

Old Oak & Park Royal Opportunity Area Planning Framework draft 27 February 2015

The following are the comments on the draft OAPF by the London Forum of Amenity and Civic Societies, established in 1988 to represent over 130 community and civic groups in the capital.

The key points which London Forum makes are as follows.

- Relocation or placing underground of the Crossrail depot and sidings and other rail tracks is a priority. Similarly, the IEP depot for the Great Western Main Line.
- Ease of interchange between rail services must be achieved.
- The proposals for dealing with road congestion and the impact of through routes across the OA are inadequate.
- The OO_PR draft OAPF lacks detail on the best physical location of development types and infrastructure and should be more precise in those respects to prepare the basis for Local Development Orders in the OPDC Local Plan, to determine what will be built and where, at what density, design, height and massing.
- The outline of the Opportunity Area (OA) should include the Kensal OA to ensure that decisions affecting the use of open land and development for the whole area are integrated and traffic implications are assessed.
- Consideration must be given to the impact of the OA development on the surrounding communities, town centres and businesses.
- The creation of new Lifetime Neighbourhoods will require careful planning and development control decisions that prevent developers taking the initiative on spatial configurations and housing types.
- A percentage of new homes must be affordable to the people living in the area and for their future families. There must be delivery by policy of sufficient homes with three or four bedrooms.
- Local people in the OA must benefit from the creation of new jobs.
- Public realm policies must be clear in the OPDC Local Plan.
- Office space requirements based on data later than 2012 should be used.
- The aspirations of Queens Park Rangers for a new football stadium in Old Oak North seem to be incompatible with the objectives outlined in the OAPF.
- Lifetime Neighbourhood policies and guidance of the GLA must be applied for new developments.
- Current industrial uses must not be lost nor disadvantaged by OA development.
- There must be good use of SuDS by planning conditions.
- Opening of the canal edges for walking and set-back of development from the canal banks is important.
- The continued use of Northolt airport should be examined.
- The air quality proposals are inadequate for post-construction monitoring and mitigation.

Specific comments

1. Introduction

- 1.1 (Figure 1 and para. 1.12) It will be important to consider the effect of the OA development on the land immediately to its east, including Kensal Green station and the area to its south which should be included in the OPDC Local Plan.
- 1.2 (1.16) The Inspector of the 2014 FALP version wrote in his report paragraph 87 that "I do not consider it likely that altering the London Plan to include a new OA could be considered so minor as to not warrant consultation." He was responding to the proposal by LB Hounslow that the Great West Corridor or Golden Mile should be an Opportunity Area. It is wrong, therefore, to refer to the Golden Mile as a "planned new Opportunity Area" and to show it as such on figure 4.

2. Vision and Objectives

- 2.1 The Park Royal Atlas shows that the area is incompatible with the term 'New Town' in the first paragraph of the Vision. Park Royal is to be "protected and strengthened" as "London's largest industrial estate".
 - 2.2 The fourth paragraph of the Vision should be corrected to "many new amenity spaces".
 - 2.3 The placing of 1,500 new homes within Park Royal is not supported until it can be demonstrated that there would be no conflicts with its industrial uses and satisfactory living conditions could be achieved for new residents.
 - 2.4 Add the word 'training' after "accountability" in the Objectives section 3.
 - 2.5 The Vision map, Figure 6, does not indicate the residential intentions in the Park Royal Industrial Estate. The catalysts for regeneration on that map should be explained.
 - 2.6 Links to other OAs and to areas of leisure, entertainment, shopping and culture should be indicated.
- Q1 London Forum agrees with the objectives, providing they include the preparation for the jobs that will be available for people who are unemployed or in low skill work within the OA and its surrounding areas. The physical infrastructure must include greatly improved utility supplies, digital facilities and alleviation of road congestion.

The correct numbers and integration of jobs and homes should be considered by further analysis in the OPDC Local Plan, rather than continuing too long with the estimates in the London Plan.

- Q2 There should be an objective to redevelop, support and sustain existing communities and their facilities within Old Oak and to integrate new residents successfully in line with the Lifetime Neighbourhoods policies and associated guidance of the London Plan. That requires more detail on the housing mix and tenures plus an objective that there will be enough truly affordable homes created for the key workers and other low wage residents in the area. There should be percentage targets for social rented homes, homes at between 50% and 65% of the market rent and homes for shared ownership. No person who has exercised their Right to Buy and lives still in the OA should be offered less for their home than they would need in order to buy a flat in the same area.

