

Old Oak West

Supplementary Planning Document Consultation Statement

February 2024



1. Introduction

- 1.1 This Consultation Statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 to support the adoption of the Old Oak West Supplementary Planning Document (SPD).
- 1.2 In accordance with the Regulations and OPDC's Statement of Community Involvement, this statement sets out:
 - who was consulted during the preparation of the SPD;
 - how they were consulted;
 - each consultation comment and individual OPDC responses including how issues have been addressed in the adopted SPD.

2. Public Consultation Process

- 2.1 In October 2023, OPDC's Planning Committee approved public consultation on the draft Old Oak West SPD. Public consultation took place between 16th October and midnight on 27th November 2023.
- 2.2 Awareness raising comprised the use of:
 - Letters sent to over 18,000 addresses.
 - Emails were sent out to contacts on OPDC's consultation database, which included public authorities, developers and landowners, interest groups, residents' groups, and residents.
 - OPDC's online engagement platform providing a dedicated [Old Oak West SPD page](#) holding copies of the consultation material. The page was visited over 700 times by people.
 - Provision of paper copies of consultation materials in the local locations:
 - OPDC offices, 1st Floor, Brent Civic Centre, Wembley, HA9 0AF
 - Wembley Library, Brent Civic Centre, Wembley, HA9 0AF
 - Harlesden Library, Craven Park Road, NW10 8SE,
 - Brent Hub Community Enterprise Centre, 6 Hillside, NW10 8BN
 - The Collective, Old Oak Lane, NW1 6FF
 - Regular sharing on social media.
 - A dedicated email address and phone line.
 - Advertisements in local newspapers.
 - Posters in the local area.
- 2.3 Engagement events comprised an in-person drop-in event on 1 November at The Lab in Oaklands Rise and an online consultation event held on 14 November 2023. Approximately 30 people attended the drop-in event and 12 people attended the online event. Comments on the SPD were able to be provided by email, post and the online engagement platform. Stakeholders were also provided with a telephone number and email address in order to ask OPDC officers and questions ahead of submitting a formal response to the public consultation.

3. Public Consultation Responses

- 3.1 Consultation responses to the draft SPD were received from 16 stakeholders, comprising 269 individual comments. Table 1 below sets out who submitted the

comment, the comment, and a response from OPDC. If a modification to the SPD has been made in response to a comment this is confirmed in the OPDC response. Modifications are identified in the track changed version of the SPD and the Adoption Statement. The modification references in these documents are comprised of the Respondent Reference number and Comment Reference number provided in table 1 below, e.g. (3/19)

4. Consultation on the SEA Screening

- 4.1 As part of the process for developing the Old Oak West SPD, an assessment of the requirement for a Strategic Environmental Assessment (SEA) was needed. Screening consultations were undertaken to enable the Environmental Bodies as specified in section 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 to provide comment on the appropriateness of the screening process and its conclusion for this proposed SPD.
- 4.2 Those bodies are:
 - Natural England;
 - Historic England; and
 - Environment Agency.
- 4.3 Other bodies were specifically invited to comment:
 - London Boroughs of Brent, Ealing, and Hammersmith and Fulham; and
 - Greater London Authority.
- 4.4 The screening consultation period ran for 5 weeks from 6 February 2023 to midnight on 14 March 2023.
- 4.5 Natural England responded to the SEA screening stating that there are unlikely to be significant environmental effects from the proposed plan and view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect. The Environment Agency also responded and did not anticipate that the SPD would have any significant negative effects on the environment.
- 4.6 The SEA Consultation and Determination Statement (which can be viewed on OPDC's website along with the other SPD documents) confirms that the SPD will not change or introduce new planning policy over and above the Local Plan and, whilst there may be some environmental effects, these have already been considered in principle in the Integrated Impact Assessment of the Local Plan. It concludes that an SEA, in addition to the Local Plan Integrated Impact Assessment (IIA), is not required for the SPD.

Table 1: Public consultation comments and OPDC responses

| Respondent Reference | Comment reference | Respondent | Comment | OPDC Response |
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| 1 | 1 | Old Oak Neighbourhood Forum | <p>The Old Oak Neighbourhood Forum was designated by OPDC in 2017. The Forum responded to consultations at all stages of the preparation of the OPDC Local Plan and participated in the Examination hearings held in 2019-2022.</p> <p>This is an initial response to OPDC’s consultation on a Draft Supplementary Planning Document for an area defined as Old Oak West. We will be submitting further detailed comments before the consultation closes on 27th November.</p> | Noted |

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| 1 | 2 | Old Oak Neighbourhood Forum | <p>At this stage our response examines one question only, on the status of the document. Our question is: Does the content of this document as drafted constitute a development plan document (DPD), as defined by the Town and Country Planning (Local Planning) (England) Regulations 2012, and therefore require Examination and potentially a Strategic Environmental Assessment (SEA)?</p> <p>The legal distinctions between content and subject matter which can be included in a SPD as opposed to a DPD have proved a difficult area of law.</p> <p>There have been a series of cases where SPDs have strayed into the territory of a DPD and have been quashed by the Courts as a result. In most cases this has happened after adoption. We think it important for OPDC to demonstrate during the consultation period that this risk will not arise in the case of the Old Oak West SPD.</p> <p>The legal cases which we have examined on this issue are as below:</p> <p>Wakil and Others v London Borough of Hammersmith & Fulham Neutral Citation Number: [2012] EWHC 1411 (QB) Case No: CQ/735/2011 Skipton Properties Ltd n Craven District Council Neutral Citation Number: [2017] EWHC 534 (Admin) Case No: CO/5521/2016</p> | <p>No change proposed. The draft Old Oak West SPD confirms that it supplements OPDC's Local Plan (paragraph 0.1) and is a material consideration (paragraph 1.10). It coordinates existing Local Plan policies specific to Old Oak West and includes guidance informed by community engagement that supplements existing Local Plan policies.</p> <p>Therefore, it does not set out new policy and is consistent with the Local Plan. Officers consider that the draft SPD adheres to the principles that the referenced legal cases establish.</p> |
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| | | <p>William Davis Ltd & Ors v Charnwood Borough Council [2017] EWHC 3006 (Admin) (23 November 2017)</p> <p>We fully accept that each of these cases involved different sets of circumstances, with each being judged on their merits. But some general principles emerged from the judgments in each case. We consider that these beg serious questions on whether the current Draft Old Oak West SPD would survive a legal challenge, if adopted in its present form.</p> | |
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| 1 | 3 | Old Oak Neighbourhood Forum | <p>Context of the Old Oak West SPD</p> <p>We see this as an unusual and unorthodox example of a SPD. This alone does not make it unlawful. Below are some of the attributes of the OPDC draft document which we feel are questionable for a purported SPD as opposed to a DPD.</p> <p>a) The Draft refers to development sites in an area defined (for the first time in a Local Plan document) as a 'Place' labelled Old Oak West. Paragraph 1.3 states The sites are located in six different 'Places' in the Local Plan and subject to different Place policies. This SPD amalgamates the relevant place policies in the Local Plan to provide clearer spatial planning guidance for Old Oak West and to support a comprehensive and coordinated approach to development in Old Oak West.</p> <p>It is established that SPDs are intended to provide 'policy guidance' and are allowed to contain 'policy'. But this must be justified and must not conflict with the adopted development plan (Reg 8(3)). SPD policy cannot supersede development plan policy.</p> <p>The concept of 'amalgamating' the wording of a series of adopted local plan policies without creating 'new' policy seems to us to be questionable. Paragraph 1.5 of the Draft states This SPD focuses on coordinating existing relevant spatial policies. We are not clear what is meant by the term 'co-ordinating'? Precise</p> | <p>No change proposed. We consider that the SPD content accords with the Town and Country Planning (Local Planning) (England) Regulations 2012. The SPD includes reasoned justification of its guidance and does not conflict with the Local Plan policies.</p> <p>No change proposed. The amalgamation and coordination of existing Local Plan policies into SPD guidance has not created new policy. The intention is to coordinate these policies as spatial planning guidance for Old Oak West which includes areas of six Local Plan Place policies. OPDC considers that a comprehensive approach to developing Old Oak West will deliver a variety of benefits. This includes better placemaking to foster sustainable and complementary neighbourhoods, coordinating the delivery of infrastructure to connect the area and support existing and future residents; and potentially delivering more homes and space for jobs than set out in our Development Capacity Study Update (2021) through optimised and accelerated development capacities.</p> <p>Change proposed. Local Plan policies continue to form part of the development plan and have greater weight than SPD guidance which does not form part of the development plan. Wording reflecting this relationship has been added to the Introduction.</p> |
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| | | | terminology has proved to be significant in the legal cases referred to above. | |
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| 1 | 4 | Old Oak Neighbourhood Forum | <p>b) Paragraph 1.7 of the introduction to the Draft SPD goes on to say -- The sections will set out guidance and information in the form of:</p> <ul style="list-style-type: none"> • Principles – Proposals will be required to comply with Principles. <p>It is not explained why the term ‘Principles’ is used. OPDC has previously made use of this term in publishing a series of documents for specific areas titled Development Framework Principles. Although overtaken by events in some cases, these publications continue to feature as ‘supporting document’ for the Local Plan. We have not come across the term in relation to other local plans, despite checks on Google and use of AI searches. It does not feature in the Government’s Plain English Guide to the Planning System or on the Planning Portal. Explanation is needed of why this term is used.</p> <p>It appears that the term Principles is being used in the Old Oak West SPD to lessen the risk of challenge that ‘amalgamated’ wording constitutes ‘new policy’.</p> | <p>No change proposed. OPDC has consistently used Principles in its SPDs to structure guidance alongside Ambitions. This approach is commonly used by local planning authorities to differentiate between Local Plan Policies and SPD guidance. All three host boroughs and the Royal Borough of Kensington and Chelsea have taken this approach in various SPDs.</p> |
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| 1 | 5 | Old Oak Neighbourhood Forum | <p>c) More importantly, the second part of this sentence states Proposals will be required to comply with Principles. This elevates the status of 'Principles' to development management requirements.</p> <p>Our understanding of the judgments in the Charnwood and Skipton cases is that the offending and quashed SPD documents were deemed to contain 'policies' which clearly related to forms of development to be encouraged, and imposed development management requirements against which applications could be refused. Hence (we argue) these amalgamated statements (whether termed 'policies' or 'principles') can only be adopted as a Local Plan (DPD), following examination.</p> | <p>Change proposed. It is not the intention for Principles to be development management requirements. To ensure consistency, the previous definition of principles has been removed and the definition of Principles set out in the SEA Screening and Determination Statement has been included in the SPD. This will clarify the intended role of Principles in the SPD.</p> |
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| 1 | 6 | Old Oak Neighbourhood Forum | <p>d) In the Charnwood case the District Council promoted the SPD as an ‘interim approach’ or a necessary ‘stopgap’ prior to preparation of an updated local plan. OPDC is to an extent in the same position. After the Inspector’s intervention in 2019, the OPDC Local Plan required 464 major modifications as a result of which the spatial context was substantially altered, with Old Oak West a new creation as compared with the submission version of the Plan.</p> <p>Hence the need to relabel six original ‘places’, and in doing so set aside the logic of their earlier boundaries. The case for justifying an ‘interim approach’ was rejected by Mr Justice Jay on the basis that the content of the document was ‘clearly policy’.</p> | <p>No change proposed. The Local Plan Place policies and intention to deliver their visions remain in place. The Old Oak West SPD does not propose an interim approach. It seeks to amalgamate and coordinate the existing Local Plan policies to provide clarity for the development of the Old Oak West area. It is consistent with the Local Plan and does not set new policy.</p> |
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| 1 | 7 | Old Oak Neighbourhood Forum | <p>e) The Draft SPD contains a section 10 on Design. This includes Principle DP2 on Building Heights. This 'Principle' starts by saying Proposals should deliver a range of building heights comprising.. and then continues to specify height ranges at specified locations at Old Oak West. These height ranges were introduced in January 2022 as 'supporting text' as part the final modifications to the Post Submission Draft Local Plan. The Inspector chose to accept these very late modifications despite the fact that they were not consulted on at PSMDLP stage in late 2021.</p> <p>OPDC now seeks to give these height ranges the status of 'Principles' in a SPD rather than supporting text in a local plan. As noted above, the concept of 'Principles' adding any weight as a material consideration is questionable. But it is clear that these height ranges are not currently full 'policy' in the adopted OPDC Local Plan and as such are now proposed to be included in a document as an attempt to introduce 'new policy' in a manner which we consider to be incompatible with SPD categorisation.</p> | <p>Change proposed. General building height ranges are located in Local Plan policies and therefore it is appropriate to include these in Principle DP2. It was not the intent to elevate the status of the tall building heights guidance. Principle DP2(k) has been amended to relocate the predominant tall building height ranges to supporting text. Supporting text to Principle DP2 has been amended to confirm that SPD building heights guidance and supporting text information does not amend the status of existing Local Plan heights policies and supporting text.</p> |
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| 1 | 8 | Old Oak Neighbourhood Forum | <p>Our understanding of the construction of the 2012 Regulations is that documents that have the characteristics listed in regulation 5 of the 2012 Regulations must (under Regulation 6) be prepared as local development documents (DPDs). SPDs are defined negatively (under Regulation 2) as anything that is not a Local Plan or LDD.</p> <p>Our understanding is that SPDs cannot contain policy identifying development and use of land which the authority wishes to encourage, making site allocations or site allocation policies or setting development management requirements which have to be met to secure consent or which would constitute sufficient grounds for refusal.</p> <p>Regulation 5 reads as below</p> <p>5. —(1) For the purposes of section 17(7)(za)(1) of the Act the documents which are to be prepared as local development documents are—</p> <p>(a) any document prepared by a local planning authority individually or in cooperation with one or more other local planning authorities, which contains statements regarding one or more of the following—</p> <p>(i) the development and use of land which the local planning authority wish to encourage during any specified period;</p> <p>(ii) the allocation of sites for a particular type of development or use;</p> <p>(iii) any environmental, social, design and</p> | <p>No change proposed. The draft Old Oak West SPD is legally compliant, consistent with the Local Plan is consistent with the NPPF. Regarding the stated bullet points:</p> <p>1. Old Oak West represents a portion of an area of significant change that is already identified in the Local Plan. The SPD guidance is consistent with the existing Local Plan policies for the area and adds supplementary detail to these existing policies.</p> <p>2. / 3. /4. The Old Oak West SPD contains Principles that amalgamates and coordinates existing Local Plan policies, site allocations and objectives already set out in the Local Plan. It also includes guidance informed by community engagement that supplements existing Local Plan policies. The SPD therefore is consistent with existing Local Plan policies and adds supplementary detail to these existing policies. It does not set out new policy.</p> <p>Therefore, officers do not agree that the SPD should be restarted nor that its development should be replaced with the development of an DPD.</p> |
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| | | | <p>economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i); and</p> <p>(iv) development management and site allocation policies, which are intended to guide the determination of applications for planning permission;</p> <p>(b) where a document mentioned in subparagraph (a) contains policies applying to sites or areas by reference to an Ordnance Survey map, any map which accompanies that document and which shows how the adopted policies map would be amended by the document, if it were adopted.</p> <p>(2) For the purposes of section 17(7)(za) of the Act the documents which, if prepared, are to be prepared as local development documents are—</p> <p>(a) any document which—</p> <p>(i) relates only to part of the area of the local planning authority;</p> <p>(ii) identifies that area as an area of significant change or special conservation; and</p> <p>(iii) contains the local planning authority's policies in relation to the area; and (b) any other document which includes a site allocation policy.</p> <p>SPDs are defined negatively (under Regulation 2) as anything that is not a Local Plan document. Assessing the SPD as a whole, it would seem to fall under Regulation 5 in these key respects:</p> <ul style="list-style-type: none"> • It identifies a specific area 'of significant | |
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| | | | <p>change' while relating to only part of the area of the local planning authority</p> <ul style="list-style-type: none"> • It contains the local planning authority's policies in relation to the area in a newly 'amalgamated' form. • It contains development management and site allocation policies, which are intended to guide the determination of applications for planning permission. • It contains many environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land <p>The first of the Court judgments on the legitimate scope of a supplementary planning document, cited at the start of this representations involved a development brief prepared and adopted by LB Hammersmith & Fulham in relation to potential development at Shepherds Bush Market. To quote relevant paragraphs 87-90 from the judgment:</p> <p>87. Whilst that is an important conceptual difference between the two categories of document, it does not replace the provisions of the statute which require me to consider whether, looking at the document as a whole and as a matter of substance, it satisfies all of the requirements of an area action plan so as to be a DPD not an SPD.</p> <p>88. In considering whether this document does amount to a DPD I have had particular regard to those passages in the introduction</p> | |
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| | | <p>concerning: background, vision and objectives to which I have referred above. I have also had regard to the range of policy statements set out in the remainder of the document under the various headings to which I have referred.</p> <p>89. In my judgment, Mr Jones is right when he says that the whole point of the document is to identify the Shepherd's Bush Market area as an area of significant change. In my judgment, the whole thrust, tenor and organisation of the document is about the fact that the area is to be transformed and identifies it as an area of significant change.</p> <p>90. Accordingly, and conscious of the fact that in making this judgment I am disagreeing with the view taken by the local planning authority, in my judgment they have, erroneously, failed to characterise this document as an area action plan. That being so the statutory scheme requires that it should have been subject to the procedure required for a DPD. It is not in dispute that it was not subject to that procedure. It follows that, for that reason, the adoption of the document by the Council on the 27th October was procedurally flawed and, on that ground, the decision was unlawful (our emphasis).</p> <p>The OPDC Local Plan, in the form adopted in June 2022, does not demarcate and identify Old Oak West as an 'area to be transformed and of significant change'. It identifies 6 other 'Places' to which policies specific to each were</p> | |
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| | | | <p>drafted for the submission version, consulted on, and heavily modified at stages up to and subsequent to the final consultation on modifications.</p> <p>As of October 2023 the Draft SPD now carries out a different role. While OPDC members and officers may have become familiar with the concept of 'Old Oak West' this concept does not feature in the adopted Local Plan. This is newly introduced to the local plan process. We therefore argue that the tenor, thrust and organisation of the Draft SPD requires it to be consulted on and progressed under the procedures required for a DPD, and not as a SPD</p> <p>We therefore believe that the current consultation should be restarted. Either the current draft SPD should be substantially redrafted in a form which would meet the (negative) SPD characteristics under the Regulations. Or the present draft should be consulted on as a DPD and subject to Examination and any SEA requirements deemed to apply.</p> | |
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| 1 | 9 | Old Oak Neighbourhood Forum | <p>The officer report to the OPDC Board on October 12th included a brief paragraph of legal comments, stating Part 5 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the procedure for the production of SPDs. This draft Old Oak West SPD constitutes the consultation version required to be carried out under Regulation 12 of Part 5 of those Regulations.</p> <p>These legal comments in the report were very thin. Part 5 of the Act concerns the process for preparing and adopting a SPD. It does not address the question of the distinction between a DPD and a SPD.</p> <p>We would now expect the OPDC's response to the current SPD consultation to include authoritative legal advice that adoption as a SPD of a finalised draft document is lawful. This is not a straightforward legal issue and other planning authorities have seen decisions quashed, as in the three cases cited above.</p> | <p>No change proposed. The draft Old Oak West SPD is considered to be legally compliant. Therefore, the report's legal comments reflect this status.</p> <p>Officers have secured legal advice which has informed responses to individual comments. This confirms that the SPD proposed for adoption is lawful.</p> |
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| 1 | 10 | Old Oak Neighbourhood Forum | <p>Strategic Environmental Assessment Screening and Determination Statement</p> <p>We note that the concluding section of this October 2023 document reads as below:</p> <p>4.11 OPDC’s Old Oak West SPD will provide additional information on the policies set out in OPDC’s adopted Local Plan. It will not create additional planning policies or amend current planning policies. As such, the screening of this document, and the comments received from consulted bodies listed in paragraph 4.6 above, has led to the conclusion that the SPD is unlikely to have any significant environmental impacts, and therefore, an SEA is not required.</p> <p>4.12 This section therefore constitutes the OPDC’s Determination Statement outlining the process that has led to the conclusion that a SEA is not required.</p> <p>We consider this a disingenuous statement. Is ‘amalgamating’ not ‘amending’? Earlier sections of the Screening Assessment set out the ‘Proposed Structure’ of the SPD and use this terminology below: Guidance - Sets out SPD guidance in the form of Principles and Ambitions: • Principles provide guidance on things that must be considered in developing proposals.</p> <p>‘Guidance on things which must be considered’ is not the same language as used in the draft SPD itself, where (as noted above) the</p> | <p>Change proposed. To ensure consistency, the previous definition of principles has been removed and the definition of Principles set out in the SEA Screening and Determination Statement has been included in the SPD.</p> <p>No change proposed. SPD guidance is consistent with Local Plan policies. The guidance coordinates existing Local Plan policies specific to Old Oak West and includes guidance informed by community engagement that supplements existing Local Plan policies. It does not set out new policy.</p> |
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| | | | <p>language used at 1.7 is Principles – Proposals will be required to comply with Principles. This latter wording imports a swathe of development management requirements, to be interpreted by applicants and the public and using new amalgamated wording, into the SPD. This was not made clear to those invited to comment on the Screening Assessment.</p> | |
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| 1 | 11 | Old Oak Neighbourhood Forum | <p>It is notable that none of the three Boroughs nor the GLA submitted any comments on this Screening and Determination Statement and hence were deemed by OPDC to have gone along with the conclusion reached on the screening process, as below: it is concluded that as the OPDC Old Oak West SPD will not change or introduce new planning policy, proposals or allocations and that those on which it will rely are within the Local Plan which are subject to an Integrated Impact Assessment (IIA) (including a SA/SEA), it is considered that a SEA is not required for the Old Oak West SPD.</p> <p>We do not see how this approach complies with the Act and Regulations. Or how the consultation on SEA Screening and the consequent Determination can be deemed to have been a valid exercise.</p> | <p>No change proposed. SEA regulations require that the Environmental Bodies, as specified in section 4 of the Environmental Assessment of Plans and Programmes Regulations 2004, are invited to provide comment on the appropriateness of the screening process and its conclusion for this proposed SPD. Those bodies are Natural England, Historic England and the Environment Agency. The regulations do not require the GLA or host boroughs to be invited for comment. These bodies were invited for completeness. Officers invited these three bodies, alongside the GLA and host boroughs, to comment. Natural England and the Environment Agency provided responses. Others did not.</p> <p>Natural England's response identified that there are unlikely to be significant environmental effects from the proposed plan and view the proposals contained within the plan to not have significant effects on sensitive sites that Natural England has a statutory duty to protect.</p> <p>The Environment Agency's response identified that they do not anticipate that the SPDs will have any significant negative effects on the environment.</p> <p>In light of the above, the legal requirements to invite environmental bodies to comment and to undertake an SEA screening and determination process have been met.</p> |
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| 1 | 12 | Old Oak Neighbourhood Forum | <p>Conclusions</p> <p>For all the above reasons, we argue that that the current consultation on the Draft SPD should be restarted. Either the current document should be substantially redrafted in a form which would meet the (negative) SPD characteristics under the Regulations and thereby avoid being categorised as a DPD under Regulation 5. Or the present draft should be consulted on as a DPD and subject to Examination and any SEA requirements deemed to apply.</p> <p>Given the wide scope and content of the Draft SPD, and its introduction of new policies, we consider that the proposals in the Draft SPD should be progressed as a Partial Review of the Local Plan. There are precedents such as the Local Plan Partial Review for North Kensington, undertaken by RBKC in 2017.</p> <p>As a result of events external to OPDC since the 2018 submission of the Draft Local Plan (the cancellation of the HS2 project north of Birmingham, increased construction costs, shrinking residential values) there has been much change impacting on the Draft Plan as prepared for Examination. Five years have passed. Not only has the focus of the Plan shifted from Old Oak North to Old Oak West, but many other assumptions built into the adopted Local Plan are seriously outdated.</p> <p>A Partial Review, we suggest, would be a way</p> | <p>No change proposed. The content and development of the SPD is considered to be legally compliant, consistent with the NPPF and the development plan. SPD guidance is consistent with Local Plan policies. The guidance coordinates existing Local Plan policies specific to Old Oak West and includes guidance informed by community engagement that supplements existing Local Plan policies. It does not provide new policies.</p> <p>Therefore, officers do not agree that the SPD should be restarted nor that its development should be replaced with a Partial Review of OPDC's Local Plan.</p> |
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| | | | forward that allows for an Examination in Public and reconsideration of key assumptions on which the adopted Local Plan is based. | |
| 1 | 13 | Old Oak Neighbourhood Forum | <p>DRAFT OLD OAK WEST SUPPLEMENTARY PLANNING DOCUMENT: Second response from the Old Oak Neighbourhood Forum</p> <p>The Old Oak Neighbourhood Forum was designated by OPDC in 2017. The Forum responded to consultations at all stages of the preparation of the OPDC Local Plan and participated in the Examination hearings held in 2019-2022. We have 150 members living or working in or around the area now labelled by OPDC as 'Old Oak West'.</p> | Noted |

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| 1 | 14 | Old Oak Neighbourhood Forum | <p>Legal status of the document were it to be adopted</p> <p>We submitted an initial representation on this consultation on 13th November. This set out the detailed reasons why we consider that the current draft document could not lawfully be adopted as a SPD and would require adoption as a development plan document, subject to being found sound at an Examination.</p> <p>We are not rehearsing these arguments in this second representation. Given no response to date from OPDC, our view remains that what has been published for consultation goes well beyond what can be included in a Supplementary Document to a Local Plan. We are assuming that OPDC will respond on these legal questions in a forthcoming consultation statement after 27th November. In the absence of OPDC obtaining advice from leading Counsel on the questions that we posed, we would intend to pursue this issue further through various other channels.</p> | <p>No change proposed. Officers have secured Counsel advice which has informed responses to individual comments. This confirms that the SPD proposed for adoption is considered to be lawful.</p> |
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| 1 | 15 | Old Oak Neighbourhood Forum | <p>Extent of the consultation process We do not as yet know how widely OPDC circulated leaflets and flyers or used social media to inform local people of this SPD consultation. It follows several years of previous consultations on the OPDC Draft Local Plan and on other SPDs. It feels as though a level of ‘consultation fatigue’ has set in amongst local people. The planning system is complex and many of the public may not have realised that this SPD is of more potential significance than others published recently by OPDC. It seeks to revise a key part of the 2018-38 adopted Local Plan.</p> <p>On this latest exercise in inviting responses, the OPDC website provided some links to its ‘consultation platform’ at which a copy of the document and details of consultation sessions could be found. But anyone new to all the issues involved and searching via OPDC web pages, under OPDC Planning/Planning Policy/The Local Plan (i.e. three layers down) would not have found relevant information. A search via the main page and a link to a page called ‘Get Involved’ would have had more success. But this is not a heading that attracts responses from landowners/developers or from amenity and resident groups which have already been ‘involved’ with OPDC over many years. We raised these points with OPDC some weeks ago.</p> <p>A ‘drop-in session’ was held locally by OPDC on November 1st (thinly attended). An online</p> | <p>No change proposed. OPDC went above and beyond what is required of a local planning authority not only to engage and consult on the Old Oak West SPD, but to extensively co-design it with local people, because we recognise its significance.</p> <p>This comprised an early non-statutory engagement and co-design programme between February and June 2023, two reviews by our Community Review Group and the formal statutory 6-week SPD consultation which took place between 16 October and 27 November 2023.</p> <p>The early engagement and co-design programme was extensive, supported by specialist engagement consultants to deliver accessible and inclusive engagement activities. This involved a multi-media outreach campaign, including two mail drops to over 16,000 properties, a door knocking exercise and pop-up stalls at places of high footfall. The engagement activities included three innovative co-design workshops, a site visit, over 11 meetings with groups seldom heard and groups with protected characteristics, and a specific series of events to work with young people to shape the content of the SPD. This resulted in over 260 people participating in events and extensive community recommendations for the SPD. The majority of which have been included in the SPD. These are documented in the published Community Engagement Summary Report which identifies where recommendations have been included and why some</p> |
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| | | | <p>session held on November 14th attracted an audience of less than ten members of the public of whom most were members of our Forum and/or the Grand Union Alliance and who have been attending our monthly online meetings for several years. Two students from UCL who have been working with the GUA were on this Zoom webinar. Overall, we conclude that this important OPDC consultation on revised spatial planning proposals at Old Oak West did not reach a wide public. We will be interested to see how many other stakeholders (landowners, developers, London wide agencies, Boroughs) have responded to this consultation.</p> | <p>recommendations cannot be included due to the nature of an SPD.</p> <p>The formal SPD consultation was also carried out to ensure it was accessible and inclusive and that it conformed with OPDC's Statement of Community Involvement. This involved an extensive multimedia outreach campaign (including emails to contacts on OPDC's consultation database, social media posts, local newspaper adverts and a letter drop to over 18,000 addresses) a dedicated page on our online engagement platform, an afternoon and early evening in-person drop in event, an online evening event and multiple options for providing responses. The online engagement platform page was visited over 700 times by people, approximately 30 people attended the drop-in event and 12 people attended the online event. This demonstrates a high level of engagement on the SPD in addition to engagement carried out earlier in the year.</p> <p>Online information relating to the Old Oak West SPD consultation is easily available through searches through the commonly used search engines with all consultation material, including event materials, available on our dedicated online engagement platform - consult.opdc.london.gov.uk. The 'Get Involved' link on our webpages provides a direct link to the engagement platform. We have added a direct link to the platform from our Planning Policy pages.</p> |
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| 1 | 16 | Old Oak Neighbourhood Forum | <p>Timing of the consultation</p> <p>We see the timing of a consultation period from October 16th to November 27th as having been wholly inappropriate, in the context of Government decisions on HS2 and also taking account of the remaining years in which the key development sites at Old Oak West will remain in use by HS2.</p> <p>The Draft SPD was worked up by OPDC officers over the period from July 2022 (when the OPDC Local Plan was adopted) to September 2023. This is a relatively long period for SPD preparation, given that these documents can add only 'policy guidance' to a Local Plan. In this case, the extent of additional evidence-gathering and new work involved is one of several reasons why we consider the end result to represent a DPD or area action plan rather than a SPD.</p> <p>After lengthy preparation, the remaining stages of the timetable to adoption of this SPD seem now to be being compressed for reasons which are not obvious. Given the Government announcements on HS2 on October 4th, we are concerned that adoption in January will involve the OPDC Planning Committee and Board in making decisions at a time of major uncertainty on Old Oak Common station. Decision makers will be speculating, on various scenarios around Euston which could well be clarified or resolved within months if not weeks. This is not a good basis for decision-making. So why the sudden haste?</p> | <p>No change proposed. The timing of the formal SPD consultation was appropriate and the timeframes for adoption are appropriate. The content, development and adoption of the SPD are not impacted by the recent HS2 announcements and we have been reassured by HS2 that the delivery of Old Oak Common station is on course, which will support the phased comprehensive delivery of Old Oak West. Old Oak Common station opening as a temporary terminus has been the working assumption for a few years now and the Government's announcement in autumn 2023 confirms this. The change to the HS2 delivery programme does not impact the planned opening of Old Oak Common Station and trains will continue on from Birmingham but not at High Speed. Old Oak Common Station's role as a temporary terminus strengthens the need for local regeneration, since it will be the sole interchange for passengers who would otherwise have continued into Euston. At this stage, and based on all advice given, we are not expecting significant revisions and, in any case, the SPD is sufficiently flexible to adapt to changing circumstances. That said, should potential revisions be required, they would be made within a future Local Plan review as the SPD cannot revise content within the Local Plan.</p> <p>OPDC wants to adopt the SPD as soon as is reasonably practicable because it will assist in securing high quality development when determining applications in the Old Oak West Area and assist in promoting development which incorporates community priorities and aspirations.</p> |
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| | | | <p>The Draft SPD and proposed timetable for a public consultation was considered and approved by the OPDC Board at its meeting on September 21st. By this date there had already been extensive and authoritative media coverage of the strong likelihood of Government announcements curtailing the scope of the HS2 project. It was known that such a decision would have consequences for this SPD.</p> <p>To our surprise, this imminent decision was not even mentioned at the OPDC Board meeting on 21st September (in that part of its session open to the public). No discussion at all took place on the potential consequences. When this was queried by OONF after the event, OPDC Chair Liz Peace wrote to us to say: As you mention in your letter, although the Prime Minister was reported as being expected to make an announcement, in fact the week of the Board passed without any such announcement being made, and I suggest therefore, that it would have been less than helpful to have had a discussion without any of the salient facts before us.</p> <p>We were not expecting the Board to have all 'salient facts' before it on the 21st September but instead to have recognised that launching the SPD consultation might not be good timing. There remain at the end of November huge and relevant uncertainties as to whether HS2 will continue to Euston with tunnel costs and a</p> | <p>The development of the SPD commenced in late 2022 and was finalised in September 2023 in preparation for the formal SPD consultation. This is an appropriate timeframe for the development of a spatial SPD and is appropriate in light of the early engagement activities that were undertaken.</p> <p>Supporting studies for the SPD comprise the Consultation Engagement Summary and North Action Station Feasibility Study Update. The development of these is not considered to justify the replacement of the SPD with a DPD.</p> <p>OPDC's November Board meeting was held at Oaklands because members were also visiting the OOC site. It was not possible to webcast from Oaklands. Minutes will be published with the board papers for the next board meeting.</p> |
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| | | <p>new terminus now required to be funded by the private sector. It will be many months before a full picture emerges.</p> <p>For the public, some questioning on the timing of this SPD consultation would have made sense. As it was, this OPDC Board meeting took place only days before heavily trailed Government announcements which impacted heavily on OPDC aspirations for 'transformative' regeneration at Old Oak. The total lack of discussion has reinforced concerns that the Board chooses to operate but holding its key discussions in private 'briefings' or 'Part 2' sessions of meetings from which the public are excluded.</p> <p>A pause in the consultation on this Draft SPD for only a few weeks would have allowed the public to have been better informed on the changed planning context for Old Oak – or at least to have become aware of new levels of uncertainty over the 'catalyst' impact of HS2 passengers passing through the Old Oak interchange.</p> <p>In the event, the general public, landowners, developers and other agencies have been required to respond to the consultation on the Old Oak West SPD during a period ending on November 27th while new and significant factual information has been emerging every week since October 4th. Important information emerged from a HS2 presentation to the OPDC Board on November 23rd, only four</p> | |
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| | | <p>days before the close of the consultation period.</p> <p>In our view, this has compromised the consultation process. It adds to legal concerns that we consider fatal to early adoption of a planning document due to be treated as a material consideration in planning decisions at Old Oak West.</p> <p>At its November 23rd meeting, the OPDC Board listened to and discussed for 50 minutes a presentation from HS2 managers on progress at Old Oak Common Station and on the Government's 're-scoping' of the HS2 project. Information provided at this meeting features in some of our comments and concerns on the SPD, as set out below. This HS2 presentation did not appear as an agenda item on the published agenda for the meeting, contrary to Access to Information requirements.</p> <p>As a result this latest information from HS2 would be unknown to most respondents to this consultation. The only two members of the public present at the OPDC Board meeting were from the Old Oak Neighbourhood Forum and from the Grand Union Alliance. Unusually (as a result of the location used for the meeting on that day) the session was not recorded, and was not made available as a Mayoral webcast on the GLA web site. Parts of the session were inaudible to those in the public seating at the back of the room, despite a request for participants to speak up.</p> | |
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| | | | <p>At this meeting, it emerged from a comment by OPDC's Director of Planning that there is a perceived urgency in the OPDC Board adopting a final version of the Old Oak West SPD at its next meeting scheduled for 31st January 2024. The reasons for this short timeline were not explained. They are hard to understand given the contextual timeline for 'Old Oak West' of a rail station opening at some date between 2029-33, and the key development sites being released from 2028 onwards. These are not imminent events.</p> <p>We can only speculate that the urgency for adoption of the Old Oak West SPD may stem from discussions in progress between HMT, DLUHC, and DFT on the OPDC Outline Business case. The OBC was submitted to Government on August 1st and remains a confidential document. Officer reports to the 21st September OPDC Board mentioned that approvals were likely to come through in September. The November 23rd Board was informed that certain questions and 'clarifications' are now having to be provided to these Government departments.</p> <p>It may be that one of these 'clarifications' involves assurances that the Old Oak West SPD has been consulted on and adopted. If so, this would seem a reasonable condition for Government to impose. As we commented in our previous representation, 'Old Oak West' as the new 'major town centre' of an 'urban</p> | |
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| | | <p>district' at Old Oak is a comparatively recent (2019) construct and does not feature in the Local Plan as submitted for Examination in October 2018.</p> <p>The concept emerged subsequent to Cargiant Ltd abandoning its joint work with OPDC. The Corporation's subsequent 'change of direction' from Old Oak North to the 'Western Lands' was incorporated into the Draft Local Plan through post-submission major modifications. These involved a changed approach to policies in six different 'Places' which featured in the Submission Version of the Plan. The Draft SPD now seeks to consolidate these changes through 'amalgamations' of previous policy wording and new diagrammatic maps.</p> <p>This history has relevance to the prospects for the OPDC Outline Business Case. We can understand why those civil servants assessing this business case may have questions to ask about the realism of proposals for Old Oak West.</p> <p>If we are wrong in this speculation on reasons for urgency for a January adoption of the SPD, OPDC can of course make this clear in its responses in the forthcoming consultation statement. If we are right, we see this as a further example of the innate flaws in the Mayoral Development Corporation model. We have long had concerns about OPDC's role as planning authority taking second place to those as a delivery agency. OPDC's track record</p> | |
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| | | | since 2015 as a delivery agency had proved a freight one, as recognised in a 2021 report by the London Assembly ¹ . | |
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| 1 | 18 | Old Oak Neighbourhood Forum | <p>Use of maps and diagrams</p> <p>The adopted 2022 OPDC Local Plan includes a series of 'Place' chapters in section 4 (Places P1-12 along with some sub-places defined as 'clusters'). These include diagrams underpinning the policy proposals.</p> <p>As mentioned above, the Old Oak West Draft SPD merges parts of six Places in the adopted Plan into the new Place relabelled as 'Old Oak West'. Wording of Local Plan policies is 'amalgamated' for the Draft SPD. As set out in our previous representation, this raises questions of whether 'new' policy is being created in this process.</p> <p>In terms of diagrammatic maps, the SPD includes a series of new versions. Where these are not identical to those in the adopted local plan, which prevails? Should an applicant ensure that their proposals comply with the adopted plan version, or what is a subsequent 'replacement' version which has not undergone an Examination?</p> <p>The Introduction section to the SPD has a paragraph stating: Diagrammatic maps – These diagrammatic maps reflect the illustrative masterplan, early community engagement suggestions and updated supporting studies. They are indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map such as boundaries for heritage designations and town centres.</p> | <p>No change proposed. The SPD guidance is consistent with Local Plan policies. The guidance coordinates existing Local Plan policies specific to Old Oak West and includes guidance informed by community engagement that supplements existing Local Plan policies. It does not set out new policy.</p> <p>Change proposed. SPD paragraph 1.7 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map. Paragraph 1.10 confirms that the SPD is a material consideration for the determination of planning applications. OPDC's Local Plan forms part of its development plan. Therefore, Local Plan maps and diagrams have more planning weight and would be considered as such in the development management process. Wording reflecting this relationship has been added to the Introduction.</p> |
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| | | | <p>This gives some clarity, but not enough. If an applicant comes forward with a proposal that is policy compliant with the Local Plan Policies Map, but diverges from the 'illustrative masterplan' or 'indicative' diagrams in the SPD, would this justify a refusal by OPDC? Would such a decision survive an appeal to the Planning Inspectorate?</p> | |
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| 1 | 19 | Old Oak Neighbourhood Forum | <p>Case Studies and ‘Precedent’ photographs These are used extensively in the document and appear on pages, 22, 27, 44, 57, 60, 63, 70, 75, 79, 82, 86, 94, and 113. They feature photographs and brief descriptions of building and locations in other parts of London, and in other UK and European cities.</p> <p>We do not see such material as appropriate, in providing additional ‘policy guidance’ within a SPD. Case studies and images can be helpful in giving ideas to the public (and to potential applicants) at the Regulation 18 or ‘issues and questions’ stage of a Local Plan.</p> <p>Cherry-picking and reproducing images of buildings, open spaces and public realm seen as successful in other cities is not (in our view) providing additional ‘guidance’ in interpreting local plan policies. This material is not the same as using clear diagrams and CGI images to demonstrate the parameters of adopted policies, in terms of building lines, heights, massing, building lines, layout of external spaces, parking and other features are a very different matter and are commonly used in SPDs and now in Design Codes. Such content offers serious ‘guidance’ to an applicant, whereas a photo of an existing building in a wholly different context does not.</p> <p>This type of illustration has been used (for example) in the OPDC’s Industrial SPD, now out for consultation. Where Character Studies form part of the input to a local plan,</p> | <p>No change proposed. Case studies are not identified as providing guidance in the SPD. The use of case studies is appropriate to help identify how relevant elements of each example could shape the future of the Old Oak West area. The development capacities do not prohibit the delivery of the positive attributes that the case studies present. They are provided in addition to the diagrammatic maps and visualisations.</p> |
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| | | <p>photographs of buildings in the same area may well be appropriate. But this Draft SPD document is not a Design Guide nor a Character Study. It has been drawn up with a far wider scope.</p> <p>‘Case study’ material can give a misleading impression to the public of the heights, massing and quality of architectural design which has been delivered elsewhere in the UK and abroad, but which may well be impossible to replicate at Old Oak West given the quantum of housing fixed for site allocations, and the building heights that feature as ‘Principles’ in this document.</p> <p>‘Precedent’ images are now routinely used by developers in Design and Access studies, in attempts to persuade planning authorities and the public that proposals are of ‘exemplary design’. Their use in a SPD risks misleading the public and raising false expectations what outcomes can be achieved under Local Plan policies.</p> <p>As we have pointed out in the past, we do not see it as the role or responsibility of the planning arm of OPDC to do a ‘selling job’ for development at Old Oak. Nor to adopt a SPD which comes across as ‘advertorial’ for the location. Our Forum has found it hard enough since 2015 to intervene and curb the claims of developers who have based their marketing material on over-optimistic timelines, and exaggerated claims for how the area may</p> | |
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| | | | <p>develop in in the 2018-38 period of the adopted Local Plan.</p> <p>OPDC as well as HS2 have been guilty of unjustified hyperbole in their claims for the future of the area. This remains the case in passages of text in this SPD. A SPD, in our view, should take the form of an objective and well-evidenced planning document and no more.</p> <p>Images and current photos of locations within the area are informative and useful for the public. But we ask for the case studies and precedent photos to be removed from the final version of this draft document.</p> | |
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| 1 | 20 | Old Oak Neighbourhood Forum | <p>Visualisations</p> <p>These also feature prominently in the document, as a means of communicating what different locations at Old Oak West could look like once development is complete.</p> <p>These are helpful to an extent, provided that they reflect with reasonable accuracy the policy parameters on building heights and massing encouraged in the Local Plan. The technology for creating and rendering such images has advanced enormously, and the quality of the versions used by OPDC in the draft SPD does not match the CGI images currently being used by the developers at the Kensal Canalside OA or the Earls Court OA. Hence the occasional question from the public at consultation sessions on why are all the new buildings shown in these funny colours?</p> | <p>No change proposed. The visualisations are used to help illustrate what Old Oak West could look like in the future. Their illustrative style is appropriate for supplementary planning guidance. They reflect the development capacities, Local Plan policies and SPD guidance for Old Oak West. CGI's are not appropriate at this stage as there is not a fully worked up scheme. The visualisations are indicative.</p> |
| 1 | 21 | Old Oak Neighbourhood Forum | <p>The Introduction to the SPD</p> <p>Our concerns about the legal implications of some of the terminology and wording of this section have been covered in our previous representation.</p> | <p>Noted. Please see related responses.</p> |

