



## **TITRA Response to HS2 Schedule 17 planning application 20/0012/HS2OPDC – Old Oak Common Station May 4, 2020**

The island triangle residents' association (TITRA) represents people living in the 220 railway cottages in the Old Oak Lane Conservation Area to the north of the proposed Old Oak Common station.

TITRA has four main objections to HS2's Schedule 17 planning application 20/0012/HS2OPDC for Old Oak Common station which are outlined below.

### **1.0. Local environmental impacts**

#### 1.1 Design & Access statement - Inadequate assessment of design's local environmental impact

TITRA considers that the application does not complete a proper assessment on the impact of the design on the local environment as in Schedule 17, section 2(5)(a) – whether the design needs to be modified to preserve local environment or local amenity.

#### 1.2. Design & Access statement - Inadequate discussion of pollution issues for residents

TITRA objects to the design documentation's failure to fully identify and adequately discuss the likelihood of different forms of pollution affecting residents in Wells House Road which is very close to the proposed station.

##### 1.2.1. Design & access statement - failure to adequately discuss light pollution

The proposed Old Oak Common station is likely to cause light pollution issues for residents in Wells House Road which overlooks the planned station and measures for its mitigation.

The Design and Access Statement (20/0012/HS2OPDC)'s Lighting Strategy section 11.3. (p113) starts off by saying that it will show 'sensitivity to the local context' but then immediately discusses how it will highlight ("accentuate") key parts of the building design, stating:

*11.3.2 A lighting scheme will be developed that reinforces the legibility of the architectural design after dark which retains the legibility of the station entrance*

*11.3.3 The lighting scheme will pick out and accentuates key elements of the design such as the west entrance portal.*

TITRA believes that any properly-considered and environmental risk-assessed application would outline and consider the following:

- 1) the impacts on Wells House Road residents
- 2) mitigation measures to prevent light pollution affecting, ideally through scaling back the proposed lighting scheme for accentuating the station building.

It cannot be right that a design statement for such a major project serving up to 250,000 train users daily, does not consider potentially-harmful impacts on residents from seeking to lighting up the proposed Old Oak Common station buildings.

**TITRA therefore supports Wells House Road RA's request that the station design and landscaping should include mature planting of trees and shrubs on the east side of Old Oak**

## **Common Lane between the station (particularly the Crossrail platforms) and Wells House Road again to buffer noise, light and air pollution.**

### 1.2.2. Design & Access statement - Inadequate discussion of potential noise pollution issues

TITRA objects to the Design & Access document's failure to discuss likely noise pollution affecting residents of Wells House Road given that the station will have platforms above ground and will operate for much of any 24-hour cycle.

TITRA is aware that HS2 in response to enquiries from Wells House Road Residents Association, has stated that the Old Oak Common Schedule 17 station design "*complies with the Environmental Minimum Requirements, with no new or different significant sound, noise or vibration effects than those reported in the HS2 Phase One Environmental Statement.*" In other words, HS2 is content to rely on impact assessments made many years ago for the ES but HS2's February 2019 station design leaflet "Old Oak Common Station Design" (p.26) can only say that HS2 is:

*"working to integrate innovative sound & visual systems into the design. This will increase accessibility, allow a healthy internal environment and minimise noise from the station."*

**TITRA is very concerned that HS2's station design proposal fails to discuss how the design will mitigate noise pollution for residents on the East side of Wells House Road. TITRA therefore supports Wells House Road RA's request for noise mitigation measures to be acknowledged in the design and planning process including:**

- **The station materials for the walls to be sound proofed**
- **Investigation of sound barriers along Old Oak Common lane on the east side of Wells House Road**
- **Extending existing noise insulation to all homes and all sides of homes in Wells House Road.**

## **2.0. Lack of clarity regarding retaining wall at Wells House Road**

TITRA secondly objects to the planning application's lack of clarity over the securing of the Wells House Road retaining wall which is surely an integral part of the design and the development of the station, which our association is aware has been a cause of continuing concern for residents of the estate for many years.

Written Statement paragraph 4.2.23 states:

*"A Condition and Dilapidation Survey of the existing Wells House properties retaining wall has been undertaken by HS2. From the report it is understood that the wall condition varies from locally fair to very poor. The approach to the proposed Old Oak Common Lane west footway retaining wall ensures that it is moved away from the existing Wells House Road retaining wall to mitigate impacts on the neighbouring properties. This configuration also maintains pedestrian comfort levels by retaining the existing footway."*

Our association asks for greater clarity around the statement's language and the design proposals. If the proposed Old Oak Common Lane west footway approach is 'moved away from the existing Wells House Road retaining wall', the type of construction and who maintains it needs to be clearer.

The application's Written Statement's visualisation (page 43) shows a raised pavement on the western side of Old Oak Common Lane. The proposed width of the re-aligned Old Oak Common lane does not look wide enough to accommodate a two-way cycle lane - as well as having an adequate pavement. Both of these elements are essential not only for effective access for train users to the proposed station (with reduced motor vehicle trips envisaged in the design) but also for Wells House Road and other local residents in Old Oak to continue to be able to use Old Oak Common Lane to access local amenities – this lane is the only road out of the estate for Wells Road residents anyway.

TITRA considers it essential for a liveable and sustainable future of Wells House Road as a community that HS2 should take ensure that the wall is made secure and rebuilt and take proper

responsibility for doing so – whether LB Ealing or HS2 eventually assumes legal responsibility for it. Our association believes that the uncertainty over the securing of the retaining wall has gone on for far too long, especially when HS2 has already safeguarded many of the gardens of Wells House Road for essential ground monitoring work.

