

OPDC POST SUBMISSION MODIFIED DRAFT LOCAL PLAN

Agenda 1 for Modifications Hearings: PTALs 10am Tuesday 11th January 2022

The Inspector's agenda ID-39v2 identified a series of matters for discussion on this subject. His note acknowledges that concerns over connectivity across the OPDC area was a subject raised by more respondents than any other in the consultation on the Modifications to the OPDC Draft Local Plan. (46 respondents are named in the agenda note).

We see this level of public concern as resulting from the fact that the PSMDLP simply does not work as a coherent and successful spatial plan for a new part of London. Local people, who travel in and out and across the OPDC area regularly, are well placed to flag up what my look plausible on a diagrammatic map, but what will not make for successful placemaking in the real world. This further representation is for the 11th January EIP hearing and includes an Addendum responding to OPDC's note of 29th December.

In our previous representations on the Modifications we commented on the way in which the OPDC Draft Local Plan has in effect become two plans – one for the area on the west side of Wormwood Scrubs in East Acton and North Acton, and one for the eastern part of the OPDC area including Scrubs Lane.

As we have pointed out these areas have remained separated not just by administrative boundaries between Boroughs, but by the physical features of the Scrubs as a large area of MOL and by a shortage of connecting routes that run east to west.

The original vision of the 2015 OAPF was to change this geography for good, introducing a critical new east/west connection (Union Way/Park Road) and also siting the new 'heart of Old Oak' between the two main north/south routes of Old Oak Lane/Old Oak Common Lane and Scrubs Lane/Wood Lane.

The 2019 'change of direction' and the 'Western Lands strategy' was a fundamental alteration to the Local Plan as submitted in October 2018. The Local Plan is now heavily weighted towards the western part of Old Oak. An ill-defined 'major new town centre' stretches from Channel Gate to North Acton. There are no guarantees of eastern vehicular access to Old Oak Common Station, due to be 1km in length. The proposed Hythe Road Overground station has disappeared from the plan. Funding for an Old Oak Common Lane Overground station remains in doubt, particularly given TfL's funding crisis.

These are features of the PSMDLP which local residents (and businesses) can understand without having to immerse themselves in planning jargon. We can all see that the PSMDLP maps and 'figures' of Old Oak are not what was originally intended. While housing sites and housing numbers have been brought back to the original target figures (more or less) the connectivity of the area has not. This applies to car users as well as those reliant on public transport.

PTAL levels

The Inspector has chosen to focus on PTAL levels, and what has changed since the October 2018 submission of the Draft Plan. In ID-39 he has asked specifically for *a series of PTAL maps showing how the various proposed interventions get us from figure 7.10 to figure 7.11, and how these changes relate to the phasing of development as Modified and to the areas identified as suitable for tall buildings as Modified*). We too feel that this information is critical to the final stages of the examination of the OPDC Local Plan.

Both the Old Oak and StQW neighbourhood forums are familiar with working with PTAL measures. The PTAL system was a creation of Hammersmith & Fulham Council¹. We have used PTAL measures and TfL's [WebCAT tool](#) many times when commenting on individual planning applications and on the suitability of specific locations for very high density housing.

While the London Plan Density Matrix² has not been carried forward into the 2021 London Plan, there are a series of 2021 London Plan policies which continue the explicit link between housing density and transport connectivity, including PTAL levels. **We consider that as a result of the changes to the 2018 submitted version of the OPDC Draft Local Plan, conformity with these aspects of London Plan policy is now highly questionable.**

Paragraph 10 of ID-39 picks up on this issue. In footnote 2 below we refer to the relevant London Plan policies and particularly the new wording of D3(B) on *Optimising site capacity*. **In its Statement of Conformity with the London Plan OPDC-44, conformity with London Plan D3 is not addressed other than in relation to 'well-designed buildings' – a notable omission.** The same applies to the February 2021 Statement of Common Ground agreed with the GLA.

