept the statistics on loss of SIL in London. But these factors should not prevent OPDC from preparing a Local Plan which looks ahead to fast changing patterns of living and working, especially in London.

Draft New London Policy E7 carries some weight as emerging policy. This promotes Industrial intensification, co-location and substitution, and E7D allows for mixed use redevelopment in appropriate circumstances. Where this can be achieved with no net loss of employment floorspace, and in areas of suitable buildings such as 'Old Park Royal' this seems to us to be an obvious route to relatively low cost housing and affordable workspace.

The current Draft Plan reads like a 20<sup>th</sup> century urban renewal strategy. With a 20 year plan period, it will become increasingly inappropriate to the lives of those living and working in the 21<sup>st</sup> century London. It proposes a very high density residential environment, adjoining (but separated from) a large and relatively low density industrial zone. The former is to be 'car-free' while the latter has much of the available land given over to surface car-parking.

Young Londoners increasingly prefer to live and work in the same area, or within walkable or cyclable distance. This avoids lengthy and time-consuming commutes. Increasing numbers work from home suiting the opportunities that fast broadband and interconnectivity provides. This already distorts traditional measures of employment activity in any specified area of London under-reflecting true levels.

The current OPDC Draft Plan largely misses the opportunity to create 'walkable neighbourhoods' and the sorts of streets with a mix of activities (particularly at ground level) which young Londoners now seek out and which make for vibrant 'city living' of the kind experienced in the most successful global cities. A London based on high rise residential towers and sterile business parks is not where Londoners want to make their lives in 2020 onwards.

As noted in international research *In the late 20th century, many world cities were characterised by single-use asset classes in zones and on big grids. But there are significant demographic and technological changes happening now that are likely to change this in the future. New generations in the digital age are creating conditions for what we are calling the 'fifth age of cities', which looks surprisingly like the first age*<sup>1</sup>.

In our submissions on the Regulation 18 Local Plan, the Old Oak Neighbourhood Forum stated

- *We support a policy SP7b(i) of minimising the need to travel, but question how Local Plan policies resisting any mixed use on Strategic Industrial Land are compatible with this? In an area of existing traffic congestions, let alone massive new development, an increasing number of Londoners will wish to arrange their lives to minimise the need from a journey to and from work. Resisting mixed use development through traditional and inflexible zoning policies flies in the face of this trend.*

In our representations on the Regulation 18 Draft Plan we commented *Policy OSP 2 on Land Use defines fixed zones with hard boundaries for 'industrial uses' and 'mixed uses'. Within the Park Royal 'Place' (shown yellow in the map at Figure 10) the Wesley Estate and the TITRA railway cottages are left as isolated islands within this industrial zone. Midland Terrace/Shaftebury Gardens lies on its border. We suggest that an alternative approach to some of these land use zonings would achieve future development that is more sustainable, and which would better integrate existing communities within a 'new Old Oak'. More details are given in comments on each 'Place'.*

The case was made by several residents groups for the area lying between Old Oak North and South and the core part of Park Royal to be able to develop in a more evolutionary manner, with no hard division between a SIL and non SIL boundary. The area involved forms parts of P7, P8, P5 and P9 and includes the 22 ha area designated by OPDC as the Old Oak neighbourhood area.

The intention was that this would not only provide a 'buffer' between very high density residential development and the industrial and distribution activity of Park Royal but would also stitch together the existing 19<sup>th</sup> and early 20<sup>th</sup> century residential enclaves in East Acton and make good use of the building types in 'Old Park Royal'. This would create a lively mixed use area where 'live/work' would be a realistic option, reducing commutes and demands on an already congested transport network.

## **Conclusion**

**The current Draft OPDC Local Plan fails to take sufficient account of rapidly changing patterns of working and living, and will introduce over-prescriptive policies that will hamper successful and sustainable development.**

## **Modifications sought**

**Policy SP5(b) should be modified to allow for mixed use within the designated SIL area, where there is no net loss of employment floorspace. Related 'Place' policies for places P7, P8, P5 and P9 should be modified accordingly.**

Old Oak Neighbourhood Forum  
February 2019

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<sup>i</sup> Entering the 5<sup>th</sup> Age of World Cities, Yolanda Barnes Professor of Real Estate, Bartlett Real Estate Institute  
University of London