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| 1 | 22 | Old Oak Neighbourhood Forum | <p>Our other main concern is that the present introduction includes no explanation of the timetable for completion and opening of Old Oak Common station and the release by DfT and HS2 of the key development sites – central to the whole aspiration for Old Oak West as a new major town centre and part of London.</p> <p>We accept that there are uncertainties over such timelines. We also accept (for the time being) assurances given by HS2 that the October 4th 2023 announcements on HS2 will not hold up construction work on OOC station itself, or for most of the TfL/HS2 sites in use as construction compounds.</p> <p>We do not accept, in the absence of any revised passenger forecasts of numbers travelling on what is left of the project, that these changes to the HS2 project will not have significant consequences for OPDC plans and aspirations for Old Oak West. The optimistic view that ‘the case for regeneration remains as strong as ever’ was repeated by the OPDC chair at the Board meeting on 23rd November. We see it as highly questionable.</p> <p>Coupled with shrinking investment demand in the London commercial and residential market, we continue to see the current HS2 and OPDC response to the October 4th announcements (that ‘nothing has changed in relation to Old Oak’ to lack any solid evidence. Much has changed and much more may yet change.</p> | <p>No change proposed. The SPD provides guidance that is consistent with Local Plan policies. The content, development and adoption of the SPD are not impacted by the recent HS2 announcements and we have been reassured by HS2 that the delivery of Old Oak Common station is on course, which will support the phased comprehensive delivery of Old Oak West. Old Oak Common station opening as a temporary terminus has been the working assumption for a few years now and the Government’s announcement in autumn 2023 confirms this. The change to the HS2 delivery programme does not impact the planned opening of Old Oak Common Station and trains will continue on from Birmingham but not at High Speed. Old Oak Common Station’s role as a temporary terminus strengthens the need for local regeneration, since it will be the sole interchange for passengers who would otherwise have continued into Euston. At this stage, and based on all advice given, we are not expecting significant revisions and, in any case, the SPD is sufficiently flexible to adapt to changing circumstances. That said, should potential revisions be required, they would be made within a future Local Plan review as the SPD cannot revise content within the Local Plan.</p> <p>OPDC wants to adopt the SPD as soon as is reasonably practicable because it will assist in securing high quality development when determining applications in the Old Oak West Area and assist in promoting development which incorporates community priorities and aspirations. The development of the SPD commenced in late</p> |
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| | | | <p>The Introduction and Context Overview in the Draft SPD repeats the OPDC mantra With unrivalled connectivity across London and the UK, Old Oak and Park Royal can become a thriving, inclusive and healthy place..’</p> <p>OPDC continues to make this claim of ‘unrivalled connectivity’. Since 2015, this assertion has never been supported with any objective metrics or measures. Old Oak as compared with Kings Cross/St Pancras and this location’s multiple direct connections into London’s public transport network? HS2 similarly make the same claim, as in their promotional video on their website as shown to the OPDC Board on November 23rd.</p> <p>For Londoners and those wishing to cross London north/south or to travel onwards to reach south east England, Old Oak will remain a comparatively poorly connected place (on current funded plans).</p> <p>The Advertising Standards Authority is continuing to investigate complaints about misleading statements from TfL on ULEZ2. This became a politicised London issue and hence several hundred complaints have been made. Old Oak residents are becoming sufficiently concerned by the persistent misleading content of OPDC and HS2 website claims, as well as those in documents such as this draft SPD, to start to follow suit.</p> | <p>2022 and was finalised in September 2023 in preparation for the formal SPD consultation. This is an appropriate timeframe for the development of a spatial SPD and is appropriate in light of the early engagement activities that were undertaken.</p> <p>Supporting studies for the SPD comprise the Consultation Engagement Summary and North Action Station Feasibility Study Update. The development of these is not considered to justify the replacement of the SPD with a DPD.</p> <p>OPDC’s November Board meeting was held at Oaklands because members were also visiting the OOC site. It was not possible to webcast from Oaklands. Minutes will be published with the board papers for the next board meeting.</p> <p>The high connectivity levels stated in the SPD are demonstrated and justified in the Local Plan and are underpinned by transport related supporting studies. These studies, Local Plan policies and SPD guidance demonstrate increased local, regional and national improvements in public transport connectivity.</p> <p>Change proposed. Reference to the Hammersmith and Fulham Local Plan 2022 has been amended to 2018.</p> |
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| | | | <p>On more detailed points, page 16 of the Draft SPD includes a puzzling reference to the 'Hammersmith and Fulham Local Plan 2022'. The LBHF adopted Local Plan dates from 2018.</p> <p>Another heading refers to the Ealing Draft Local Plan 2022, but this draft is at Regulation 18 stage only at this stage and carries limited weight. The adopted Local Plan for Ealing dates from 2012/13.</p> | |
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| 1 | 23 | Old Oak Neighbourhood Forum | <p>The spatial vision As with many local plans, this ‘boxed text’ of a 2038 vision is aspirational. The final paragraph is the one which local residents find it hardest to accept. This reads The established Old Oak commercial centre will be a new employment hub for London, home to flourishing local businesses and new economic sectors attracted by the area’s excellent connectivity.</p> <p>The SPD diagram shows a contiguous and irregular shaped area, extending from Atlas Road to North Acton and denoted in grey hatching as an ‘Old Oak major town centre’. This area includes OOC station and the Adjacent Site, and a section of Old Oak Common Lane, as a ‘major commercial centre’. Parts of this larger area are shown as a ‘commercial centre’. The whole of North Acton is also classified as a ‘neighbourhood centre’.</p> <p>This is confusing for the public. What is intended to be the difference between a ‘commercial town centre’ and a ‘major town centre’ in terms of what are usually referred to as ‘town centre uses’ in planning documents? The Regulation 19.2 OPDC Draft Local Plan as submitted in 2018 for Examination was centred around a wholly different ‘major town centre’ at Old Oak North, on the Cargiant land. This location, with a ‘high street’ leading to OOC station, had coherence and focus and felt plausible.</p> <p>The propositions in the adopted Local Plan and</p> | <p>No change proposed. The town centre and commercial centre boundaries shown in the Spatial Vision diagram are consistent with the Local Plan designations. The Local Plan provides policies and information to define the role of the commercial centre and major town centre. SPD table 9.1 provides supplementary guidance for the commercial centre as part of the major town centre.</p> <p>The major town centre proposal is coherent, coordinated and deliverable. This is justified in the adopted Local Plan. The location and delivery of the town centre reflects the various adjacent locations that will be delivered over different phases to meet the needs of surrounding communities as part of an overall comprehensive development of Old Oak West.</p> <p>A portion of the Channel Gate site allocation is at risk of potential delay, due to associated tunnelling to Euston. We are currently working with HS2 to explore what areas under their control can be released, to prevent delay to development and town centre uses. There are also privately owned sites within the Channel Gate site allocation whose delivery are not impacted by changes to HS2 phasing. Regardless, the SPD must accord with the Local Plan phasing and capacities. Any changes will be included through the future Local Plan Review.</p> <p>The SPD provides additional supplementary guidance, informed by the early community</p> |
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| | | | <p>now in this SPD lack these attributes. Residents have seen how 'activation' of ground floors at North Acton has not delivered on town centre uses. Occupation of large commercial ground floor units built at Oaklands Rise, in the destined 'Old Oak major town centre', has yet to happen several years after completion of these buildings. The proposed widely dispersed geographic area for a 'major Old Oak town centre' will not (in our view) achieve the footfall needed to achieve success. There is not the spatial concentration needed to bring this about, especially when major uncertainties remain over when the potential development land at Channel Gate will come into play (see below).</p> | <p>engagement, to support the delivery of meanwhile and early activation uses as soon as possible.</p> |
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| 1 | 24 | Old Oak Neighbourhood Forum | <p>Good Growth This section reflects policies in the 2021 London Plan. The 'Principles' involved add nothing very new although it is not clear how 'social value' will be assessed in applications (the text reading contribute to delivering Social Value by improving life chances, health and well-being, fairness and the day-to- day quality of life;</p> | <p>No change proposed. OPDC is committed to delivering Social Value and securing benefits for existing and future local communities. The SPD utilises the current policy framework to deliver Social Value. The assessment of social value is multifaceted reflecting its crosscutting nature. Assessment through the development management process will be informed by relevant London Plan policies, Local Plan policies and SPD guidance.</p> <p>This approach will evolve and expand through the future Local Plan review and in accordance with any relevant national and mayoral guidance.</p> |
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| 1 | 25 | Old Oak Neighbourhood Forum | <p>Transport</p> <p>The absence of improvements to the local road network, and to levels of access to public transport within the adopted 2022 OPDC Local Plan, was one of the main issues on which the Forum raised objections on the consultation on the Post Submission Modified Draft Local Plan (PSMDLP) at Examination stage. This Draft SPD does not take matters further.</p> <p>The initial premise in the SPD that OOC station will 'transform connectivity' at Old Oak we now question with more force than before. Yes, this rail interchange will include connections to the GWR rail lines, as already available at Paddington. Old Oak will become the 42nd station to be added to the Elizabeth line a decade after this successful and well used line came into operation, and when resultant commercial and residential interest in clustering at these station locations will already be history. So why will Elizabeth line platforms at OOC station prove any more 'transformational' than at e.g Acton Mainline or Ealing Broadway? We await revised projections of passenger numbers on a truncated HS2 line.</p> | <p>No change proposed. The SPD reflects Local Plan policies which demonstrate increased public transport access and improvements to active travel networks. This is reflected in the SPD which identifies new stations, enhanced stations, an enhanced bus network and improved walking and cycling routes.</p> <p>The delivery of Old Oak Common Station will continue to enhance transport connectivity in Old Oak West and across the OPDC area. The combination of the various transport modes will support the development opportunities in Old Oak West.</p> |
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| 1 | 26 | Old Oak Neighbourhood Forum | The 'movement network' at Old Oak West looks as of 2023 that it will be little different to that of today with high levels of traffic congestion and no solution to joining up the residential settlements to the west and east of Wormwood Scrubs, originally one of the prime objectives of the 2015 Mayoral OAPF. Again, the failure to achieve a successful outcome to negotiations with Cargiant in 2018/19 is the origin of this fundamental flaw in the adopted OPDC Local Plan, which the Draft SPD cannot resolve. | <p>No change proposed. The SPD reflects Local Plan policies which demonstrate increased public transport access and improvements to active travel networks. This is reflected in the SPD which identifies new stations, enhanced stations, enhanced bus network and improved walking and cycling routes.</p> <p>Old Oak West is one area within the wider OPDC area. OPDC's Local Plan sets out long term proposals for the delivery of the new Wormwood Scrubs Street to the north of Wormwood Scrubs open space. This will deliver new east-west connections between Old Oak Common Lane and Kensal Canalside.</p> |
| 1 | 27 | Old Oak Neighbourhood Forum | The proposals embedded in Principle TP1 are fine as far as they go. But there is already evidence that they will not be achieved on the ground (e.g the segregated cycle lane in Old Oak Common Lane, on which HS2 are not carrying out the bridge lengthening that is needed to achieve this outcome). | No change proposed. OPDC is working with stakeholders including the highways authorities, host boroughs, TfL and HS2 to ensure Local Plan policies, reflected in Principle TP1 will be delivered. |
| 1 | 28 | Old Oak Neighbourhood Forum | The SPD document includes diagrammatic maps of the proposed bus network, and cycle and walking network. But no map of the road network, nor information on how this is intended to cope with the arrival of an assumed 'major town centre', a 'commercial centre', or a single entry and exit point off Old Oak Common Lane to the OOC rail interchange still claimed to be handling 250,000 passengers a day? | No change proposed. The Local Plan identifies the key routes in the OPDC area. The SPD sets these out in the Spatial Vision diagram, diagrammatic maps supporting principles and the illustrative masterplan. The forthcoming Public Realm and Green Infrastructure SPD will propose a movement hierarchy for the OPDC area which will include Old Oak West |

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| 1 | 29 | Old Oak Neighbourhood Forum | <p>In terms of the ambitious proposals in TP1(g), those for 'Old Oak Street' extending east/west to North Acton are dependent on major infrastructure funding and the fate of the OBC. Those for 'Channel Gate Street' now have a new set of dependencies relating to future dates when HS2 will release those parts of its constructions compound required for possible works on the tunnel from OOC station to Euston and a revised set of plans for a Euston terminus (see further below).</p> <p>These dependencies and potential timelines are not explained in the SPD document, rendering it of limited practical value to prospective applicants or to the public.</p> | <p>No change proposed. The delivery and phasing of key streets are consistent with the Local Plan. The content, development and adoption of the SPD are not impacted by the recent HS2 announcements and we have been reassured by HS2 that the delivery of Old Oak Common station is on course, which will support the phased comprehensive delivery of Old Oak West. Old Oak Common station opening as a temporary terminus has been the working assumption for a few years now and the Government's announcement in autumn 2023 confirms this. The change to the HS2 delivery programme does not impact the planned opening of Old Oak Common Station and trains will continue on from Birmingham but not at High Speed. Old Oak Common Station's role as a temporary terminus strengthens the need for local regeneration, since it will be the sole interchange for passengers who would otherwise have continued into Euston. At this stage, and based on all advice given, we are not expecting significant revisions and, in any case, the SPD is sufficiently flexible to adapt to changing circumstances. That said, should potential revisions be required, they would be made within a future Local Plan review as the SPD cannot revise content within the Local Plan.</p> <p>A portion of the Channel Gate site allocation is at risk of potential delay, due to associated tunnelling to Euston. We are currently working with HS2 to explore what areas under their control can be released, to prevent delay to development. There are also privately owned sites within the Channel Gate site allocation</p> |
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| | | | | whose delivery are not impacted by changes to HS2 phasing. Regardless, the SPD must accord with the Local Plan phasing and capacities. Any changes will be included through the future Local Plan Review. |
| 1 | 30 | Old Oak Neighbourhood Forum | In terms of detail, the SPD diagrams of pedestrian/cycle routes at North Acton remove an important bridge and connection shown in the Local Plan. Can a SPD make what is effect a negative policy change, when such documents cannot add 'new policy'? | Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge was intended to reflect updated outputs of supporting studies. It was not the intention to change the Local Plan policies relating to the delivery of the bridge. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals. |

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| 1 | 31 | Old Oak Neighbourhood Forum | <p>Environment and Utilities</p> <p>Principle EUP1 is unobjectionable in its content, but again sets out aspirations entirely removed from the reality on the ground today at 'Old Oak West'.</p> <p>Local residents and businesses have already experienced eight years of worsening environmental conditions, and now face a potential further decade exacerbated by the new uncertainty on any timeline for funding of the proposed tunnel from OOC station to Euston and the Government commitment to a Euston terminus.</p> <p>The separation of responsibilities between OPDC as a development corporation and LB Ealing as the Highways Authority has led to endless problems on a deteriorating local infrastructure of roads and pavements. Maintenance has become inadequate. No solutions are in sight for flooding in Victoria Road, beyond assurances that OPDC and LBE staff are 'having meetings' to discuss the problem.</p> | <p>No change proposed. Supporting existing communities is a core element of our work. We've set out how we require developers to avoid or address impacts on local residents' amenity and health in our Local Plan. We're working with stakeholders including HS2, TfL, the local highway authorities and our host boroughs to ensure the policy requirements in the Local Plan are implemented using our tools as a local planning authority and regeneration agency.</p> <p>A key corporate priority within our community engagement strategy is supporting communities affected by change in the area through effective and meaningful community relations. We hold quarterly stakeholder roundtables with HS2, the host boroughs and developers to mitigate disruption through construction. We also hold and attend community group meetings and operate multiple lines of communications including mail drops, an online engagement platform, local noticeboards, social media and newsletters to regularly inform local people.</p> <p>To help deliver shorter-term improvements, we are delivering a range of early activation and meanwhile projects. Supporting these in the SPD was a key suggestion from the early engagement work we undertook in 2023 and therefore we have included Principles GGP1(c) and TCCP3 to achieve this. These Principles require developers to demonstrate in their Meanwhile Strategies how they will secure uses through engagement with local businesses, community groups and social infrastructure providers. OPDC will secure the</p> |
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| | | | | <p>delivery of meanwhile uses through conditions. The Principles also require major development proposals to provide planning obligations to support projects which contribute towards the early activation of the OPDC area, including community based projects, events or other initiatives which build upon the art, culture and heritage of the local area.</p> <p>Examples of existing early activation projects that are helping to support communities and improve the area are our Small grants programme, The Forge, Harlesden Canalside, Willesden Junction Station Improvements, Grand Union Canal Towpath Access, Park Royal Food Festival and the emerging North Acton public realm improvements.</p> <p>The Local Plan and SPD provide guidance for delivering green infrastructure and water management to manage surface water flooding along Victoria Road. OPDC is working with stakeholders including HS2, highways authorities, host boroughs and Thames Water to ensure planning conditions are implemented as prescribed through the development management process to manage surface water flooding.</p> <p>We have recently established a new operational working group with Ealing, including Ealing Highways, to ensure that operational issues are addressed. We are working with HS2 to secure their involvement in this new working group.</p> |
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| 1 | 32 | Old Oak Neighbourhood Forum | <p>Housing</p> <p>The figure of 6,905 new homes quoted in Principle HP1 comes across as ludicrously precise for the 2018-38 plan period. It is derived from a 2021 Capacity Study and a set of site allocations in the adopted Local Plan. Use of such precise figures for housing and jobs raises false expectation amongst a public led to believe that a Mayoral Development Corporation is somehow 'in control' of the future of the area when this is very far from reality.</p> <p>As the SPD acknowledges Additional housing on windfall sites may also increase the overall supply of homes. These may include sites not identified in the Local Plan and Development Capacity study, changes of use of non-residential buildings and conversions of existing residential buildings. So why not give projected housing numbers in round figures?</p> | <p>No change proposed. The SPD provides development capacity information that is consistent with the Local Plan. The capacities for housing and non-residential floorspace are identified as minimums.</p> |
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| 1 | 33 | Old Oak Neighbourhood Forum | <p>This section of the SPD offers no policy guidance on housing densities. Nor does it spell out the implications for housing densities of the target figure quoted above.</p> <p>2021 London Plan Policies D2 and D3 maintain some elements of the critical relationship between housing densities and access to public transport. This relationship had real force in the era of the London Plan Density Matrix. While this matrix and its associated policy disappeared from the 2021 London Plan the basic spatial planning principle remains valid and key to sustainable development of new housing. London Plan Policy D2(B) in particular should be referenced clearly in this SPD, given its relevance to part of an Opportunity Area with very little certainty at present that major infrastructure requirements for the area will be funded anytime soon, or ever³.</p> | <p>No change proposed. Minimum development capacities of sites are consistent with the quantum identified in the Local Plan. Local Plan paragraph 3.78 and the Local Plan Glossary identify an indicative density range of 300 to 600 units per hectare. However, the London Plan and Local Plan do not provide density-based policies. Therefore, the SPD cannot provide density-based supplementary guidance. In accordance with London Plan policies a design-led approach will be required to optimise site capacity. This process will be informed by development plan policies and material considerations.</p> <p>OPDC's Infrastructure Delivery Plan and Infrastructure Funding Statements provide information regarding the funding of infrastructure. This identifies relevant existing sources, such as S106 funds, and potential future sources such as Community Infrastructure Levy and other sources of government funding. OPDC is implementing a Community Infrastructure Levy which will help OPDC optimise contributions from developments towards infrastructure funding.</p> <p>Paragraph 12.22 sets out next steps for delivering Old Oak West including infrastructure. This states that OPDC:</p> <ul style="list-style-type: none"> - working collaboratively with both Department for Transport, Network Rail, High Speed 2, Department for Levelling Up, Housing and Communities and Homes England to enable the delivery of comprehensive regeneration and optimising the public benefits achieved; |
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| | | | | <ul style="list-style-type: none">- is progressing masterplanning activities and the delivery of Old Oak West;- is actively engaging with major stakeholders within Old Oak West to support the delivery of Old Oak West;- is preparing a Regeneration Strategy, Land Assembly Strategy and a Relocation Strategy to sit alongside this SPD which will set out further details of proposals for the delivery of development in Old Oak West; and- secured substantial enabling funding from both the GLA and DLUHC to support plans for comprehensive development in Old Oak West, including site acquisitions and sustainable energy and strategic infrastructure. |
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| 1 | 34 | Old Oak Neighbourhood Forum | <p>Employment Draft SPD Principle EP2a) reads contribute to creating a new major commercial centre which is optimised through comprehensive development that: i) is focused around Old Oak Common station, its surrounds and Old Oak Common Lane; Our Forum members do not share OPDC's belief that the stretch of Old Oak Common Lane between the station entrance/exit will ever be successfully 'activated' given its topography and the fact that the western side of this road falls away to railway tracks.</p> <p>We can see that it is important to OPDC to attempt to show in diagrams a continuous commercial centre/town centre between the station and the potential key development site at Atlas Road/Channel Gate. But as yet we see no evidence that landowners/developers view this as a remotely viable proposition in terms of footfall and suitability of sites (see further below on Town Centres).</p> <p>Figure 8.4 and the boundary shown for an 'Atlas Junction Cluster' adds further to the confusion over an 'Old Oak commercial centre' and an 'Old Oak major town centre'.</p> | <p>No change proposed. The stretch of Old Oak Common Lane between the proposed Old Oak Street and Atlas Junction is identified in the Local Plan as being part of the Old Oak major town centre and commercial centre. This stretch is adjacent to Development Capacity Study Site 20 which has a minimum development capacity of 300 homes and 7,400 square metres of non-residential floorspace which will comprise town centre, employment and social infrastructure uses. Old Oak Common Lane will be a key desire line for people to access to Old Oak Common Station and the potential Old Oak Common Lane Station from the north. Old Oak Common Lane is also identified for public realm improvements and enhancements to support walking, cycling and bus routes. These elements are reflected in the SPD and in the Local Plan.</p> <p>Officers consider that these elements will ensure Old Oak Common Lane will be an activated street.</p> <p>Figure 8.4 shows the boundaries of the Old Oak major town centre, commercial centre and Atlas Junction Cluster to reflect the different Principles guidance in the SPD.</p> |
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| 1 | 35 | Old Oak Neighbourhood Forum | <p>Town Centres and Community Uses – will Channel Gate ever become a major town centre?</p> <p>The first paragraph of this section of the SPD exemplifies the difficulties that OPDC has faced since 2019 in making a case that an area redefined as the ‘Western Lands’ (and now ‘Old Oak West’) has either the spatial and topographical attributes, or the road and transport connections, to become the heart of a new part of London.</p> <p>The SPD draft text reads Old Oak West will deliver a new major town centre for Old Oak and Park Royal serving existing and new residents, workers and visitors. A portion of the North Acton neighbourhood town centre is also in Old Oak West. The Old Oak major town centre will be delivered in a number of adjacent locations, over different phases as part of overall comprehensive development.</p> <p>To use the wording ‘Old Oak West will deliver’ is meaningless. ‘Old Oak West’ cannot ‘do’ anything of itself. It is an artificial planning construct pursued by OPDC following the failure of plans for Old Oak North. In the eyes of local people this rebadging of parts of six ‘Places’ in the Local Plan takes little account of the history of the area, nor its current urban grain and varying character. ‘Delivery’ remains dependent on essential infrastructure being funded by Government and the fate of OPDC’s Outline Business Case to Government.</p> | <p>No change proposed. This SPD amalgamates the relevant place policies in the Local Plan to provide clearer spatial planning guidance for Old Oak West and to support a comprehensive and coordinated approach to development in Old Oak West. Local Plan policy SP10 requires that proposals take an integrated and comprehensive approach to the design, construction and management of proposed development. OPDC considers that a comprehensive approach to developing Old Oak West will deliver a variety of benefits. This includes better placemaking to foster sustainable and complementary neighbourhoods, coordinating the delivery of infrastructure to connect the area and support existing and future residents; and potentially delivering more homes and space for jobs than set out in our Development Capacity Study Update (2021) through optimised and accelerated development capacities.</p> <p>The need for a major town centre is identified in OPDC’s Local Plan, evidenced by a Retail and Leisure Needs Study. The town centre will comprise areas of differing character, ensuring the centre is vibrant and caters for differing needs.</p> <p>Paragraph 12.22 sets out next steps for delivering Old Oak West including infrastructure. This states that OPDC:</p> <ul style="list-style-type: none"> - working collaboratively with both Department for Transport, Network Rail, High Speed 2, Department for Levelling Up, Housing and |
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| | | | | <p>Communities and Homes England to enable the delivery of comprehensive regeneration and optimising the public benefits achieved;</p> <ul style="list-style-type: none">- is progressing masterplanning activities and the delivery of Old Oak West;- is actively engaging with major stakeholders within Old Oak West to support the delivery of Old Oak West;- is preparing a Regeneration Strategy, Land Assembly Strategy and a Relocation Strategy to sit alongside this SPD which will set out further details of proposals for the delivery of development in Old Oak West; and- secured substantial enabling funding from both the GLA and DLUHC to support plans for comprehensive development in Old Oak West, including site acquisitions and sustainable energy and strategic infrastructure. |
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| 1 | 36 | Old Oak Neighbourhood Forum | <p>Secondly, delivery will depend on developer and investor interest in 'comprehensive development' in a part of West London during a period when competing Opportunity Areas at Earls Court and (to a lesser extent) at Kensal Canalside are in possession of cleared sites and have firmer proposals for 10 year build programmes in the decade 2024-34. These areas have more advanced plans (with an application for 2,500 new homes and commercial floorspace now submitted by Ballymore/Sainsburys at Kensal). The Earls Court Development Company is in final stages of consultation on its proposals, for a site with far better connectivity than at Old Oak West.</p> | <p>No change proposed. The SPD next steps section sets out the Delivery Next Steps which demonstrate how OPDC is progressing delivery of Old Oak West. This includes engaging with major stakeholders to support delivery.</p> <p>Officers consider the delivery of Old Oak West will complement existing and emerging major regeneration schemes within west London reflecting the opportunities and phasing set out in the SPD.</p> |
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| 1 | 37 | Old Oak Neighbourhood Forum | <p>Thirdly, the concept of a ‘major town centre’ delivered at what are currently separate and severed geographic locations is seen by the existing residential communities at Old Oak West as fanciful. We have never been convinced by the argument that a major rail interchange will have sufficient impact as a ‘catalyst’ to bring town centre or major cultural uses to this location, even before the curtailment of HS2. We do not now believe the HS2 forecasts of 250,000 passengers a day passing through this station. Even if this figure were to remain accurate, how many would be motivated to walk along a 1km windswept road to reach Atlas Road/Channel Gate?</p> <p>HS2 themselves have not until now portrayed the concept of Old Oak Common as a ‘destination’. Recent events have now pushed the company into referring belatedly to the ‘regeneration’ potential of Old Oak. As our Forum has pointed out for many years, HS2 consultation material and their website (to this day) shows the OOC station as sitting in a green field rather than at the heart of a ‘major commercial centre’. [IMAGE OF OLD OAK COMMON STATION PROVIDED]</p> <p>The 2018 Regulation 19.2 submission version of the OPDC Local Plan had plausibility given the work undertaken by Cargiant for a 6,500 residential and commercial regeneration scheme, with an Overground station and a new ‘high street’ leading to and from the rail interchange and the Adjacent Site. Channel</p> | <p>No change proposed. OPDC’s Local Plan designates the Old Oak major town centre. The need for this centre was evidenced through a Retail and Leisure Needs Study. The SPD cannot amend this designation.</p> <p>The future major town centre at Old Oak is not proposed to be delivered at a single location, but at a number of well connected locations identified in the Local Plan which combined will function as a major town centre. This includes a residential focused character area in Channel Gate that will benefit from a new Local Park and proximity to the Grand Union Canal. While development sites may currently be geographically separate, new and enhanced connections, including the new Old Oak Street and Channel Gate Street, and enhanced Victoria Road, Old Oak Lane and Old Oak Common Lane, will help to deliver a comprehensive new movement network across the area which support the functioning of a future major town centre. The fact that the centre is spread spatially and will provide differing retail and leisure offers along its length is considered to add to the vitality and resilience of the centre.</p> <p>Catalyst and cultural uses are supported in the Local Plan. The SPD continues to reflect these policies.</p> |
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| | | | Gate has no such attributes as a 'major town centre' location. | |
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| 1 | 38 | Old Oak Neighbourhood Forum | <p>On Principle TCCP3 Meanwhile uses and early activation we have long supported the idea of meanwhile uses at what is now called Old Oak West. As shown in figure 0.1 in the draft SPD the boundary of Old Oak West overlaps significantly with that of the Old Oak Neighbourhood Area, as designated by OPDC in 2017.</p> <p>This designation was approved at a time when the Development Corporation was focused elsewhere on Old Oak North.</p> <p>The 2017 decision by OPDC to ‘refuse’ our application for a much larger neighbourhood boundary, and to allow designation of a small part of East Acton, was made on the basis that the boundary fixed by OPDC officers included very little land with development potential. In 2021, our Forum applied formally to extend the boundary of the designated neighbourhood area to include the Atlas Road and Channel Gate sites, as below:</p> <p>We argued that the neighbourhood planning framework could provide a speedy and flexible framework for adopting fresh site allocations and housing/employment policies for these sites – taking account of any changes by DfT and HS2 on dates for their release. We floated the possibility of use of part of the sites for 10-15 year life housing, should the planning constraints on the sites change at any time (such as in the event of cancellation of the HS2 project). This was at the stage before the</p> | <p>Noted. OPDC's rationale for designating the amended Old Oak Neighbourhood Forum boundary is set out in the published Old Oak Neighbourhood Area Amendment Decision Document (https://www.london.gov.uk/sites/default/files/old_oak_neighbourhood_area_amendment_decision_document_december_2021.pdf).</p> |
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| | | | <p>OPDC Local Plan had completed its Examination. [IMAGE OF PROPOSED NEIGHBOURHOOD AREA EXTENSION PROVIDED]</p> <p>The statutory consultation on our application to extend the neighbourhood boundary received 95% positive support from 106 respondents. But was 'refused' by OPDC in November 2021 on the basis of an analysis of different 'character areas' across the whole OPDC area.</p> <p>Prior to this decision we had been given the opportunity to present to an informal meeting of the OPDC Planning Committee. Our presentation suggested that OPDC and the Forum should work together to prepare a 'Plan B' for Channel Gate/Atlas Road, should OPDC Local Plan proposals not proceed in the way envisaged. The relevant slide from 2021 is shown below [IMAGE OF PLAN B SLIDE SHOWN]</p> | |
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| 1 | 39 | Old Oak Neighbourhood Forum | <p>Time will tell in terms of what ultimately happens on the land at Atlas Road/Channel Gate. This is the largest of the sites cleared by HS2 used as a construction compound). The release date given to us for this site by HS2 in autumn 2022 was 'Q2 2032, which is later than the other three sites as it is a key part of the delivery of the HS2 Euston station'. [IMAGE OF SLIDE SHOWING ANTICIPATED RELEASE DATES OF HS2 SITES]</p> <p>At the OPDC Board on November 23rd 2023, the HS2 representatives explained in detail the significance of this site in relation to constructing the tunnel between OOC station and Euston and the building of a terminus at Euston. The Channel Gate site houses the rail connection for the removal of waste at the OOC construction site. It also accommodates the end of a 6m wide logistics tunnel to the OOC 'station box', nearing completion, through which materials and operatives will pass along with waste from the tunnel to Euston.</p> <p>HS2 managers confirmed that the OOC to Euston tunnel remains a 'procured contract' on which work is due to start in 2025 – even though Government has for the time being removed the relevant budget..</p> <p>The two tunnel boring machines purchased from Germany for the OOC to Euston link are due to be lowered into the station box and 'parked' there for an indefinite period pending decisions on whether the tunnelling contract is</p> | <p>No change proposed. The SPD must be consistent with the Local Plan including site allocations. Channel Gate is a site allocation in the Local Plan. The SPD is consistent with the minimum development capacities and phasing as set out in the Local Plan.</p> <p>A portion of the Channel Gate site allocation is at risk of potential delay, due to associated tunnelling to Euston. We are currently working with HS2 to explore what areas under their control can be released, to prevent delay to development. There are also privately owned sites within the Channel Gate site allocation whose delivery are not impacted by changes to HS2 phasing. Regardless, the SPD must accord with the Local Plan phasing and capacities. Any changes will be included through the future Local Plan Review.</p> <p>Progression of a Local Plan review will commence following publication of government guidance for the development of new Local Plans. This will reflect any potential changes to phasing for development sites.</p> <p>Paragraph 10.6 states that Future Design Codes will also play a role in helping to shape Old Oak West. These have the potential to include more detail in relation to heights, massing, material palettes, design-details, character based and contemporary architecture styles, facade design and the design of open spaces. These design codes may form part of future Supplementary Plans or as part of the future Local Plan Review.</p> |
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| | | | <p>cancelled (with resultant costs to the Government) or proceeds.</p> <p>This complex and uncertain scenario suggests to local people that the Channel Gate HS2 compound is now unlikely to be released by 2032. The final planned role of the 'logistics tunnel' is to allow the expensive tunnel boring machines to be dismantled at Euston and the parts retrieved at Old Oak Common via the tunnel.</p> <p>We therefore believe that the type of 'Plan B' proposition suggested by our Forum back in 2021 merit further consideration in respect of the Channel Gate/Atlas Road site. The prospect of LURA style 'supplementary plans' for regeneration areas now offers an alternative way forward to what we suggested two years ago.</p> <p>This is a further reason for OPDC not to adopt the present SPD in January but to use the evidence base and material gathered for this document as a Supplementary Plan as soon as DLUHC introduces the necessary secondary legislation to implement this part of the 2023 Act.</p> | |
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| 1 | 40 | Old Oak Neighbourhood Forum | <p>We still do not see Channel Gate/Atlas Road as a suitable site for high density residential towers, as assumed by the OPDC Local Plan site allocation and housing numbers. An application from Pocket Living at 'Atlas Wharf' with 9 to 30 storey towers has already been granted consent but is on hold presently. Our first draft neighbourhood plan was based around a 'neighbourhood hub' at the Atlas Road junction, serving the existing residential communities at Wells House Road, Midland Terrace/Shafesbury Gardens, and the 'railway cottages' off Old Oak Lane. As explained above we do not see how or why such a neighbourhood centre would grow into a 'major town' centre given that its location is a 1km unappealing walk from the OOC station platforms (see slide below). [IMAGE SHOWING 1KM WALKING DISTANCE FROM HS2 PLATFORMS AND OLD OAK MAJOR TOWN CENTRE LOCATION WITHIN CHANNEL GATE]</p> | <p>No change proposed. The SPD must be consistent with the Local Plan including site allocations. Channel Gate is a site allocation in the Local Plan. The SPD is consistent with the minimum development capacities and phasing as set out in the Local Plan. Figure 10.9 depict illustrative building heights showing one way heights could be delivered based on Local Plan policies. This shows a range of heights could be delivered in Channel Gate and around Atlas Junction.</p> <p>The character area focused around Atlas Junction forms part of the major town centre. The combined character areas as a whole will form the major town centre. Development along Old Oak Common Lane alongside public realm enhancements will provide a high quality environment connecting Atlas Junction with Old Oak Common Station.</p> |
| 1 | 41 | Old Oak Neighbourhood Forum | <p>Design This section of the SPD covers some of the issues that could potentially be included in a detailed Design Guide for the Old Oak West area. But in insufficient detail at present to be used for this purpose in making development management decisions.</p> | <p>No change proposed. The Design Principles are appropriate for an SPD. They will be a material consideration in the determination of planning applications. Paragraph 10.6 states that Future Design Codes will also play a role in helping to shape Old Oak West. These have the potential to include more detail in relation to heights, massing, material palettes, design-details, character based and contemporary architecture styles, facade design and the design of open spaces.</p> |