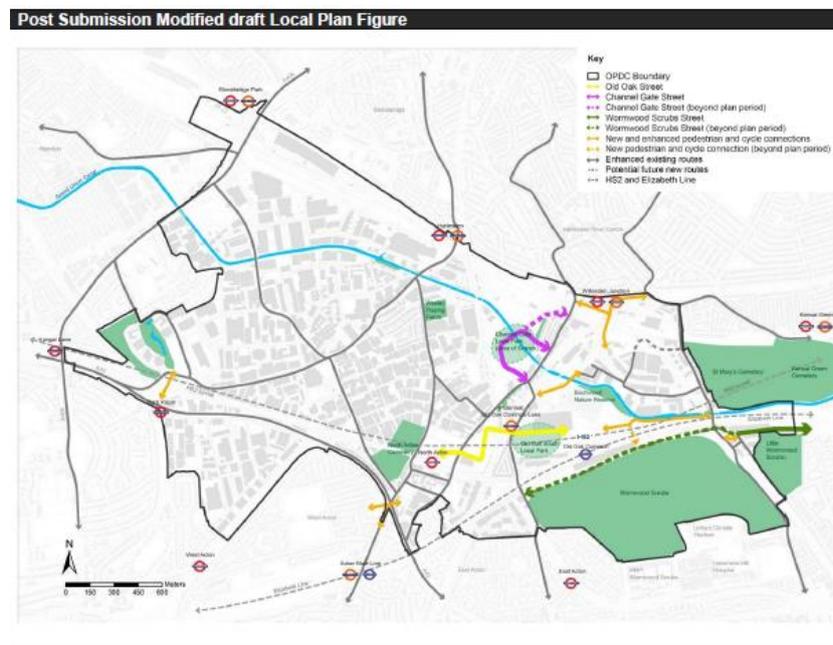


Figure 3.13 on Policy SP8 shows in diagrammatic form the connections proposed in the PSMDLP. At first sight this shows several east-west connections. But Old Oak Street (in yellow) is speculative if no funding is found for Old Oak Common Lane Overground station. Other connections are pedestrian/cycle routes only. Wormwood Scrubs Street is phased at 20+ years.

¹ See paragraph 2.3 of the Mayor of London/TfL publication **Assessing Transport Connectivity in London 2015** which reads *PTAL was originally introduced by the London Borough of Hammersmith & Fulham, and was later adopted across London to support various planning processes. The use of PTAL is now deeply embedded in strategic and local planning. A key example for such use is in the London Plan, which is the overall strategic plan for London, that sets out economic, social and environmental goals for the period until 2031. The London Plan uses PTAL as one of the key factors in determining the density of housing that is desired in different parts of London. This is based on the idea that areas with good public transport service are more suitable for intense development. This is demonstrated in figure 2.1, which is taken from the London Plan.*

² The removal of Policy 3.4 and the associated Density Matrix was contested during the examination of the New London Plan. We see the basic planning principle of the matrix, that high density housing should be located where public transport access is good, to be irrefutable. The principle remains in 2021 London Plan policies GG2(B) on *Making best use of Land*, D1(A)4 on *London's form, character and capacity for growth*, D2 (A)2 and B on *Infrastructure requirements for Sustainable Densities*, and the new D3(B) on *Optimising site capacity through the design-led approach*.

