



Ms Emma Williamson
Director of Planning
Old Oak and Park Royal Development Corporation
City Hall
The Queen's Walk
London
SE1 2AA

Sent by email to: localplan@opdc.london.gov.uk

My reference: OPDC Main modifications Local Plan consultation

05/07/2021

Dear Ms Williamson

OPDC Main modifications Local Plan consultation

The Royal Borough welcomes the opportunity of further comments in relation to the above consultation. As far as this Council is concerned these revolve around the North Pole East coming forward within the Local Plan period. The principle of this is supported as it provides the opportunity of better and new links being provided between Kensington and Chelsea and OPDC.

POLICY P10C5: Mitre Way Cluster –connecting Mitre Way with Scrubs Lane
The Council supports the site allocation for the place of Scrubs Lane. This allocation is directly linked to RBKC's North Pole Depot site, which forms part of the Kensal Canalside Opportunity Area. RBKC and OPDC officers have worked proactively in the development of OPDC's Local Plan and the Draft Kensal Canalside SPD, as these documents have clear interaction. As a result, coordinated and consistent guidance is provided for the Kensal Canalside / Scrubs Lane area.

The combined guidance within the OPDC Local Plan and the Kensal Canalside SPD will ensure that the area delivers well connected good growth and that the development capacity, phasing, land uses and indicative building heights on the North Pole Depot development site, that comprises locations within both the OPDC and RBKC areas, are coordinated and complimentary.

RBKC specifically welcomes the inclusion of the proposed east to west route (known as Wormwood Scrubs Street within the OPDC Local Plan and South Street in the Kensal Canalside SPD) connecting Ladbrooke Grove within RBKC to Scrubs Lane within OPDC during the OPDC Local Plan period (ending 2038) and to Old Oak Common Station and Old Oak Common Lane beyond the OPDC Local Plan period. This will provide a vital east west connection for the opportunity area, ensuring a well-connected neighbourhood and in the long term providing a link to the Old Oak Station hub. The new policy identifies the need to safeguard land to allow a continuous east west road link to be delivered in the future and this is welcome as it could provide the hook for compulsory purchase if the need arises.

The proposed bus route and walking and cycling routes along Wormwood Scrubs Street / South Street are also welcome additions to the Local Plan, with the bus route providing an important westward public transport route.

The modification MM/PS2/OPDC/P1/5 to support active and positive frontages along the edge of the Elizabeth line depot and along the walking and cycling route from Old Oak Common station to Scrubs Lane where feasible, is supported.

The removal of Hythe Road station from the plan is disappointing as that would have been the means of connecting the western side of our borough to the Elizabeth line and HS2. However, as this change was necessitated by the outcome of the Car Giant case the Council accept that it cannot be avoided.

Development at Mitre Way/ western end of North Pole Depot

The Council accepts that development coming forward in this area over and above the one tall building allocated (15 storeys) will inevitably be seen from the park at Little Wormwood Scrubs and views from the park will change as a result. However, whilst we support the principle of development, there is potential that the views from the park may suffer harm – and so buildings brought forward need to consider very carefully their relationship with the sensitive RBKC context.

The sensitivity of the park, St Mary's cemetery to the north east and the Grade one listed Kensal Green cemetery, mean it will be essential that any proposals for tall buildings coming forward here are appraised in line with Policy D9 of the London Plan. This will mean proposals will need to be appraised to assess the impacts at different distances including immediate to long range views, that tall buildings should reinforce the spatial hierarchy of the local and wider context, that architectural quality and materials should be of an exemplary standard and that proposals should take account of and avoid harm to the significance of heritage assets and their settings.

As Policy D9 states, proposals that do involve harm will need clear and convincing justification, demonstrating that alternatives have been explored and that clear public benefits outweigh that harm and that buildings should positively contribute to the character of the area. To this end the following amendments to major modifications are noted and supported. However, they must also be implemented.

MMPS/OPDC/M4 that local context, character, and environmental impacts are important factors to consider in the design process with development coming forward with a range of densities and lower heights in more sensitive locations.

The rewording shown at MM3/PS/Q3 where it must be demonstrated that engagement with relevant stakeholders has informed the design of proposals. In a similar vein MM4/ PS/Q3c stating that proposals coming forward should demonstrate proactive engagement with the community and other relevant stakeholders.

Gypsy and Travellers

The modification MM/PS2/OPDC/H8/1 to remove reference to the wider definition of Gypsy and Travellers that was previously proposed by the draft London Plan is supported.

Waste

The main modification MM/PS2/OPDC/P2/1 now clearly safeguards Old Oak sidings (Powerday waste site) for continued use as a waste management site, this aspect of the main modification is supported. It is noted in that the updated supporting text at

paragraph 4.38 states that Old Oak sidings waste site is capable of increasing its waste throughput and potentially generating a surplus. We would welcome continued joint working and discussions on how any surplus could assist Kensington and Chelsea meet its London Plan waste apportionment.

We look forward to the continued joint working with the OPDC to deliver high quality, sustainable new neighbourhoods and connections in the Kensal Canalside / Scrubs Lane area and welcome the modifications that have been made.

Yours sincerely,

Amanda Reid

Amanda Reid
Director of Planning and Place

Yours sincerely