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| 1 | 42 | Old Oak Neighbourhood Forum | <p>Figure 10.7 labels the section of Old Oak Common Lane between the station and Atlas Junction as a 'key frontage'. But at present the only sizable buildings in the stretch of road are a motor vehicle shop and a community centre. Pedestrian footfall is even more modest than at e.g. Scrubs Lane (another street which the OPDC Local Plan aims to 'activate').</p> | <p>No change proposed. The stretch of Old Oak Common Lane between the proposed Old Oak Street and Atlas Junction is identified in the Local Plan as being part of the Old Oak major town centre and commercial centre. This stretch is adjacent to Development Capacity Study Site 20 which has a minimum development capacity of 300 homes and 7,400 square metres of non-residential floorspace which will comprise town centre, employment and social infrastructure uses. Old Oak Common Lane will be a key desire line for people to access to Old Oak Common Station and the potential Old Oak Common Lane Station from the north. Old Oak Common Lane is also identified for public realm improvements and enhancements to support walking, cycling and bus routes. These elements are reflected in the SPD and in the Local Plan.</p> <p>Officers consider that these elements will ensure Old Oak Common Lane will be an activated street.</p> <p>Figure 8.4 shows the boundaries of the Old Oak major town centre, commercial centre and Atlas Junction Cluster to reflect the different Principles guidance in the SPD.</p> |
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| 1 | 43 | Old Oak Neighbourhood Forum | <p>Our strongest objections to this section of the Draft SPD are on Principle DP2 Building heights. This 'principle' introduces and 'amalgamates' sections of supporting text that were introduced as Major Modifications via OPDC-51, a document submitted to the Planning Inspector in late January 2022. This was after public consultation had closed on the extensive set of modifications proposed by OPDC officers to the submitted Draft Local Plan.</p> <p>These height ranges were added to the Draft Local Plan at the last minute after our Forum had successfully persuaded the Planning Inspector that the PSMDLP version of the local plan was deficient in failing to address the requirements of London Plan Policy D9 on identifying suitable locations and appropriate heights for Tall Buildings.</p> <p>Attempting now to add extra policy weight to these height ranges (which remain highly contentious locally) we see as a clear attempt to smuggle into a SPD a set of 'new policies'. These proposals were never consulted on during a 3.5 year Examination process. It remains unclear whether they were even considered and approved by the OPDC Planning Committee (and certainly not at any formal meeting). They are an egregious example of seeking to 'retrofit' local plan policies around the aspirations of developers at pre-application stage and should not be allowed to proceed to</p> | <p>Change proposed. General building height ranges are located in Local Plan policies and therefore it is appropriate to include these in Principle DP2. It was not the intent to elevate the status of the tall building heights guidance. Principle DP2(k) has been amended to relocate the predominant tall building height ranges to supporting text. Supporting text to Principle DP2 has been amended to confirm that SPD building heights guidance and supporting text information does not amend the status of existing Local Plan heights policies and supporting text.</p> |
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| | | | <p>adoption as part of a SPD.</p> <p>While the text of Principle DP2 reflects sections of supporting text in the adopted Local Plan, Figure 10.9 goes further in offering a diagrammatic map labelled as Illustrative building heights showing one way heights could be delivered based on Local Plan policies.</p> <p>We consider this Figure 10.9 to be inappropriate for an unexamined SPD and as that that it be removed from the final document. Applicants for developments involving tall buildings should be required to ensure that they meet the requirements of London Plan D9 and relevant policies in the OPDC Local Plan and Policies Map. Applications should stand or fall on these documents alone unless and until a further DPD for Old Oak West is examined and adopted.</p> | |
| 1 | 44 | Old Oak Neighbourhood Forum | <p>We support Principles D3 (on quality of contemporary architecture) and D4 on Local character and heritage) but suggest that the 'precedent' photos of buildings in Holborn and Stratford should be removed as irrelevant to this SPD.</p> | <p>No change proposed. Case studies are not identified as providing guidance in the SPD. The use of case studies is appropriate to help identify how relevant elements of each example could shape the future of the Old Oak West area. The development capacities do not prohibit the delivery of the positive attributes that the case studies present. They are provided in addition to the diagrammatic maps and visualisations.</p> |

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| 1 | 45 | Old Oak Neighbourhood Forum | <p>Place and Cluster visions</p> <p>This section states at 11.3 For each Place and Cluster a vision is set out in the Local Plan and repeated below. This seems unnecessary duplication, but would be acceptable in a SPD were the wording and diagrams to remain identical to those sections of the Local Plan as the parent document.</p> <p>It is unsurprising that OPDC officers may wish to refine diagrams in light of further work and discussions which have taken place since the Local Plan was drafted and modified. But it does not feel appropriate for changes to be introduced via a SPD as opposed to a development plan document.</p> <p>This draft SPD is an uneasy combination of an ‘illustrative masterplan’ in its diagrammatic maps, and an attempt to add material weight in decision-making to a set of amalgamated ‘Principles’ that are not (and cannot be used as) new Local Plan policies for development management purposes.</p> <p>LB Ealing adopted a Core Strategy in 2012 and a separate Development Sites DPD in 2013. The latter DPD was examined in June 2013. The level of detail on ‘Place policies’ and the diagrammatic maps in this Ealing DPD are very similar to those in the OPDC Draft SPD for Old Oak West, and have been in routine use until recently for determining delegated applications at North Acton. We are not clear why OPDC feels it can take a different</p> | <p>No change proposed. Each Place and Cluster vision is accompanied by a diagrammatic map that reflects how Local Plan Place Policy maps relate to the illustrative masterplan. The illustrative masterplan illustrates one way in which Old Oak West could be developed. Including illustrations and illustrative plans are common practice in spatial SPDs to help visualise how development could come forward.</p> <p>SPD paragraphs 1.7 and 11.4 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map. Paragraph 1.10 confirms that the SPD is a material consideration for the determination of planning applications. OPDC's Local Plan forms part of its development plan. Therefore, Local Plan maps and diagrams have more planning weight and would be considered as such in the development management process. Wording reflecting this relationship has been added to the Introduction.</p> <p>No change proposed. The amalgamation and coordination of existing Local Plan policies into SPD guidance has not created new policy. The intention is to coordinate these policies as spatial planning guidance for Old Oak West which includes areas of six Local Plan Place policies.</p> <p>Change proposed. Local Plan policies continue to form part of the development plan and have greater weight than SPD guidance which does not form part of the development plan. Wording reflecting this relationship has been added to the</p> |
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| | | | approach in now adopting as an unexamined SPD a document with equivalent content? | <p>Introduction.</p> <p>LB Ealing's DPDs do not form part of OPDC's planning policy and guidance framework. The approach for and content of the SPD is consistent with OPDC's Local Plan.</p> |
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| 1 | 49 | Old Oak Neighbourhood Forum | <p>In some instances the boundary defined for 'Old Oak West' includes only part of the area previously identified as a 'Place' in chapter 4 of the adopted Local Plan. This begs some questions on the boundaries previously defined (supposedly based on objective character studies and topographical features). It also means that the visions for the SPD Place and Cluster 'visions' may not be applicable to the totality of the former 'Place'. North Acton and Acton Wells is the clearest example of these issues.</p> | <p>No change proposed. The Local Plan Place boundaries remain designated and unchanged and are based on local character in accordance with GLA guidance. The SPD includes the Local Plan Place and Cluster Visions. They are unchanged and continue to apply to the whole of each Place defined in the Local Plan, including the areas in Old Oak West.</p> |
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| 1 | 50 | Old Oak Neighbourhood Forum | <p>The details of changes that we have noted between the diagrammatic maps in the Local Plan and the Draft SPD are covered in Annexe 1 to this representation, for reasons of space. Overall these add to evidence that the SPD is being used as a vehicle to vary Local Plan policies, and to introduce an 'illustrative masterplan' for Old Oak West in a manner incompatible with a purported SPD document which also states that Proposals will be required to comply with (SPD) Principles. This attempts to elevate 'Principles' to the status of 'Policies'.</p> | <p>No change proposed. OPDC considers that the SPD content accords with the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>No change proposed. The amalgamation and coordination of existing Local Plan policies into SPD guidance has not created new policy. The intention is to coordinate these policies as spatial planning guidance for Old Oak West which includes areas of six Local Plan Place policies.</p> <p>Change proposed. Local Plan policies continue to form part of the development plan and have greater weight than SPD guidance which does not form part of the development plan. Wording reflecting this relationship has been added to the Introduction.</p> <p>Change proposed. It is not the intention for Principles to be development management requirements. To ensure consistency, the previous definition of principles has been removed and the definition of Principles set out in the SEA Screening and Determination Statement has been included in the SPD. This will clarify the intended role of Principles in the SPD.</p> |
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| 1 | 51 | Old Oak Neighbourhood Forum | <p>Delivery and Implementation</p> <p>This is the final section of the Draft SPD. Its stated aim is to ensure that development proposals are brought forward in a way that secures a coordinated and comprehensive approach to the delivery of development and infrastructure across Old Oak West.</p> <p>The wording of Principles DIP1, DIP2 and DIP3 bear some relation to Local Plan Policies in the Delivery and Implementation chapter of the Local Plan (DI1, DI2 and DI3). But the headings and language are different. They seek to assert OPDC's role as delivery body, referring to (unspecified) powers available to OPDC under the 2011 Localism Act.</p> <p>The tone reads as if this section of the SPD has been drafted by the OPDC delivery arm rather than the planning team. Gone are the sections in the Local Plan saying Community participation will be a defining factor in the delivery of successful regeneration in the OPDC area. A new part of Principle DIP1 reads at paragraph 12.10 In accordance with Local Plan policy SP10 and DI4, it may be in the interests of the proper planning and delivery of Old Oak West for OPDC to acquire land using compulsory purchase powers to deliver its objectives as a regeneration body including accelerating delivery and optimising capacities and densities, where there is a compelling case in the public interest to use such powers.</p> | <p>No change proposed. The Delivery and Implementation chapter sets out guidance and information that is consistent with Local Plan Policies DI1 to DI4. It has been drafted by OPDC Planning Policy Officers. This Chapter and the Next Steps Chapter reflect the stage of development of the OPDC area.</p> <p>Significant changes have been delivered since the establishment of OPDC including over 3,500 new homes being completed and over 8,000 new homes being progressed in the development pipeline. In addition to new homes, OPDC has secured over 150,000 square metres of net additional industrial floorspace and is delivering public realm improvements along the Grand Union Canal and at Willesden Junction Station.</p> |
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| | | | <p>The language of this section of the SPD has a focus on 'delivery' which perhaps reflects the frustrations of the Corporation that not much as happened on the ground in the eight years since the MDC was established by the then Mayor of London.</p> | |
| 1 | 52 | Old Oak Neighbourhood Forum | <p>A Table 12.1 adds a further five new site allocations, noted as 'Not a site allocation' in the adopted Local Plan. We have no problem with the fact that new sites have been identified since the Local Plan was finalised and adopted in June 2022. But we do not see that these can be added via an SPD rather than a development plan document.</p> | <p>No change proposed. These sites are shown on figure 3.16 of the Local Plan and are guided by relevant Local Plan policies. They are identified in the Development Capacity Study Update 2021 which was a supporting study to the Local Plan and contributed to the Local Plan development capacities. Therefore there are appropriate to be included in the SPD. They were not identified as site allocations as they did not meet the criteria set out on Local Plan paragraph 3.82.</p> |

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| 1 | 53 | Old Oak Neighbourhood Forum | <p>Conclusions</p> <p>We believe that this Draft SPD is now being progressed swiftly to adoption in January 2024 for the following inappropriate reasons:</p> <ul style="list-style-type: none"> • To stay ahead of the implementation of the new planning framework in LURA 2023 and to avoid any challenge or questioning at an Examination. LURA provides that local planning authorities “will have a new power to prepare ‘supplementary plans’, where policies for specific sites or groups of sites need to be prepared quickly (e.g. in response to a new regeneration opportunity), or to set out design codes for a specific site, area or across their whole area”. • To bolster evidence to HMT, DfT and DLUHC of ‘momentum’ by the MDC and to offer an updated spatial plan that covers the same geographic area as that included in the OPDC Outline Business Case for Old Oak West. The reality is that the adopted Local Plan does not refer to ‘Old Oak West’. Local Plan policies applying to this post 2019 concept were achieved (with a struggle) via a set of 460 Major Modifications on which ‘soundness’ requirements (in our view as participants in the EIP) were accepted by the Planning Inspector at a late stage in light of advice from the Planning Inspectorate on ‘pragmatism’ at the end of a 3.5 year Examination. <p>Neither of the above are good reasons for bringing this SPD process to a conclusion at</p> | <p>No change proposed. The timeframes for adoption are considered appropriate.</p> <p>No change proposed. Old Oak West represents a portion of an area of significant change that is already identified in the Local Plan. The amalgamation and coordination of existing Local Plan policies into SPD guidance has not created new policy. The intention is to coordinate these policies as spatial planning guidance for Old Oak West to provide clarity for the development in the area utilising the current planning framework.</p> <p>Change proposed. Local Plan policies continue to form part of the development plan and have greater weight than SPD guidance which does not form part of the development plan. Wording reflecting this relationship has been added to the Introduction.</p> <p>A future Local Plan review will be undertaken in accordance with the Levelling-Up and Regeneration Act (LURA) 2023. It would not be effective for a Supplementary Plan to be developed as LURA compliant plan-making guidance has not been issued and there is not a LURA compliant Local Plan for it to supplement.</p> <p>OPDC wants to adopt the SPD as soon as is reasonably practicable because it will assist in securing high quality development when determining applications in the Old Oak West Area and assist in promoting development which incorporates community priorities and aspirations.</p> |
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| | | | <p>this time. While there is no definite timescale for when the various provisions in LURA will be brought into effect, we suggest that the public interest would be better served by OPDC embarking on preparation of a Supplementary Plan for Old Oak West as a key part of the wider Opportunity Area.</p> | |
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| 1 | 56 | Old Oak Neighbourhood Forum | <p>It is early days in terms of preparation of the next iteration of the London Plan. The 2021 London Plan acknowledges that housing and employment targets set for Mayoral Opportunity Areas are 'indicative' and need to be tested.</p> <p>We consider that the experience of the OPDC since 2015 has now 'tested' these targets and has found them wanting, as having never been realistic. The targets were set on the basis of a superficial analysis of the scale of 'brownfield' public land at Old Oak. Too little recognition was given to the barriers of the canal, extensive rail lines and the topography of the area.</p> | <p>No change proposed. The Local Plan's development capacities meet the London Plan's development targets. The capacities are demonstrated by the Local Plan and extensive suite of supporting studies to be appropriate and deliverable. These included studies which considered the existing and future context, opportunities and challenges to optimising development.</p> |
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| 1 | 57 | Old Oak Neighbourhood Forum | <p>These latest plans in the Draft SPD will not lead to successful and sustainable development. Nor are there any signs to date that OPDC plans will lead to the emergence of a truly exceptional, exciting and super-connected place to live, work and play4.</p> <p>A series of events since 2015 have changed the planning context for Old Oak. The work of the MDC at Park Royal is a different matter and is showing better results.</p> <p>The Government's October 2023 decisions on the future of HS2 are a moment which should prompt reflection and a new approach by OPDC and by the Mayor of London. The next iteration of the London Plan should be used to consolidate such a changed approach.</p> | <p>No change proposed. Officers consider that the full suite of national, London and Local planning policies and guidance, alongside other materials, will help to deliver a high quality sustainable, inclusive and characterful new area of London within Old Oak West. The Local Plan was adopted in 2022 and remains deliverable. The SPD supplements the Local Plan.</p> <p>The content, development and adoption of the SPD are not impacted by the recent HS2 announcements and we have been reassured by HS2 that the delivery of Old Oak Common station is on course, which will support the phased comprehensive delivery of Old Oak West. Old Oak Common station opening as a temporary terminus has been the working assumption for a few years now and the Government's announcement in autumn 2023 confirms this. The change to the HS2 delivery programme does not impact the planned opening of Old Oak Common Station and trains will continue on from Birmingham but not at High Speed. Old Oak Common Station's role as a temporary terminus strengthens the need for local regeneration, since it will be the sole interchange for passengers who would otherwise have continued into Euston. At this stage, and based on all advice given, we are not expecting significant revisions and, in any case, the SPD is sufficiently flexible to adapt to changing circumstances. That said, should potential revisions be required, they would be made within a future Local Plan review as the SPD cannot revise content within the Local Plan.</p> |
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| | | | | <p>Amendments to the London Plan will be determined by GLA officers. OPDC officers will engage with GLA officers to ensure the updated London Plan and the content of the future reviewed Local Plan are coordinated.</p> |
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| 1 | 58 | Old Oak Neighbourhood Forum | <p>ANNEXE 1 – AN ASSESSMENT OF THE ‘PLACE AND CLUSTER’ MATERIAL IN THE DRAFT SPD AS COMPARED THE PLACE CHAPTERS IN THE ADOPTED 2022 OPDC LOCAL PLAN.</p> <p>P3 Grand Union Canal – the text of the ‘vision’ remains as in the Local Plan. The location of Channel Gate Park and alignment of Union Way varies between the two diagrammatic maps.</p> | <p>No change proposed. Paragraph 11.4 confirms that the Place and Cluster visions maps are indicative save for those elements that are fixed in the Local Plan such as boundaries for heritage designations and town centres. The figures accompanying the Place and Cluster Visions in the SPD illustrate how Local Plan Place and Cluster diagrams would look in relation to the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed. This results in differences between the SPD and Local Plan figures.</p> <p>Change proposed. Local Plan figures remain part of the development plan and have more planning weight in the development management process. Wording reflecting this relationship has been added to the Introduction.</p> |
| 1 | 59 | Old Oak Neighbourhood Forum | <p>P7 North Acton and Acton Wells - the text of the ‘vision’ remains as before. The diagrammatic map in Figure 11.10 of the SPD loses the important ‘non-ticketed’ bridge providing a north/south pedestrian/cycle route across the rail tracks at North Acton station (as noted above). A proposed ‘cluster’ disappears from the tip of the ‘shield’ site on the proposed ‘Old Oak Street’ as compared with Figure 4.21 in the Local Plan (active frontages re-appear in other diagrams).</p> | <p>Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge was intended to reflect updated outputs of supporting studies. It was not the intention to change the Local Plan policies relating to the delivery of the bridge. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals.</p> <p>The Old Oak Common Lane Station Cluster remains in accordance with Local Plan Policy P7C1 and as shown in SPD figure 11.13.</p> |