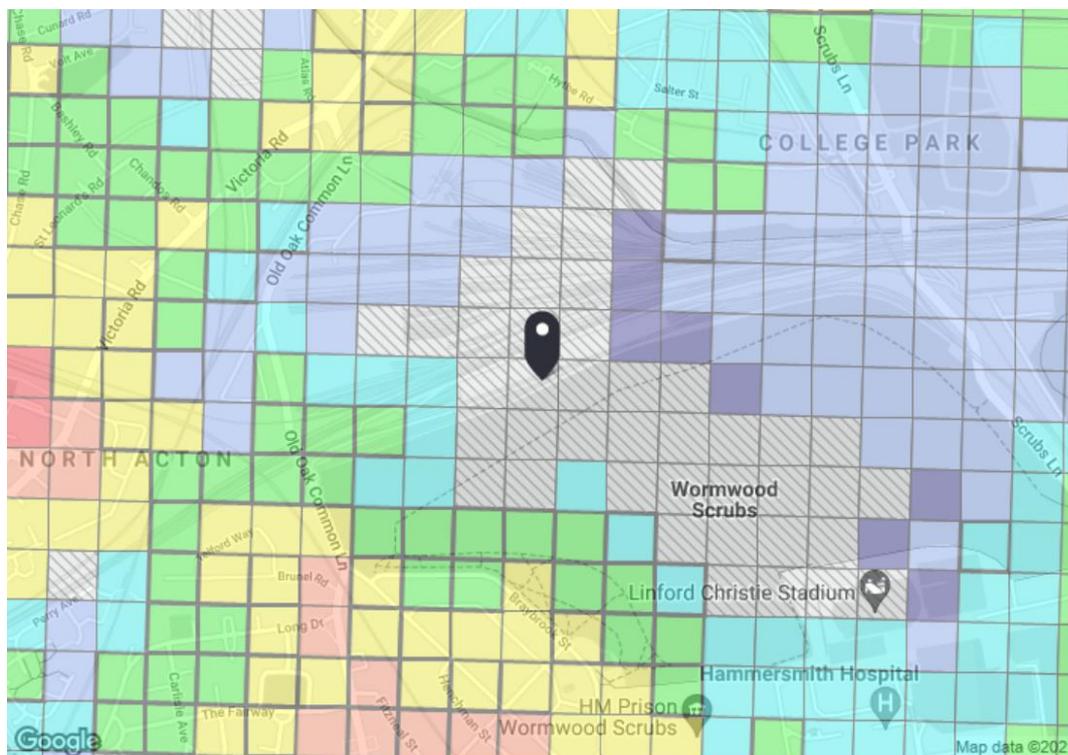
PTAL levels in a future Old Oak

The Inspector has asked for a new set of PTAL maps that explain the impact of forecast future changes in levels of public transport accessibility and when these will arise. As we see it, the only fairly definite piece of new transport infrastructure within the plan period is the Old Oak Common Lane rail interchange providing access to Crossrail, HS2 and GWR lines.

PTAL levels will therefore rely heavily on a Bus Strategy. We do not have the technical capabilities to answer the Inspector's question at paragraph 6 and 7 of ID-39 on bus trip generation. Local knowledge tells us that the main north/south bus routes at Scrubs Lane and at Old Oak Lane are already heavily congested.

In terms of ensuring increased bus frequencies, routes using Scrubs Lane/Wood Lane will be competing with the redevelopment of Kensal Canalside with an additional 4,000 new homes (very close to planning application submission). Developers Sainsburys/Ballymore and St William have been negotiating with TfL over a long period but have not been able to secure commitments to all the route changes and bus frequencies to achieve their desired levels to service this Opportunity Area (which has similar low PTAL levels to much of Old Oak).

As a result of major changes in travel to work patterns resulting from the pandemic, any forecasts for passenger numbers on the HS2 line and on Crossrail are highly uncertain. Loss of passenger numbers have led to budget shortfalls for TfL which may well result in major reductions in bus routes and frequencies across London. More announcements may be made by the Mayor of London prior to the resumes EIP hearings.



PTAL output for 2031 (Forecast)

0

Easting: 521867, Northing: 181946

The map above from the WebCAT planning tool gives an overview of forecast PTAL levels in 2031 for the Old Oak area. Clearly the assumptions built into this model affect the outcome.

The 100m squares shown with a heavier line are those where changes are predicted between the base year (2015) and the forecast date. As shown above, changes are predicted for some locations on the western side of the Scrubs (such as Acton Wells and Old Oak Common Lane). But for College Park and Scrubs Lane the position remains static.

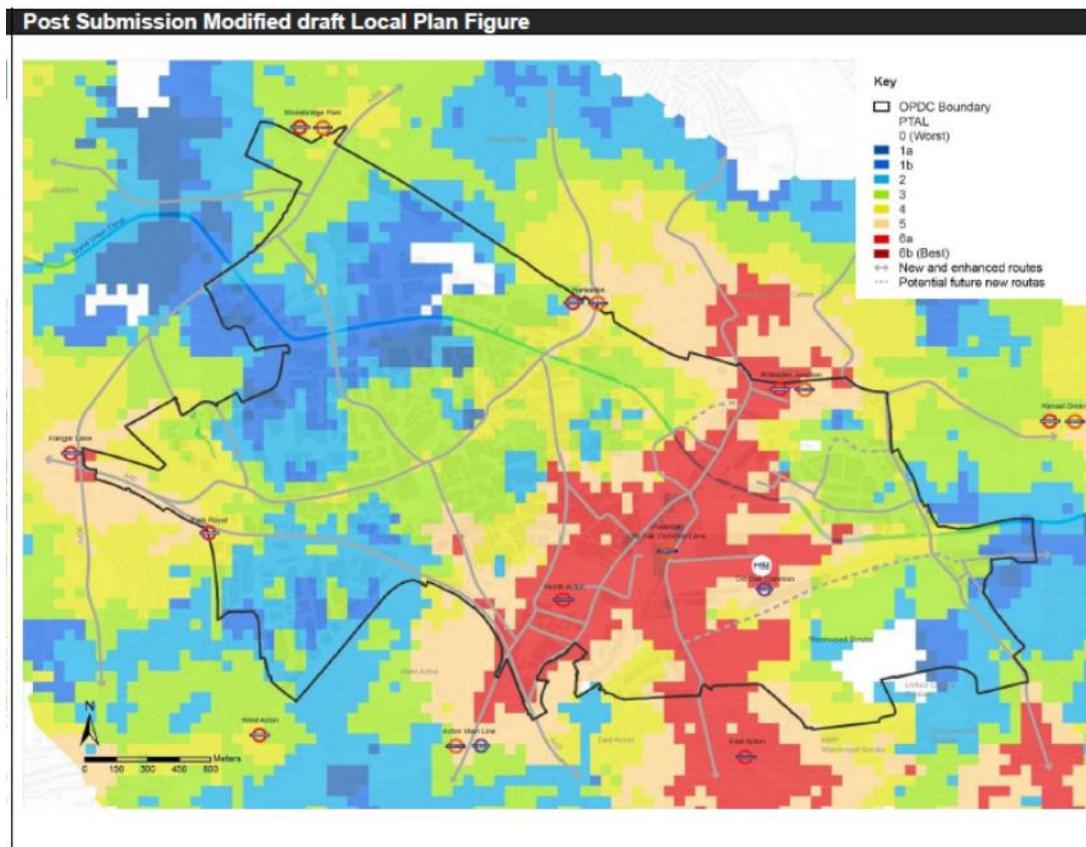
TfL's notes on these WebCAT maps give the following information on assumptions in the model:

All public transport modes in London available in 2031: National Rail, London Overground, Tube, DLR, Tram, Buses

Principal public transport network improvements include schemes held in TfL's committed and funded transport investment programme. New proposals such as Crossrail 2 are not yet fully funded and are not included in this scenario.

Bus services are based on the base year network with a 3% uplift in frequencies.

When we compare this map with that in the modified version of the map at PSMDLP Figure 7.1 we are puzzled by the fact that the latter shows large areas of PTAL 6A along Victoria Road and Old Oak Common Lane. This area extends into the southern part of the Atlas Road area.

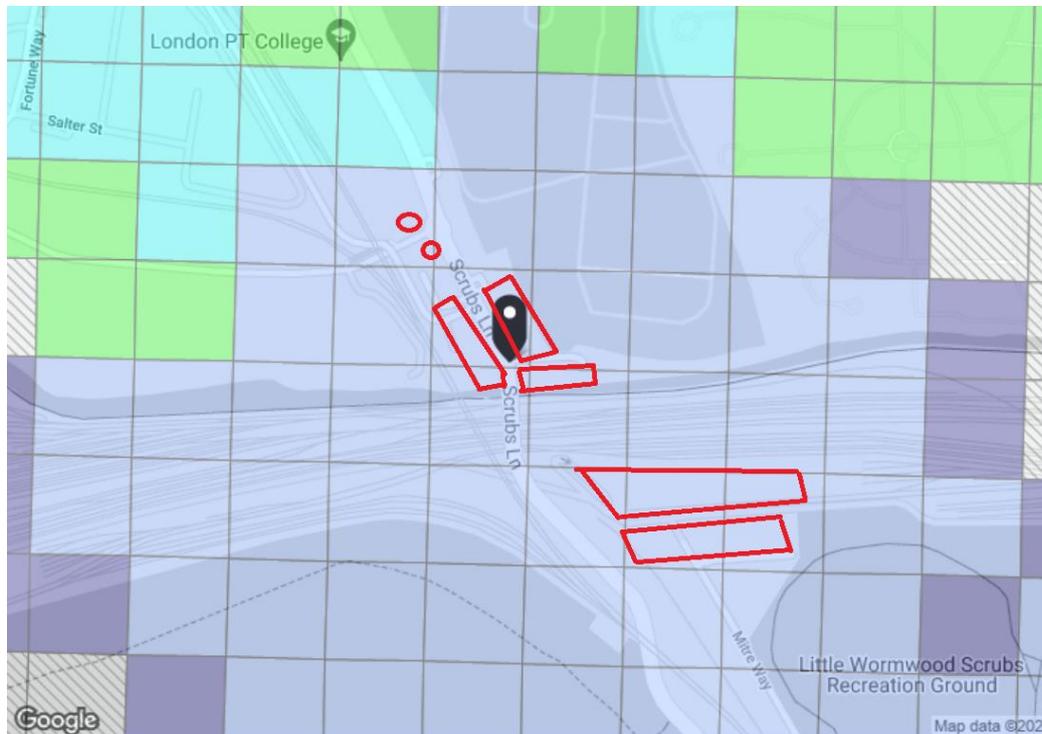


We assume that the additional maps requested by the Inspector will explain whether these high levels of PTAL result from an assumed Overground station at Old Oak Common Lane and/or a combination of other factors.