3. Land Use Strategy

- 3.1 In 'Existing Land Use' there is no indication of how many businesses could operate in shared

buildings and how many of those could be multi-storey to increase the intensification of land use in future.

- 3.2 There needs to be explanation of the opportunity to accommodate the industrial land uses within Park Royal that are shown in Figure 9 to be now in the designated residential and town centre areas of Old Oak (Figure 6).
 - 3.3 L1: Old Oak – The figures for additional homes and jobs will need validating when the OPDC Local Plan is prepared to ensure sustainability.
The 'large scale facilities' need explanation.
Correct words to "a network of streets...."
The canal should not just be "celebrated", its use should be planned for water transport and its facilities for transfer of goods from land to water and vice versa should be protected and enhanced. Recreational use of the canal should be considered also.
 - 3.4 L2: Park Royal – Intensification of uses is supported but, as above, intensification of land use should be explored together with assessment of the road capacity and usage required. Park Royal 'must' (not "could") accommodate displaced employment from Old Oak.
 - 3.4 L3: Wormwood Scrubs – The Scrubs should indeed be protected. If diversion of rail lines and tall buildings on its northern edge affect its boundaries, enjoyment and open feel, there should be planting of mature trees to reduce the adverse impact on the MOL. Any changes must be justified on a full benefit analysis.
 - 3.5 The town centre use in Park Royal shown in Figure 10 seems to be quite large and the impact of land loss for existing businesses should be explained.
- Q3 London Forum agrees with the objectives but proposes that there should be another one to cover consideration of any adverse affect of development on businesses and residents in the areas surrounding the OA and on the road network and congestion in the general locality.

4. Design Strategy

- 4.1 London Forum supports D1 for Public Amenity Space but expects the sustainable urban drainage methods to include the use of soakaways and permeable tarmac and other surfaces.
- 4.2 D1 a. iii should be amended to require the restoration and enhancement of all pieces of open space, including pocket parks, or their logical relocation, that are required temporarily during development, construction, utility works and transport changes.
- 4.3 D1 should require the protection of green spaces and open areas along the canal and open them to safe public use (without cycling). It should be an aim to have a continuous canal walk through the OA, although diversions will be required at locations of goods transfer stations or moorings.
- 4.4 (para. 4.1) This section on the purpose of a green grid should be reworded to make it clear that such chains are not just for movement to destinations but for quiet leisure, play and exercise. It is wrong that Figure 14 implies that green routes are required just to link the stations.
- 4.5 D2: Streets and Public Realm is not satisfactory because it implies that main streets should not have residential usage in upper floors.
- 4.6 D2 fails also to require that streets and public realm are made as attractive as possible with shade, trees, meeting places and seating areas.
- 4.7 D2 should require also the separation of pedestrians, cyclists and vehicles for good levels of safety. Neighbourhoods should have only one point of both entry and exit where possible and

be configured to deter 'rat-running' of drivers seeking to avoid points of road congestion.

- 4.8 D2 should specify how retail, services, leisure, culture and night time economy facilities will be distributed for viability and successful integration.
- 4.9 D3: Building Heights and Densities – The Mayor should seek from the Government the closure of Northolt airport to avoid restrictions on building heights in OA locations where they would be acceptable and context suitable and also to avoid aircraft noise and any conflicts of flight paths that could lead to accidents over the area.
- 4.10 D4: Built Heritage must be developed to include principles for good building design and the avoidance of the uninteresting glass and steel towers that have been delivered recently in many parts of London. It should encourage the modern equivalent of mansion blocks and Georgian terraces and squares that made Earls Court and Kensington some of the highest density areas in Western Europe with a good public realm and squares. As Peabody told an NLA audience, the best building material is brick. Old Oak could be an exemplar of optimised density with high quality building design including orientation, colour and style covered by planning policies.
- 4.11 D4: Built Heritage – The consideration of heritage is welcomed but the text should read that heritage assets will be evaluated for their importance and given suitable protection.
- 4.12 D5: Placemaking areas objectives are supported.

