

GREATER LONDON AUTHORITY

Emma Williamson
Director of Planning
OPDC,
City Hall,
The Queen's Walk,
London
SE1 2AA

Department: Planning

Our reference: LDF40/LDD01/LP01/HA01
Date: 05 July 2021

By email: Emma.Williamson@opdc.london.gov.uk
localplan@opdc.london.gov.uk

Dear Emma,

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

RE: Old Oak and Park Royal Development Corporation (OPDC) Local Plan - Proposed Main Modifications

Thank you for consulting the Mayor of London on the proposed Main Modifications to OPDC's Local Plan following the Examination Hearing sessions. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor provided comments on the Regulation 19 version of the draft OPDC Local Plan on 27 July 2018 (Reference: LDF40/LDD01/DR01) and agreed a Statement of Common Ground with OPDC on 4 February 2021¹.

The London Plan 2021 was formally published on the 2 March 2021, and now forms part of OPDC's Development Plan and contains the most up-to-date policies.

The Mayor has carefully considered the proposed main modifications and is of the opinion that the draft Local Plan is in general conformity with the London Plan 2021 (LP2021).

The Mayor has afforded me delegated authority to make more detailed comments on his behalf which are set out below. Representations from Transport for London (TfL), which I endorse, are included and attached to this response.

¹ <https://consult.opdc.london.gov.uk/9276/widgets/26419/documents/12105>

Detailed comments on the proposed main modifications to OPDC's Local Plan are set out in the table below.

Main Modification Reference	Policy / Paragraph	Mayor's response
MM/PS2/OPDC/SP/2	3.3	The Mayor notes and welcomes the updated housing target which is in line with the agreed Statement of Common Ground. The projected employment numbers are slightly lower than what was agreed in the Statement of Common Ground with the Mayor but it is noted that the newer figure is based on the latest information available and is acceptable.
MM/PS2/OPDC/SP/6	SP4 a)	The Mayor notes and welcomes the updated housing targets which are in line with the agreed Statement of Common Ground and set out a commitment to meet OPDC's housing target to deliver 13,670 new homes between 2019 and 2029 as set out in Table 4.1 of the LP2021.
MM/PS2/OPDC/SP/9	SP5 a)	It is recognised that the projected employment numbers are slightly lower than what was agreed in the Statement of Common Ground with the Mayor but it is noted that the newer figure is based on the latest information available and is acceptable.
MM/PS2/OPDC/SP/5	3.8	Welcome the additional work on industrial intensification at Old Oak North and how this will contribute towards the Plan's growth aspirations.
MM/PS2/OPDC/SP/12	3.26	Welcome the modification, which is in line with the Statement of Common Ground with the Mayor and establishes clearly the uplift in industrial capacity that can be brought about on other sites in the OPDC area.
MM/PS/Q12Q13Q16(2)	P7, P4, P5 & supporting figures	Welcome the modification, which provides clarity that the listed waste sites are safeguarded as part of the West London Waste Plan.
MM/PS2/OPDC/P4/4	4.58	Welcome the modification as it reflects LP2021 Policy SI9 which makes compensatory capacity a necessary requirement if the safeguarded waste site was to be redeveloped.
MM/PS2/OPDC/P5/2	4.86	Welcome the modification as it reflects LP2021 Policy SI9 in order to seek compensatory capacity if the safeguarded waste site was to be redeveloped.
MM/PS2/OPDC/P7/7	4.108	Welcome the modification as it reflects LP2021 Policy SI9 in order to seek compensatory capacity if the safeguarded waste site was to be redeveloped.
MM/PS2/OPDC/P10/2	P10(a)	The Mayor supports residential-led mixed use development along Scrubs Lane. Housing delivered

		here will make a positive contribution in meeting OPDC's housing target as set out in the LP2021.
MM/PS2/OPDC/P10/10	4.170	The proposed modifications are welcomed. With the focus on place-making and supported by the Scrubs Lane Development Framework Principles Update, this area presents a good opportunity for high quality residential-led mixed use development which can capitalise on its pivotal location. It will benefit from its proximity to Old Oak Common Station, Harlesden Town centre, Willesden Junction Station and the Kensal Canalside and White City Opportunity Areas.
MM/PS2/OPDC/EU6/1	6.69	Welcome the intention to bring forward an up-to-date West London Waste Plan which will take into account the apportionment targets set out in the LP2021.
MM/PS/OPDC M9(5) and MM/PS/OPDC M9(6)	8.23, 8.24 & 8.25	The Mayor welcomes the stronger emphasis on the delivery of much needed social rent and London Affordable Rent homes.

Directions received from the Secretary of State in December 2020 in relation to the London Plan 2021 resulted in changes to Policy D9 Tall buildings. In light of those changes, OPDC's approach to tall buildings as set out in the Tall Buildings Statement Update (May 2021) and the draft Plan is consistent with the approach in the LP2021.