**TITRA therefore supports Wells House Road RA's ongoing request that the retaining wall be made safe and its current request that to mitigate noise impacts from the station that the retaining wall should be rebuilt to the tops of fences with sound proofed materials to buffer the sound in gardens.**

### **3.0. No discussion of emergency vehicle access in design documents**

TITRA is concerned that neither Section 4.5 Connectivity (p31) nor Section 10.3 Emergency Egress (p104) of the Design Access statement (1SN02 - Old Oak Common Design And Access Statement) discusses how emergency vehicles will access the proposed Old Oak Common station site. In addition, the statement does not mention or discuss emergency access to the station site from Scrubs Lane.

TITRA residents have been troubled by traffic and access problems affecting the Old Oak area for many years, even before HS2 began works here and is concerned by this omission. Our association objects to the lack of a review of this issue across the application's documentation and would like to see this subject clarified in revised application documents.

### **4.0. Concerns over the Station Design Consultation process**

TITRA objects to the stop-start nature of this station design consultation process. HS2's consultation has relied on documents that were developed in early 2019 and followed by public meetings about the station design later that year but subsequently saw four applications – each with highly-technical planning documents - published on the OPDC planning portal without notice to residents at the end of 2019 – and without meetings to explain the applications' scope and meaning being held early in 2020. Local people felt blindsided by the way this planning applications' details have been published and presented.

As a result, this consultation process has been undermined. It is difficult and very time-consuming for residents across Old Oak to get an effective overview of the design and its likely impacts on their communities.

#### **4.1. Lack of clarity over Planning Application's visual materials**

Through discussions with HS2, the OPDC and other residents groups, TITRA is concerned by inconsistencies in the documents and visualisations for the Old Oak Common station planning application documents. These issues and confusing nature and labelling of the drawings make it very difficult for residents and lay persons to understand all of HS2's plans for the area around the site and the likely impacts on the neighbouring communities, most particularly on Wells House Road.

For residents of the Old Oak Conservation Area, our primary concern in this consultation process has been how aspects of the construction process, such as how the use of conveyor equipment and lorries might affect the TITRA community and make it more difficult to live in: this task requires documents that explain technical plans in simple terms to residents.

A major example of inconsistency in the application documentation is the inaccurate portrayal of the Adjacent Site at Old Oak Common Station in the consultation process and the documents. The Adjacent Site has been portrayed in HS2 consultation materials, especially HS2's Commonplace public [consultation website](#) and its 2019 design leaflet as a green space but earmarked for future development (*HS2's February 2019 leaflet "Old Oak Common Station Design, p9's aerial visualisation of the proposed Old Oak Common Station and the visualisation of the public space on p19*).

This use of 'green space' imagery, together with the February 2019 leaflet's visualisations of the area in front of the station entrance as a kind of tree-lined park-style area (see the 2019 "Getting to and from the station" leaflet pp 20-24) which are clearly for public consumption and used together they give the

impression to the lay reader that there might be low-rise park style development in front of the proposed station. However, the *current* planning application materials and HS2's general communications to local residents both ignore the fact in March 2019 the Old Oak Neighbourhood Forum (of which TITRA is a member) had identified through trade media reports that HS2 was seeking a development partner to develop the Adjacent Site as commercial office space with a suggested capacity of 146,000 sq. m of floorspace in a series of buildings between 4 and 21 storeys. The Forum discussed HS2's call for partners in a public meeting in the first quarter of 2019. Forum members, like other residents, feel that the *intention* to add such a major development should be communicated to local communities as it will radically change the nature of the development as well as potential additional facilities and user traffic (pedestrian / cyclists / vehicle drop-offs, as well as train journeys, even with no parking).

In its design work and pursuing its consultation process, HS2 too easily forgets that local people in Old Oak may at some point have to decide whether they can continue to live in the Old Oak area given such massive developments and construction programmes by HS2 and its partners and the years of traffic / other impacts that these programmes could bring to the area..

If HS2 is sending out mixed messages over its early-stage development plans for Old Oak Common, then it is even more difficult for residents to gain a full understanding of this complex development and how it might affect them in the future. Should, for example, HS2 bring forward the Adjacent Site's development, this intention and the potential impacts on the Wells House Road community in particular, should be made clear in its Commonplace website, planning application documents and the visuals that help local people consider it.

#### 4.2. Concerns over HS2 Community Engagement process for station planning applications

The current HS2 planning application documentation was published in December 2019 – alongside three related applications - with a consultation deadline ending in February 2020 without any notice to residents, and no scheduled public meetings to explain the information documents themselves.

Residents' groups complained to HS2 at HS2's own Old Oak Community Forum on March 5 that the planning documents were not written in plain English, there was little "read-across" between documents to enable residents to understand the likely impacts of the station's construction and operation.

In addition, the planning documents were mainly available as electronic format documents hard to access (the Design & Access statement file alone was available as a 200Mb document making it hard to distribute on email to residents). As a result, HS2 said at that March 5 Forum meeting that it would supply clearer information through clearer documents presented at a public meeting but at the time of writing this response (May 3) it hadn't done so.

HS2 has now requested a virtual public meeting for TITRA residents on May 12, 2020, to discuss the 9/0175/HS2OPDC Schedule 17 for lorry routes associated with main works. This consultation response by our association has been researched and written so that this community's views are represented at the OPDC's scheduled planning committee meeting on May 19, 2020 (convened ahead of the HS2 public consultation finally closing on May 22).

As a consequence, HS2's call for a meeting with residents on May 12 would seem to be too late and characteristic of an unsatisfactory stop-start consultation process which is difficult and very time consuming for residents that are most affected by it.

Ends