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| 1 | 60 | Old Oak Neighbourhood Forum | <p>P7C1 North Acton town centre Cluster – the text of the ‘vision’ remains the same, although only the northern part of what the public recognise as ‘North Acton’ lies within the ‘Old Oak West’ boundary.</p> <p>In the diagrammatic maps, the route of ‘Old Oak Street’ has been realigned in Figure 11.12, while arriving at the northern side of the tracks at North Acton station, as per the Local Plan Figure 4.23.</p> | <p>No change proposed. Paragraph 11.4 also confirms that the Place and Cluster visions maps are indicative save for those elements that are fixed in the Local Plan such as boundaries for heritage designations and town centres. Figure 11.10 shows the portion of North Acton that falls within Old Oak West. The figures accompanying the Place and Cluster Visions in the SPD illustrate how Local Plan Place and Cluster diagrams would look in relation to the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed. This results in differences between the SPD and Local Plan figures.</p> <p>Change proposed. Local Plan figures remain part of the development plan and have more planning weight in the development management process. Wording reflecting this relationship has been added to the Introduction.</p> <p>Change proposed. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals for North Acton Station and the nearby route of Old Oak Street.</p> |
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| 1 | 61 | Old Oak Neighbourhood Forum | <p>P7C2 Old Oak Common Lane Station Cluster – the text of the ‘vision’ remains the same. In the diagrammatic maps the new SDP version (Figure 11.4) shows ‘Old Oak Street’ with a strip of land denoted as new and enhanced publicly accessible open space, to the west of the rail bridge. The word ‘potential’ is missing from the label of Old Oak Common Lane station, an important omission which renders the diagram misleading to the public.</p> | <p>No change proposed. Paragraph 11.4 also confirms that the Place and Cluster visions maps are indicative save for those elements that are fixed in the Local Plan such as boundaries for heritage designations and town centres. The figures accompanying the Place and Cluster Visions in the SPD illustrate how Local Plan Place and Cluster diagrams would look in relation to the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed. This results in differences between the SPD and Local Plan figures.</p> <p>Change proposed. Local Plan figures remain part of the development plan and have more planning weight in the development management process. Wording reflecting this relationship has been added to the Introduction.</p> <p>Change proposed. To ensure consistency between figures, Old Oak Common Lane Station in figure 11.14 has been labelled as potential.</p> |
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| 1 | 62 | Old Oak Neighbourhood Forum | <p>P8 Old Oak Lane and Old Oak Common Lane – the text of ‘vision’ remains the same. In the diagrammatic maps a ‘potential new street’ has been relocated further north of ‘Old Oak Community Gardens’ (behind the houses on Stephenson Street). The shape of the proposed open space at ‘Channel Gate Park’ has been firmed up and a street network and building plots defined along the proposed new ‘Channel Gate Street’.</p> <p>A significant change is that the Local Plan diagram (Figure 4.27 below) showed an ‘area of search ‘ for an ‘Old Oak South Park’ through which ‘Old Oak Street’ would cross. The new Figure 11.16 in the Draft SPD no longer includes this. Instead the area of public realm planned by HS2 in front of Old Oak Common station is now badged by OPDC as ‘Old Oak South Park’. This suggests a reduction overall in the areas of new ‘park’ which were included in the Local Plan. A block layout is shown for the HS2 owned Adjacent Site.</p> <p>A range of coloured blocks on shown on the diagram, with the Key identifying these as ‘illustrative masterplan/existing buildings/recent developments/current planning permissions’. It not clear that these colours have been applied consistently across the diagram.</p> | <p>No change proposed. Paragraph 11.4 confirms that the Place and Cluster visions maps are indicative save for those elements that are fixed in the Local Plan such as boundaries for heritage designations and town centres. The figures accompanying the Place and Cluster Visions in the SPD illustrate how Local Plan Place and Cluster diagrams would look in relation to the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed. This results in differences between the SPD and Local Plan figures.</p> <p>Change proposed. Local Plan figures remain part of the development plan and have more planning weight in the development management process. Wording reflecting this relationship has been added to the Introduction.</p> <p>No change proposed. The proposed Old Oak South Local Park being delivered by HS2 meets the size requirements of a Local Park set out in the London Plan and Local Plan. Should the long-term development of the Elizabeth Line Depot be undertaken additional public open space would be sought.</p> <p>Change proposed. The key has been updated to confirm that the colour blocks refer to Local Plan Places and reflect ‘illustrative masterplan/existing buildings/recent developments/current planning permissions’ for all Place figures.</p> |
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| 1 | 63 | Old Oak Neighbourhood Forum | <p>P8C1 Atlas Junction Cluster. This is one of the elements of the Draft SPD on which local residents feel most strongly. The 'vision' text in the SPD remains unchanged from that in the Local Plan and reads as follows: As part of Old Oak major town centre, Atlas Junction will provide local services for communities centred on an improved Atlas Junction and Union Way. Active uses will sit beside high quality canal-side spaces helping to establish this stretch of the canal as a place to visit and enjoy.</p> <p>We have no problem with the concept that this section of the Grand Union Canal offers scope for development and some places for residents and visitors to eat and drink. The Collective established itself at this location several years ago, and while the original parent company went into liquidation this 'co-living' building has since remained viable. Pocket Living has a consent for a neighbouring housing development at 'Atlas Wharf' but tell us that they remain in S106 negotiations. Developers at the Lords site have postponed the submission of an application at 'Old Oak Wharf'.</p> <p>These schemes may proceed as the sites are close to Old Oak Lane. We remain unconvinced that the remainder of the large 5.9 ha Atlas Road/Channel Gate land will become 'part of Old Oak town centre'. This triangular site is bordered by the canal and by rail lines. The Channel Gate section will remain</p> | <p>No change proposed. Atlas Wharf was granted planning consent on 21st December 2023.. 2 Victoria Terrace is a site identified in OPDC's Development Capacity Study Update 2021 for development. The Local Plan designates the area of the Old Oak major town centre. This includes Channel Gate and Atlas Junction which will benefit from a new Local Park, enhanced public transport and active travel routes to support existing and future town centre uses. The SPD cannot amend the major town centre boundary. Therefore, it is appropriate for the SPD to identify the area as part of the major town centre.</p> <p>A portion of the Channel Gate site allocation is at risk of potential delay, due to associated tunnelling to Euston. We are currently working with HS2 to explore what areas under their control can be released, to prevent delay to development and town centre uses. There are also privately owned sites within the Channel Gate site allocation whose delivery are not impacted by changes to HS2 phasing. Regardless, the SPD must accord with the Local Plan phasing and capacities. Any changes will be included through the future Local Plan Review.</p> <p>No change proposed. The SPD guidance for development capacities is consistent with the Local Plan minimum site allocation and Development Capacity Site capacities. The SPD cannot amend these capacities. The capacities, building heights and density range guidance set out in the Local Plan were demonstrated to be appropriate through the Local Plan examination</p> |
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| | | <p>bound up with HS2 construction works, as explained above, for what is now an indefinite time period. The location is by no means 'on the doorstep' of the OOC station (or vice versa) even if it looks relatively close on a diagrammatic map, as also explained in this representation.</p> <p>Figure 11.18 in the SPD shows only part of the 'cluster' as defined in the SPD. 'Atlas Wharf' is shown as if already built. 'Victoria Terrace' is also shown and is believed to be a site which OPDC has acquired via its £50m loan from the Mayoral Land Fund. But we continue to believe that this location does not have the topography, existing nearby residential settlements, road network and public Transport access that would support a 'new major town centre' or even 'part of a (dispersed) major new town centre'.</p> <p>As a neighbourhood centre, with housing development at density levels reflecting those in the National Model Design Code for a 'town/city centre' (over 120 units/hectare) this location could become sustainable and successful. Allowing for greater 'intensification' in an Opportunity Area, densities up to 200 dph could be appropriate. But the OPDC Local Plan site allocations and housing targets combine together to require average densities of up to 600 dph at this location. This leads inevitably to the building typology of high rise towers, as shown below in an OPDC image from earlier versions of the Draft Local Plan.</p> | <p>process and form part of the development plan. The Local Plan, London Plan and OPDC SPDs and London Plan Guidance documents provide guidance to ensure appropriate heights and densities in high quality developments are delivered.</p> <p>Change proposed. General building height ranges are located in Local Plan policies and therefore it is appropriate to include these in Principle DP2. It was not the intent to elevate the status of the tall building heights guidance. Principle DP2(k) has been amended to relocate the predominant tall building height ranges to supporting text. Supporting text to Principle DP2 has been amended to confirm that SPD building heights guidance and supporting text information does not amend the status of existing Local Plan heights policies and supporting text.</p> |
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| | | | <p>The Draft SPD does not attempt to introduce significant new policies for Channel Gate, other than in respect of Tall Building heights – as covered above – where the SPD is being used as a vehicle for reinforcing ‘appropriate’ height ranges inserted belatedly into the supporting text of the Local Plan but proposed to be elevated to the status of ‘Principles’.</p> | |
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| 1 | 65 | Old Oak Neighbourhood Forum | P9 Channel Gate – the text of the ‘vision’ for this ‘Place and Cluster vision’ remains the same as in the Local Plan. The diagrammatic map in the SPD is the same as shown for ‘Old Oak Common Lane and Old Oak Common Lane Place and has already been commented on above. | <p>No change proposed. Paragraph 11.4 confirms that the Place and Cluster visions maps are indicative save for those elements that are fixed in the Local Plan such as boundaries for heritage designations and town centres. The figures accompanying the Place and Cluster Visions in the SPD illustrate how Local Plan Place and Cluster diagrams would look in relation to the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed. This results in differences between the SPD and Local Plan figures.</p> <p>Change proposed. Local Plan figures remain part of the development plan and have more planning weight in the development management process. Wording reflecting this relationship has been added to the Introduction.</p> |
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| 1 | 66 | Old Oak Neighbourhood Forum | P11 Willesden Junction – the text of the ‘vision’ remains the same as in the Local Plan. The diagrammatic map at Figure 11.22 of the Draft SPD covers a smaller area than its equivalent in the Place chapter of the SPD and shows no significant changes. | <p>No change proposed. Paragraph 11.4 also confirms that the Place and Cluster visions maps are indicative save for those elements that are fixed in the Local Plan such as boundaries for heritage designations and town centres. Figure 11.22 shows the portion of Willesden Junction that falls within Old Oak West. The figures accompanying the Place and Cluster Visions in the SPD illustrate how Local Plan Place and Cluster diagrams would look in relation to the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed. This results in differences between the SPD and Local Plan figures.</p> <p>Change proposed. Local Plan figures remain part of the development plan and have more planning weight in the development management process. Wording reflecting this relationship has been added to the Introduction.</p> |
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| 2 | 1 | Grand Union Alliance | <p>We wish to complain about your efforts in the SPD to change the currently-adopted OPDC Local Plan in a way that exceeds your lawful powers under the Town and Country Planning (Local Planning) (England) Regulations 2012 and other primary and secondary legislation.</p> <p>You can only lawfully change your adopted Local Plan under the supervision of the Planning Inspectorate, and it must involve one of:</p> <ul style="list-style-type: none"> - a new Local Plan - an Amendment to the current Local Plan (or similar wording). (I believe the Planning Inspectorate might in practice try and steer you towards a new full-Monty Local Plan, if too much was changing) - an additional Development Plan Document, not originally envisaged. (Again I believe the Planning Inspectorate might in practice try and steer you towards the other options, if too much was changing). | <p>No change proposed. The content and development of the SPD is considered to be legally compliant, consistent with the NPPF and the development plan. The Local Plan remains unchanged. SPD guidance is consistent with Local Plan policies. The guidance coordinates existing Local Plan policies specific to Old Oak West and includes guidance informed by community engagement that supplements existing Local Plan policies. It does not provide new policies.</p> |
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| 2 | 2 | Grand Union Alliance | <p>You have produced an unacceptable draft Old Oak West Supplementary Planning Document.</p> <p>Supplementary Planning Documents are non-statutory documents that provide further guidance on how policies or proposals set out in the adopted Local Plan / Development Plan Documents will be implemented.</p> <p>They cannot be used to change development policy.</p> <p>Yet you are trying to do so, regarding the area in and near a redevelopment of North Acton tube station.</p> <p>You are guilty of that, and any defence would reverse statements since made by your officers.</p> <p>In particular, your Old Oak West SPD destroys much of Local Plan Policy P7C1, meaning both its wording and graphic.</p> <p>To be clear, your Planning Inspectorate - endorsed development plan cannot be overridden by an SPD that removes the pedestrian and cycling bridge over the Central Line and Chiltern Line tracks, between Station Square South and the HS2 Crossover Box's Station Square North.</p> <p>Both the short technical appendix in the SPD, and the longer technical report since supplied, display an unreasonable waste of public</p> | <p>No change proposed. The content and development of the SPD is considered to be legally compliant, consistent with the NPPF and the development plan. The Local Plan remains unchanged. SPD guidance is consistent with Local Plan policies. The guidance coordinates existing Local Plan policies specific to Old Oak West and includes guidance informed by community engagement that supplements existing Local Plan policies. It does not provide new policies.</p> <p>Local Plan Policy P7C1 remains unchanged and part of the development plan.</p> <p>Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge was intended to reflect updated outputs of supporting studies. It was not the intention to change the Local Plan policies relating to the delivery of the bridge. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals.</p> |
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| | | | <p>money, and show a worrying quality of project management.</p> <p>Your SPD is fatally flawed.</p> <p>On the above basis, it is not necessary to then continue, to comment in any detail on your SPD plans in that location.</p> <p>The plans would certainly destroy the OPDC's potentially pleasant and safe, mostly off-road, pedestrian and cycling route, starting at the A40 Western Avenue, to:</p> <ul style="list-style-type: none"> - the future Crossover Box development - a crossing of Victoria Road to the Flat Iron site and the HS2 station and possible London Overground station, and - a longer off-road and traffic-calmed route, maybe involving St Leonard's Road and Bashley Road, to much of Old Park Royal and the Wesley Estate. Those interventions there could continue further, meeting the major TfL/LB Brent proposals for Walking and cycling improvements between Wembley Central and Harlesden stations Have Your Say Transport for London (tfl.gov.uk) <p>You have made a serious strategic mistake.</p> | |
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| 2 | 3 | Grand Union Alliance | <p>General comment; This submission is based up on the views of the Grand Union Alliance established over many years updated by the comments made by members of the community at the OPDC's community workshops and at recent joint meetings of the Old Oak Neighbourhood Forum.</p> <p>It does not seek to duplicate the comments made by the Old Oak Neighbourhood Forum which have been circulated and are supported.</p> <p>Whilst there was a reasonably good level of participation at the OPDC's community workshops It is apparent that a readiness to respond with comments on the actual draft of the SPD has noticeably fallen off compared with other plan-making consultations. This is disappointing but is probably a reflection of a commonly held view that amelioration and mitigation of the scale and massing of the development at Old Oak West cannot be secured through community participation. This contrasts with the positiveness of the community workshops where some semblance of coproduction and codesign was apparent. This should serve as a lesson for the future if effective and meaningful community participation is to be sought for further refinements to the plans and guidance for the OPDC's area.</p> | <p>Noted. OPDC's commitment to deliver inclusive engagement is set out within our Community Engagement Strategy and our Statement of Community Involvement regarding planning consultations. We will use outputs from the consultation on the Old Oak West SPD to inform engagement approaches for future projects and we will continue to be clear in what can be shaped by engagement.</p> <p>OPDC carried out a series of extensive and inclusive engagement activities to inform the development of the SPD. This comprised an early engagement and co-design programme between February and June 2023, two reviews by our Community Review Group and the formal 6-week SPD consultation which took place between 16 October and 27 November 2023.</p> <p>The early engagement and co-design programme was extensive, supported by specialist engagement consultants to deliver accessible and inclusive engagement activities. This involved a multi-media outreach campaign, including two mail drops to over 16,000 properties, a door knocking exercise and pop-up stalls at places of high footfall. The engagement activities included three innovative co-design workshops, a site visit, over 11 meetings with groups seldom heard and groups with protected characteristics, and a specific series of events to work with young people to shape the content of the SPD. This resulted in over 260 people participating in events and extensive community recommendations for the SPD. The majority of which have been</p> |
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| | | | | <p>included in the SPD. These are documented in the published Community Engagement Summary Report which identifies where recommendations have been included and why some recommendations cannot be included due to the nature of an SPD.</p> <p>The formal SPD consultation was also carried out to ensure it was accessible and inclusive and that it conformed with OPDC's Statement of Community Involvement. This involved an extensive multimedia outreach campaign (including emails to contacts on OPDC's consultation database, social media posts, local newspaper adverts and a letter drop to over 18,000 addresses), a dedicated page on our online engagement platform, an afternoon and early evening in-person drop in event, an online evening event and multiple options for providing responses. The online engagement platform page was visited over 700 times by people, approximately 30 people attended the drop-in event and 12 people attended the online event. This demonstrates a high level of engagement on the SPD in addition to engagement carried out earlier in the year.</p> |
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| 2 | 4 | Grand Union Alliance | <p>Green infrastructure:</p> <p>1. Green streets within connected green routes as in Principle EUP1.bi are welcomed and supported. However, existing communities should be consulted first on any greening of their street to ensure that people are supportive of the proposals. Clearly the forthcoming draft SPD on Public Realm & Green Infrastructure has provided useful Information on biodiversity & urban greening strategy (See SEA. Document).</p> | Noted. OPDC will work with relevant stakeholders to liaise with existing communities in the preparation of any proposals to green existing streets. |
| 2 | 5 | Grand Union Alliance | <p>2. It would be helpful to set out specific functions and characters of open spaces using further public engagement.</p> | No change proposed. Principle EUP2 and supporting text includes suggestions for open space design from early engagement carried out for the SPD. Future guidance for public open spaces will be informed by community engagement and input from OPDC's Community Review Group. |
| 2 | 6 | Grand Union Alliance | <p>3. Food growing: Whilst principle EUP2c provides opportunities. It is doubtful that adequate opportunities will be delivered given the intensity of development, competing uses of open spaces, over shadowing etc. It is welcomed that the definition of meanwhile uses includes food growing.</p> | No change proposed. In accordance with Local Plan policy EU1(d)(iii) and Principle EUP2(c), OPDC will seek the delivery of food growing opportunities where appropriate. This will be informed by environmental considerations and the mix of activities identified for open spaces. |

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| 2 | 7 | Grand Union Alliance | 4. The references to SuDs in Principles EUP1 & P2 and at paragraph 6.6 are welcomed. But more can be said on their amenity and biodiversity benefits. Presumably this will be in the forthcoming. Public Realm & Green Infrastructure SPD. More ought to be said on rain gardens and permeable surfaces. These interventions are particularly important given the large areas of buildings and impermeable surfacing. | No change proposed. The forthcoming Public Realm and Green Infrastructure SPD will provide guidance regarding sustainable drainage systems and approaches to manage surface water flooding. |
| 2 | 8 | Grand Union Alliance | 5. Whilst Principle EUP1A references climate resilience, which is welcomed, it is considered that “improving ecology”, providing “net gain” and conserving and enhancing SINC are not sufficient to ensure biodiversity resilience. There is a need to elaborate as to what is meant by improved, enhancement etc. and for biodiversity resilience in the face of changing climate and seasons to have equivalence to climate resilience. | No change proposed. The forthcoming Public Realm and Green Infrastructure SPD will provide further detailed guidance to support biodiversity resilience and nature recovery. |
| 2 | 9 | Grand Union Alliance | 6 Soil hospitals referenced at paragraph 6.8 need to be carefully managed throughout their lives. Otherwise, they become potential enduring sources of dust, pathogens etc. for the neighbouring residences and places of work. | No change proposed. Local Plan policies D5, EU4 and EU5 will be utilised to prevent issues relating to amenity, air, noise and vibration pollution. |
| 2 | 10 | Grand Union Alliance | 7. Green infrastructure for the young and all ages and abilities as promised in Principle EUP2c is welcomed. Detailed provision should be the subject of further public engagement, ideally using coproduction and codesign. | No change proposed. Principle EUP1 and supporting text includes suggestions from early engagement carried out for the SPD. Future guidance for green infrastructure will be informed by community engagement and input from OPDC's Community Review Group. |

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| 2 | 11 | Grand Union Alliance | 8. Outdoor exercise equipment at Principle EUP2c Is welcomed. Protection of existing habitats at Principle EUP1 Is supported, as is biodiversity net gain requirements. However, there are concerns around the movement and feeding corridors for wildlife within Old Oak West, particularly along the Grand Union Canal. Railway lines also function as wildlife corridors. The proposed scale and form of development beside the canal is likely to have an adverse effect as a wildlife corridor. | No change proposed. Principle EUP1(c) provides guidance to conserve and enhance Sites of Importance for Nature Conservation which include railway lines and the Grand Union Canal. Other non-designated railway lines are covered by Principle EUP1(b)(x) which supports the continued and improve rewilding of inaccessible spaces, including railway embankments. These Principles and Local Plan policies SP8 and P3 will ensure the wildlife value of the Grand Union Canal is conserved and enhanced. |
| 2 | 12 | Grand Union Alliance | 9. Typo. Document refers to Public Open Space and not to publicly accessible open space, although it must be noted that POS would be the preferable option if it was possible. | No change proposed. The use of public open space and publicly accessible open space accords with the Local Plan Glossary definitions. |

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| 2 | 13 | Grand Union Alliance | <p>Active Travel:</p> <p>1. On the issue as to whether the design and layout of infrastructure supports safe, accessible and inclusive active travel, including public transport, it is observed that the OPDC's Transport Study dates from 2015. And whilst "a full transport study is required for TfL to assess the potential impact of this development [i.e. Western Lands] on the transport network..." this work timetabled to end October 2022 (see Mayoral Decision 'MD2971 OPDC payments to TfL and GLA' https://www.london.gov.uk/decisions/md2971-opdc-grant-payments-tfl-and-gla) is currently not expected to be completed until February 2024, possibly with further slippage. Such an updating to reflect the fundamentally significant changes to the location of the 'centre of gravity' of development set out in the adopted Local Plan compared with earlier iterations of the Plan should have been a prerequisite for any draft SPD on Old Oak West. Not a retrospective afterthought exercise. 'The cart has been put before the horse'.</p> | <p>No change proposed. The SPD is consistent with the Local Plan. Therefore, the SPD continues to be based on the previous Transport Study which modelled a similar/higher quantum of development as proposed in the adopted Local Plan. This informed OPDC's Infrastructure Delivery Plan and proposed upgrades to strategic roads and junctions taking into account cumulative impacts of development. As a strategic model, the recommendations from this are still considered to be fit for purpose for the current Local Plan.</p> <p>Updated Strategic Transport modelling is being carried out by TfL colleagues and will be used to inform the future Local Plan review. The SPD is consistent with the Local Plan and cannot reflect updated supporting studies or modelling intended for a Local Plan review which might require significant amendments to existing Local Plan policies.</p> |
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| 2 | 14 | Grand Union Alliance | <p>2. North Acton Station concerns around: the diminution in connectivity between North Acton and the Crossover Box site and beyond by omitting in the draft SPD a linking bridge; resulting also in a lack of a required consistency between the Local Plan and the draft SPD calling into question the status and acceptability of the SPD if adopted, have been raised in the parallel submission as explored in the on-line meeting of 22 November 2023. They need not be repeated here, save to note that a planned passive provision at this station for an eventual Chiltern Line service to Old Oak Common Station would have greatly enhanced access by the less mobile to the Elizabeth Line, HS2 and the Chiltern Line. Its omission is regretted.</p> | <p>Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge was intended to reflect updated outputs of supporting studies. It was not the intention to change the Local Plan policies relating to the delivery of the bridge. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals.</p> <p>No change proposed. Local Plan paragraph 4.118 requires development proposals to safeguard land for potential delivery of the Chiltern Line to Old Oak Common Station. Principle DIP3 requires that proposals should contribute to and/or deliver and safeguard land for the delivery of infrastructure identified in this SPD, OPDC's Local Plan and Infrastructure Delivery Plan.</p> |
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| 2 | 15 | Grand Union Alliance | <p>3. The Commissioner of TfL’s letter of 20 November 2023 to the Government on supplying more Elizabeth Line trains etc. Included the following: “Relying on the existing services on the Western Route would undercut the benefits brought by introducing high speed rail travel between Birmingham and London; it would be detrimental to the local area, as it would fail to cater for the growing community around the station which has 26,000 homes and 56,000 new jobs in the pipeline; and the consequences would extend to the national economy.”</p> <p>‘Would be detrimental to the local area’ is very significant for it conveys an understanding that the very foundation on which Old Oak West is predicated is not only at risk but has been undermined. This is contrary to the scope and content of the draft SPD and to the OPDC’s Chair’s expression of confidence at the Board meeting of 23 November 2023 that the Government’s decision “will not affect our plans to build...”. There is a difference or disconnection there between the assessments of the OPDC and TfL. This ought to be resolved before further work to adopt the draft SPD is pursued.</p> | <p>No change proposed. The timing of the development and adoption of the Old Oak West SPD is appropriate. The content, development and adoption of the SPD are not impacted by the recent HS2 announcements and we have been reassured by HS2 that the delivery of Old Oak Common station is on course, which will support the phased comprehensive delivery of Old Oak West. Old Oak Common station opening as a temporary terminus has been the working assumption for a few years now and the Government’s announcement in autumn 2023 confirms this. The change to the HS2 delivery programme does not impact the planned opening of Old Oak Common Station and trains will continue on from Birmingham but not at High Speed. Old Oak Common Station’s role as a temporary terminus strengthens the need for local regeneration, since it will be the sole interchange for passengers who would otherwise have continued into Euston. At this stage, and based on all advice given, we are not expecting significant revisions and, in any case, the SPD is sufficiently flexible to adapt to changing circumstances. That said, should potential revisions be required, they would be made within a future Local Plan review as the SPD cannot revise content within the Local Plan.</p> |
| 2 | 16 | Grand Union Alliance | <p>4. That the ‘Park Royal Bus Depot’ be “ideally” relocated (para 5.28) is supported as the optimum option. The Mayor’s ‘Healthy Streets’ is well referenced.</p> | <p>Noted. This is consistent with Local Plan policies SP3, SP7, SP8 and P9.</p> |

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| 2 | 17 | Grand Union Alliance | 5. Principle TP2 and Table 5.1's requirement that topography and changing levels, particularly along Old Oak Street at railways lines is particularly important to ease easy and accessible movement. | Noted. |
| 2 | 18 | Grand Union Alliance | <p>Town Centre and Community Uses:</p> <p>1. Concern has been expressed that the proposed school and other community facilities will not be conveniently located. for bus routes. See Figure 9.7 Social infrastructure which gives illustrative social infrastructure locations whereby what may be a super nursery on Channel Gate Street is nearly at the maximum distance from Victoria Road and its bus routes. That the school will be, in a sense, co-located with the Channel Gate Local Park is welcomed for it is essential for the school and its pupils to have access to a clean and natural environment.</p> | <p>No change proposed. Figure 9.7 sets out illustrative locations of social infrastructure. Principle TCCP2 and Local Plan policy TCC3 provide guidance for the locations of social infrastructure which will be determined through the development management process.</p> <p>Change proposed. To provide further clarity, figure 9.7 has been updated to define the illustrative locations of social infrastructure.</p> |
| 2 | 19 | Grand Union Alliance | 2. Although the potential that there will be a mix of uses the major town centre is not compact but is loosely connected in a very elongated configuration. That the community hub will embrace both public services and community services is supported. Health facilities should be broadened out to include well-being enabling facilities. | No change proposed. Health facilities reflect Local Plan policies for the amount and location of primary care facilities. Should health stakeholders seek the delivery of well-being enabling facilities, this requirement will be used to inform future supporting studies to inform the Local Plan review. |

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| 2 | 20 | Grand Union Alliance | <p>Urban design:</p> <p>1. It is appreciated that the Appendix has an illustrative master plan and that maps throughout the draft SPD reflect this illustrative masterplan. So, there is scope for variation in approach, locations etc. However, there is some merit in the Illustrated arrangement of features, facilities and movement networks. Paragraphs 10.6 and 12.21 refer to future design coding in helping shape Old Oak West. It is regretted. that this process of design coding has been omitted from the preparation of this draft SPD, particularly since the Government has been actively promoting this process of design coding and has an expectation that It employs community participation as an essential production mechanism.</p> | <p>Noted. SPD paragraph 10.6 confirms that Design Codes will play a role in helping to shape Old Oak West. These have the potential to include more detail in relation to heights, massing, material palettes, design-details, character based and contemporary architecture styles, facade design and the design of open spaces.</p> |
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| 2 | 21 | Grand Union Alliance | <p>2. There is a need to make more explicit the following points.:</p> <ul style="list-style-type: none"> - The need to make place 'understandable' by incorporating distinctive features which reveal a character of place and engender a sense of belonging by, among other ways, using existing assets as anchor features. - Support the varying of street types, urban grain, plot shapes and sizes, building forms and materials. Sensitively transition between existing and new development with comfortable relationships in layouts, typologies and building heights. - Straight, or nearly straight, simple connected street patterns making pedestrian routes as direct as possible; that are easy to get around and to know are welcomed. - Blocks, but not super blocks, within which private areas prevail to the exclusion of the public and buildings that present unmitigated, unvaried street faces., with hidden away play or sitting out facilities should not be countenanced. | <p>Change proposed. Supporting text to Principle DP4 will make reference to incorporating features that help makes Old Oak West navigable.</p> <p>No change proposed. Street types will be defined in the forthcoming Public Realm and Green Infrastructure SPD. Urban grain, plot shapes and sizes are considered to be appropriate to be defined in detailed masterplanning states; however, Local Plan policy D3(a)(i) requires development to respond positively to the character of the existing context which would include urban grain, plots shapes and sizes. Building forms and materials are guided by Local Plan policy D3(a)(i)(iii). Transitions between existing and new development is managed by Local Plan policy D3(a)(i). Principle DP2 and Local Plan policy SP9(a)(ii) ensure that developments respond appropriately to sensitive locations including existing residential neighbourhoods. Principle TP1(c) seeks delivery of a high quality walking network to support people reaching their destinations.</p> <p>No change proposed. OPDC's Local Plan Policy D3 provides guidance to ensure building frontages maximise the delivery of positive frontages. London Plan Guidance: Optimising Site Capacity provides guidance for delivering a range of block types. Principle DP1 provides guidance to deliver positive and active frontages.</p> |
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| 2 | 22 | Grand Union Alliance | <p>3. Incorporation of natural surveillance opportunities: whilst paragraph 10.9 refers to natural surveillance this should occur not only by active and positive frontages but throughout Old Oak West. Natural surveillance ought to figure more prominently by its inclusion in a 'Principle' box. Unfortunately, much active frontage in new development across London remains inactive. As for the public realm this Old Oak West draft SPD is reliant on the compatibility of the forthcoming Public Realm & Green Infrastructure SPD.</p> | <p>No change proposed. OPDC's Local Plan Policy D3 provides guidance to ensure building frontages maximise the delivery of positive frontages. Principle DP1 provides guidance to deliver positive and active frontages that will result in natural surveillance. The forthcoming Public Realm and Green Infrastructure SPD will provide guidance for maximising natural surveillance in the public realm including public open spaces.</p> |
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| 2 | 23 | Grand Union Alliance | <p>Good Growth:</p> <p>1. This is cited as a fundamental component of both the London Plan and the Local Plan (para 4.1). But is manifest within the draft SPD that much of the over 6900 homes will be in tall buildings. Research and critical reviews have revealed the disadvantages to residents of such accommodation. For example, publication, 'What is the future of high-rise housing?' (https://www.levittbernstein.co.uk/site/assets/files/3959/high-rise_housing_report_2023.pdf) examining the long-term social and financial impacts of residential towers', says that more information should be made available to buyers of high-rise housing about the likely costs of managing and maintaining their homes over their lifetimes and that high-rise housing for households on moderate incomes can be highly problematic because of increasing maintenance costs over time to keep the services and fabric in good repair. Elsewhere in this document at Section 06 'Experiencing the high Life – the State of Wellbeing in High-Rise Housing it is demonstrated that tall buildings are not suitable for families and their quality of life. Yet Principle HP1 promotes the proportion of family housing beyond the required 25%. There is a conflict between achieving the given development quanta and the expectations of Good Growth as it ought to be realised with the creation of place where such attributes as health, wellbeing and flourishing lives result.</p> | <p>No change proposed. Principle DP2 illustrates that there will be a range of building heights in Old Oak West, including tall buildings. These reflect existing Local Plan policies and proximity to destinations such as stations and adjacency to sensitive locations such as heritage assets and existing communities.</p> <p>Officers contributed to the development of the referenced report and are aware of its recommendations. The Local Plan, London Plan, OPDC SPDs and London Plan Guidance provide a comprehensive range of guidance to deliver high quality tall buildings. This includes Local Plan policy EU9 which requires the use of sustainable materials for all developments and that they are designed to last and wear well over the life of the development.</p> <p>No change proposed. OPDC recognises the different needs of family housing in relation to its location within a building. Principle HP1(b)(iii) includes seeking the delivery of family housing as a priority at the ground or first floor with direct access to a garden or other secure private and/or communal open space followed by floors above ground/first floor with access to child appropriate private/communal spaces. It also seeks the delivery of family homes close to Channel Gate Local Park, other open spaces and social infrastructure. These elements will contribute to the delivery a high quality place including family housing at appropriate levels within a building</p> |
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| | | | | alongside implementation of other policy and guidance requirements. |
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| 2 | 24 | Grand Union Alliance | 2. It is crucial that the residential environment should be free from intrusive noise, air pollution, disruptive light and activity. However, many plots and blocks are depicted, all be it in an illustrative way, near railways, major roads and industrial areas. | No change proposed. Local Plan policies D5, EU4 and EU5 will be utilised to prevent issues relating to amenity, air, noise and vibration pollution. This includes implementation of the Agent of Change principle to ensure existing industrial employment uses aren't negatively impacted while delivering high quality homes. |
| 2 | 25 | Grand Union Alliance | 3. Social Value: it is unclear how this will be assessed given the generalised deliverables that the draft SPD explains such as "improve life chances, health & wellbeing ...". Further elaboration and precision are warranted. Whilst during the OPDC's on-line consultation session reference was made to the Equity, Diversity & Inclusion Statement accompanying the draft SPD and to the OPDC's EDI Strategy 2022-27, these documents are not referenced in the draft SPD's Good Growth section. As noted in the GUA's response to the Industrial SPD consultation in July 2023, there is an expectation that EDI's present rather skeleton framework needs to grow in further planning documents. This draft SPD has not really progressed this. | <p>Change proposed. Reference to the EDI Statement and OPDC's EDI Strategy has been included in the Good Growth Chapter.</p> <p>No change proposed. OPDC is committed to delivering Social Value and securing benefits for existing and future local communities. The SPD utilises the current policy framework to deliver Social Value. The assessment of social value is multifaceted reflecting it's crosscutting nature. Assessment through the development management process will be informed by relevant London Plan policies, Local Plan policies and SPD guidance.</p> <p>This approach will evolve and expand through the future Local Plan review and in accordance with any relevant national and mayoral guidance.</p> |

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| 3 | 1 | Transport for London | <p>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). A separate response may be prepared by Places for London to reflect TfL's interests as a landowner and potential developer.</p> | Noted. |
| 3 | 2 | Transport for London | <p>Thank you for giving Transport for London (TfL) the opportunity to comment on the Old Oak West SPD. The London Plan was published in March 2021. Local authority policy documents should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). It is important that local policy documents support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.</p> | <p>Noted. OPDC's Local Plan and SPDs are considered to be in general conformity with the London Plan and are consistent with TfL's aims and the Mayor's Transport Strategy. The Local Plan and the Old Oak West SPD provide guidance to deliver the Healthy Streets Approach and supporting use of healthy and sustainable travel modes which will contribute to achieving Vision Zero.</p> |

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| 3 | 3 | Transport for London | <p>Whilst overall we are satisfied that the document is consistent with London Plan transport policies, there are some points where further clarity would be welcomed, as detailed below. We have also highlighted some areas which might need to be reconsidered as part of a future policy review, largely as a result of circumstances changing in some areas e.g. Old Oak Common becoming the temporary terminus, as further detailed below. This means that the previous assumptions made with regards the transport network may in some instances no longer be valid.</p> <p>As you are aware, we are currently undertaking a strategic modelling exercise for the area, and this should be used to inform the future transport policy for the area and the associated infrastructure requirements. As such the below comments relate to the document as currently drafted. However, we believe this may need to be updated in the future once we have had time to review the modelling results and have a better understanding of what this means for the transport requirements for the area, as it may impact on what transport infrastructure and services we think are needed to serve the site and where.</p> | <p>Noted. The SPD is considered to be consistent with the Local Plan. Therefore, the SPD continues to be based on the previous Transport Study which modelled a similar/higher quantum of development as proposed in the adopted Local Plan. This informed OPDC's Infrastructure Delivery Plan and proposed upgrades to strategic roads and junctions taking into account cumulative impacts of development. As a strategic model, the recommendations from this are still considered to be fit for purpose for the current Local Plan.</p> <p>Updated Strategic Transport modelling is being carried out by TfL colleagues and will be used to inform the future Local Plan review. The SPD is consistent with the Local Plan and cannot reflect updated supporting studies or modelling intended for a Local Plan review which might require significant amendments to existing Local Plan policies.</p> |
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| 3 | 5 | Transport for London | <p>It is acknowledged that this is an SPD and therefore isn't intended to set new policy, however OOC becoming the temporary (and potentially permanent) terminus for HS2, plus other changes mean there might now be a need for additional transport infrastructure e.g. bus standing facilities, to be provided outside of the surface transport interchange located by the HS2 station. This is to ensure that sufficient space is available across Old Oak West to support a future bus network, car lite development and other policy aspirations. This is something to be mindful of for future policy development, as without having adequate supporting bus infrastructure in place it will be difficult to deliver a comprehensive bus network.</p> | <p>Noted. The SPD is consistent with the Local Plan. The contents of the SPD are not impacted by the recent HS2 announcements and we have been reassured by HS2 that the delivery of Old Oak Common station is on course, which will support the phased comprehensive delivery of Old Oak West. Old Oak Common station opening as a temporary terminus has been the working assumption for a few years now and the Government's announcement in autumn 2023 confirms this. The change to the HS2 delivery programme does not impact the planned opening of Old Oak Common Station and trains will continue on from Birmingham but not at High Speed. Old Oak Common Station's role as a temporary terminus strengthens the need for local regeneration, since it will be the sole interchange for passengers who would otherwise have continued into Euston. At this stage, and based on all advice given, we are not expecting significant revisions and, in any case, the SPD is sufficiently flexible to adapt to changing circumstances. That said, should potential revisions be required, they would be made within a future Local Plan review as the SPD cannot revise content within the Local Plan.</p> |
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| 3 | 6 | Transport for London | States that Old Oak West will potentially deliver more homes and space for jobs than OPDC Development Capacity Study Update (2021). It is unclear how much additional development exactly is being considered in comparison to the Local Plan and how the impacts of this have been assessed. This should therefore be clarified. | No change proposed. The development capacities set out in the Local Plan and reflected in the SPD are minimum capacities. Updated Strategic Transport modelling is being carried out by TfL colleagues and will be used to inform the future Local Plan review. The SPD is consistent with the Local Plan and cannot reflect updated supporting studies or modelling intended for a Local Plan review, which might require significant amendments to existing Local Plan policies. |
| 3 | 7 | Transport for London | Safeguarding for Old Oak Common Lane (OOCL) station and WLO services are mentioned, with Chiltern Line services also mentioned in the same bullet point as being “associated” with the station. We think the intention for a potential Chiltern station would be to locate at/near Old Oak Common (HS2/Elizabeth line) station, although didn’t realise this was still being considered. Either way, this would not require any safeguarding related to OOCL station, so should be noted separately to avoid confusion. | Change proposed. The inclusion of 'Lane' in the station name was an error. Modifications have been made to paragraph 2.8 to clarify that safeguarding of land for the Chiltern Line relates to the Old Oak Common Station. |