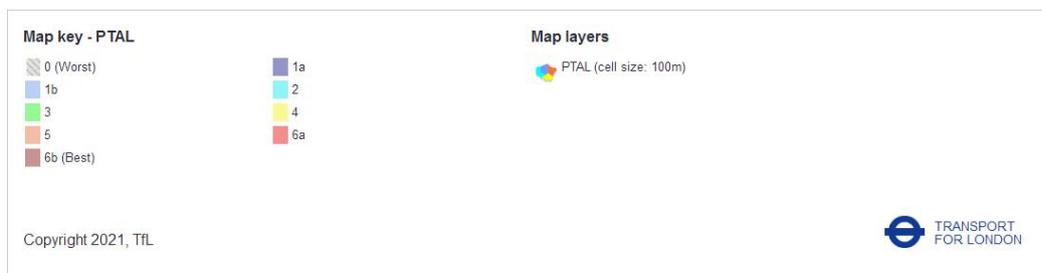
We have focused on looking at the WebCAT maps for two of the areas where the site allocations in the PSMDLP assume significant levels of new high density housing. These are Scrubs Lane/Mitre Bridge and Channel Gate/Atlas Junction (including a potential second site next to the completed

Oaklands Rise development). North Acton already has good PTAL levels and these will improve when Crossrail becomes operational at Acton Mainline station.

In each case we added onto the PTAL maps the areas planned for new housing (the red lined shapes). These include consented schemes and those where planning applications are imminent or under consideration.



PTAL output for 2031 (Forecast)
1b
Easting: 522576, Northing: 182297



In our response to the Modifications we commented that Mitre Bridge is a location with very poor connectivity and low PTAL levels 1b. Planning applicants in the early years of the OPDC insisted that schemes at North Kensington Gate and Mitre Yard would have much improved PTAL levels of 5 and 6a by the time these developments were completed. We argued that OPDC consents on these schemes were premature. That at Mitre Yard is now at the early stages of construction. Schemes at North Kensington Gate (North) and at 2 Scrubs Lane have stalled.

Developers London Green have recently been undertaking consultation on a proposed development at 'Mitre Wharf' adjoining the canal. This involves 137 housing units plus 752 sq m of flexible commercial space.

The site allocations 27,28,29,30 and 31 in Scrubs Lane (at table 3.1 in the PSMDLP) add up to 1,047 new homes. The sites south of Mitre Bridge (32-34) would add a further 400. Despite London Plan

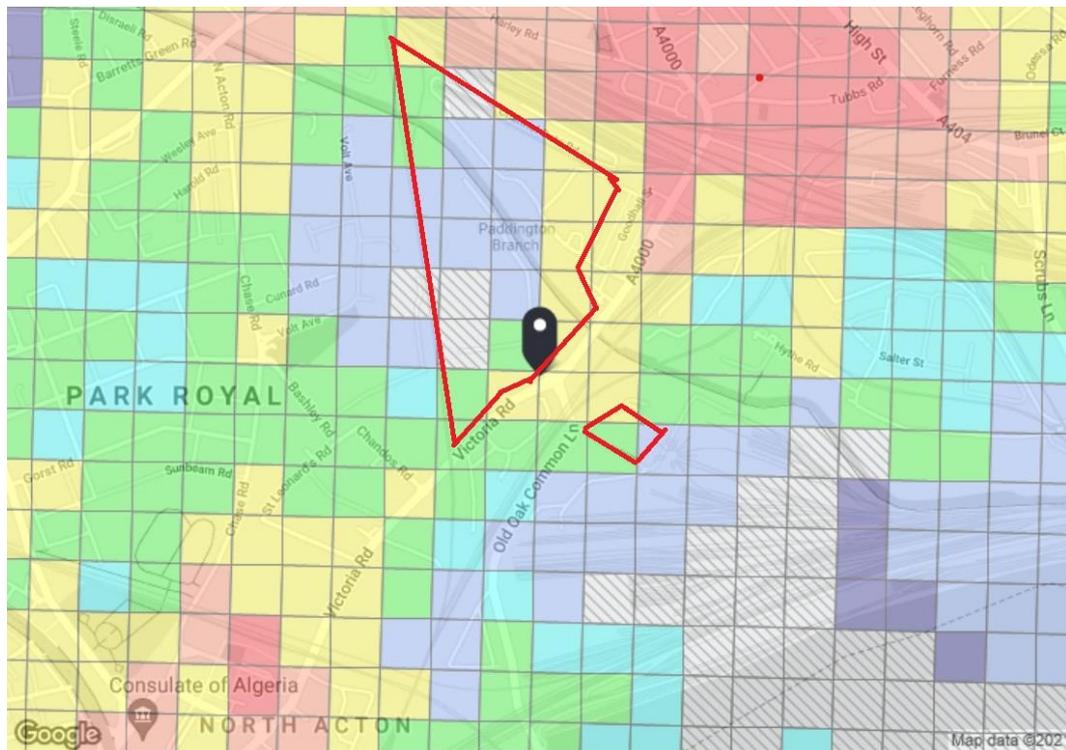
policies for 'intensification' in Opportunity Areas, we think it a serious distortion of the planning system to allow adoption of a local plan which consigns some 2,500 future residents to living in high-rise and 'car-free' buildings at a location with no certainty of PTAL levels rising significantly from 1b (the forecast WebCAT figure for 2032).