Next steps

I hope these comments positively inform the preparation of the OPDC Local Plan and we look forward to continuing to work with you to ensure it aligns with the LP2021 as well as delivering OPDC's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Hassan Ahmed on 020 7983 4000 or at hassan.ahmed@london.gov.uk

Yours sincerely



Lucinda Turner

Assistant Director of Planning

Cc Krupesh Hirani, Dr Onkar Sahota and Tony Devenish, London Assembly Constituency Members
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG



ANNEX 1 – Transport for London Representation

Transport for London
City Planning
5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

30th June 2021

Dear Sir/Madam,

RE: Post submission modified draft Local Plan consultation

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA).

Comments

- General: The general emphasis in the draft Local Plan is aligned with TfL policies and priorities; it makes appropriate references to MTS objectives, e.g. Healthy Streets, however we would recommend referring to Vision Zero in relation to any relevant road safety policies.
- General: We welcome the agreements reached in the Statement of Common Ground on a range of topics and as such are generally supportive of the transport policies contained within the Local Plan. There are some areas where we consider it would be beneficial to undertake additional work, as detailed below, but are satisfied that this can be done later and that the outputs would have no material impact on the contents of the current Local Plan:
 - we recommend there is a commitment to undertaking a future refresh of the existing Transport Strategy. The current transport strategy, although still adequate and fit for purpose in terms of modelling the overall scale of development being proposed for the area, is based on what is now relatively old data. As land uses, capacities and phasing begin to become more clear, there is a need for the strategy to be updated. This needs to include reviewing the impact on junctions along the A40.

This is agreed in the SoCG and given the impact Covid is having on travel patterns, we agree it makes sense to undertake additional work in the future.

- There is a need to develop a separate Walking and Cycling Strategy for area to provide additional detail for the area and to build on what is within the Local Plan, which is considered acceptable for now.
- There should be a commitment to developing a monitoring strategy (in collaboration with TfL) with evaluation triggers, if the mode shift is not being achieved. Adding a sentence to cover developing this in the future would be sufficient.
- Places: Footway widths should be appropriate for pedestrian demands with an aim of achieving a B+ pedestrian comfort level (PCL). This is a TfL requirement (as per TfL's Pedestrian Comfort Guidance).
- Para 4.18: This includes a new reference to the potential provision of a local park on the Elizabeth line depot site. We previously raised the following comments in relation to development on the depot site and these continue to apply: *Any future redevelopment on the depot site will need to be both viable and deliverable, which may impact on the end uses that can be provided. The site cannot be considered in isolation and has to work as part of a long-term holistic strategy.*
- Para 4.97: This refers to a complementary night shuttle bus service for shift workers. It should be noted that this not something that TfL would be in a position to fund/financially support and therefore if this were to be taken forward it would need to be through a private enterprise, which may not be viable.
- Design (p105): Maintenance should be at the forefront of securing high quality design to ensure the longevity of the investment. During the design stage it would be valuable to engage with stakeholders with protected characteristics to ensure proposals are inclusive.
- Policy T1 (supporting text): Designs should be subject to EqlAs.
- Policy T2: The policy should include applying suitable surface materials and neatly aligned street furniture. This will support legibility and provide easily navigable walking routes, particularly for pedestrians who are disabled, older or with children. Crossing facilities should be provided where there are pedestrian desire lines to improve road safety and directness where there is a demand to cross.
- Para 7.16: Consideration of walking routes during all times of day is important. Designing well-lit areas and designing out crime gives greater confidence for more walking at night.

- Policy T4 Parking and 7.29: We support the changes to wording in part A (ii) of this policy and the explanatory text in 7.29 which are necessary to bring the parking policy into line with the London Plan 2021. The requirement for car free development for residential developments located in existing or planned areas of PTAL 4–6b is consistent with policy T6.1 in the London Plan as set out in the TfL Statement of Common Ground.
- Policy T8: TfL has devised its own Temporary Traffic Management Handbook (published January 2019). The specific detail on managing pedestrian and cycling safety during street works should inform this policy.
- Policy P7: As per our SoCG, we welcome the additional wording to support the safeguarding and potential funding towards Old Oak Common Lane station. There are a few points of clarification needed as follows:
 - The WLO is currently listed as something to be delivered in 21+ years. This should instead be in the 10-20 years category.
 - Safeguarding for the OOCL station should include the design of the ped/cycle bridge which crosses the railway and should also ensure the necessary provision for when the OOCL station is built. Infrastructure which may come in advance (e.g. the ped/cycle link) must not impact the delivery of the station.
 - We would welcome strengthened support for the station and WLO which recognises the benefits they would deliver for the area and the attractiveness and value of development. Even if they do not unlock many new homes in the area, OOCL station will improve public transport connectivity.
 - The text in the plan should be updated to reflect the current stage of development of the WLO scheme.
- Policy P2: We are supportive of the additional wording in relation to Willesden Junction station.

I trust the above comments are helpful in the further preparation of the Local Plan, please do not hesitate to contact the case officer (rachelmcelhone@tfl.gov.uk) should you have any questions. Otherwise, we look forward to working with you further on this.

Yours sincerely,

Josephine Vos

Manager – London Plan and Planning Obligations Team, TfL City Planning

Email: josephinevos@tfl.gov.uk



Appendix A:

Section		Track change/comment