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| 3 | 8 | Transport for London | References the 'retention or potential relocation/ reincorporation of the Willesden Freight Terminal and Park Royal Bus Depot'. It should be assumed the Park Royal Bus Depot would need to remain in its current location unless a suitable viable alternative can be found and agreed with TfL and the bus operator. The bus garage is an important piece of transport infrastructure that needs to be retained in the area to support the development of the current and future bus network. Were the bus garage to be relocated it would need to i) be re-provided within the local vicinity of the existing facility; ii) have the capacity to accommodate current demands, plus future growth given the aspirations for the bus network in this area; iii) be capable of accommodating zero-emission buses, iv) involve engagement with TfL and the bus operator at a very early stage. | No change proposed. Principle TP6 is consistent with Local Plan Policy P9 and paragraph 4.168 regarding the Willesden Freight Terminal and Park Royal Bus Depot. This includes securing agreement with TfL for any relocation |
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| 3 | 9 | Transport for London | <p>Shows the spatial vision for the area. This includes the new 'Channel Gate Local Park' which seems to potentially partially conflict with the Park Royal Bus Depot, which is a change from the Local Plan where only an 'area of search was identified'. It should be assumed that the bus depot will need to remain in current location and any proposed park should not conflict with this. It should also be noted that due to space restrictions at the Old Oak interchange, there may be a need for additional bus infrastructure (e.g. standing space and bus driver facilities) to be provided in Old Oak West in order for us to deliver a bus network that can adequately serve the future development aspirations. This would require land and is something to be mindful of as part of any future policy review.</p> | <p>Change proposed. SPD paragraph 1.7 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map. The SPD provides guidance for the Local Plan period which ends in 2038. All diagrammatic maps illustrate one way in which Old Oak West could be developed in 2038. Wording reflecting this relationship has been added to the Introduction.</p> <p>No change proposed. The figures accompanying Principles in the SPD illustrate how Local Plan maps would look in relation to the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed. This results in differences between the SPD and Local Plan figures.</p> <p>Change proposed. Local Plan figures remain part of the development plan and have more planning weight in the development management process. Wording reflecting this relationship has been added to the Introduction.</p> <p>In relation to Channel Gate Local Park, the Local Plan continues to show an area of search for the park. The location of the park would need to consider any requirements for the bus depot should it be retained or relocated on site.</p> |
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| 3 | 10 | Transport for London | TfL may have additional comments to make with regards to Old Oak West once we have been able to review the Public Realm SPD referenced in this document as having an appropriate street network will be important to deliver the transport aspirations of the site. The impact of proposals on highway capacity could potentially be a limiting factor in delivering some of the identified improvements e.g. new cycle lanes, and we would suggest that impact assessments may be needed at the appropriate time to better understand this. | <p>Noted. OPDC looks forward to working with TfL in the development of the forthcoming Public Realm and Green Infrastructure SPD.</p> <p>TfL and the relevant highways authority would be consulted regarding any proposals that could have an impact on highway capacity through the development management process.</p> |
| 3 | 11 | Transport for London | Suggest this section could also potentially include a reference to the need to safeguard land to support the future bus network | No change proposed. Principle TP3 and Local Plan policy T6 require developments to facilitate, deliver and contribute to the existing and future bus network and infrastructure. |

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| 3 | 12 | Transport for London | <p>The first map shows only one potential pedestrian/ cycle route from the station to Wormwood Scrubs whilst the latter shows three and as such it is unclear what the aspiration is here in terms of walking and cycling links?</p> <p>In addition, there are some inconsistencies between the two drawings in terms of the proposed junction improvements. The former shows an improvement south of Wells House Road and the latter appears to show this further north around Loverose Way. The latter also shows proposed junction improvements to the west of North Acton station, which aren't present on the other map, so we would recommend this is reviewed to make sure all plans are consistent.</p> <p>It should be noted that aspirations to deliver walking/cycling links to the south and east are unlikely to be feasible whilst Old Oak Common is acting as the HS2 terminus and are therefore unlikely to be deliverable before 2038, unless the HS2 consented design is significantly modified. People will therefore likely only be able to access site the from the east during the time covered by this SPD, which will put a lot of pressure on Old Oak Common Lane and the new site access being delivered by HS2. It therefore needs to be ensured that this site access can adequately accommodate the volume of people expected to use it, both my motorised and more sustainable modes.</p> | <p>No change proposed. Figure 5.5 reflects Local Plan figure 7.5 which shows one potential future route to Wormwood Scrubs. Figure 12.3 reflects the Infrastructure Delivery Plan which shows three potential locations for this future route to Wormwood Scrubs. The differences illustrate that the location of routes has yet to be defined. The Local Plan identifies that the development of the IEP Depot, south of Old Oak Common Station, will take place beyond the plan period. These links would be dependent on this development taking place. Enhancements to Old Oak Common Lane are support in the Local Plan and SPD. OPDC will work with stakeholders including TfL, HS2, host boroughs and relevant highways authorities to delivery these enhancements to provide adequate access to Old Oak Common Station.</p> <p>No change proposed. Figure 5.5 reflects Local Plan figure 7.5 which has a focus on new or enhanced walking/cycling junctions. Figure 12.3 reflects the Infrastructure Delivery Plan which covers all modes of transport.</p> |
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| 3 | 13 | Transport for London | <p>It should be noted that the bus network as currently shown is indicative only at this stage and may change following receipt of the modelling results. Delivering a suitable future bus network will also be reliant on land being available in relevant locations for us to provide suitable supporting infrastructure as referenced elsewhere in this document.</p> <p>It is currently unknown whether proposed routes can be delivered reliably or if local congestion will require investment in bus priority or other bus standing to stabilise journey times and further work in relation to this will be needed.</p> | <p>Change proposed. Principle TP3 has been amended to refer to potential bus routes. Figure 5.7 has been labelled as Illustrative Bus Network. This reflects supporting text to Local Plan policy T6 and OPDC's Bus Strategy Update 2021 as developed by TfL.</p> |
| 3 | 14 | Transport for London | <p>It should be noted that bus route 228 is missing from the map and should be added. As above, reference should be added to the map to make it clear that these bus routes are indicative only at this stage and will be subject to change.</p> | <p>No change proposed. The SPD provides guidance for the Local Plan period which ends in 2038. All diagrammatic maps illustrate one way in which Old Oak West could be developed in 2038. Figure 5.7 is consistent with Local Plan figure 7.15, which in turn is based on the indicative bus network for 2038 in OPDC's Bus Strategy Update. This figure does not include route 228.</p> |

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| 3 | 15 | Transport for London | <p>The transport section (and the document as whole) makes limited reference to the fact that Old Oak Common will now be the HS2 terminus on a temporary basis and likely for the life of this plan, which may have implications for what onward transport infrastructure might be needed to support the onward (and inbound) dispersal of passengers. It will be important for developers and others to respond to the changing context of the site, as this might impact on the associated infrastructure requirements of the area, in particular around the transport interchange.</p> | <p>No change proposed. The contents of the SPD are not impacted by the recent HS2 announcements and we have been reassured by HS2 that the delivery of Old Oak Common station is on course, which will support the phased comprehensive delivery of Old Oak West. Old Oak Common station opening as a temporary terminus has been the working assumption for a few years now and the Government's announcement in autumn 2023 confirms this. The change to the HS2 delivery programme does not impact the planned opening of Old Oak Common Station and trains will continue on from Birmingham but not at High Speed. Old Oak Common Station's role as a temporary terminus strengthens the need for local regeneration, since it will be the sole interchange for passengers who would otherwise have continued into Euston. At this stage, and based on all advice given, we are not expecting significant revisions and, in any case, the SPD is sufficiently flexible to adapt to changing circumstances. That said, should potential revisions be required, they would be made within a future Local Plan review as the SPD cannot revise content within the Local Plan.</p> |
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| 3 | 16 | Transport for London | <p>For us, the top priorities for North Acton station are delivering i) step-free access and ii) capacity enhancements and think these could potentially be higher up the list given this policy relates to the station itself rather than the surrounding public realm.</p> <p>We are unsure why the document references 'enhancing the existing North Acton Station Square', when we thought the aspiration was to bring the square up to Victoria Road level, and the station is being redesigned in a way that supports this? If this is the case, the wording should be revised to reflect this</p> | <p>Change proposed. Principle TP5 relates to stations and station public realm. To clarify this, the opening sentence of Principle TP5 now refers to station public realm.</p> <p>No change proposed. Principle TP5's content is not prioritised; therefore, locating content higher up in the Principle will not result in greater weight being attributed.</p> <p>No change proposed. Principle TP5 is consistent with Local Plan Policy P7(i)(i) regarding the delivery of North Acton Station Square, Policy SP8(a)(ii) regarding enhancements to existing open spaces and Policy EU1(d) regarding all open spaces to be of a high quality.</p> <p>No change proposed. Outputs of the North Acton Station Feasibility Study Update do not represent a finalised approach to the improvements to the North Acton Station Square.</p> <p>Change proposed. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals for the station and square.</p> |
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| 3 | 17 | Transport for London | The desire for an upgraded North Acton station to enable ' <i>the delivery of development over and around the station and railway</i> ' is noted as an aspiration, but the station cannot be designed properly until the scale and extent of any development above the site is known. We would recommend that work is undertaken to better understand what the aspiration is so that this can be taken into consideration as part of the plans to upgrade the station. | No change proposed. Principle TP5(b)(vii) is considered to be consistent with Local Plan Policy P7C1(g) which seeks to enable the delivery of development over and around North Acton Station and railway. OPDC will continue to work with TfL, LB Ealing and other stakeholders to deliver improvements to North Acton Station. |
| 3 | 18 | Transport for London | 'Stations' should be deleted from end of the paragraph. | Change proposed. This corrects a typo. |
| 3 | 19 | Transport for London | Clarification needs to be provided as to how the station improvements are intended to be funded i.e. through developer contributions | No change proposed. Approaches to securing funding for infrastructure is set out Principle DIP3 and Local Plan Policy DI1. This will include contributions from planning obligations in accordance with our Planning Obligations SPD and our forthcoming Community Infrastructure Levy. Updates to secured funding are published in OPDC's Infrastructure Funding Statement. |

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| 3 | 20 | Transport for London | <p>Refers to delivering two new parks of a minimum of 2ha in size. Whilst it is acknowledged this is as per the adopted Local Plan, we have previously highlighted that more space is needed within the transport interchange zone to support a suitably sized bus station. Without it, additional bus facilities may also be needed in the Channel Gate area. Having insufficient space available within the interchange (and/ or elsewhere) to meet our bus requirements may mean we need to review the bus network, and that fewer buses than anticipated can serve the site which could have wider implications in terms of the ability of the bus network to support the proposed scale of development.</p> | <p>Change proposed. SPD paragraph 1.7 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map. The SPD provides guidance for the Local Plan period which ends in 2038. All diagrammatic maps illustrate one way in which Old Oak West could be developed in 2038. Wording reflecting this relationship has been added to the Introduction.</p> <p>No change proposed. The figures accompanying Principles in the SPD illustrate how Local Plan maps would look in relation to the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed. This results in differences between the SPD and Local Plan figures.</p> <p>Change proposed. Local Plan figures have more planning weight in the development management process as they form part of the development plan. Wording reflecting this relationship has been added to the Introduction.</p> <p>In relation to Channel Gate Local Park, the Local Plan continues to show an area of search for the park. The location of the park would need to consider any requirements for the bus depot should it be retained or relocated on site.</p> <p>OPDC is continuing to work with TfL on bus station requirements and any changes needed will be discussed and agreed following the completion of the revised strategic modelling.</p> |
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| 3 | 21 | Transport for London | It would be useful to get clarity on the housing numbers and how they compare to the Local Plan, to make sure we are clear on the scale of development being proposed and where. Table 11.1 of the Local Plan states North Acton and Acton Wells alone has capacity for 8,000 new homers, whereas the SPD says Old Oak West should support the delivery of a minimum of 6,905 units, so it would be good to understand why there is a difference. | <p>No change proposed. The SPD development sites, capacities and phasing are consistent with the Local Plan capacities and phasing for the site allocations and Development Capacity Sites.</p> <p>Old Oak West and North Acton and Acton Wells are different geographic areas with different development capacities. This results in a difference in capacity figures for each area.</p> |
| 3 | 22 | Transport for London | The labelling of OOCL station on figures is not necessarily clear, with one icon placed on the North London Line (NLL). The West London Orbital (WLO) service would serve platforms along the Dudding Hill line. We think it has generally just been shown as one station in past documents and if there were platforms on both lines, it would be operated as a single station. However, it could just have NLL platforms, just WLO platforms or both and this should be reflected in the plans if possible. | No change proposed. The level of detail provided in the diagrammatic map reflects the current stage in the development of the station's proposals. However, for the purposes of figure 11.2, the roundel has been moved into the Old Oak Common Lane Station Cluster. |
| 3 | 23 | Transport for London | We assume it's just an issue with the key, but the map reads as though the North Acton neighbourhood town centre is located around Old Oak Common station rather than North Acton. In fig 9.4 this area is referred to as the 'Old Oak commercial centre' instead, so we would recommend this is clarified. | Change proposed. This error in the key has been addressed for figures 8.5 and 9.4. |
| 3 | 24 | Transport for London | OOCL station not located within the station cluster, as with the other station clusters. We assume this is a design issue and the roundel just needs moving into the cluster boundary | Change proposed. For the purpose of figure 11.2, this figure has been amended to move the roundel into the Old Oak Common Lane Station Cluster. |

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| 3 | 25 | Transport for London | <p>Whilst this policy is supported in principle, it could potentially be worth specifically mentioning buses here given their importance in facilitating onward journeys from the station. As above, 'Old Oak South' park should be designed in such a way that enables a suitably sized/ designed transport interchange to be delivered.</p> | <p>No change proposed. SPD paragraph 11.3 states that the Local Plan Place and Cluster vision text are repeated in the SPD. The SPD is consistent with the Local Plan and therefore cannot amend Local Plan visions.</p> <p>SPD paragraph 1.7 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map.</p> <p>The figures accompanying Principles in the SPD illustrate how Local Plan maps would look in relation to the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed. This results in differences between the SPD and Local Plan figures.</p> <p>Change proposed. Local Plan figures have more planning weight in the development management process as they form part of the development plan. Wording reflecting this relationship has been added to the Introduction.</p> <p>In relation to Old Oak South Local Park, the Local Plan continues to show an area of search for the park. The SPD reflects the permitted Schedule 17 designs for the park which include the transport interchange.</p> |
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| 3 | 26 | Transport for London | <p>The map does not appear to show the existing bus depot. As stated above, it should be assumed this needs to be retained in its current location unless a suitable alternative can be found and agreed with TfL. In addition, the proposed new 'Channel Gate Street/ Road' appears like it could conflict with the bus depot and this should also be avoided.</p> | <p>No change proposed. SPD paragraph 1.7 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map. The SPD provides guidance for the Local Plan period which ends in 2038. All diagrammatic maps illustrate one way in which Old Oak West could be developed in 2038.</p> <p>The figures accompanying Principles in the SPD illustrate how Local Plan maps would look in relation to the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed. This results in differences between the SPD and Local Plan figures.</p> <p>Change proposed. Local Plan figures have more planning weight in the development management process as they form part of the development plan. Wording reflecting this relationship has been added to the Introduction.</p> <p>No change proposed. In relation to Channel Gate Local Park, the Local Plan continues to show an area of search for the park. The location of the park and location of Channel Gate Street would need to consider any requirements for the bus depot should it be retained or relocated on site.</p> |
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| 3 | 27 | Transport for London | <p>There is a new 'key route' called Old Oak Street, running E-W from Old Oak Common Station to North Acton. It seems to partially use the new bridge alignment over the NLL and Dudding Hill Line. Clarification is needed that this street is not intended for any motorized vehicles, at least in the central bridge section around the Overground station. Principle TP1g) i) states that it will be "a through-route for walking and cycling including a new bridge over the railway corridor, and where feasible, buses, providing access only for private vehicles".</p> <p>Figures 11.14 and 12.3 do seem to confirm it's a walking/cycling route only through the OOCL station area – but wording elsewhere in the document is somewhat vague on what modes are allowed, so clarity on this is needed.</p> | <p>Change proposed. Principle TP1(g)(i) has been amended to reflect the Cluster Vision for Old Oak Common Lane Station which identifies Old Oak Street as a walking and cycling route for the connection between Old Oak South and Acton Wells.</p> |
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| 3 | 28 | Transport for London | <p>Some illustrative development is shown north of the canal/ east of Old Oak Lane for mixed use development, 6-12 storeys in height within the next 6-20 years. This appears to be on part of the Willesden Southwest siding lands that are investigating for WLO train stabling and a new facility building (see image below) [image of SPD figure 11.18 with circle highlighting location]. These sidings are very likely to be needed for this future rail use and so cannot be assumed to be available for development at this time. With further design work there may be options to develop over the sidings if this can be shown to be viable, but there would need to be sufficient space for train storage and potential ancillary infrastructure such as the facility building and a rebuilt bridge over the canal.</p> | <p>No change proposed. This location forms part of the Channel Gate site allocation which is designated in the Local Plan. Any change to site allocation designations would need to be made through a Local Plan review.</p> |
| 3 | 29 | Transport for London | <p>No reference has been made in the document to the maintenance, servicing, and freight strategy for the intensified land use. Clarity is therefore requested on how these issues are proposed to be dealt with within Old Oak West.</p> | <p>No change proposed. Local Plan policy T7 provides guidance to deliver sustainable approaches for freight, servicing and deliveries.</p> |
| 3 | 30 | Transport for London | <p>No reference has been made to how the cumulative impact of construction traffic on Old Oak Common Lane will be mitigated whilst both the ASD and HS2 are being delivered? The SPD states that Old Oak Common Lane will be widened to include generous footpaths and segregated cycle lanes but does not illustrate where this will occur. The current designs do not include walkways of both sides of the highway.</p> | <p>No change proposed. Local Plan policies T8 and T9 provide guidance for managing the impacts of construction for development sites. Local Plan policy P8(e)(iii) sets out guidance for widening Old Oak Common Lane to include generous footpaths and segregated cycle lanes. Principle TP1(g)(iii) is consistent with this guidance and provides appropriate level of detail for an SPD. The Policy and Principle relates to the length of Old Oak Common Lane and guides development proposals alongside all other development plan policies and material considerations.</p> |

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| 3 | 31 | Transport for London | <p>No reference has been made on how surface run off from the adjacent site development located close to the HS2 site will be managed. The adjacent highway will be lowered on Old Oak Common Lane and recent experiences on the parallel highway (Victoria Road) indicate there is flood risk (see photo from 13/11/2023). Flooding along this route would have a significant impact so it would be useful to understand how/ if the potential for this this has been assessed, and how the potential impacts would be mitigated.</p> | <p>No change proposed. Local Plan Policy EU3 provides guidance for managing surface water flooding using an integrated approach. This includes the delivery of Sustainable Drainage Systems (SuDS) which is reflected in Principle EUP2(c)(iii). The forthcoming Public Realm and Green Infrastructure SPD will provide further guidance for SuDS in the public realm.</p> <p>In terms of implementing planning policies and guidance, OPDC is working with stakeholders including HS2, highways authorities, host boroughs and Thames Water to ensure, where feasible, that planning conditions are implemented as prescribed through the development management process.</p> |
| 4 | 1 | Places for London (TfL) | <p>Thank you for the opportunity to comment on OPDCs Old Oak West draft Supplementary Planning Guidance (SPD). Please note that the views expressed in this letter and our site submissions are those of Places for London planning team in its capacity as a significant Landowner and developer only. and do not form part of the Transport for London (Tfl) corporate / statutory response. Our colleagues in TfL Spatial Planning have provided a separate response to the draft SPD consultation in respect of TfL-wide operational and Land-use planning / transport policy matters as part of their statutory duties.</p> | Noted. |

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| 4 | 2 | Places for London (TfL) | <p>Places for London</p> <p>Places for London is a financially independent property company, formerly known as TTL Properties. Places for London provides space for over 1,500 businesses in TfL stations and railway arches and on London's high streets. It is also working to release more of the untapped opportunity in TfL's property portfolio to deliver much-needed new homes and jobs to create places for Londoners to Live, work and play which are sensitive to Local needs and communities and improve access for all. Places for London own two sites in the draft SPD Old Oak West area, which are adjacent to North Acton Station, and are therefore in a Location where development should be optimised. A Location map with the two sites (Sites A and B) [SITE A SHOWN AS RAILWAY SIDES NORTH OF NORTH ACTON STATION; SITE B SHOWN AS RAILWAY SIDES NORTH OF THE UNKLE ACTON SITE, EAST OF VICTORIA ROAD] is provided below. The sites are available, developable and deliverable over a range of timescales and have the potential to come forward during the OPDC Local Plan period.</p> | <p>Noted. These sites are not identified as development sites in the Local Plan; however the plan supports delivery of windfall sites. This information can be used to inform development land availability work underpinning the future Local Plan review.</p> |
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| 4 | 3 | Places for London (TfL) | <p>Response to the Old Oak West draft SPD document</p> <p>Places for London generally welcomes the draft SPD and its aspirations to support comprehensive and coordinated development in the Old Oak West area to deliver a variety of benefits such as better placemaking, the coordination of the delivery of infrastructure and new homes and employment opportunities.</p> <p>With land in its ownership, Places for London/TfL is willing to support OPDC deliver its objectives for the area through transport orientated development that could contribute positively to the delivery of a stronger neighbourhood town centre in North Acton, an improved public realm around the station, an upgraded North Acton station (with step free access and capacity enhancements) and new homes, including affordable homes, as well as employment opportunities.</p> | Noted. |
| 4 | 4 | Places for London (TfL) | <p>Detailed comments</p> <p>The OPDC adopted Local Plan has identified the North Acton and Acton Wells area as having the capacity to deliver a minimum of 8,000 new homes during the plan period, whereas the draft SPD states that the sites identified in the Old Oak West area could deliver a minimum of 6,905 new homes. Clarity on the housing numbers in the draft SPD and how they compare to the Local Plan would be helpful to understand the scale and location of development being proposed.</p> | <p>No change proposed. The SPD development sites, capacities and phasing are consistent with the Local Plan capacities and phasing for the site allocations and Development Capacity Sites.</p> <p>Old Oak West and North Acton and Acton Wells are different geographic areas with different development capacities. This results in a difference in capacity figures for each area. Only part of North and Acton Wells falls within the Old Oak West area.</p> |

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| 4 | 5 | Places for London (TfL) | Places for London would welcome any collaboration with OPDC to realise the SPD and adopted Local Plan's objectives. Please do not hesitate to contact me if you have any questions. | Noted. |
| 5 | 1 | London Borough of Brent | <p>Thank you for the opportunity to comment on the Old Oak West SPD.</p> <p>The northernmost part of the Old Oak West area includes a portion of land in the London Borough of Brent. It also covers a portion of the Harlesden Neighbourhood Area. Harlesden town centre is to the north of the Old Oak West area.</p> <p>Harlesden Neighbourhood Plan forms part of OPDC's Development Plan. Developments within Old Oak West would therefore be required to adhere to the Harlesden Neighbourhood Plan along with other Development Plan Documents.</p> | Noted. The Harlesden Neighbourhood Plan is noted to provide policies for its area within paragraph 2.10. |

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| 5 | 2 | London Borough of Brent | <p>Overall, the SPD is welcomed. However, it is considered that there could be greater explanation of the approach to the Willesden Junction area at the beginning of the document, or throughout each section. It is appreciated that there are current uncertainties over the form and timescale for redevelopment at Willesden Junction. However, it would be helpful for the SPD to make it clear what work is likely to be required to ensure that the site can deliver an effective scheme to a realistic timeframe. This may involve a masterplanning exercise for this site. At present, information for the Willesden Junction Place, including principles set out in the Local Plan for the area, is missing from several of the maps where they might be anticipated. It is not clear why this is, and this absence is unhelpful and potentially misleading. We have highlighted some of these issues in the respective sections below, e.g. tall buildings, but might not have addressed every relevant point. We would suggest that either indicative details of the form of development anticipated for this area are included on the maps or the area is perhaps hatched out and identified as an area earmarked for future masterplanning where insufficient detail to allow the principle/ design feature to be incorporated within diagrams is available.</p> | <p>Change proposed. The SPD provides guidance for Willesden Junction that is consistent with the Local Plan. This comprises:</p> <p>Principle TP5(d) regarding enhancements to Willesden Junction Station and optimising development on and/or adjacent to the station and tracks. Principle EUP2(b)(iii) regarding delivering Small Open Spaces and Pocket Parks. Principle EP2(b)(viii) regarding employment uses. Principle TCCP1(i) regarding town centre uses. Principle TCCP3(c)(vi) regarding meanwhile uses and early activation. Principle DP1(f) regarding active or positive frontages. Local Plan Place Vision P11 for Willesden Junction. Figure 12.4 which identifies development in Willesden Junction to be delivered after the Local Plan period.</p> <p>Officers note that additional elements from the Local Plan Policy P11 are appropriate to be included and these have been included within the SPD. Specifically Principle TP5 and supporting text has been amended to include references to joint working with stakeholders to support earlier delivery of development in accordance with Local Plan Policy P11(a). Paragraph 10.6 sets out that Design Codes will play a role in helping to shape Old Oak West. This would include Willesden Junction.</p> <p>The SPD maps reflect how Local Plan Place</p> |
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| | | | | <p>Policy maps relate to the illustrative masterplan. The maps relating to Willesden Junction are consistent with the Local Plan maps. The Local Plan identifies that the phasing for development in Willesden Junction is after the plan period. This is reflected in SPD figure 12.4. Although Local Plan policy P11(a) supports earlier delivery, the SPD maps must be consistent with the Local Plan maps and cannot identify additional sites for development or attribute guidance for them.</p> |
| 5 | 3 | London Borough of Brent | This spatial vision is supported with the sustainable development envisaged likely to bring a wide range of benefits to Brent residents and the Brent economy. | Noted. |
| 5 | 4 | London Borough of Brent | The emphasis on inclusivity and delivering Social Value is supported. | Noted. |

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| 5 | 5 | London Borough of Brent | Principle TP1 b) states that proposals should deliver, enable and/or contribute to the delivery of new and enhanced connections to Harlesden town centre, which is strongly supported. | Noted. |
| 5 | 6 | London Borough of Brent | Old Oak Lane, which connects Old Oak West to Harlesden, is highlighted as a key route to include segregated cycle lanes where possible, and to connect to a high quality walking and cycling route to the canal that mediates level changes. This is supported. | Noted. |
| 5 | 7 | London Borough of Brent | Improvements to walking and cycling routes, including canalside routes, are supported. | Noted. |
| 5 | 8 | London Borough of Brent | 'New' and 'enhanced existing' walking and cycling routes are depicted separately on this map, while 'new and enhanced' underpasses and junctions and bridges are depicted together, therefore it is unclear which are new and which are existing. Separating out these categories would be clearer. | Change proposed. Icons for bridges and underpasses have been amended to reflect their status |
| 5 | 9 | London Borough of Brent | It would also be helpful if the bridges referenced in table 5.1 were labelled with the same numbering in figure 5.5. Figure 5.5 would also be easier to interpret if some additional street names were added. | Change proposed. Labels for bridge as per table 5.1 have been added to Figure 5.5. |

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| 5 | 10 | London Borough of Brent | <p>Proposals to deliver outstanding design quality and accessibility to all in relation to Willesden Junction station are strongly supported.</p> <p>Principle TP5 d) highlights that upgrades should not result in reduced access to public transport services provided by the station for areas to the north of Willesden Junction, which is agreed with as an important consideration.</p> | Noted. |
| 5 | 11 | London Borough of Brent | <p>Principle TP5 also emphasises that proposals should optimise development on and/or adjacent to the station and tracks. This clarification is welcomed, with optimised housing and commercial development likely to bring benefits to station users and those in the surrounding area. This is also in line with the Harlesden Neighbourhood Plan (2019) which provides policies for the Willesden Junction area supporting the delivery of residential, employment and town centre uses alongside station and sustainable travel improvements.</p> <p>The TP5 supporting text clarifies that enhancements to Willesden Junction should deliver an unpaid route from Station Approach to the west and Harrow Road to the east providing access to both sides of Harlesden town centre. This enhanced connectivity is welcomed in the interests of promoting sustainable travel patterns and effectively embedding new development within its surroundings.</p> | Noted. |

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| 5 | 12 | London Borough of Brent | <p>Local Plan policy T7 Freight, servicing and deliveries provides details relating to measures to coordinate and reduce freight, servicing and delivery trips and effectively manage these in a more sustainable way. Whilst this policy is signposted, it would be good to highlight the importance of these considerations within the SPD, either within TP6 or elsewhere. For example, 'Proposals should seek to minimise the quantum of deliveries / servicing that occurs.</p> <p>There is an expectation that any such activities are managed in a sustainable way and are carried out by sustainable modes as far as possible.'</p> | No change proposed. Local Plan policy T7 provides guidance to deliver sustainable approaches for freight, servicing and deliveries. |
| 5 | 13 | London Borough of Brent | <p>Whilst not yet mandatory, it might be helpful to highlight that a biodiversity net gain of 10% is likely to be a requirement imminently. It may also be helpful to highlight the need to secure future management and maintenance arrangements for approved landscaping schemes, to ensure that their benefits will endure.</p> | Change proposed. Reference to biodiversity net gain legislation requirements has been made in supporting text to EUP1. No change proposed, this is already provided through Local Plan policies. |

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| 5 | 14 | London Borough of Brent | Small Open Spaces and Pocket Parks are envisaged within a prospective Willesden Junction scheme and this should be indicatively shown on figure 6.4. | <p>No change proposed. The SPD provides guidance for Willesden Junction that is consistent with the Local Plan. In relation to open spaces in Willesden Junction, this comprises:</p> <p>Principle EUP2(b)(iii) regarding delivering Small Open Spaces and Pocket Parks.</p> <p>The SPD maps reflect how Local Plan Place Policy maps relate to the illustrative masterplan. The maps relating to Willesden Junction are consistent with the Local Plan maps. The Local Plan identifies that the phasing for development in Willesden Junction is after the plan period. This is reflected in SPD figure 12.4. Although Local Plan policy P11(a) supports earlier delivery, the SPD maps must be consistent with the Local Plan maps and cannot identify additional sites for development and therefore cannot show indicative locations for open space within these sites.</p> |
| 5 | 15 | London Borough of Brent | The emphasis on delivering a range of housing tenures, types and sizes to meet diverse housing needs, and guidance on how this will be achieved, is supported. | Noted. |
| 5 | 16 | London Borough of Brent | Maximising access to training, employment and economic opportunities for local people is supported, with Brent residents likely to benefit from such opportunities. It would be helpful to highlight the key role of partnership working with local authorities, businesses, education bodies and other stakeholders, in ensuring that benefits of development are shared by local communities. | Change proposed. Paragraph 8.1 has been updated to refer to joint working with stakeholders. |

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| 5 | 17 | London Borough of Brent | The delivery of employment uses across Willesden Junction where residential uses are less appropriate is supported in the interests of providing active and viable mixed-use developments which maximise the development potential of the site. | Noted. |
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| 5 | 18 | London Borough of Brent | <p>Principle TCCP1 i) states that proposals should support the delivery of the Old Oak major town centre by delivering a range of town centre uses across Willesden Junction where residential uses are less appropriate. We note that this is consistent with the approach set out in OPDC Local Plan policy P11: Willesden Junction. The Local Plan supporting text sets out that 'In addition to supporting new residential uses, the delivery of new town centre uses focused around Willesden Junction station will ensure it can positively integrate into its surroundings and help create a new place. Town centre uses should be delivered to complement other established and planned centres, particularly Harlesden district town centre'.</p> <p>The text should require proposals for town centre uses at Willesden Junction to demonstrate how these would positively relate to Harlesden Town centre and would not result in a harmful impact on the vitality and viability of the town centre. In order to be effective and robust, this would need to apply to uses smaller than those captured by OPDC Local Plan policy TCC1, reflected in OB8C of the OPDC Planning Obligations SPD. Community Use Agreements (CUA) should also be required, to promote multiple use of facilities, particularly for educational facilities. The development and implementation of CUAs can help support well-managed and safe community access to facilities on educational sites. As well as widening access to facilities</p> | <p>Change proposed. Supporting text to Principle TCCP1 has been amended to reflect Local Plan Policy TCC1(h) and refer to Local Plan paragraph 10.11. The thresholds in Policy TCC1 cannot be amended through a SPD and these will continue to apply to development proposals.</p> <p>Change proposed. Potential use of Community Use Agreements has been made to supporting text to Principle TCCP2.</p> |
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| | | | <p>and providing clarity on their use, CUAs can help to enhance links between educational establishments and sports clubs. This approach is in line with London Plan policy S1 D, and paragraph 5.1.10 expands on the benefits of the shared use of facilities.</p> | |
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| 5 | 19 | London Borough of Brent | The principle of delivering a range of meanwhile uses with active and/or positive frontages on ground floors around Willesden Junction is supported. These should be shown indicatively on Figure 10.7. | <p>No change proposed. The SPD provides guidance for Willesden Junction that is consistent with the Local Plan. In relation to meanwhile uses and active/positive frontages in Willesden Junction, this comprises:</p> <p>Principle TCCP3(c)(vi) regarding meanwhile uses and early activation. Principle DP1(f) regarding active or positive frontages.</p> <p>The SPD maps reflect how Local Plan Place Policy maps relate to the illustrative masterplan. The maps relating to Willesden Junction are consistent with the Local Plan maps. The Local Plan identifies that the phasing for development in Willesden Junction is after the plan period. This is reflected in SPD figure 12.4. Although Local Plan policy P11(a) supports earlier delivery, the SPD maps must be consistent with the Local Plan maps and cannot identify additional sites for development and therefore cannot show active or positive frontages of these sites.</p> |
| 5 | 20 | London Borough of Brent | The 'Context overview' (p.15) notes that the Local Plan envisages tall buildings within the Willesden Junction Place but Willesden Junction is not mentioned within Principle DP2. Guidance should be added within this section for clarity, in line with Plan Policy P11, which notes the need to appropriately respond to existing residential areas to the north. Illustrative building heights should be shown indicatively on Figure 10.9. | Change proposed. Principle DP2 has been amended to refer to ensuring development responds appropriately to the residential areas to the north of Willesden Junction in accordance with Local Plan policy P11(i)(iii). |

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| 5 | 21 | London Borough of Brent | The need for future proposals to be informed by positive elements of Harlesden's wider heritage is welcomed. | Noted. |
| 5 | 22 | London Borough of Brent | The Place vision for Willesden Junction is fairly brief but this is considered to be appropriate considering that OPDC Local Plan policy P11: Willesden Junction and its supporting text sets out detailed guidance on the opportunities, constraints and development potential of this Place. The SPD could highlight that further detailed information is available in the OPDC Local Plan. | No change proposed. The introduction section to the Place and Cluster Visions Chapter makes reference to the Local Plan. |
| 5 | 23 | London Borough of Brent | It is noted that Figure 12.4 indicates a 21+ years development site phasing for development around Willesden Junction. Clarity would be welcomed on how this timescale has been arrived at. Given the importance of this site as a busy destination with considerable development potential, it would be helpful for the SPD to summarise the work that is likely to be required over the intervening period up to a 21+ years timeframe to ensure that the site can ultimately deliver a high quality and well-connected scheme after this time. | Change proposed. The SPD has been amended to include references to joint working with stakeholders to support earlier delivery of development in accordance with Local Plan Policy P11(a). Paragraph 10.6 sets out that Design Codes will play a role in helping to shape Old Oak West. This would include Willesden Junction. The phasing for development in Willesden Junction is consistent with the phasing set out in the Local Plan. The Development Capacity Study Update 2021 underpins this phasing. |

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| 5 | 24 | London Borough of Brent | <p>Owing to the colours used, it is quite difficult to distinguish between the grey used for buildings and the pale green used for 'other open spaces'.</p> <p>It would be helpful to include indicative details of the form of development anticipated for the Willesden Junction area on both these maps.</p> | <p>No change proposed. The tones have been reviewed and are considered to be clear.</p> <p>No change proposed. The SPD maps reflect how Local Plan Place Policy maps relate to the illustrative masterplan. The maps relating to Willesden Junction are consistent with the Local Plan maps. The Local Plan identifies that the phasing for development in Willesden Junction is after the plan period. This is reflected in SPD figure 12.4. Although Local Plan policy P11(a) supports earlier delivery, the SPD maps must be consistent with the Local Plan maps and cannot identify additional sites for development.</p> |
| 6 | 1 | Imperial College London | <p>Imperial acknowledge that the Draft Old Oak West SPD will form part of the guidance that supports the OPDC Local Plan (2022) and is part of OPDC's engagement strategy to give stakeholders the opportunity to help shape growth of the Old Oak West Development Area.</p> | <p>Noted.</p> |