This disposition of high-density/high rise housing would never have come about had there not been a stage when speculative developers fastened on Scrubs Lane as part of a vision for Old Oak Park which failed.

We see every likelihood that the amenities, shops and facilities promised by developers in their 'activated' ground floors will not materialise. Scrubs Lane will remain an unappealing residential environment due to a poor public realm and a 'haul road' giving access to waste disposal sites which will continue in operation with HGVs queuing to enter and exit these sites.

There are many other locations in London where new housing would be better located. OPDC's unwillingness to accept the need to re-negotiate targets with the Mayor, in late 2019 risks consigning large numbers of BTR tenants to the wrong type of development in the wrong place.

Channel Gate and Atlas Road



PTAL output for 2031 (Forecast)

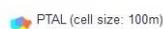
4

Easting: 521400, Northing: 182478

Map key - PTAL



Map layers



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A similar situation will arise at Channel Gate/Atlas Road. This site is allocated for 3,200 new homes in the PSMDLP. In ID-39, the Inspector has asked this question: *Henry Peterson's representation obo OONF & STQNF makes the points that North Acton and Channel Gate sites are both 1km or more from Old Oak HS2 station, that walking distances to Old Oak Common station from Scrubs Lane will be at or above the 960m outer limit used by TfL for PTAL assessments and that Willesden Junction is 750m from the centre of the Channel Gate site and 950m from the Atlas Road site. Is this correct?*

The map below shows the walking distance from the HS2 platforms at OOC station to the centre of the Atlas Road/Channel Gate triangle, as measured via Google Earth. The distance from exiting a train onto the platform and reaching the station entrance/exit Old Oak Common Lane is already appreciable, for a pedestrian. The remainder of the walk along this road is unappealing and there is little scope for 'activating' this section of street in future. This contrasts with the original 'high street' as visualised between OOC station and Hythe Road station and square, at 'Old Oak Park'.



Other distances quoted in our representations were also measured via Google Earth. We think that these distances are accurate and fair.

Developers Pocket Living has in December 2021 submitted an application for a development of 436 new homes for rent, ranging from studios to larger 3 bed family home at 'Atlas Wharf'. The site is behind the Collective building and on the Grand Union Canal. The scheme involves towers of 28 and 14 storeys immediately to the south of the Old Oak Conservation Area.



Pocket Living proposals for Atlas Wharf

ADDENDUM A: Comments on OPDC Note of 29th December 2021 on Public Transport Accessibility Level (PTAL) Forecast, Development Phasing and Tall Buildings Information

This note reached us on December 31st, after this representation on ID-39 had been prepared. We comment briefly below on why we feel this OPDC material should not be accepted at face value, in a final assessment by the Inspector on issues on PTAL.

The note explains that the PTAL Maps shown for the years 2020, 2027, 2032 and 2038 are based on four supporting studies:

- Bus Strategy Update (2021)
- Development Capacity Study Update (2021)
- Infrastructure Delivery Plan (2021)
- Tall Buildings Statement Update (2021)

We contend that these documents, as is the case for many elements of the PSMDLP, are highly aspirational and reflect scenarios which OPDC officers would like to see but for which there are more questions and doubts than there are certainties.

While we would hope that GLA, TfL and OPDC officers all maintain complete objectivity when making assessments and judgments built into the OPDC Local Plan, after 5 years of dealings with the Local Plan process and with decisions on individual planning applications, our level of confidence is not what it was. The fact that all three bodies are part of the Mayoral family and subject to pressures to meet Mayoral objectives and targets, we believe has had an impact over the years and continues to do so.