5. Old Oak Strategy

- 5.1 001: Land Use a. i and ii and paragraphs 5.1 and 5.4 repeat the estimates of the London Plan on the number of jobs and homes in the OA but it is not explained how that mix is to be achieved, nor if it is appropriate or obtainable. The location of the new commercial hub and the infrastructure support it will require are important for preparing the OPDC Local Plan.
- 5.2 (001 a. iv and para. 5.10) – Town centre uses should be considered also for main road intersections and crossroads.
- 5.3 (001 a. vi) - A highly integrated transport network is one of the key requirements for the OA. The Transport for London proposals so far have not been impressive and have included a half mile walk between stations. It is essential that the HS2 and Crossrail interchange for passengers is quick and easy, entailing simple and short transfer for high volume interchange. There must be sufficient funds made available by Government for a top quality station for HS2 and Crossrail in the OA. The opportunity to do this properly must not be missed and the planning, negotiation and intervention to make it happen must start now from Spring 2015. The House of Lords' opposition and that of MPs and Camden Council to the unnecessary cost and harm of routing HS2 into Euston station must be considered seriously by the new Government and the GLA Mayor.
- 5.4 (para. 5.2) – The location, type, design and heights of housing should be defined within the OPDC Local Plan by Local Development Orders to avoid the spatial distribution, appearance and type of homes within the OA being determined by developers by their planning applications.
- 5.5 (para. 5.4) – The floor space required for the estimated numbers of office jobs should be based on the most recent analysis of need and ways of working. The GLA refused to include in the FALP version of the London Plan the latest figures they had for such purposes in the London Office Floorspace Projections of 2014, despite London Forum's evidence (attached) that the forecast of floor space requirement derived from figures of 2012 had been over-estimated in the Plan and it lacked detail for outer London.
- 5.6 Figure 18 for Old Oak land use has an indicator for "Potential catalyst for regeneration" but it does not seem to appear on the map.

- 5.7 (para. 5.15) – The provision of a new stadium for QPR football club is **not** supported. It would take up too much valuable land space on the OA, required for other purposes. The noise from matches at QPR’s current stadium indicates the adverse effect that would be caused on the amenities of existing and future residents in the OA. The proposals by the owner of the large size 15.7 ha Car Giant site for the future use of its land, which QPR hope to obtain for their stadium, are much more contributory to the aims of this OAPF for homes and regeneration. That is our answer to Q4.
London Forum objects to the inclusion of a football stadium in Key Objective 3 for Old Oak North. As paragraph 5.31 states “Land currently occupied by Car Giant and EMR could be brought forward for redevelopment in advance of HS2” and the OAPF’s Vision for Old Oak North is “residential-led”.
- 5.8 The design policies in 001: Land Use, 002: Public Amenity Space, 003: Streets and Public Realm, 004: Building Height and Density are supported and London Forum welcomes the indication of sensitive areas for building height in Figure 26 and the aim in 004 for appropriate transition in scale of buildings with their surroundings.
- 5.9 Questions 5 and 6 on important entrance points and views are left to input by the existing local residents, businesses and boroughs.

OLD OAK PLACES

- 5.10 The ‘Place’ Visions seem to be reasonable starting points for the preparation of the OPDC Local Plan but require response by local people and businesses. There must be full consideration of the impact of development on the communities and businesses surrounding the OA.
- 5.11 For Old Oak North land usage, see our comments in 5.7 above.
- 5.12 Key Objective 2 should specify the percentages of affordable homes to be planned, preferably at least 40%, including a defined percentage for social housing that recognises the characteristics of the existing OA population and that of the communities surrounding it, all of whom will want future homes for their children within their family area at prices related to their potential income.
- 5.13 There must be policies in the OPDC Local Plan to prevent the development of ‘Buy to Leave’ investment properties in the OA. Such ‘dwellings’ in other development areas of London are taking land that is needed for homes that London’s residents need.
- 5.14 For Old Oak South, consideration should be given for putting railway depots and sidings underground if they cannot be relocated (Key Objective 7 and paragraph 5.41).
- 5.15 (para.5.34) – There should be more detail on the likely location of a District Town Centre to serve the area. That may require amendment to Key Objective 5.
- 5.16 London Forum’s comments for housing in Key Objective 1 are the same as in 5.13 above.
- 5.17 For the new employment intended by Key Objective 2, there should be policies for training of existing residents and apprenticeships.
- 5.18 For the new rail interchange, Key Objective 3, see our comments in 5.3 above.
The benefits and disadvantages of an entrance to the HS2 station being at the eastern or western end or both should be evaluated.
- 5.19 London Forum supports careful consideration of the impact of development (Key Objective 8) and paragraph 5.45. However, the requirement to be “mindful of” that impact in KO 8 is an inadequate term. Movements of trains near to existing bedroom windows must be taken fully into account and cuttings and tunnels used where possible.