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| 6 | 2 | Imperial College London | <p>Further to a meeting with OPDC policy officers on 10 November 2023, Imperial have been invited to respond to the above consultation. It is important to note from the outset that Imperial remain supportive and appreciative of this initial engagement on the draft SPD which is of great interest to Imperial given the significance of the delivery of the Old Oak Station (and the surrounding environment) will have on the West London region. The success of Old Oak West is critical in supporting Imperial's long-term aims of delivering a globally competitive innovation region in West London including their ambitions to grow innovation activity at their nearby White City Hammersmith Campus and in the North Acton / Park Royal area. The SPD also has a direct impact on Imperial's existing significant landholdings in North Acton including 140 Wales Farm Road, Woodward Halls and 1 Portal Way which borders the SPD boundary to the south. 1 Portal Way received a resolution to grant permission for their major hybrid application for residential, student accommodation and associated employment development (21/0181/OUTOPDC) in October 2023. The scheme will act as a major catalyst for regeneration in North Acton and therefore the wider Old Oak West area.</p> | Noted. |
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| 6 | 3 | Imperial College London | In summary, our client supports many of the principles and aims outlined in the draft SPD, particularly the intention to establish Old Oak West as a “new commercial destination” and the proposed upgrades to North Acton Station and surrounding transport network. Comments focus on: the relevance of case study examples, clarifying how the SPD area will connect to existing and proposed infrastructure, contradictions between local demographics and the proposed housing mix, proposed employment uses, expected design standards and the approach to the North Acton “Place and Cluster Vision”. | Noted. |
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| 6 | 4 | Imperial College London | <p>a. Imperial College London & OPDC</p> <p>Imperial is regularly ranked amongst the top ten best universities in the world, has an international reputation for excellence in teaching and research, and is the only university in the UK to focus exclusively on science, engineering, medicine and business.</p> <p>Imperial is a committed, long-term local stakeholder in the West London region, founded in 1907 in South Kensington. Today, the University in its entirety is home to around 23,000 students and 8,000 staff with an international community attracting undergraduates from more than 125 countries. Imperials mission is to tackle the world's biggest challenges through industry including climate change, future energy supplies, antibiotic resistance, and national security. Imperial has the greatest concentration of high impact research of any major UK university and was recently named by the QS World University Rankings 2024 as 6th in the world. Imperial was also named by the Guardian University Guide 2024 as 1st for graduate prospects, as their world-leading research and educational environment provides highly skilled graduates and lifelong learning opportunities for the UK labour force.</p> <p>Imperial is a significant stakeholder within the OPDC area, as a major landowner, operator and landlord of homes and workspaces in North Acton and West London as a whole.</p> | Noted. |
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| | | | <p>North Acton is home to two of Imperial's newest halls of residence, the Kemp Porter and Woodward Buildings, which opened in 2020 and 2014 respectively. Together, they are home to approximately 1,200 first year undergraduates, and have given rise to a thriving student community in the local area. Imperial own and manage Clayworks residential apartments in North Acton, which includes key worker accommodation. Imperial is also a proud sponsor of the Park Royal Design District which made its debut at the 2021 London Design Festival.</p> <p>Significantly, Imperial own 1 Portal Way in North Acton, which received a resolution to grant permission in October 2023 from OPDC's planning committee for their major hybrid application for a major mixed use multi-phase scheme (Planning Ref. 21/0181/OUTOPDC). The scheme will provide a range of residential typologies including, co-working and student accommodation as well as flexible workspaces (21/0181/OUTOPDC) and was developed in conjunction with OPDC's planning team.</p> <p>Imperial are supportive of Old Oak and Park Royal as the single largest development opportunity in London. Imperial are developing a vision for innovation growth that draws from activities across multiple boroughs in West London, that builds a strong and meaningful ecosystem of research; start-ups, scale ups and corporates. Through the White City Innovation District and facilities at</p> | |
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| | | <p>Hammersmith Hospital, Imperial are the early adopters of this vision, whilst also playing an active role in bringing forward sustainable development in and around North Acton.</p> <p>The White City Hammersmith Campus is a significant eco-system for science and innovation in London with many occupiers now seeking additional space to expand their operations as their firms scale. Science and innovation scaling firms require appropriate development space within proximity of their current research facilities. Old Oak West sits within the largest industrial area in London and is in a unique position to enable the delivery of required space for modern innovation industry. For West London firms to stay and scale they also require accommodation infrastructure to house innovators in proximity to workspaces.</p> <p>Imperial are owners, developers, and operators of affordable workspace including the Incubator at White City, providing office and laboratory space for early-stage companies. Imperial's experience to date has been shared with OPDC through previous consultations and has supported our comments in this representation.</p> <p>This letter sets out Imperial's thoughts in respect of a number of the draft principles and aims published within this SPD, as well as identifying matters which are not addressed at this stage for consideration in subsequent draft documents.</p> | |
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| 6 | 5 | Imperial College London | <p>b. Representations</p> <p>As already stated, Imperial are supportive of many of the principles outlined within the Draft Old Oak West SPD. However, Imperial would like to make representations directly responding to several SPD Principles. This section provides representations that directly responds to the questions set out in relation to the relevant principles/ambitions within the Old Oak West SPD consultation survey. These questions are in bold, and italics, with our response following.</p> | Noted. |
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| 6 | 6 | Imperial College London | <p>What do you like about the Good Growth chapter and how could it be improved?</p> <p>Imperial agrees with the OPDC’s intention to deliver “socially, economically inclusive and environmentally sustainable growth” but consider that the case studies are small in scale and unrelated to the West London region. The case studies should reflect the full potential of the Old Oak West development area centred in its regional context. Currently ‘Good Growth’ is categorised as sustainable / inclusive growth with examples of an affordable workspace building in Brixton, a community food hub in Shepherd’s Bush and Hackney Wick Circular Economy District. Imperial recognise the importance of bottom-up growth, and the support of start-up and scaling firms given their experience at the White City Hammersmith Campus. Case study examples could highlight for example good growth at the nearby White City Hammersmith Campus, supported by buildings for early-stage innovators such as the Imperials incubator in Scale Space and Imperials Advanced Hackspace and Invention Rooms. It is important to recognise the local, regional and national importance of the White City Hammersmith Campus to good growth and thereby how the Old Oak West can connect into this District to create a wider West London innovation ecosystem. It is also important to reflect the rich economic growth of West London within other examples of good growth such as Paddington, the Incubator at</p> | <p>Change proposed. The SPD has been amended to include West London case studies. This reflects supporting text to Local Plan Policy SP1.</p> |
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| | | | University of West London and the work of Brunel in the Hillingdon / Ealing areas as well as future innovation areas such as Brent Cross & Earls Court (particularly given the proposed train link to the Brent Cross area). | |
| 6 | 7 | Imperial College London | Given the scale of the commercial ambitions at Old Oak West the SPD should also consider how the area can secure anchor institutions and firms. Imperial propose that it would also be useful for the SPD to highlight the growth of innovation and science activity in the West London region, as well as other sectors, and how further growth could be supported in the Old Oak West area. The identification of sector specific growth i.e. innovation should also support discussion around barriers to growth, in regard to the built environment strategy in the area, and how the SPD can support in unlocking identified barriers. | Change proposed. Supporting text to Principle EP2 has made reference to additional future growth sectors identified in OPDC's Future Employment Growth Sectors Study. This accords with Local Plan Policy E2. This includes Life Sciences. |

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| 6 | 8 | Imperial College London | <p>Additionally, given the Old Oak Common Station underpins the strategy of Old Oak West we consider that HS2 and the future growth that this will encourage should feature more prominently in the Good Growth Section. Examples of newly commutable locations such as Birmingham Curzon Street and the potential economic growth that improved connections to these areas could provide should be included in this section of the SPD. Examples could also relate to other areas in London or elsewhere transformed by transport infrastructure including the Elizabeth Line.</p> | <p>Change proposed. Paragraph 8.7, supporting Principle EP2, will refer to the role of Old Oak Common Station in underpinning economic growth in Old Oak West.</p> |
| 6 | 9 | Imperial College London | <p>What do you like about the Transport chapter and how could it be improved?</p> <p>Imperial agrees with the broad aims of the Transport chapter, in particular the commitment of Principle TP5 to deliver North Acton station as an “improved high-quality station” and “encourage the delivery of development around the station and railway” and the continued support of the Willesden Freight Terminal and Park Royal Bus Depot in Principle TP6 (Strategic Transport Uses). Additionally, we welcome the intention to enhance existing walking and cycling routes around North Acton station which will help to improve access between the Woodward Student Accommodation building, Old Oak Common Lane Station, and the proposed Acton Wells Character Area.</p> | <p>Noted.</p> |

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| 6 | 10 | Imperial College London | <p>Despite these improvements to the travel network surrounding North Acton Station, it is understood that this will be at the expense of a creating new bridge to directly connect North Acton Station with most of the SPD area to the north. Whilst we acknowledge that efforts have been made to improve connections around the station and the findings of the “North Acton Station Feasibility Study Update” (2023), Imperial consider that the omission of a direct connection from the station still has the potential to harm its connectivity to the residential area to the north. Imperial ask that the delivery of the “preferred strategic approach” for providing links over the railway and on to Old Oak Common Station are seen by OPDC as a priority to minimise disruption to the local area.</p> | <p>Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge was intended to reflect updated outputs of supporting studies. It was not the intention to change the Local Plan policies relating to the delivery of the bridge. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals.</p> |
| 6 | 11 | Imperial College London | <p>Imperial would also like to highlight the importance of the east to west link between Old Oak Station and the places to the east of the station, including Park Royal and thereby North Acton. It is critical that these connections are delivered to ensure the benefits of Old Oak Station is fully realised and to ensure the areas are connected, integrated places.</p> | <p>Noted.</p> |

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| 6 | 12 | Imperial College London | <p>Imperial also have concerns over the lack of clarity on the connections to Wormwood Scrubs and major hubs such as the White City Hammersmith Campus and Hammersmith Hospital as Figure 5.5 only displays a “potential new walking and cycling route” from Old Oak Common Station. The adopted Local Plan (2022) states in paragraph 4.17 that “Old Oak Common Station should not preclude a connection to Wormwood Scrubs in the future and development should safeguard for and if relevant and appropriate, contribute to and / or deliver a bridge to Wormwood Scrubs.”. Policy P12 Section G also states a commitment to “Improving access to Wormwood Scrubs for all Londoners by ensuring development contributes to new and improved sensitive walking and cycling access points.”</p> <p>Given the above, Imperial consider that OPDC should include supporting text to accompany Principle TP1 which outlines the intention to improve connections to Wormwood Scrubs and the wider area, the delivery of which would allow innovators and the community (Imperial staff, students and related firms) to travel freely and safely between North Acton, Old Oak and the Imperial College White City Hammersmith Campus and Hammersmith Hospital. This would also enable the SPD to reflect the same commitment to improving connections to Wormwood Scrubs and the wider area as the adopted Local Plan.</p> | <p>Change proposed. Supporting text to Principle TP1 has been amended to refer to destinations in and around Old Oak West including Wormwood Scrubs, North Acton, stations, Harlesden town centre, Old Oak major town centre and White City.</p> |
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| 6 | 13 | Imperial College London | Imperial strongly support the delivery of the Old Oak Common Lane Station and the connected West London Orbital link. Imperial understand the station is listed as 'potential' given the lack of clarity from national government surrounding funding and delivery, which is appropriate. | Noted. |
| 6 | 14 | Imperial College London | <p>What do you like about the Housing chapter and how could it be improved?</p> <p>Imperial support the acknowledgement that “sites not identified in the Local Plan and Development Capacity Study” may be used to “increase the overall supply of homes” (para 7.5) but consider that there should be greater clarity on where these developments should be located, for example around stations or local centres.</p> | No change proposed. The policies in the development plan, SPD guidance and other material considerations will be used to determine planning applications for windfall sites. |

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| 6 | 15 | Imperial College London | <p>Additionally, there is also an inconsistency between the self-identified demographics of the SPD area and the type of housing that the OPDC seeks to deliver.</p> <p>The “Context Overview” of the SPD (page 11 – age) finds that “The majority of people fall within the 25-64 age range” and that this “reflects a relatively young population with a higher proportion of residents aged 0 – 24 compared to London figures.”. Additionally, page 12 (Housing) finds that “there is a higher proportion of 1 person households compared to the London average”. Given the higher densities and the potential to be within a 20-minute walk from 4 major rail links, this is also a trend that is likely to continue over the projected 2018 – 2038-time span of the SPD.</p> <p>Despite this higher proportion of young people and single householders, Imperial consider that the SPD focuses on the delivery of family housing and children’s spaces – supporting co-living, shared housing and PBSA schemes within or directly adjacent to Old Oak and North Acton centres but only when they do not undermine conventional self-contained housing supply and housing targets. Whilst Imperial understand that it is important to deliver mixed and balanced communities, it is essential that the size and type of housing being planned for is reflective of the local demographics. If these figures are ignored, the OPDC may fail to meet the needs of what will be a naturally younger, less family orientated place. To avoid this, the</p> | <p>No change proposed. Local Plan Housing Policies continue to meet the housing needs of the OPDC area which reflect local demographics as well as considering future need.</p> <p>As an SPD, the Old Oak West SPD must be consistent with the Local Plan. Principle HP1 is consistent with the Local Plan housing policies. These are supported by the Strategic Housing Market Assessment (SHMA) supporting study which identifies the housing needs which the policies must meet. The SHMA identifies that there is a significant need for family sized housing which is reflected in Local Plan Policy H3 and therefore Principle HP1. Any changes in demographics will be used to inform the future supporting studies for the future Local Plan review.</p> <p>Delivery of Co-Living and Student Housing will be managed in accordance with development plan policies, SPD guidance and other material considerations.</p> |
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| | | | <p>OPDC should provide greater support for co-living, shared housing and PBSA schemes and see them as an opportunity to enhance and expand the place rather than “undermine the delivery of conventional self-contained housing” (para 7.8). Imperial continue to strongly support the delivery of high-quality community-led Co-Living, PBSA and shared living housing typologies given the need to support early career stage innovators to live, learn and work in West London against a backdrop of a worsening supply and higher demand of rental accommodation in the private markets.</p> | |
| 6 | 16 | Imperial College London | <p>Additionally, Imperial do not consider it appropriate for most of Principle HP1 to be a repetition of Adopted Local Plan Policy H2 (Affordable Housing). Whilst it is understood that SPDs cannot introduce new policy, they should be used as an opportunity to provide greater clarity on existing policy which is not possible if it is repeated word for word. Imperial propose that the repeated sections of Policy H2 within Principle HP1 are be removed and replaced with more in-depth guidance on the OPDC’s preferences towards housing delivery.</p> | <p>No change proposed. The SPD is consistent with the Local Plan and has repeated relevant Local Plan policies where appropriate to provide clearer spatial planning guidance for Old Oak West and to enable an optimised, complementary, comprehensive, timely and integrated approach to the development of sites and infrastructure within Old Oak West. Given the importance of delivering affordable housing, officers consider inclusion of Principle HP1 is appropriate.</p> |

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| 6 | 17 | Imperial College London | <p>What do you like about the Employment chapter and how could it be improved?</p> <p>Imperial support the Employment Chapter’s objectives to establish Old Oak West as a “new commercial destination” and “deliver employment uses within the proposed Old Oak major town centre and North Acton neighbourhood town centre”. There are concerns however, regarding the general focus of the SPD and connections to surrounding areas of opportunity – namely links to the Park Royal and Old Oak North Strategic Industrial Areas, the employment hubs soon to be connected by HS2 and existing institutions such as Imperial College.</p> <p>Imperial would like to see a greater focus on education and innovation industries in the Employment chapter. Limited guidance is provided in paragraph 8.10 which states that aspirations in the identified local centres of Park Royal, Harlesden, White City and Acton included uses in the “food and drink sector, TV and film industry, music industry, a wide range of creative industries and Life Sciences.” Whilst supportive of these uses, Imperial see them as secondary to the overarching vision for the regeneration of Old Oak and Park Royal. Paragraph 2.4 explains how the OPDC intends to “Draw(..) on its rich heritage at the heart of west London’s manufacturing industry”. To maintain the area’s rich manufacturing heritage there must be a focus on innovation industry in the broadest sense. As an institution which</p> | <p>Change proposed. The sectors listed are those suggested by the community for identification in the SPD. Officers consider these sectors are important to the economic growth and shaping of Old Oak West. However, officers also recognise the importance of ensuring the SPD recognises the importance of industrial innovation reflecting the area's heritage. Therefore, supporting text to Principle EP2 has been amended to include further detail on the potential growth sectors referenced in OPDC's Future Employment Growth Sectors Study with references to existing West London locations. This includes Life Sciences and other innovative industries.</p> |
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| | | | focuses exclusively on “STEMB” subjects, Imperial college is very well placed to grow and maintain this connection to the overarching vision. | |
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| 6 | 19 | Imperial College London | <p>Currently the SPD is focused on providing new “employment space across a range of sizes, types, tenures, forms and affordabilities” (Principle EP2: Employment Uses (c)). However, this is all located exclusively within the SPD boundary with little consideration as to what currently exists in the surrounding area, what is planned in the future and how this could contribute to the overall vision for Old Oak West. Similarly, the employment section outlines the regional importance of the new station at Old Oak Common Station with little discussion as to what it is linking to and references 3 case studies with little context as to why they are relevant.</p> <p>Whilst supportive of the creative uses being discussed in the SPD, Imperial suggest that other industries should also be considered including science and innovation industries. This is in terms of promoting new opportunities via the provision of appropriate workspace and in terms of advertising partnerships with existing institutions, such as Imperial College, to attract new businesses within this sector to invest. Greater detail is also needed on the linkages afforded by HS2 and the 3 case studies provided in paragraph 8.3 e.g. What surrounds these developments and why are they relevant?</p> | <p>Change proposed. Paragraph 8.1 sets out the SPD's intentions to provide guidance to enable existing businesses to grow and new economic sectors to locate to the area making use of the excellent transport links and mix of uses in the Old Oak major town centre. This is not limited to existing uses in Old Oak West. To clarify this, paragraph 8.1 has been amended to refer to Old Oak West and surrounding areas. This will complement Principles EP2(b)(ii) and TCCP1(b) which provide guidance to deliver employment and town centre use floorspace to provide opportunities for local business communities across Old Oak, Park Royal and surrounding areas.</p> <p>Change proposed. The sectors listed are those suggested by the community for identification in the SPD. Officers considers these sectors are important to the economic growth and shaping of Old Oak West. However, officers also recognise the importance of ensuring the SPD recognises the importance of industrial innovation reflecting the area's heritage. Therefore, supporting text to Principle EP2 has been amended to include further detail on the potential growth sectors referenced in OPDC's Future Employment Growth Sectors Study with references to existing West London locations. This includes Life Sciences and other innovative industries.</p> <p>Change proposed. The Local Plan extensively sets out the benefits of enhanced connections to destinations along routes meeting at the Old Oak Common Station. To further reflect this in the</p> |
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| | | | | <p>SPD, paragraph 8.7 has been amended to refer to how regional and national connectivity will support the Old Oak commercial centre.</p> <p>Change proposed. Officers consider the case studies are relevant and reflect elements relevant to Old Oak West. The SPD has been amended to include West London case studies.</p> |
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| 6 | 21 | Imperial College London | Imperial would also like the SPD to provide greater detail about Old Oak station itself, including the commercial and retail provision within the station and how this connects into the wider area. | <p>No change proposed. SPD guidance for town centre uses in the Old Oak Common Station is set out in Local Plan Policy P1C1 and Principle TCCP1(g)(iii). This reflects the approved station design as per the High Speed Rail (London – West Midlands) Act 2017 and any associated Schedule 17 permissions.</p> <p>No change proposed. Connections from Old Oak Common Station to the wider area are illustrated in the Local Plan including figures 3.1, 3.10, 4.2, 7.5, 7.7, 7.12 and 7.15.</p> |
| 6 | 22 | Imperial College London | <p>What do you like about the Town and Community Uses chapter and how could it be improved?</p> <p>Imperial strongly supports the proposals of Principle TCCP3 (Meanwhile Uses and Early Activation) and the intention to work with and prioritise local businesses, social infrastructure providers and community stakeholders to deliver shorter-term and longer-term meanwhile uses and activation projects and spaces. Imperial requests that all meanwhile uses remain non-invasive and will not obstruct the delivery or operation of the site once it is brought forward for development. Case studies in this section could include some of the highly successful meanwhile provisions Imperial have delivered i.e. The Ugly Campus and Scale Space in White City alongside other alternative leisure, food and beverage, culture meanwhile uses that are critical in delivering an exciting live, work, play environment around Old Oak West given the delivery timescales.</p> | <p>No change proposed. Local Plan policy TCC8 requires the delivery of meanwhile uses. It sets out guidance for their role and supporting future development. The supporting text to policy TCC8 sets the context for meanwhile uses. Principle TCCP3 signposts to this policy.</p> <p>Change proposed. Relevant case studies have been included.</p> |

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| 6 | 23 | Imperial College London | <p>What do you like about the Design chapter and how could it be improved?</p> <p>Imperial agree that Old Oak West presents a “significant opportunity to create a distinctive, successful and thriving urban district” (para 10.1) but has concerns that the standards and/or type of design being sought by the Design chapter may compromise delivery.</p> <p>Paragraph 10.2 states that the OPDC seeks to deliver “the highest quality of architecture, landscape and urban design drawing on the area’s existing heritage, whilst also providing opportunities for architectural brilliance which help to define Old Oak West as a unique place”. Whilst Imperial agree that design should reflect local character and be aspirational, this should not be at the expense of functional, viable and deliverable design which may prove difficult if developers are asked to provide design standards of this scale across all developments in the area. This is particularly the case for innovation commercial buildings, that should be designed as functionally and sustainably as possible.</p> <p>Paragraph 10.19 continues by stating that “High quality world class design will be expected to be delivered for all schemes regardless of their architectural approach, form, use, function scale and size”. Again, such high expectations of design may compromise functionality, viability and therefore may discourage investment. As an</p> | <p>No change proposed. Paragraph 10.2 is consistent with Local Plan policies SP2(c) and SP9(a) which seek the delivery of the highest design quality and architecture for buildings, public realm and architecture. Officers consider that functionality and viability are not mutually exclusive from delivering world class design. These elements would be considered through the development management process and informed by relevant development plan policies, SPD guidance and other material considerations.</p> |
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| | | | <p>alternative, Imperial suggest that the OPDC seeks to achieve “high quality design”. Design should still reflect the industrial nature of the area, but targets need to be more realistic and be subject to viability.</p> | |
| 6 | 25 | Imperial College London | <p>Additionally, Imperial consider that the potential for industrial units to provide “active frontages at ground and lower floors and high-quality design façade” may be unnecessary in certain locations and again, risks compromising the functionality of units intended for industrial employment uses.</p> | <p>No change proposed. Principle DP1 is consistent with Local Plan policy P9(h). For industrial proposals, OPDC's Industrial SPD guidance for industrial frontages will also be a material consideration.</p> |

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| 6 | 26 | Imperial College London | <p>What do you like about the Delivery and Implementation chapter and how could it be improved?</p> <p>Imperial support the OPDC’s commitment in DIP3 (Infrastructure delivery and Phasing) to securing the delivery of infrastructure necessary to support sustainable development and the inclusion of “improved existing streets including key routes of Old Oak Lane, Old Oak Common Lane and Victoria Road” as one of these infrastructure projects. However, whilst the improvements to surrounding road network are included, there is no mention of North Acton Station and the wider North Acton gyratory within this chapter or the OPDC’s proposed physical upgrades to the station itself. Transport Principle TP5 (b) states that North Acton station will be delivered as an “improved quality station” by “enhancing the existing North Acton Station Square”, “providing step-free access” and “delivering a high quality station entrance onto the station square”. Imperial requests that North Acton Station and its proposed improvements are featured in this policy to improve the continuity of the SPD.</p> | <p>Change proposed. To ensure consistency, new and enhanced stations have been referenced in DIP3(b) in accordance with Principle TP5 and Local Plan Policy T5.</p> |
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| 6 | 27 | Imperial College London | <p>What do you like about the Place and Cluster Visions Chapter and how could it be improved?</p> <p>Imperial welcomes the provision of guidance which reflects the characteristics of the six “places” that lie within the Old Oak West SPD boundary. Paragraph 11.3 states that “for each Place and Cluster a vision is set out in the Local Plan” and that the SPD vision will “support a coordinated and comprehensive approach to development”. Despite this, Imperial notes that the boundaries for the cluster visions are different between the SPD and the adopted OPDC Local Plan 2022.</p> | <p>No change proposed. SPD paragraph 1.7 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map. Paragraph 11.4 also confirms that the Place and Cluster visions maps are indicative save for those elements that are fixed in the Local Plan such as boundaries for heritage designations and town centres.</p> <p>The figures accompanying principles in the SPD illustrate how Local Plan maps would look in relation to the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed. This results in differences between the SPD and Local Plan figures.</p> <p>Change proposed. Local Plan figures have more planning weight in the development management process as they form part of the development plan. Wording reflecting this relationship has been added to the Introduction.</p> |
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| 6 | 28 | Imperial College London | <p>Policy P7: North Acton and Acton Wells and Policy P7C1: North Acton Town Centre Cluster of the Adopted OPDC Local Plan 2022 both show a large area south of North Acton Station whereas this same area is excluded from Figures 11.10 and 11.12 of the Draft SPD. Whilst it is understood that this land is not within the Old Oak West SPD boundary, the land does contain 1 Portal Way which has recently received a resolution to grant at planning committee for Imperial's major hybrid planning application (21/0181/OUTOPDC). This application seeks to deliver a major mixed-use scheme and will undoubtedly have a significant impact on the SPD area and its associated infrastructure.</p> <p>In the interests of supporting a “coordinated approach to development”, Imperial consider that the same Place and Cluster Vision plans be used in both the adopted plan and the Draft SPD. We also recognise the importance of referencing significant developments located in close proximity to vision areas which will inevitably impact how they function and develop in the future.</p> | <p>No change proposed. The diagrammatic maps reflect how Local Plan Place Policy maps relate to the illustrative masterplan. The illustrative masterplan illustrates one way in which Old Oak West could be developed.</p> <p>SPD paragraphs 1.7 and 11.4 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map. Paragraph 1.10 confirms that the SPD is a material consideration for the determination of planning applications.</p> <p>Change proposed. OPDC's Local Plan forms part of its development plan. Therefore, Local Plan maps and diagrams have more planning weight and would be considered as such in the development management process. Wording reflecting this relationship has been added to the Introduction.</p> <p>No change proposed. 1 Portal Way is located outside of Old Oak West and therefore cannot be included. However, it is identified within the Local Plan as Site Allocation 41.</p> |
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| 7 | 1 | Sport England | <p>Good growth should ‘create a place that enable enables active and healthy lifestyles, improves mental and physical health and wellbeing and reduces health inequalities.’ Sport England supports this intention but considers more is required within the SPD to encourage and support health and well-being through the provision of infrastructure and its activation. Big Issue 5 of Sport England’s current strategy, Uniting the Movement is Active Environments this highlights that there is no such thing as a ‘neutral space’. The places and spaces around us can have a positive or negative impact on whether, how, when, and where we move. This means connecting dedicated sport and activity facilities and community spaces, by making it easy for people to walk and cycle, by better design and by using the built and natural environments around us. There are helpful policies within the SPD to deliver better walking and cycling routes within this document which is welcome.</p> <p>However, delivering active environments also means delivering and activating dedicated sport and physical activity facilities i.e. pitches, courts, pools and leisure centres and also community spaces where sport and physical activity can also take place i.e. parks and open spaces, community centres and schools. Sport England has made representations to the questions that follow to areas where we consider the Old Oak West SPD could deliver more on active environments and better health</p> | <p>No change proposed. The SPD, alongside the Local Plan, London Plan and forthcoming Public Realm and Green Infrastructure SPD provide comprehensive guidance to support opportunities for improving mental and physical health which include the delivery of informal spaces and dedicated sport facilities.</p> |
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| | | | <p>outcomes for its future residents. Please see our website for more information; https://www.sportengland.org/about-us/uniting-movement/what-we-do/active-environments</p> | |
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| 7 | 2 | Sport England | <p>For example, it is not clear how Principle GGP1 (b) will be delivered. In comparison, GGP1 (c) explains that developers will be asked to contribute to activation events for art, culture and heritage of the local area. Sport England would like to see this included for (b) by encouraging community activation for health and wellbeing using provided infrastructure. For example, Sport England's Active Design guidance document (produced jointly with Active Travel England and OHID) Principle 8 providing activity infrastructure highlights the importance of providing infrastructure to enable sport, recreation and physical activity to take place. This should be provided across all contexts including workplaces, sports facilities and public space, to facilitate activity for all. Principle 10 - activating spaces – explains that the provision of spaces and facilities which can help to improve physical activity should also be supported by a commitment to activate them, encouraging people to be more physically active and increasing the awareness of activity opportunities within a community. The document should therefore include measures to ensure that developers provide activity infrastructure and also contribute to activating spaces, as is required in the policy for art, culture and heritage.</p> <p>https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design</p> | <p>No change proposed. The delivery of social value is multifaceted reflecting it's crosscutting nature. Delivery will be secured through the development management process. OPDC is committed to delivering Social Value and securing benefits for existing and future local communities. The SPD utilises the current policy framework to deliver Social Value. This approach will evolve and expand through the future Local Plan review and in accordance with any relevant national and mayoral guidance.</p> <p>The reference to art, culture and heritage of the local area were elements identified by the community during the early consultation phase. Delivery of infrastructure to support physical activity is identified in Principles EUP2(c) and TCCP2(b) which supplement Local Plan policies SP4, SP7, EU1 and TCC5.</p> |
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| 7 | 3 | Sport England | Finally, Figure 4.5 on page 25 shows a picture from Harlesden Canalside canoe club. There may be existing sport and leisure facilities operating in or near the SPD area that could meet the needs of incoming residents? If this is the case, these should be identified within the SPD so that developers are aware of them and to ensure that they are included within the redevelopment of sites and that they are protected from loss (in line with paragraph 99 of the NPPF and the relevant London Plan policies i.e. S5. | No change proposed. Identification of sport and leisure facilities is provided in Figure A1.8 in the Local Plan Appendix. Updated information and the need to protect existing facilities would be considered as part of each planning application. |
| 7 | 4 | Sport England | The SPD is supportive of active travel and Sport England welcomes the polices within the document that aim to support this and the creation of Active Environments. | Noted. |

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| 7 | 5 | Sport England | <p>Whilst it is identified EUP2 (c) (vi) that recreation areas, outdoor gyms and sports space for use by all ages that are, where feasible, co-located with public sports centres'. As set out elsewhere in our response to this consultation, Sport England would like the SPD to be more specific about the sports hall/swimming pool (leisure centre) will be located and how this will be delivered. We also query whether 'a minimum' 2 hectares open space is a large enough to support the incoming population? Often by setting a minimum, this is all that is likely to be delivered by the developer. It is likely that this is based on the Table 8.1 of the London Plan 2021 which describes a local park as 'these provide for court games, children's play, sitting out areas and nature conservation areas'. However, providing such a small space leaves no space to accommodate outdoor sports facilities including playing fields and informal recreation pursuits (as according to the London Plan would be delivered within a District Park). Given the high population proposed in this area this would surely justify a larger park to at least accommodate some sports and informal recreation space? It is noted that Wormwood Scrubs provides the nearest playing fields approx. 60 ha (metropolitan/district park) but this is not easily accessible and will already be well used by the existing population. The definitions in the London Plan should not be so rigorously applied that it is only 2 hectare park or a district park that becomes the only types of space provided with new development</p> | <p>Change proposed. The diagrammatic maps reflect how Local Plan Place Policy maps relate to the illustrative masterplan. The illustrative masterplan illustrates one way in which Old Oak West could be developed including the potential location of the leisure centre. To provide further clarity, figure 9.7 has been updated to define the illustrative locations of social infrastructure.</p> <p>No change proposed. Principle EUP2(b) reflects Local Plan policy EU1(c) which requires that a minimum of 30% of the developable area is provided as publicly accessible open space. This includes the proposed two Local Parks and a range of connected smaller open spaces. The SPD does not limit the size of the Local Parks to two hectares. Principle EUP1(c)(i) requires that these are at least two hectares in size. This approach was demonstrated to be appropriate in the Local Plan to meet the needs of local people to access high quality open space including provision of sport courts and other recreational activities. The forthcoming Public Realm and Green Infrastructure SPD will also provide further information regarding the design, delivery and management of open spaces.</p> <p>Principle TCCP2 reflects Local Plan policy TCC5 which requires the delivery of sport and leisure facilities to meet the needs of local people. The requirements for the sport and leisure facilities are set out in Local Plan paragraph 10.48.</p> <p>No change proposed. Local Plan policy P12 and Principle TP1 provide guidance to enhance</p> |
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| | | | <p>opportunity areas. It is recommended that the size of the new park is increased to allow for more space for sports facilities to meet the needs of the new development.</p> | <p>connections to Wormwood Scrubs to support local people making use of this open space.</p> |
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| 7 | 6 | Sport England | <p>It is noted that there is proposed to be a new 3 form entry primary school provide within the new town centre. If this were to come forward with accompanying playing field/games court and a small sports hall, this could also be used by the community and help to meet community sport and leisure needs arising from the development. The London Plan (Policy S3) recommends that development proposals should maximise the extended or multiple use of educational facilities or recreational use, through appropriate design measures. This can also be secured through a community use agreement. More information about community use agreements is available from Sport England's website; https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/community-use-agreements . Schools should also be located next to parks or green spaces where possible and this is included in the document.</p> | <p>Noted. As part of the development plan, London Plan policy S3 would be implemented as part of the development management process. SPD paragraph 9.15 supports the use of facilities for local communities.</p> |
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| 7 | 7 | Sport England | <p>The OPDC's Infrastructure Delivery Plan identifies a need for a new leisure centre and a new community centre within the SPD area and this is carried forward into TCCP2. With regard to the first of 2 Community Centres identified as being needed in the OPDC Infrastructure Delivery Plan (2021), this states; 'Exact location to be determined, but to be delivered within Old Oak major town centre in the Channel Gate place. SINS has identified that the facility is required by 2030. Cost represents a facility which will be delivered as a stand alone structure, but it may be collocated with mixed use development.' The IDP states that at least 2 new leisure centres need to be provided and the location of the first of these should be within P9 (CG). It is understood that this is within the area that forms part of this area and therefore its location (or approximate preferred location) should be identified through this SPD.</p> <p>The identified need to provide a leisure centre and community hub is therefore welcome. The examples on page 9 are also useful. However, the SPD gives 6 different locations of where this could be delivered. It is recommended that the plan sets out clearly, what type of leisure centre will be sought and where. For example, a sports hall with the number of courts specified, a swimming pool (with an indicative size given) and an artificial pitch (size specified). Without this information included, there is more of a risk that this much needed facility will not be delivered.</p> | <p>Change proposed. To provide further clarity, figure 9.7 has been updated to define the illustrative locations of social infrastructure.</p> <p>No change proposed. Local Plan policy TCC5(c) and paragraph 10.48 provide guidance for the quantity of sport facilities required. This is signposted to in the SPD.</p> |
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| 7 | 8 | Sport England | As a new leisure centre is required within the P9 Channel Gate Cluster, this should be acknowledged in the SPD. | Change proposed. SPD paragraph 11.3 confirms that the Place and Cluster Visions are repeated from the Local Plan. The SPD cannot amend the vision. However, to provide further clarity, figure 9.7 has been updated to identify the illustrative locations for social infrastructure. |
| 7 | 9 | Sport England | <p>As highlighted in our responses to other questions, more should be included within the SPD to identify how the new leisure centre will be delivered and what will be included within it. A number of examples are given in Section 9 (Town Centre and Community Uses) of the Draft West Oak SPD (recently out for consultation), but it is likely in most cases that the public sector played a significant role in many of examples given in selecting a site and potentially funding the project.</p> <p>The Queen Elizabeth Olympic Park is mentioned as an example of best practice. As it has the legacy of the Olympic games it delivered world class facilities including sports halls, velodrome and that were designed to provide a sporting legacy for the local community after the event. Significant public investment combined with developer contributions is needed to provide active environments including outdoor and indoor sports facilities. Sport England considers that there is no clear plan for the location or size of these facilities this within the SPD currently and that more information should be included in the SPD.</p> | <p>No change proposed. Local Plan policy TCC5 supporting text sets out potential delivery and management of sport and leisure facilities. These facilities will be funded from CIL revenues. Additionally, for public sports facilities identified in the IDP, and any other social infrastructure facility proposed as part of a scheme and the facilities meet an identified need which is wider than that of the proposed development, OPDC may in appropriate circumstances give consideration to how this would be secured through the in-kind and infrastructure payment provisions in the CIL regulations.</p> <p>Change proposed. To provide further clarity, figure 9.7 has been updated to define the illustrative locations of social infrastructure including the sport and leisure centre.</p> <p>No change proposed. Local Plan policy TCC5 provides guidance for the size of sport and leisure facilities to meet local needs. The diagrammatic maps reflect how Local Plan Place Policy maps relate to the illustrative masterplan. As the masterplan is illustrative, it would not be appropriate to provide further specificity regarding the size of a leisure centre at this point in time.</p> |