Bus Strategy Update February 2021

The contents of this OPDC Supporting Study are heavily qualified at the start of the document, with two statements reading:

- *The interventions considered are ideas and not proposals and are therefore subject to change.*
- *Any proposal will require a detailed cost benefit appraisal and would be subject to funding*

As pointed out in the main part of this representation, TfL is currently going through a major budget crisis with warnings of major cuts to bus services. There is no evidence that OPDC has obtained TfL commitments to its ideas for changed bus routes and frequencies as set out in the Bus Strategy.

We are aware that developers at Kensal Canalside, in negotiations with TfL over many months, have failed to achieve all they sought in terms of changes to routes and frequencies to enable the desired levels of servicing for 4,000 new homes in this Opportunity Area to the immediate east of the OPDC boundary (developments on which planning applications are imminent).

Hence we do not see that assumptions from this Bus Strategy, when incorporated onto PTAL modelling, should have serious reliance placed on them at this time.

The four PTAL assessments and maps

The OPDC note says *PTAL forecasts have been produced by TfL based on information contained within the studies outlined above*. This does not make sufficiently clear exactly what assumptions have been fed into TfL modelling for each of the maps shown. We think this level of detail is

needed if these maps are to be accepted a credible picture of future PTAL levels. They show far higher levels of PTAL than in the WebCAT map for 2032, for which TFL state they have taken into account all budgeted infrastructure projects in their forward programme.

We don't accept the validity of the 2038 PTAL ranges given in paragraph 8 (Channel Gate at 6b to 3, and Scrubs Lane at PTAL 3 and 4). Unless much more detail is available on the changes that have been fed into the model to achieve these levels of improvement, we urge the Inspector to place more faith in the WebCAT figures for these two locations, as shown in the previous part of this representation.

Paragraph 9 states *For Scrubs Lane in particular current bus services, walking and cycling routes enable people to reach Willesden Junction Station within 14 minutes by foot.* This claim shares the wishful thinking of the developers of North Kensington Gate and Mitre Yard. From doorstep to a platform at the station, this walk takes several minutes longer by whichever route chosen.

Paragraph 10 states *The approach to optimising development ahead of planned infrastructure has been common practice in planning authorities elsewhere in London. Examples include the planned delivery of development at Vauxhall Nine Elms ahead of the delivery of the Northern Line extension and plans from various local planning authorities along the Crossrail 1 Line which have identified growth/regeneration areas around planned Crossrail stations and encouraged early and optimised development of these sites ahead of the opening of Crossrail.* We do not see VNEB as a good example of urban renewal to be followed, and are far from alone in this view.

Paragraph 12 acknowledges that the 'Mitre Way' location will not have a new connection to Scrubs Lane until the 11-15 year period, while continuing *However, in the interim, these sites would benefit from the new all modes route of Wormwood Scrubs Street connecting to Kensal Canalside Opportunity Area, the new walking/cycling connection to Scrubs Lane to be delivered in the 6-10 year period and existing and enhanced bus services along Scrubs Lane and a new route along Scrubs Lane terminating at the North Pole East Depot.*

Our understanding of the Infrastructure Delivery Plan (and the 2021 RBKC SPD on Kensal Canalside) is that the eastern section of 'Wormwood Scrubs Street' is dependent on DoT/Network Rail releasing for development the strip of land to the south of the main GWR rail lines- on which there are no firm dates. Projects for all mode routes TV3 and TV4 as shown at Figure 4.3 of the Infrastructure Delivery Plan rely on the availability of this strip of land and are shown as 'necessary' while 'unfunded'.

Developers St William, about to submit an application for their site at the western end of the Kensal Canalside OA, acknowledge the landlocked nature of this OA with its sole entrance/exit on Ladbroke Grove. The canalside cycle/footpath from Kensal Canalside to Mitre Bridge and beyond will be the only east/west connection to Scrubs Lane for the foreseeable future.

'Channel Gate Street' is a loop road into Atlas Road/Channel Gate triangle which joins again with Old Oak Lane south of the bridge to Willesden Junction. If this becomes part of a bus route, this would improve PTAL levels for the northern part of the triangle. But this assumes that TfL will be willing for certain buses to take this loop, at the cost of extending travel times for buses on Old Oak Lane. At Kensal Canalside only certain buses on Ladbroke Grove will take the loop around the Opportunity Area.