- 5.20 For Old Oak High Street, London Forum supports strongly the generous street width in Key Objective 4 and the SuDs proposal in Key Objective 5.
- 5.21 The objective 7 for increased building heights along the street must be considered for the impact on the adjoining neighbourhoods.
- 5.22 London Forum has expressed its view in 5.3 above on the development of Old Oak Common Station. We offer no comments on North Acton or Scrubs Lane as the comments of local people are important.
- 5.23 For the Grand Union Canal, London Forum supports strongly the Key Objective 12 for the use of the canal for transport of people and freight but that objective should be near to the top of the list, not the bottom. Existing transfer stations on the canal should be protected until proven not to be required. Restriction on building heights along the canal, as in paragraph 5.71 must be carried into the OPDC Local Plan. There should be consideration of public crossings of the canal.
- 5.24 The experiences reported of pedestrian and cyclist conflicts on river walks along the Thames in West London and on the Regents Canal would suggest that Key Objective 7 for shared towpaths would not be sensible. The risk of children and elderly people being knocked into the water would be too high unless segregated routes could be achieved.
- 5.25 Consideration should be given to the use of the canal for water source heat pumps, as described at <http://bit.ly/1IUVKq9>
- 5.26 For Old Oak Lane, London Forum considers that the 'Vision' is appalling. It is quite wrong to consider planning such development of homes and businesses in this important Opportunity Area and still leave a main highway, Old Oak Lane, through it as the route for all traffic between Harlesden Town Centre and the A40. "Improvements to the street may be required to mitigate increased transport use" is a disgracefully inadequate comment (Key Objective 3). Safeguarded industrial land, existing residential areas and Conservation Areas along Old Oak Lane are acknowledged (Key Objectives 1 and 5) together with "increased traffic" (para. 5.82) and a "narrow street width" (para. 5.83) which it seems cannot be altered. The improvement suggested is simply enhanced public realm (Key Objective 6).
- 5.27 The HS2 work site will be alongside Old Oak Lane and in use until 2026. Associated vehicle movements will be considerable, as well as construction traffic associated with the development proposed to the east of Old Oak Lane. With HS2 operating, up to 140 taxi trips per hour are expected (para. 8.29).
- 5.28 The strategy and vision are flawed in their consideration of Old Oak Lane and Old Oak High Street in the context of both the developed OA and the changes at the Wembley OA which will lead to more traffic through Harlesden and North Acton. There is also the development in future for the Kensal Canalside OA. Old Oak Lane cannot be left to perform its current through-route function and support all additional traffic generated by the OPDC Local Plan. This must be addressed by the draft OAPF Transport Strategy but it fails to do so in that section 8, as below.

6. Park Royal Strategy

- 6.1 PR1: Land Use lacks an objective to identify, safeguard and develop space for industries displaced from Old Oak and to support them in their relocation.
- 6.2 Park Royal and Old Oak must be protected by policy from any further Government interference and diktats on permitted conversion of buildings and changes of use.
- 6.3 The North Acton area to be created in Figure 4.8 for Park Royal should be considered as a site for the suggested future housing development to be built in the right location, some distance from public transport.

- 6.4 PR2: Infrastructure lacks proposals for ensuring adequate supplies of reliable electricity, gas and water to the OA. Some improvements for them are indicated on page 127.
- 6.5 The Heart of Park Royal vision is supported. Development of the ASDA site (key Objective 4) is not explained. Is the store not to remain? It seems to be an essential part of a town centre.
- 6.6 Figure 51 seems to imply the required relocation of SIL sites in the northern part of the Heart of Park Royal new town centre. That needs careful consideration, particularly if there are low cost units now occupied by users who cannot afford increased rents.