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| 7 | 10 | Sport England | By showing the location of a range of new sports and leisure facilities including promotion of locations for informal activity and also a larger park. The masterplan should help set out a clear vision for where infrastructure can be located to meet sport and leisure needs and deliver positive health outcomes. | Change proposed. To provide further clarity, figure 9.7 has been updated to define the illustrative locations of social infrastructure including the sport and leisure centre. The SPD provides guidance for how informal activity can be supported within the public realm and open spaces including the illustrative locations of open spaces. The forthcoming Public Realm and Green Infrastructure SPD will also provide further information regarding how streets and spaces will deliver the Health Streets Approach to support activity, health and well-being. |
| 8 | 1 | Gempoint 2000 Ltd | These Representations are written on behalf of our client, Gempoint 2000 Ltd in response to the Old Oak West Supplementary Planning Document Consultation from 16th October 2023 to midnight 27th November 2023. These Representations are written specific to Old Oak Wharf, Goodhall Street, London, NW10 6UA ('the Site') which is a Site located within the Channel Gate Area and currently occupied by Lords Builders Merchants, see Figure 1. | Noted. |
| 8 | 2 | Gempoint 2000 Ltd | 1.1 Policy P9 in the OPDC Local Plan (adopted 22nd June 2022) covers the Channel Gate neighbourhood, within the Old Oak West area. The Channel Gate area is allocated to be a new high quality residential-led neighbourhood comprising a minimum of 3,100 new homes and 600 new jobs. Old Oak Wharf ("the Site") sits in the middle of the allocated area of Channel Gate, adjacent to the Grand Union Canal, and is currently operational as a builders merchant. The Site falls within the 'Channel Gate' place and the 'Atlas Junction' cluster. | Noted. |

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| 8 | 3 | Gempoint 2000 Ltd | 1.2 The Site is currently at pre-application stage, and discussions have been taking place with OPDC Planning and Design Officers to find the best design for the scheme in line with Policies P8C1, P9 and P3 of the OPDC Local Plan. The pre-application discussions have informed and directed the proposals to date, some of which are not consistent with the contents of the draft SPD. | Noted. |
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| 8 | 4 | Gempoint 2000 Ltd | <p>1.3 The Site provides an opportunity to deliver a range of public benefits such as affordable housing, significantly improved public space as amenity to the residents, and an improved environment to neighbour the surrounding conservation areas. The site is also allocated to include town centre and community uses, which would provide improved public amenity to the area. However, viability is a critical factor in allowing the existing business to be relocated and facilitate this key Site within the Channel Gate Area to come forward in line with the allocation. This means that the policies in place are critical in allowing the development proposals and associated public benefits to be maximised.</p> <p>1.4 The SPD is therefore of significant importance to our client who has a strong interest in ensuring that it creates a strong, flexible, and ambitious planning backdrop to facilitate sustainable growth in this area of the OPDC. Our client is supportive of the Council's objective to capitalise on the area's strategic location to maximise economic opportunities in the area. Our client agrees that growth should make the best use of brownfield land and to address the current deficiencies in the area, from housing through to biodiversity and public amenity space. It is therefore important for this SPD to be ambitious reflecting both the NPPF's (Chapter 11) and London Plan's (Policies GG2 & H1) requirement to make effective use of land, especially on existing, underutilised brownfield sites (especially in</p> | Noted. Officers consider the SPD to be consistent with the NPPF and in general conformity with the London Plan. |
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| | | | Opportunity Areas) identified to be capable of accommodating moderate or significant development intensity, such as and including the Site. | |
| 8 | 5 | Gempoint 2000 Ltd | 2.1 The SPD is welcome to give further detail and clarity for the vision of Old Oak West. | Noted. |

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| 8 | 6 | Gempoint 2000 Ltd | <p>2.2 Figure 3.1 shows the Site to be at least three blocks up to 6 and 8-9 storeys. It is unclear what this configuration is derived from, and doesn't reflect the Local Plan policy P3 for height at key crossing points such as Old Oak Lane. The extensive pre-application discussions with Officers have led to a form and layout for the Site, significantly different to what is shown in this SPD. The figure also does not show Atlas Wharf, which is a permitted development, and is therefore misleading in its presentation of density. The SPD itself (Principle DP2) suggests that the development shown as a green building, on the eastern side of Old Oak Lane and south of the canal, has capacity to match the height of the Collective building, which is not represented in this image.</p> <p>2.3 The SPD indicates 6-8 storeys on the Site. Policy P3 of the Local Plan states that buildings fronting the canal should generally be in the range of 6 to 8 storeys in height and that there should be lower heights adjacent to the Island Triangle, to ensure that the setting of the canal and Old Oak Lane conservation area is not over-dominated. Policy P3 also goes on to state "...subject to the impact on the heritage, character, biodiversity and amenity of the Grand Union Canal within Channel Gate, delivering heights of generally 6 to 8 storeys fronting directly onto the Grand Union Canal with opportunities for tall buildings at key crossing points such as Channel Gate Street, Old Oak Lane and</p> | Change proposed. Principle DP2(d) has been amended to be consistent with Local Plan policy P3(n)(i) regarding potential tall buildings at key crossing points. |
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| | | | Scrubs Lane;" This has not been reflected with the drafted SPD and needs to be amended to be consistent with the adopted Local Plan. | |
| 8 | 7 | Gempoint 2000 Ltd | 2.4 Figure 5.5 (p.32) shows the proposed walking and cycling network for the area, however, this is not noted in the plan as indicative (nor is it where referenced in Principle TP1). The plan is not consistent with others showing walking and cycling routes throughout the SPD, for example Figures 11.16 and 12.3 show different walking and cycling routes. These should be illustrative only as in practice they are subject to building layouts, landscape design and ground floor uses. | No change proposed. SPD paragraphs 1.7 and 11.4 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map. The walking and cycling routes are consistent between figures 5.5, 11.16 and 12.3 while recognising the different roles these maps fulfil. |

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| 8 | 8 | Gempoint 2000 Ltd | <p>2.5 Principle EUP2 Open Spaces Locations and Design (p.48) is a welcome promotion of improved greening, specifically along Old Oak Lane and the Grand Union Canal. It is encouraged that Old Oak Community Gardens could be enhanced and potentially expanded or connected to new open spaces. Figure 6.4 is a good illustration of the potential for new green spaces. However, there is an inconsistency with Policy P8 of the Local Plan, where the search area for the Channel Gate Local Park extends across the canal to the north as one of the strategic areas of expanding parks. During the public consultation events for the Site, it was noted that there is very little accessible public open space nearby the Island Triangle, and having Channel Gate Local Park extend across the canal would make open space more accessible to those residents. Locals responded positively to the northern-most section of the Site contributing open space to a park of the north-eastern side of the canal. Moving this open space to the south-west of the canal only would move it further away from the existing community of the Island Triangle, who, through our consultation, expressed a need for easy and close access to more significant open space as a priority.</p> | <p>No change proposed. SPD paragraph 1.7 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map. The SPD provides guidance for the Local Plan period which ends in 2038. All diagrammatic maps illustrate one way in which Old Oak West could be developed in 2038.</p> <p>The figures accompanying Principles in the SPD illustrate how Local Plan maps would look in relation to the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed. This results in differences between the SPD and Local Plan figures.</p> <p>Change proposed. Local Plan figures have more planning weight in the development management process as they form part of the development plan. Wording reflecting this relationship has been added to the Introduction.</p> <p>No change proposed. In relation to Channel Gate Local Park, the Local Plan continues to show an area of search for the park on both sides of the Grand Union Canal.</p> |
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| 8 | 9 | Gempoint 2000 Ltd | 2.6 Principle TCCP1 Town centre uses and areas (p.72) gives community suggestions for Old Oak major town centre character areas in Table 9.2. Our consultation work with residents also identified banks or banking facilities as a requirement for the area, specifically mentioned regarding Channel Gate, Atlas Junction and the Grand Union Canal. Our local engagement has also noted the importance of town centre and community uses in supporting the creative industries in the area, with workspace and event spaces for industry professionals. | Change proposed. To reflect suggestions from local residents, Table 9.2 will make reference to banks. |
| 8 | 10 | Gempoint 2000 Ltd | 2.7 Principle TCCP3 Meanwhile uses and early activation (p.81) does not provide much context to the requirement for meanwhile uses. It should be made clear that meanwhile uses are only required where feasible and practical for a certain interior/exterior space, and are not necessary where the site remains in existing uses. | No change proposed. Local Plan policy TCC8 requires the delivery of meanwhile uses. It sets out guidance for their role and supporting future development. The supporting text to policy TCC8 sets the context for meanwhile uses. Principle TCCP3 signposts to this policy. |
| 8 | 11 | Gempoint 2000 Ltd | 2.8 Principle DP1 (p.87) discussed active and 'positive' frontage. It is unclear what the definition of 'positive frontage' is, and recommended that a definition is provided to distinguish between the two. This also provides a slight contradiction to P8C1 Atlas Junction Cluster (p.109) where frontage is shown as part active and part positive frontage. Principle EP2 (p.65) Figure 8.4 shows all frontages across the indicative blocks for the Site as 'employment use and/or Class E use active frontages', which is unrealistic as it would be unfeasible in this location to have that quantum of commercial space. | No change proposed. Positive Frontages are defined in the Local Plan Glossary. Change proposed. The key to figure 8.5 (previously figure 8.4) has been amended to make reference to Employment use and/or Class E active/positive frontages. |

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| 8 | 12 | Gempoint 2000 Ltd | <p>2.9 The example buildings shown on the plans for the Site are not in line with the existing buildings or any proposals discussed with the OPDC to date, so it is unclear what the arrangement of two large blocks is based on. Figure 10.9 (p.93) shows the Site building heights to be 6-8 storeys across the site which is inconsistent with the Local Plan policies. Local Plan Policies P8C1 and P9 and the proposed Principal DP2 Building Heights (p.91) of the SPD state; and 'generally 6 to 8 storeys fronting directly on to the Grand Union Canal'; and 'generally lower heights responding to existing residential neighbourhoods'. The Local Plan Policy P3 reference to tall buildings being suitable at key junctions does not appear to be reiterated beyond the Local Plan Context Overview (p.15), and should be incorporated within the detail of Principle DP2 (p.91) for consistency. The junction/crossing is shown in Figure 11.2 (p.110) and should be replicated in other plans throughout the SPD, for example in Figure 12.3 (p.116). The point of height allowance is a specifically concerning inconsistency that is also relevant to the misleading configuration of the indicative layout of the Site throughout the SPD.</p> | <p>No change proposed. The layout of the site reflects the illustrative masterplan provided in the appendix. This illustrates one way in which Old Oak West can be delivered.</p> <p>Change proposed. Principle DP2(d) has been amended to be consistent with Local Plan policy P3(n)(i) regarding potential tall buildings at key crossing points.</p> <p>No change proposed. Figure 11.20 shows bridge improvements while Figure 12.3 shows junction improvements.</p> |
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| 8 | 13 | Gempoint 2000 Ltd | 2.10 Principal DP4 Local Character and Heritage (p.95) states that proposals should strengthen local identity and character by conserving and enhancing the canal and Old Oak Lane Conservation Areas and locally listed buildings. The intention behind this is clear, however there is a concern that strengthening local identity could be interpreted as maintaining existing context and promote a preference towards no development, which is not helpful in encouraging good growth. | No change proposed. OPDC's Local Plan sets minimum development capacities for developments sites. The guidance to strengthen local identity and character would be utilised to meet these minimum capacities. |
| 8 | 14 | Gempoint 2000 Ltd | 2.11 Principal P3 Grand Union Canal (p.104) promotes the enhancement of canalside areas which is considered a positive intent in terms of promoting redevelopment, and it shows the benefit of redevelopment in providing enhanced green space and new walking and cycling routes down the canal. However, the plan and the routes shown should be stated as indicative. | No change proposed. SPD paragraph 1.7 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map. All diagrammatic maps illustrate one way in which Old Oak West could be developed. |
| 8 | 15 | Gempoint 2000 Ltd | 2.12 The site allocation and Development Capacity Study Sites in Table 12.1 (p.118) would benefit from a summary plan to show the location of the sites assessed. | Change proposed. Figure 12.4 has been updated to identify sites set out in Table 12.1. |

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| 8 | 16 | Gempoint 2000 Ltd | 2.13 The Illustrative Masterplan in the Appendix shows the illustrative ground floor uses of the site to be a mixture of housing and commercial space, which is contrary to Figures 8.4 and 10.7 (p.66 & p.89), which show entirely commercial space, all of which are misaligned with the pre-application discussions held with OPDC Officers to date, which assessed that a mixed use ground floor is most suitable in this location, with the key commercial frontage on to Old Oak Lane. It is also worth noting that the subheading on p.130 incorrectly noted ground floor uses, instead of above ground floor uses. | <p>Change proposed. Figure 8.5 (previously figure 8.4) has been amended to be consistent with the Illustrative Masterplan. Figure 10.7 is consistent with the Illustrative Masterplan as residential uses can provide active frontages.</p> <p>No change proposed. The illustrative masterplan shows one way in which Old Oak West could be developed in 2038.</p> <p>Change proposed. The key of the above ground floor uses illustrative masterplan has been corrected.</p> |
| 8 | 17 | Gempoint 2000 Ltd | 3.1 It is recommended that the Local Plan Policy P3 allowance of opportunities for tall buildings at key crossing points such as Channel Gate Street, Old Oak Lane and Scrubs Lane be reiterated in this SPD, within Principle DP2. To include the wording of the guidance on 6-8 storeys along the canal and lower heights responding to existing residential neighbourhoods without the reference to tall buildings at the specific junctions is to miscommunicate the policy wording of the adopted Local Plan and should be amended to be consistent with the Local Plan. | Change proposed. Principle DP2(d) has been amended to be consistent with Local Plan policy P3(n)(i) regarding potential tall buildings at key crossing points. |

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| 8 | 18 | Gempoint 2000 Ltd | 3.2 Relating directly to the Site, it is recommended that the indicative two blocks shown throughout the SPD plans and imagery is updated to reflect the work to date on agreeing a positive massing strategy with OPDC. The preference would therefore be to show a four block configuration, in line with pre-application discussions. This allows the imagery to directly reflect the wording of the policy in terms of building heights and massing, and to reflect the design work to date with OPDC Planning and Design Officers. | No change proposed. The layout of the site reflects the illustrative masterplan provided in the appendix. This illustrates one way in which Old Oak West can be delivered. |
| 8 | 19 | Gempoint 2000 Ltd | 3.3 It is recommended that Figure 3.1 is updated to reflect these changes, to include Atlas Wharf and to reflect the height recommended for the green block in the background (as per paragraph 2.2 of this document). | No change proposed. The visualisation reflects the illustrative masterplan provided in the appendix. This illustrates one way in which Old Oak West can be delivered. |
| 8 | 20 | Gempoint 2000 Ltd | 3.4 In terms of promoting positive change to the area, it would be practical for some of the phraseology within the SPD to be more pro-development in order to enable growth. For example, Principal DP4 Local Character and Heritage (p.95) could be amended to state that proposals should work to improve local identity and character by conserving and enhancing the canal and OOL CAs and locally listed buildings. Where Principal P3 Grand Union Canal (p.104) promotes the enhancement of canalside areas, this would also benefit by adding encouragement for investment in these opening and connecting these areas by way of promoting positive development. | No change proposed. The SPD supports the coordinated and comprehensive development of Old Oak West. SPDs must be consistent with the Local Plan. Principle DP4 is consistent with Local Plan D7 regarding the conservation and enhancement of heritage assets and cannot be amended. Appropriate canalside development is supported and guided by Local Plan Policy P3 to deliver enhancements to the Grand Union Canal and adjacent areas. |

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| 8 | 21 | Gempoint 2000 Ltd | 3.5 All plans should be noted as indicative, particularly the transport, walking and cycling routes that are illustrated inconsistently throughout the document. These routes are dependent on site configuration and ground floor uses, and therefore should be shown as indicative. | No change proposed. SPD paragraph 1.7 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map. |
| 8 | 22 | Gempoint 2000 Ltd | 3.6 The Channel Gate Local Park search area should be shown to extend across to the north of the canal, as per Policy P8 of the Local Plan. This was a clear priority for local residents through our community engagement work. | <p>No change proposed. SPD paragraph 1.7 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map. The SPD provides guidance for the Local Plan period which ends in 2038. All diagrammatic maps illustrate one way in which Old Oak West could be developed in 2038.</p> <p>The figures accompanying Principles in the SPD illustrate how Local Plan maps would look in relation to the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed. This results in differences between the SPD and Local Plan figures.</p> <p>Change proposed. Local Plan figures have more planning weight in the development management process as they form part of the development plan. Wording reflecting this relationship has been added to the Introduction.</p> <p>In relation to Channel Gate Local Park, the Local Plan continues to show an area of search for the park on both sides of the Grand Union Canal.</p> |

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| 8 | 23 | Gempoint 2000 Ltd | 3.7 The consultation work undertaken on the Site has given some insight into the community needs, it would be beneficial to include these within Table 9.2. As per paragraph 2.6 of this document, the needs noted were specifically for banking facilities and general support of the creative industries. | Change proposed. To reflect suggestions from local residents, Table 9.2 has been amended to make reference to banks. Creative industries are already supported within paragraphs 8.10 and 9.7. |
| 8 | 24 | Gempoint 2000 Ltd | 3.8 Principle TCCP3 should note the context of the requirement for meanwhile uses. | No change proposed. Local Plan policy TCC8 requires the delivery of meanwhile uses. It sets out guidance for their role and supporting future development. The supporting text to policy TCC8 sets the context for meanwhile uses. Principle TCCP3 signposts to this policy. |
| 8 | 25 | Gempoint 2000 Ltd | 3.9 Principle DP1 should provide a clear definition of 'positive frontage'. | No change proposed. Positive Frontages are defined in the Local Plan Glossary. Change proposed. The key to figure 8.4 (now figure 8.5) has been amended to make reference to Employment use and/or Class E active/positive frontages. |
| 8 | 26 | Gempoint 2000 Ltd | 3.10 The timescales for the redevelopment for the Site are acceptable, however it would be beneficial for the SPD to reference these timescales as indicative. | Change proposed. Local Plan paragraph 11.20 identifies that the Local Plan figure 3.16 Development Phasing map is indicative. To ensure consistency figure 12.4 has been amended to make reference to the phasing being indicative. |
| 8 | 27 | Gempoint 2000 Ltd | 3.11 Table 12.1 would benefit from a summary plan to illustrate the sites referenced. | Change proposed. Figure 12.4 has been updated to identify sites set out in Table 12.1. |
| 8 | 28 | Gempoint 2000 Ltd | 3.12 To better reflect the future development of the Site, the ground floor uses on the Illustrative Masterplan (Appendix) should be shown as mixed use, or residential uses, with commercial space fronting Old Oak Lane. | No change proposed. The illustrative masterplan shows one way in which Old Oak West could be developed in 2038. |

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| 8 | 29 | Gempoint 2000 Ltd | 3.13 As a more general point, the boundary of the policy maps is not particularly clear in any of the Principal and Cluster plans throughout the draft SPD. It is suggested that boundary lines are included on every plan for clarity. | No change proposed. SPD paragraph 1.7 confirms that maps are diagrammatic and indicative save for those elements that are fixed in the Local Plan and shown on the Policies Map. |
| 8 | 30 | Gempoint 2000 Ltd | <p>Overall, and as set out above, our team is supportive of the intention of the Old Oak West Supplementary Planning Document and relevant emerging principles contained within it, particularly in encouraging the future regeneration of this area of strategic importance.</p> <p>However, it is important for the Council to work collaboratively to ensure the area-specific directives within the document are reflective of the emerging development context, including the work done through individual site pre-application. The amendments noted in this representation need to be made to be consistent with the adopted Local Plan.</p> <p>We look forward to continuing positive and proactive discussions with OPDC to assist in preparing a sound and deliverable SPD.</p> | Noted. |

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| 9 | 1 | Raban Ltd | <p>My client has a land holding known as the Former Railway Institute (FRI) at Goodhall Street and the adjoining land with development aspirations for a comprehensive redevelopment of the site.</p> <p>The introduction to the Draft Old Oak SPD sets out that it amalgamates the relevant place policies in the Local Plan to provide clearer spatial planning guidance for Old Oak West and to support a comprehensive and coordinated approach to development in Old Oak West.</p> <p>The SPD goes on to state:</p> <p>Local Plan policy SP10 requires that proposals take an integrated and comprehensive approach to the design, construction and management of proposed development. OPDC considers that a comprehensive approach to developing Old Oak West will deliver a variety of benefits. This includes better placemaking to foster sustainable and complementary neighbourhoods, coordinating the delivery of infrastructure to connect the area and support existing and future residents; and potentially delivering more homes and space for jobs than set out in our Development Capacity Study Update (2021) through optimised and accelerated development capacities.</p> <p>It is on this basis that these representations have been made and it is considered that the</p> | Noted. |
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| | | | SPD would not achieve these aims if it were to remain silent on the future of this site. | |
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| 9 | 2 | Raban Ltd | <p>An application for redevelopment of this site was submitted in 2022 under reference 22/0134/FUMOPDC for the following development:</p> <p>Demolition of 73 Stephenson Street and adjacent storage building and redevelopment of site to provide a part 4, part 9 storey block of 38 flats (Use Class C3) including cycle parking, landscaping and associated works.</p> <p>This application was refused in February 2023 and a revised application submitted in September 2023 (23/0214/FUMOPDC) to address the reasons for refusal. The application has reduced the proposal to 33 apartments and has been substantially altered in height and design. The application is currently being determined by OPDC.</p> <p>The application should be viewed in conjunction with the adjoining site at 80 Goodhall Street where construction is nearing completion for a 9 storey building approved under reference 195346OPDFUL by Ealing Council in September 2020.</p> | Noted. |
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| 9 | 3 | Raban Ltd | <p>The draft SPD clearly shows future intent for the land on the other side (eastern side) of my client's site at 80 Goodhall Street to be developed with an indicated height of up to 12 storeys. Then on the other side of Old Oak Lane up to 15 storeys. This is set out in Figure 10.9 of the SPD which is labelled as illustrative building heights showing one way heights could be delivered based on Local Plan Policies.</p> | Noted. |
| 9 | 4 | Raban Ltd | <p>The Delivery and Implementation Section of the draft SPD shows an additional 40 dwellings (with 150 sqm of commercial/industrial floor space) being delivered from the land immediately adjoining 80 Goodhall Street to the east in 0-5 years then a further 200 dwellings (with 1,000 sqm of commercial/industrial floor space) on the land to the west of Old Oak Lane.</p> <p>It is therefore clear that this area of Old Oak West is substantially changing and is considered to be a highly sustainable location which is very suitable for the intensification of brownfield sites.</p> | Noted. |

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| 9 | 5 | Raban Ltd | <p>The site in control of my clients directly adjoins the Channel Gate area to the west. In the late stages of the OPDC Local Plan examination process, the Corporation produced the Channel Gate Development Framework Principles as a Local Plan Supporting Study, dated February 2021. The purpose of the study states it is to provide a local vision and place guidance to the Channel Gate Place.</p> <p>The Vision for the document shows the full extent of the Channel Gate Development including a new and enhanced connection through to Stephenson Street / Goodhall Street in the location of the site owned by my client.</p> <p>This is considered logical as it would provide pedestrian connectivity through an appropriate route 'at grade'. Previous representations made by my client have shown that this can be easily achieved on the site and an allowance made for this as part of the current planning application.</p> <p>It is therefore of note that this potential connection is now absent from the vision set out within the draft SPD. The Planning Practice Guidance is clear that SPDs should be used to build upon and provide detailed advice or guidance on policies in an adopted local plan. It is considered that the draft SPD in its current form marks a retrograde step in relation to this part of Old Oak West.</p> | <p>No change proposed. The referenced route is depicted in the Channel Gate Development Framework Principles document. However, it is not identified in the Local Plan or Infrastructure Delivery Plan 2021. the SPD is consistent with the Local Plan and therefore it does not show this route.</p> |
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| 9 | 6 | Raban Ltd | <p>Moreover, it is highly surprising that there is no reference to the potential development of my client's site. Regardless of concerns raised around the technical aspects of the previous application, no objection has been raised to the principle of development. It is clear that this brownfield site has the potential for additional development and it should be considered as part of the wider cluster alongside 80 Goodhall Street and the other proposed sites to the East.</p> <p>It is considered that the inclusion of this site would be wholly in accordance with aims of the SPD to take a more co-ordinated and comprehensive approach to placemaking in this area of Old Oak. The location of the site within the Conservation Area does not preclude further consideration of how the existing site could be enhanced to create improvements to the immediate area whilst delivering housing. It is clear from the previous planning application that there was substantial interest in the proposals for this site from local residents and stakeholders. Its inclusion within this SPD would provide guidelines for its future development and provide certainty for my client, local resident, the LPA and other stakeholders.</p> | <p>No change proposed. The site is not identified as a development site in the Local Plan. The SPD must be consistent with the Local Plan. Therefore, the site cannot be included in the SPD. The policies in the development plan, SPD guidance and other material considerations will be used to determine planning applications for windfall sites. See paragraph 12.13 for further information regarding windfall sites.</p> |
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| 9 | 7 | Raban Ltd | <p>Before adoption of the SPD, OPDC must take into account the requirements of section 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 regarding Supplementary Planning Documents. In terms of public participation, the regulations state that before adopting an SPD the local planning authority should prepare a statement setting out:</p> <ul style="list-style-type: none"> (i) the persons the local planning authority consulted when preparing the supplementary planning document; (ii) a summary of the main issues raised by those persons; and (iii) how those issues have been addressed in the supplementary planning document <p>Raban Management Ltd and Raban Goodhall Ltd remain of the opinion that the Former Railway Institute Building and surrounding land has a key roll to play in the successful future of Old Oak West and the successful delivery of the Channel Gate scheme.</p> | <p>No change proposed. The SPD will be progressed in accordance with legislation and OPDC's Statement of Community Involvement. A Statement of Consultation has been published. This set out all consultation comments and officer responses to each comment.</p> <p>The site is not identified as a development site in the Local Plan. The SPD must be consistent with the Local Plan. Therefore, the site cannot be included in the SPD. The policies in the development plan, SPD guidance and other material considerations will be used to determine planning applications for windfall sites.</p> |
| 10 | 1 | Ealing Cycling Campaign | <p>Ealing Cycling Campaign (ECC) welcomes the emphasis given to walking and cycling in this document. We make the following comments:</p> | Noted |