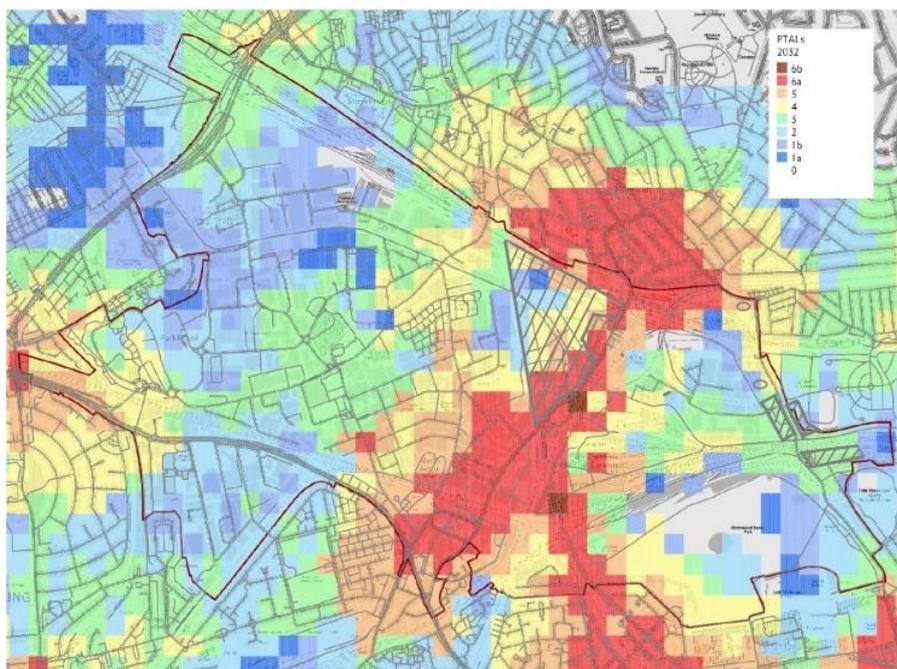
Under the PTAL map at 2038 at page 15 of the OPDC note is the statement *In 2038, Old Oak Common Lane station, which provides overground services will be operational. The new station will be supported by new bus stops.* This is a bold assertion, given that at present there is no indication

of this Overground station attracting secure funding. Or that new development in the area would generate S106 or other funding for a station costed at £155m in the Infrastructure Delivery Plan (Project TR4, included in the IDP as 'Desirable' and phased for 21+ years).

We can only surmise that OPDC and TfL have fed in optimistic assumptions on all these factors and more, to achieve the improvements in PTAL levels as compared with the standard published WebCat map for 2032.

Overall, we do not see this note as providing sufficient information on the specific assumptions that lead to specific improvements in forecast PTAL levels between

Below is a copy of the latest 2032 PTAL map provided to the Planning Inspector. We have superimposed the proposed sites for high density housing development at Channel Gate/Atlas Road and at Scrubs Lane/North Pole Depot.



OPDC latest map of PTAL levels in OPDC area, with sites at Channel Gate/Atlas Road and at Scrubs Lane/North Pole Depot superimposed (grey hatched areas).

Scrubs Lane remains at PTAL 3 and 2, as does North Pole Depot.

Channel Gate/Atlas Road ranges from PTAL 1a to 6a near Old Oak Lane.

Conclusions on PTAL levels

In terms of the Inspector's paragraph 11 in ID-39, we see the following statement made in our representations as being fair comment *OPDC's proposed site allocations and densities, as revised in light of the 2019 interim findings, are driven solely by an attempt to meet an adequate 10 year housing target and will lead to unsuccessful and unsustainable new development.*

It is not the fault of OPDC that the 2020-2022 pandemic has radically altered the context for planning in London's Opportunity Areas. We do however see it as the fault of OPDC to have clung as stubbornly as it has to an attempt to 'modify' a draft local plan out of all recognition.

The Draft Plan as submitted in October 2018 is simply not the same as now being examined at these January 2022 hearings. Its basic flaws and lack of coherence have become more apparent to local people. Its urgency has diminished since the days when OOC station was due to open in 2008.

Were this Plan to proceed to adoption, we see such a step as making little practical difference on the ground. Adoption will not act as a 'catalyst' for sustainable regeneration. Developers will have little more clarity or certainty than has been the case for the last 5 years, when a series of major schemes

have been consented by Ealing under an outdated development plan, and by OPDC on the basis of the 2015 OAPF and 'emerging policies.

We think it likely that developers will continue to pick off a small number of sites where they think a very high density housing scheme will bring an adequate return. Pockets of high density housing will be dotted across Old Oak, at locations where PTAL levels remain middling to poor (other than North Acton where an over-developed 'cluster' will bring its own long-term problems. We do not see this future as an example of successful 'placemaking' for a new part of London.

Old Oak Neighbourhood Forum and St Quintin and Woodlands Neighbourhood Forum

January 2022

Post Submission Modified draft Local Plan Figure