7. Wormwood Scrubs Strategy London Forum has no comment on this part of the document.

8. Transport Strategy

- 8.1 (T1: RAIL & UNDERGROUND)
T1:a. **must** include the Overground having good interchange with other lines. The consultations and proposals to date are not encouraging in that respect.
- 8.2 There should be an additional proposal **e. Utilise existing freight lines to increase the range of local destinations linked to OOC.**
- 8.3 (para. 8.6) London Forum is disappointed that none of the three options for the Overground include a satisfactory interchange with the other lines. A half mile walk is not acceptable when planning a largely undeveloped brownfield site.
- 8.4 (para. 8.12) We agree that developing Willesden Junction will be an early priority. It is not quite true that there are no plans. There is a long standing aspiration to reinstate a stop on the service now run by London Midland.
- 8.5 (para. 8.14) As far as possible, any closure of WJLL should not coincide with closures of WJHL.
- 8.6 (para. 8.15) Although frustrating that something still under construction will have to be replaced, we agree that this is necessary.
- 8.7 (T2: ROADS) London Forum is concerned that the OAPF seems to describe problems of road capacity and increased delays at twenty key road junctions (Figure 59) for which it states that "It may not be possible for physical improvement works to be carried out at many of these junctions". Apart from the effect of the massive development in the OA and the increased future movements of cars and other road transport, there are serious congestion issues now which will get worse. Those road traffic problems must be addressed.
- 8.8 The A40 is often congested with slow moving and polluting traffic which diverts to use Du Cane Road which then also becomes grid locked. The road from the A40 into Park Royal is used as a drivers' rat run. The main north-south road is Old Oak Common Lane and greater use of it would be detrimental to current and future residents.
- 8.9 Congestion on the A406 road now results in traffic diversions from various points along it through Park Royal to the A40 south of the Hanger Lane junction. That will need to be prevented in some way, possible by a new road tunnel, or the proposed OA development would not be sustainable.
- 8.10 London Forum has made the point above that Old Oak Lane and Old Oak High Street cannot be left to continue use as main connections through the Opportunity Area to destinations outside it.

- 8.11 Paragraph 8.18 sums up the problems as "The road network will need to change if it is going to support new development in the area, improve conditions for existing users and facilitate improved pedestrian, cycle and bus connections. It will also be important that the amount of traffic generated by the development is limited to what the strategic road network including the A40 and A406 can handle without having a negative impact on its strategic function, given the **limited amount of feasible and productive improvements** that can be made."
- 8.12 It should be recognised that the continued success of Park Royal and its additional light industrial businesses cannot be put at risk by development in Old Oak that would overload routes into and out of the area.
- 8.13 Paragraph 8.23 mentions an A40 tunnelling option but another study must be of how to create a Harlesden By-pass to make Old Oak Lane and other through routes in the OA tolerable, safe, locally effective and not inadequate in their capacity. It is understood community and amenity groups in the OA and its vicinity have proposed a Harlesden Bypass and the way in which it could be achieved. From the evidence in the draft OAPF, that seems to be essential.
- 8.14 (T3: CAR PARKING) – Maximum of one car parking space per five dwellings would seem to conflict with Government policy. So too does the policy for **no** parking spaces (except disabled) for new commercial developments. London Forum supports the proposed parking restraint strongly and the Local Plan must ensure that the parking policy is justified.
- 8.15 (T5: BUSES)
- 8.16 The availability of new bus routes (and good frequencies?) from the beginning of the occupation of development to ensure that car-dependency does not become established is welcomed.
- 8.17 Consideration should be given for additional bus routes in Park Royal (Figure 60).
- 8.18 (para. 8.35) – We warmly welcome the pledge to site bus stops close to centres of activity, something that could usefully be applied elsewhere.
- 8.19 (T6: WALKING AND CYCLING) – Paragraph 8.39 proposes use by pedestrians and cyclists of the canal towpath but warns that "currently it is narrow and its capacity is limited." The OPDC Local Plan should ensure the maximum amount of cycle lane segregation, as in proposal a.
- 8.20 (para. 8.44) – The suggestion of developers' funding of a Cycle Hire scheme covering the whole area needs to be considered carefully for the need to spend transport budgets and CIL contributions on other priorities such as the stations and buses. This topic should be examined further in the Development Infrastructure Funding Study (page 114)
- 8.21 (para. 8.45) – The highest quality of walk is attained by ensuring it is reasonably short. We are pleased to see some commitment to 24 hour pedestrian routes.
- 8.22 (T7: CONSTRUCTION FREIGHT, DELIVERIES & SERVICINGS) – London Forum supports strongly the proposal a. for the use of the canal and rail for excavated and construction material, servicing and non perishable goods deliveries. It will be important to safeguard existing transfer stations and to develop new ones by policy in the OPDC Local Plan. Land should be identified at an early stage for consolidation centres and "central drop off facilities for home deliveries including refrigerated storage." (para. 8.62)
- 8.23 In T7: a. replace "maximum" with "maximal" to be more consistent with para. 8.59.

9. Environment Strategy

The issues that are of concern to London Forum are whether or not full SuDs policies will be applied, including permeable surfaces and soakaways (ground types are not explained but may be clay); water storage and use; retrofit potential; construction emissions management; air pollution from increased traffic; the potential for heat and cooling networks; water source heat pump opportunities; energy resilience; creation of sufficient green corridors; contamination.

- 9.1 E1: WATER – London Forum supports the proposals.
- 9.2 (para. 9.4) It is good that an integrated water management plan is to be devised. In the absence of effective planning, difficulties have arisen at a relatively late stage of development over surface water drainage in Nine Elms.
- 9.3 E2: WASTE – London Forum supports the proposals but seeks early decisions on the options described before the Local Plan is drafted.
- 9.4 An issue raised in the 2014 FALP EiP was whether Mayoral Development Corporations should be waste planning authorities and have apportioned shares of responsibility for London’s waste. It can be inferred from this draft OAPF that they are not and they do not. In which case the Corporation’s relationships over waste planning with the surrounding boroughs might become critical, given the extent to which waste management facilities are already established in this area.
- 9.5 An early decision is needed on the future of the Powerday site and district energy generation.
- 9.6 E3: AIR QUALITY
The draft goes into detail about expected levels of air pollution but is seriously inadequate in its treatment of post-construction monitoring and mitigation. There should be two additional general principles at the beginning of the section: the first that there should be regular monitoring of actual concentrations of pollutants in key locations, and the second that measures should be taken to mitigate exposure to high pollution levels so long as EU standards and objectives are not being achieved.
- 9.7 The present text makes post-construction monitoring solely the responsibility of individual developers. It then assumes that, apart from any action that might be taken by individual developers, the general platitudes in the Transport Strategy about walking, cycling, use of public transport and minimising the number of trips by private vehicles will be sufficient to remove any need for more specific mitigatory measures.
- 9.8 For air quality to meet required levels, it is clear that a strategy for roads must be produced to reduce through traffic using Old Oak and Park Royal and increasing the throughput of the A406 and A40 to avoid congestion. See our comments for Chapter 8 T2: ROADS.
- 9.9 The subsection on dust emissions is confused and repetitive and needs editing. However, London Forum supports the proposals in para. 9.18 for trees. That should be amplified in E5.
- 9.10 E4: ENERGY
There should be specific mention of the desirability of optimising the orientation of buildings to save energy on cooling, heating and lighting.
The use of water heat pumps must be explored.
- 9.11 E5: GREEN INFRASTRUCTURE
This section is supported strongly, particularly paragraph 9.23

10. Delivery Strategy

- 10.1 This part of the draft OAPF clearly needs a lot more work and investigation as indicated in the text, with several strategies "to be developed over the coming months". Relocation or placing underground of the Crossrail depot and sidings is a priority. Similarly, the IEP depot for the Great Western Main Line.
- 10.2 The amount of land occupied by the West Coast Main Line shown in Figure 67's photograph prompts consideration of building over the tracks to support the development of the OA and to avoid barriers to movement in the area and noise impact on new communities and businesses. TfL, the MDC and Network Rail should investigate the opportunities.
- 10.3 It is hoped that a decision on the Powerday and Sword and Shield sites can be made earlier than indicated for redevelopment than that shown on Figure 69 for phasing.