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| 10 | 2 | Ealing Cycling Campaign | <p>The cycling network</p> <p>The draft includes a plan (figure 5.5) showing the “walking/cycling network”. This shows every proposed new street as part of that network. Insofar that most of the area is designated for high rise residential this is not unreasonable – but there needs to be a primary cycle network shown as well, forming part of the wider borough cycling network. Within Old Oak West this will need to be fully segregated from pedestrians and motor vehicles.</p> <p>ECC have produced a draft Ealing Cycling Network as an input to the Ealing Local Plan. A copy of this was sent to OPDC on 1 July 2023 (a further copy is attached for ease of reference). A final version of the network is due to be considered by Ealing council’s cabinet on 6 December 2023, which will reflect comments from other parties as well as ECC.</p> <p>The main roads included in ECC’s proposed cycling network (Victoria Road, Old Oak Lane and Old Oak Common Lane) are shown in the draft SPD as “enhanced existing walking and cycling routes” with many junction improvements, albeit only diagrammatic at this stage. The large number of sites fronting onto Victoria Road which are to be redeveloped would enable a really good cycle route to be provided alongside Victoria Road, but only if an ambitious detailed plan is drawn up soon enough.</p> | <p>No change proposed. OPDC is committed to delivering a high quality, safe, direct, accessible and inclusive walking and cycling network. The SPD cannot restrict the development of sites specifically prior to cycle network plans being defined. However, Local Plan policy SP10(c) and (e) require that proposals contribute appropriately and proportionately to infrastructure and that land is safeguarded to deliver infrastructure identified in the Local Plan and Infrastructure Delivery Plan. Cycle infrastructure is identified in both these documents.</p> <p>Additionally the forthcoming Public Realm and Green Infrastructure SPD will provide illustrative street sections and guidance for cycle infrastructure for OPDC's proposed Street Family that will reflect TfL's Streetscape and Cycling Guidance documents.</p> |
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| | | | <p>ECC therefore ask that the SPD includes a specific commitment to prepare and approve the detailed plans showing cycling facilities for both these routes, Victoria Road/Old Oak Lane and Old Oak Common Lane, before any redevelopment of sites fronting these roads takes place. This commitment could usefully be added at paragraph 5.11, which already recognises the need for buildings to be set back to allow segregated cycle facilities to be provided. These future primary cycle routes will be key elements of the framework within which adjacent development must fit; plans much more detailed than figure 5.5 are required, even if these are in a supporting document rather than the main SPD.</p> | |
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| 10 | 3 | Ealing Cycling Campaign | <p>Canal towpath</p> <p>The supporting document “Canal Placemaking Study 2019” suggests a towpath width of 2.0m plus verges. Given the density of adjacent development within the SPD area this will not be sufficient. The recommended minimum width for shared use paths (LTN 1-20 table 6.3) is 3.0m. Experience has shown that the provision of adequate width is a key factor in avoiding conflict between different classes of user. A hard surfaced width of 2.0m plus well maintained verges may just suffice in unpopulated areas which are sufficiently remote that many people will not choose to walk there, but where the towpath runs through a densely populated residential area a width greater than 3.0m is required. For busy routes LTN 1-20 recommends a width of 4.5m (table 6.3). However, LTN 1-20 strongly discourages shared-use paths in built-up areas:</p> <p>“1.6.1Shared use routes away from streets may be appropriate in locations such as canal towpaths... including in cities. Where cycle routes use such paths in built-up areas, you should try to separate them from pedestrians, perhaps with levels or a kerb.” "6.5.4Shared use facilities are generally not favoured by either pedestrians or cyclists, particularly when flows are high. It can create particular difficulties for visually impaired people. Actual conflict may be rare, but the interactions between people moving at</p> | <p>No change proposed. Officers note that the Canal Placemaking Study suggests a towpath width. However, this is not included in the Local Plan and therefore cannot be included in the SPD. This will enable a variety of widths to be delivered that respond to local constraints to provide a high quality and safe environment for pedestrians, wheelchair users and cyclists.</p> <p>No change proposed. The SPD must be consistent with Local Plan policy P3 which identifies the towpath to be enhanced as a high quality shared walking and cycling route. The towpath forms part of the walking and cycling network with other new and enhanced east to west routes being proposed.</p> |
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| | | | <p>different speeds can be perceived to be unsafe and inaccessible, particularly by vulnerable pedestrians."</p> <p>As a shared path, the canal towpath when widened will be suitable as a leisure route. However unless it is possible to widen it sufficiently to provide a segregated cycle path, it will not be suitable for commuter cycling. To avoid high volumes of cyclists on the canal towpath, an alternative east-west segregated cycle route is required.</p> | |
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| 10 | 4 | Ealing Cycling Campaign | <p>East-West Cycle Route</p> <p>The original OPDC draft Local Plan included three alternative east-west routes: Park Road, Hythe Road and Wormwood Scrubs Street. Park Road has been dropped and Wormwood Scrubs Street is designated as "beyond the plan period". Both Hythe Road and Wormwood Scrubs Street offer long-term opportunities for segregated east-west cycle routes. Future work should identify which should be the priority commuter route, bearing in mind that to attract commuters away from the Grand Union Canal towpath it will need to be direct, connect with attractive east-west routes on either side of the OPDC area, and run through areas where vulnerable cyclists feel safe. Graveyards and remote parkland will deter many pedestrians and cyclists at night.</p> <p>We welcome the east-west cycle route along the proposed Old Oak Street, in particular the bridge between Acton Wells East and Old Oak South. To meet future demand, it is important that this bridge and the new Bulls Bridge will be wide enough to carry a segregated cycle path alongside a pedestrian path.</p> | <p>Noted. This recommendation will be used to inform future cycle network development.</p> <p>Noted. Detailed bridge design will consider the needs of users to enable them to easily and safely reach their destinations.</p> |
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| 11 | 1 | Resident 1 | <p>I am writing in response to the OPDC's draft of the Old Oak West Supplementary Planning Document which aims to provide more detailed supplementary guidance on the Local Plan policies.</p> <p>My views, comments and opinions are in alignment with those put forward and submitted by the Grand Union Alliance (GUA) and the Old Oak Neighbourhood Forum (OONF).</p> | Noted. |
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| 11 | 2 | Resident 1 | <p>More has to be done to support the existing local residential communities which have been established for decades but over recent years have seen massive environmental erosion and blight due to HS2 construction works and sporadic erection of high-rise buildings.</p> <p>As a 30year resident of this specific neighbourhood, I am being subjected to continual disruption, disturbance, pollution, dust, grime, and inconvenience with suspension of bus-stops and public transport station closures, and what seems like a never-ending state of temporary traffic lights on Victoria Road and Old Oak Common Lane. The impact of all of this and more, has been detrimental to my physical and mental well-being and your organisation (OPDC) should be doing whatever it can to limit this harmful intrusion on my life, by thoroughly documenting the on-going situation and prohibiting any construction works, proposals or environmental damage that exacerbates the situation.</p> <p>The thought of another decade plus of this is "soul-destroying" to me and nothing in the draft SPD document provides me with any re-assurance to compensates for what life will be like here for this next 10 years or more.</p> | <p>Noted. Supporting existing communities is a core element of our work. We've set out how we require developers to avoid or address impacts on local residents' amenity and health in our Local Plan. We're working with stakeholders including HS2, TfL, the local highway authorities and our host boroughs to ensure the policy requirements in the Local Plan are implemented using our tools as a local planning authority and regeneration agency.</p> <p>To help deliver shorter-term improvements, we are delivering a range of early activation and meanwhile projects. Supporting these in the SPD was a key suggestion from the early engagement work we undertook in 2023 and therefore we have included Principles GGP1(c) and TCCP3 to achieve this. These Principles require developers to demonstrate in their Meanwhile Strategies how they will secure uses through engagement with local businesses, community groups and social infrastructure providers. OPDC will secure the delivery of meanwhile uses through conditions. The SPD principles also require major development proposals to provide planning obligations to support projects which contribute towards the early activation of the OPDC area, including community based projects, events or other initiatives which build upon the art, culture and heritage of the local area.</p> <p>Examples of existing early activation projects that are helping to support communities and improve the area include our Small grants programme, The Forge jobs brokerage service, Harlesden</p> |
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| | | | | Canalside, Willesden Junction Station Improvements, Grand Union Canal Towpath Access, Park Royal Food Festival and the emerging North Acton public realm improvements. |
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| 12 | 1 | Local Resident 3 | <p>Old Oak Common West Draft SPD comments as follows:</p> <p>This plans spatial vision bizarrely offers nothing/ no gain to Victorian Harlesden Town existing resident community, with a big NO to its social inclusion/ plan/ design integration into the proposed new car-free towers Major Town Centre being built adjacent to it? Harlesden locked out/by planning subordinated, where it is important to note its low car ownership and then that the biggest transport super hub in the UK is being built adjacent south of it. Given that historic Harlesden's boundary reaches south to the Grand Union Canal, what has Harlesden done to deserve being OPDC locked out, cancelled and excluded now just as its major town regeneration enhancement opportunity adjacent finally arrived? Given that HS2 tunnelling onwards towards Euston is in grave doubt (spiralling costs and with work suspended). Harlesden (Old Oak) will likely be the HS2 London gateway place. Whatever finally happens, Major Town new towers will have the built appearance of arrival to a giant modern city (rather than to to a Nowhere / Not London that the UK Press still claims) where transport interchange for customers is not unreasonable to expect as that would surely have happened at Euston anyway.</p> | <p>No change proposed. OPDC is committed to ensure that local nearby neighbourhoods, town centres and existing communities benefit from the opportunities generated by the regeneration of Old Oak and protection of Park Royal Strategic Industrial Location.</p> <p>The SPD recognises LB Brent's Local Plan guidance for strengthening Harlesden town centre in paragraph 2.11 and identifies it on the Spatial Vision diagram alongside all other Old Oak West wide maps. Paragraph 8.10 identifies the need to support local employment and town centre sectors within Harlesden which will inform the implementation of Local Plan Policy TCC1(h) which requires the delivery of measures to support the continuing vitality and viability of Harlesden District Town Centre.</p> <p>The early community engagement carried out in 2023 identified the importance of celebrating local heritage and identities including Harlesden's. To support this, Principle DP4 requires developers to ensure future local character is informed by Harlesden's wider heritage including industrial, residential, music and railway heritage.</p> <p>Harlesden will also be well connected to the OPDC area, benefiting from new bus routes, enhanced walking and cycling routes and the potential new Old Oak Common Lane London Overground Station.</p> |
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| 12 | 2 | Local Resident 3 | <p>Your plan states that east-west people movement is of plan concern, that even when the Grand Union Canal would seem to offer this traffic a clear readymade solution, admittedly increased movement space east-west needs to be planned in and strongly protected along the entire canal side. While the building of a new east-west vehicle road and towers on Wormwood Scrubs Park OPDC dream, is un-necessary and ill considered given the car-free and shadow land (many no sunlight/ 4 bedroom tower flat homes) at huge overcrowded population densities to be towered in all around this large Park anyway.</p> | <p>No change proposed. The Grand Union Canal offers opportunities for some east to west movement for walking and cycling. However, additional routes are required for these modes and vehicular travel. These are set out in Principles TP1 and TP3.</p> <p>The SPD and Local Plan do not propose development on Wormwood Scrubs. Local Plan policy P12 provides robust guidance to conserve and enhance its role as a Metropolitan Park and Metropolitan Open Land.</p> <p>The Local Plan provides extensive guidance in ensuring appropriate levels of amenity are secured for new homes and commercial buildings. Policy H4 seeks to prioritise family housing at ground of first floors of developments.</p> |
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| 12 | 3 | Local Resident 3 | <p>North-south people movement major investment also required is troublingly plan ignored however, as rail lines sever and cut, which cries out for funding of a scaled up high line active travel traffic elevated green cycleway way from Tubbs Road Pocket Park in low car ownership Old Harlesden Town south to Wormwood Scrubs Park. Note that heavily vehicle traffic Scrubs Lane and Old Oak Lane roads both drift east and west respectively and noticeably away from the surely key for car-free residents new HS2/ Elizabeth Line station transport super hub?</p> | <p>No change proposed. The SPD reflects Local Plan policies which propose increased public transport access and improvements to active travel networks. This is reflected in the SPD which identifies new stations, enhanced stations, enhanced bus network and active travel routes. These include enhancements to Old Oak Lane, Victoria Road and Old Oak Common Lane providing high quality access to Old Oak Common Station.</p> <p>Scrubs Lane is outside of Old Oak West. Therefore the SPD cannot provide guidance for this street. Local Plan policies P10 and P10C1 to P10C5 provide specific guidance for Scrubs Lane.</p> <p>A connection via Tubbs Road Pocket Park is not identified in the Local Plan. To ensure the SPD is consistent with the Local Plan, the SPD cannot identify this route.</p> |
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| 12 | 4 | Local Resident 3 | <p>Ominously, there is never in any OPDC plan mention of the narrow existing already walking and wheeling active travel traffic bridges over the rail lines and canal from Willesden Junction Station to the new HS2 station (500 metres) that allows even today for direct active travel traffic north-south. I would therefore for this plan propose a reuse/ massive widening upgrade of this readymade and already existing north-south boroughs connecting public right of way, with greenway extensions north from Willesden Junction to Tubbs Road Pocket Park and south from the new HS2/ Elizabeth station direct into Wormwood Scrubs Park, as best use of green spaces and green travel OPDC budget. Of course the stations along this route (old and new) would need to allow active travel public traffic to pass through them moving north-south as happens already at many other London station hubs- no planning problem at all there? A World Class transport super hub where people are enabled to rapidly active move between HS2, Elizabeth Line, West Coast mainline, Great Western, Heathrow Express, Overground, Southern, Orbital, Bakerloo, bus stops, canal bus services and to Harlesden Old Town and Wormwood Scrubs Park. With many thousands of people interchanging each day as well, this north-south movement enabling investment will be as important economically and socially as east-west movement and should be put among this plans main concerns?</p> <p>My idea here (and the idea of whoever designed and built the existing north-south</p> | <p>No change proposed. The SPD reflects Local Plan policies which propose increased public transport access and improvements to active travel networks. This is reflected in the SPD which identifies new stations, enhanced stations, enhanced bus network and active travel routes. The identified existing route via bridges from Willesden Junction to the future Old Oak Common Station is not located within Old Oak West. Therefore, the SPD cannot provide guidance for it. However, Local Plan Policy P2 provides guidance for enhancing this existing route. Notwithstanding these enhancements, the Local Plan and SPD proposed enhancements to existing routes in Old Oak West to provide high quality connections from Old Oak Common Station to local destinations in and around the OPDC area. This includes connections to Harlesden town centre and Wormwood Scrubs.</p> |
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| | | | <p>active travel traffic bridges and walkways) is quality of life, wellbeing, access, anti-subordination, equality of movement rights for all, north, south, east and west- Brent, Ealing and Hammersmith and Fulham residents all of equitable plan concern for highest quality travel access.</p> <p>This new high line upgrading of the existing on site active travel traffic rights of way north-south (the stations / new stations already cross the tracks for allowing platforms access) is major funding justified by the new Major Town Centre plan of many towers car-free housing and the moral/ best use of public funds/public land duty to include and regenerate Old Town Harlesden and its large existing community into and in with the new London towers Major Town building adjacent direct south. Walk, wheel and cycle between stations or take a direct 600 metre walk from Old Harlesden to Wormwood Scrubs Park giant open space through the major new town and its new attractions.</p> | |
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| 12 | 5 | Local Resident 3 | <p>New Kings Cross canal side and new Paddington canal side, though smaller scale/ with less people movement traffic are similar rail and canal 'bad lands' now by inclusive good growth plans transformed, and are civic, civil and human templates for OPDC to follow at Harlesden Major Town Centre towers add on south. This car free mega population density new town needs north-south active travel traffic investment between its stations as a matter of plan priority.</p> <p>Has anyone on the OPDC Board seen the High Line in New York? Has anyone on the OPDC Board seen the current vehicle road congestion in and through low car ownership community Old Harlesden Town?</p> <p>London's HS2 Major Town Centre gateway here needs a fair and appropriate to its car-free towers hyper population density/ city movement, master plan for actual and day one planned inclusion of all surrounding local people's lives and needs, even the residents of low car ownership Old Harlesden Town, Brent. It's not Richmond community, it's not Hampstead community, but Harlesden community is the Victorian town that the Mayors OPDC is Major Town packed towering adjacent to.</p> | <p>No change proposed. The SPD reflects Local Plan policies which propose increased public transport access and improvements to active travel networks. This is reflected in the SPD which identifies new stations, enhanced stations, enhanced bus network and active travel routes.</p> <p>Harlesden will be well connected to the OPDC area, benefiting from new bus routes, enhanced walking and cycling routes and the potential new Old Oak Common Lane London Overground Station.</p> <p>The Local Plan is underpinned by extensive supporting studies include a Public Realm, Walking and Cycling Strategy, Strategic Transport Modelling and various spatially specific studies which draw on global precedents. These have informed the movement network identified in the Local Plan to ensure neighbouring areas are well connected to the Old Oak Common Station and Old Oak major town centre.</p> |
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| 12 | 6 | Local Resident 3 | Developer-led short termism and subordination as plan default needs to be questioned. Maybe the OPDC plan team/board must be made a broader church, with not only Harlesden but Grenfell also nearby? | <p>No change proposed. The SPD provides guidance for the Local Plan period which ends in 2038. The SPD has been informed by extensive local community engagement including a wide range of activities and events that took place between February and June 2023 in addition to the formal SPD consultation. This has enabled local communities to directly shape SPD content. These elements are identified in the Community Engagement Summary Report and within the SPD.</p> <p>OPDC's Board includes representatives from the local area including residential and business communities. Further information can be found at: https://www.london.gov.uk/who-we-are/city-halls-partners/old-oak-and-park-royal-development-corporation-opdc/opdc-governance-board-and-committees/opdc-board</p> |
| 13 | 1 | Local Business 1 | <p>(What do you like about the Good Growth chapter?)</p> <p>new shops and activities</p> | Noted. |
| 13 | 2 | Local Business 1 | <p>(How could the Good Growth chapter be improved?)</p> <p>the traffic circulation is crazy, the cars need to drive a long distance because all main roads are one way. This creates long queue for unnecessary extension of routes.</p> | Noted. The SPD includes Principles in the Transport Chapter to deliver new and enhanced movement routes. These will be implemented in coordination with the local highways authorities to encourage use of public transport and active travel while supporting freight movement. |

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| 13 | 3 | Local Business 1 | <p>(How could the Transport Chapter be improved?)</p> <p>The connection with bus 260 is very bad, often very late and full of people because many courses . There are no car parks in the area and this is a huge problem for many workers. There are no stalls for motorbikes too and there are not bicycle shelters. The parking is a disaster and the connection for the rest of London is done only by central line and some bus like 260 that doesn't work well. the station needs some park spaces also to help the people from for commuting, finding a place where they can leave car and motorbike to take the underground</p> | <p>Noted. The 260 bus route does not run through Old Oak West. However, the SPD reflects the proposed potential bus network set out in the Local Plan. This will improve connectivity to, from and through the Old Oak West area including with Park Royal.</p> <p>Car parking standards are defined in the Local Plan Policy T4 to help promote a modal shift towards more sustainable modes.</p> <p>SPD Principle TP1 sets out guidance for delivering cycle infrastructure supplements cycle parking standards set out in the London Plan. This includes delivering public cycle parking at stations and cycle hire schemes.</p> <p>General commuter parking at stations is not supported in the Local Plan reflecting the high levels of public transport and active travel routes proposed that will enable people to easily reach stations.</p> |
| 14 | 1 | Local Resident 2 | <p>(What do you like about the Good Growth chapter?)</p> <p>Some places talk about improved permeability at the odpc boundary which will improve vibrancy and will make visiting on foot rather than car attractive for those living nearby.</p> | Noted. |

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| 14 | 2 | Local Resident 2 | <p>(How could the Good Growth chapter be improved?)</p> <p>A simple foot / bike crossig to over the railway to east acton at the top of Perry Avenue will add hundreds of walking visitors who will pop into shops rather than drive directly to the station. This would link with a footbridge to the east and would remove the blockage that the railway creates</p> | <p>No change proposed. The SPD reflects Local Plan policies which propose increased public transport access and improvements to active travel networks. The proposed link is outside of Old Oak West. Therefore, the SPD cannot provide guidance for this location.</p> |
| 14 | 3 | Local Resident 2 | <p>(What do you like about the Transport chapter?)</p> <p>Priority given to active travel and public transport, relevant to future residents and employees</p> | <p>Noted.</p> |
| 14 | 4 | Local Resident 2 | <p>(How could the Transport Chapter be improved?)</p> <p>Need to include provision for cycle parking, cycle hire bays, scooter hire bays, car share bays. Need more bridges over railways especially one to east acton</p> | <p>No change proposed. SPD Principle TP1 sets out guidance for delivering cycle infrastructure supplements cycle parking standards set out in the London Plan. This includes cycle hire schemes.</p> <p>Car parking standards are defined in the Local Plan Policy T4 to help promote a modal shift towards more sustainable modes. This includes car hire schemes.</p> <p>A number of bridges are proposed and shown in Figure 5.5 reflecting the Local Plan and Infrastructure Delivery Plan proposals.</p> |

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| 14 | 5 | Local Resident 2 | <p>(How could the Housing Chapter be improved?)</p> <p>You need to support on street facilities to park bikes and hire bikes/scooters and car sharing. There is not adequate provision for bike storage in agreements with developers.</p> | <p>No change proposed. SPD Principle TP1 sets out guidance for delivering cycle infrastructure supplements cycle parking standards set out in the London Plan. This includes cycle hire schemes and secure parking facilities within developments.</p> <p>Car parking standards are defined in the Local Plan Policy T4 to help promote a modal shift towards more sustainable modes. This includes car hire schemes.</p> |
| 15 | 1 | London Borough of Ealing | <p>I am writing on behalf of the London Borough of Ealing regarding the consultation on the draft Old Oak West Supplementary Planning Document (OOW SPD), which I understand closes on 27 December 2023.</p> <p>Ealing is supportive of much of the Plan particularly as this reflects the continuing joint work between Old Oak and Park Royal Development Corporation (OPDC) and the Boroughs, however there are several issues that require amendment in order to fully realise the areas potential to support local growth and placemaking benefits of the Old Oak West regeneration area.</p> <p>Comments on themes of particular interest are set out below and detailed notes on specific policies follow in tabular form at Appendix 1.</p> | Noted. |

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| 15 | 2 | London Borough of Ealing | <p>Successive London Plans and OPDC's own local plan have left unresolved the apportionment of industrial and waste needs between the Boroughs and OPDC. The plans as envisaged will result in the construction of housing on SIL land and concomitant constraints on the number and type of industrial uses that this land can accommodate.</p> <p>While the SPD builds upon OPDC's adopted plan, that plan did not include agreement for LB Ealing to accommodate any part of OPDC area's industrial needs. It is important that the SPD makes clear that these proposals will not generate net additional industrial needs and that any displacement of existing capacity has been addressed elsewhere in the OPDC local plan.</p> | <p>No change proposed. The previous Strategic Industrial Location (SIL) designation was removed upon adoption of OPDC's Local Plan. To inform and support this release, OPDC developed a number of supporting studies including the Industrial Land Review Addendum 2021 and Old Oak North Intensification Study 2021 which demonstrated how the loss of industrial floorspace would be accommodated in the remaining SIL within the OPDC area.</p> <p>As such, there was not an expectation for the host boroughs to accommodate any of this floorspace. The replacement SIL floorspace is accounted for in the Development Capacity Study and reflected in the Local Plan site allocations. The SPD does not amend these site allocations. Therefore, officers do not consider the proposed statement is required in the SPD.</p> <p>OPDC will continue to work positively with the host boroughs to help demonstrate how their London Plan apportionment targets would be met. OPDC and the 6 other WLWP LPAs are planning to work together to refresh the West London Waste Plan to ensure waste management is coordinated across the West London sub region.</p> |
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| 15 | 3 | London Borough of Ealing | <p>In addition, much of the area proposed for redevelopment constitutes the core and most diverse concentration of industrial businesses and employment in Park Royal and detail would be welcomed on the strategy for the retention and relocation of industrial businesses, the type and nature of industrial space that will be provided within Old Oak West, and the approach to colocation of industrial uses where any is proposed. In order to support the full employment ecosystem that has historically been possible within Park Royal it is important that a range of employment spaces and opportunities are enabled within the Old Oak West area. There is an opportunity to support key growth areas for the region and boost local employment sectors to build accessible local employment opportunities.</p> | <p>No change proposed. The development sites in Old Oak West largely comprise cleared HS2 construction sites. Smaller sites are home to a number of industrial uses. Their potential development will be managed by Local Plan Policy E2(b)(c) with regard to onsite reprovision of floorspace and supporting businesses to relocate. The SPD signposts to this policy on page 67.</p> <p>The type and nature of employment floorspace in Old Oak West will be governed by Local Plan policy SP5, OOW Place Policy and E2. In conjunction with this, Principle EP2 and the Industrial SPD provide guidance for industrial developments including when co-located as part of mixed use developments.</p> <p>Principles E2 and TCCP1 provide guidance for delivering and supporting a range of employment spaces within Old Oak West. They include specific references to supporting existing local sectors in paragraphs 8.10 and 9.12.</p> |
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| 15 | 4 | London Borough of Ealing | <p>Welcome the focus on enhancement of North Acton Station and environs in TP5 and reference to 'enabling development over and around the station and railway'. However, the proposed transport infrastructure and connectivity ambitions set out fall somewhat short in TP2 and TP1 for connected pedestrian and cycles connectivity north from North Acton Station to Park Royal and Old Oak. The town centre uses and public green space as indicated within the masterplan would best serve local residents, businesses and visitors to the area by providing an accessible connection to it from North Acton Station and square as set out in the OPDC Local Plan. An option to pursue improved north-south connectivity and new crossing TP20 (OPDC Local Plan) should remain on the table, and be enabled by an improved North Acton Station. Ealing would welcome continued work with TfL and HS2 engineering team to keep this (Acton Wells West to North Acton Bridge (TP20) under review.</p> <p>The public realm improvements along Victoria Road including potential for bridge widening would be necessary regardless of whether the new linkages come forward or not. Chase Road bridge improvements and potential widening for this connection north-south is also required to enable good connectivity into Park Royal.</p> | <p>Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge was intended to reflect updated outputs of supporting studies commissioned by OPDC, TfL and Ealing. It was not the intention to change the Local Plan policies relating to the delivery of the bridge. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals.</p> <p>Improvements to Victoria Road and Chase Road will continue to be supported reflecting OPDC's Infrastructure Delivery Plan.</p> |
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| 15 | 5 | London Borough of Ealing | Welcome the introduction of parks within the OOW masterplan in terms of green open space provision although we would note the importance of providing connected green spaces as a network of leisure, environment, and habitat opportunities, with the potential onward connection to Wormwood Scrubs TP22 (OPDC Local Plan). | No change proposed. Principles EUP1(e) and EUP2(f) provide guidance to improve connections to Wormwood Scrubs. |
| 15 | 6 | London Borough of Ealing | The continuation of connected town centres will be important to create a thriving place for clusters at North Acton, Acton Wells, Old Oak and Atlas Junction. Ground floor use, public realm and place-making strategy must be considered for each of the town centre areas identified. | Change proposed. The Local Plan and the Old Oak West SPD provide planning guidance for the town centres in Old Oak West. This relates to land uses, active frontages, public realm and open spaces. Further guidance for town centre public realm will also be provided in the forthcoming Public Realm and Green Infrastructure SPD. To support the establishment and functioning of the North Acton neighbourhood town centre and Old Oak major town centre, supporting text to Principle TCCP1 has been amended to make reference to working with stakeholders to support their vibrancy and vitality. |
| 15 | 7 | London Borough of Ealing | The inclusion of front-of-house facilities to complement adjacent SIL area and industrial uses is a welcome approach, this will need to be set out as a distinctive place ambition within both the town centre and employment policies. | No change proposed. This approach for providing space for Park Royal employment uses in Old Oak West is set out in Principle EP2(b)(ii). |

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| 15 | 8 | London Borough of Ealing | The Acton Wells area between North Acton and Old Oak Common Lane station (potential) has one of the highest concentrations of tall buildings over 15 storeys. This approach needs testing robustly with a cumulative impacts assessment together with the consented and built schemes at North Acton. | Noted. Figure 10.9 depicts illustrative building heights showing one way heights could be delivered to meet London Plan development capacities and are based on Local Plan policies. Future masterplanning work will be required to undertake cumulative impact assessments to ensure the delivery of a high quality neighbourhood in accordance with all relevant London Plan and Local Plan policies alongside other material considerations. |
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| 15 | 9 | London Borough of Ealing | <p>HS2 infrastructure plots and their integration within future place making appear to be unresolved. How they would relate to open spaces and streets need careful consideration at this stage and further masterplanning. A design code could be an effective tool in setting parameters for both this and the successful integration of town centre uses within the area, Ealing Council would welcome an opportunity to input.</p> | <p>No change proposed. The Local Plan and the Old Oak West SPD set out policies and guidance to enable an optimised, complementary, comprehensive, timely and integrated approach to the development of sites and infrastructure within Old Oak West. This ensures that the development of the HS2 construction sites will be optimised, developed comprehensively and well integrated with each other and the surrounding areas.</p> <p>The illustrative masterplan has been developed to illustrate one way in which the area could be developed. This considered how open spaces and streets relate to development sites and each other.</p> <p>Paragraph 10.6 sets out OPDC's commitment to deliver future Design Codes to shape Old Oak West. These have the potential to include more detail in relation to heights, massing, material palettes, design-details, character based and contemporary architecture styles, facade design and the design of open spaces. As a key stakeholder, LB Ealing will be fully involved in their development.</p> |
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| 15 | 10 | London Borough of Ealing | Delivering a high quality, connected movement network, wayfinding, walking and cycling requires provision of connected routes especially to serve transport nodes such as North Acton Station. Reinstate connection between Old Oak Street east-west link and North Acton Station and square. | <p>Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge was intended to reflect updated outputs of supporting studies. It was not the intention to change the Local Plan policies relating to the delivery of the bridge. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals.</p> <p>This includes the continuation of Old Oak Street to North Acton Station.</p> |
| 15 | 11 | London Borough of Ealing | Include TP20 within Table 5.1 to deliver pedestrian and cycles northern access to North Acton Station and public square. | <p>Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge was intended to reflect updated outputs of supporting studies commissioned by OPDC, TfL and Ealing. It was not the intention to change the Local Plan policies relating to the delivery of the bridge. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals.</p> <p>This includes reflecting Local Plan Policies in table 5.1 for the North Acton Station Bridge.</p> |
| 15 | 12 | London Borough of Ealing | Include improved pedestrian and cycle connections from Old Oak West to North Acton, with associated potential bridge widening improvements to Chase Road Bridge (TP27) and Victoria Road Bridge (TV12). | <p>Change proposed. Chase Road bridge (TP27) enhancements have been shown on figure 5.5 to ensure consistency with figure 12.3. Victoria Road bridge enhancements is shown on figure 5.5.</p> <p>Change proposed. Table 5.1 has been amended to include guidance for enhancing Chase Road Bridge in accordance with Local Plan Policy P7 and the Infrastructure Delivery Plan 2021.</p> |

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| 15 | 13 | London Borough of Ealing | Safeguard potential improved pedestrian and cycle connections to Wormwood Scrubs from Old Oak, Park Royal and North Acton via potential bridge links at TP22 and TP16. | No change proposed. TP22 in OPDC's Infrastructure Delivery Plan is located outside of Old Oak West and therefore cannot be shown in the SPD. TP16 is included in table 5.1 and shown on figure 5.5. |
| 15 | 14 | London Borough of Ealing | Within policy commentary and Table 6.1 iii. Small Open Spaces and Pocket Parks: note importance of connected green spaces as a network of leisure, environment and habitat opportunities to enhance their impact as a chain of small local open spaces. | No change proposed. Paragraph 6.6 notes how the network of open spaces and streets will ensure Old Oak West delivers an exemplary green infrastructure network that supports nature recovery, access to nature, high levels of urban greening and adapts to climate change to benefit wildlife and residents' health and well-being. |
| 15 | 15 | London Borough of Ealing | Design principles can be stipulated or required to manage successful integration of HS2 infrastructure and town centre uses within residential housing delivery. | No change proposed. Local Plan policy SP10 provides guidance to ensure development and infrastructure is appropriately integrated. Policy D5 provides guidance to ensure appropriate levels of residential amenity is provided including in relation to non-residential uses. |
| 15 | 16 | London Borough of Ealing | Support for retention and delivery of full range of spaces and employment opportunities (NB. Fig 8.4 description & key don't quite align) Include policy reference to building front of house opportunities for SIL industrial businesses within Old Oak neighbourhoods ie. Acton Wells. | Change proposed. The description of figure 8.4 (now figure 8.5) has been updated to include reference to related designations. |

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| 15 | 17 | London Borough of Ealing | <p>iv Acton Wells Tables 9.1, 9.2 and figures 9.3 and 9.4</p> <p>Although the character area highlighted in green for Acton Wells is indicative, it needs to take account of the ground floor and place making strategy for North Acton. Without a direct access point from North Acton station towards Acton Wells, there will be limited benefits to the current and planned North Acton community. Referring to Figure 9.4, suggest continue green to include North Acton Station & Square.</p> <p>Support the ambition to complement adjacent SIL area, front of house shops and industrial uses, but it will require reflecting in the EP2 Employment in setting out a distinctive place ambition. The illustrative plots could communicate such vision and suggest opportunities for larger anchor tenants or life science cluster around a new park or public space, for example, Fig 9.3 Acton Wells East appears residential led development with active food & beverage offer at ground floor. A workspace, commercial, employment led and institutional character could be included.</p> | <p>Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge was intended to reflect updated outputs of supporting studies commissioned by OPDC, TfL and Ealing. It was not the intention to change the Local Plan policies relating to the delivery of the bridge. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals.</p> <p>Local Plan Policies P7 and P7C1 remain in place to provide place based guidance for North Acton and North Acton town centre respectively.</p> <p>No change proposed. The green area relates to a character area of Old Oak major town centre. Continuing this to North Acton would result in an overlap with North Acton neighbourhood town centre and a change to the Local Plan Old Oak major town centre boundary which the SPD cannot amend.</p> <p>No change proposed. This approach for providing space for Park Royal employment uses in Old Oak West is set out in Principle EP2(b)(ii). Figure 9.3 reflects one way in which Acton Wells East could be developed and is consistent with Local Plan development site capacities. It is also consistent with the designation of Old Oak commercial centre which is focused around Old Oak Common Station. Reference to potential employment sectors for Old Oak West is set out in paragraph 8.10. This includes reference to life sciences.</p> |
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| 15 | 18 | London Borough of Ealing | Active & Positive frontages – DP1 and Figure 10.7, continue Old Oak Street beyond Victoria Road to maximise footfall and success for ground floor active frontages and businesses within Acton Wells. | <p>Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge was intended to reflect updated outputs of supporting studies. It was not the intention to change the Local Plan policies relating to the delivery of the bridge. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals.</p> <p>This includes the continuation of Old Oak Street to North Acton Station.</p> |
| 15 | 19 | London Borough of Ealing | Building Heights – DP2 and Figure 10.9, Acton Wells area -between North Acton and Old Oak Common Lane station (potential) cumulative impacts assessment required to test consecutive concentration of tall buildings indicated within this area. All tests must include surrounding consented and built schemes locally. | Noted. Figure 10.9 depicts illustrative building heights showing one way heights could be delivered to meet London Plan development capacities and are based on Local Plan policies. Future masterplanning work will be required to undertake cumulative impact assessments to ensure the delivery of a high quality neighbourhood in accordance with all relevant London Plan and Local Plan policies alongside other material considerations. |

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| 15 | 20 | London Borough of Ealing | Connected and complementary neighbourhoods, integration of North Acton with Acton Wells and Old Oak critical to deliver this fully (TP20, TP27, TV12). Also connection from Park Royal to Channel Gate TV20 desirable to achieve this ambition, noted in TA2. | <p>Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge (TP20) was intended to reflect updated outputs of supporting studies commissioned by OPDC, TfL and Ealing. It was not the intention to change the Local Plan policies relating to the delivery of the bridge.</p> <p>To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals. This includes reflecting Local Plan Policies in table 5.1 and relevant figures for the North Acton Station Bridge.</p> <p>Change proposed. Table 5.1 and figure 5.5 have been amended to include guidance for enhancing Chase Road Bridge in accordance with Local Plan Policy P7 and the Infrastructure Delivery Plan 2021.</p> <p>No change proposed. Enhancements to bridges referenced in TV12 are included in table 5.1 and figures.</p> <p>No change proposed. Potential delivery of a connection from Park Royal to Channel Gate is included in the SPD.</p> |
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| 15 | 21 | London Borough of Ealing | <p>North Acton and Acton Wells are considered a continuous complementary, high-density, mixed-use neighbourhood, although this is not clearly shown or articulated in P7 and Figure 11.10 currently. Key concerns include: connectivity to Old Oak town centre; connectivity to Old Oak Common Station; North Acton Station access; stronger emphasis on Old Oak South Local Park as a linear park and continuous open space; maximise benefits of Old Oak Street with continuation of new walking and cycling routes, and active frontages; innovative integration of HS2 infrastructure; disjointed active frontage and active travel route running along railway cutting north.</p> <p>Ealing welcome early engagement to address concerns outlined.</p> | <p>No change proposed. The Local Plan identifies that North Acton and Acton Wells are a single Place. Policy P7 and Local Plan figure 4.21 confirm this and continue to provide guidance to deliver the Vision for North Acton and Acton Wells.</p> <p>Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge (TP20) was intended to reflect updated outputs of supporting studies commissioned by OPDC, TfL and Ealing. It was not the intention to change the Local Plan policies relating to the delivery of the bridge. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals.</p> <p>This will result in a direct access from North Acton to Old Oak major town centre; continued access to North Acton Station and Old Oak Common Station via Old Oak Street.</p> <p>No change proposed. The SPD illustrates HS2's proposals for Old Oak South Local Park in accordance with the Schedule 17 application permission. The Local Park is proposed to be delivered as a continuous public open space.</p> <p>No change proposed. SPD Principles TP1 and TP2 provide guidance to ensure Old Oak Street is delivered as a continuous walking and cycling route. SPD Principle DP1 and figure 10.7 provide detailed guidance to deliver active frontages across Old Oak West include along Old Oak Street and along Old Oak Common Lane as part</p> |
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| | | | | <p>of the Old Oak major town centre.</p> <p>No change proposed. Local Plan policy SP10 provides guidance to ensure development and infrastructure is appropriately integrated.</p> |
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| 15 | 22 | London Borough of Ealing | Approach to North Acton station from Old Oak Street needs reinstating as the potential project TP20 (subject to funding, feasibility) | <p>Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge (TP20) was intended to reflect updated outputs of supporting studies commissioned by OPDC, TfL and Ealing. It was not the intention to change the Local Plan policies relating to the delivery of the bridge. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals.</p> <p>This includes the continuation of Old Oak Street to North Acton Station.</p> |
| 15 | 23 | London Borough of Ealing | Development capacity & phasing – Table 12.1 and Figure 12.4 - Sites set for 0-5 and 6-10 year delivery period require further details in terms of place making and how they could contribute towards the early critical infrastructure or enable meanwhile uses on adjacent plots. | <p>No change proposed. Table 12.1 and Figure 12.4 are accompanied by Local Plan policies and SPD guidance to deliver comprehensive and coordinated development across Old Oak West. This includes identifying locations of infrastructure that will in part be funded by planning obligations and Community Infrastructure Levy monies.</p> <p>SPD principle TCCP3 provides guidance for supporting and delivering meanwhile and early activation uses across Old Oak West.</p> |

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| 15 | 24 | London Borough of Ealing | <p>A portfolio of sites approach is welcomed by Ealing but the SPD could also set out a clear position around the need for land assembly and OPDC's role in delivering or enabling comprehensive development within the SPD area. Ealing Council would be keen to work with OPDC in progressing the next steps set out in 12.22 and ensure the land assembly, regeneration, relocation strategy are fully joined up and opportunities for housing delivery.</p> | <p>No change proposed. SPD Principle DIP1 provides guidance to ensure proposals enable an optimised, complementary, comprehensive, timely and integrated approach to the development of sites and infrastructure within Old Oak West. Part (c) states that where there is a compelling case in the public interest, in accordance with Local Plan Policy DI4(b), If necessary, OPDC can use compulsory purchase powers to facilitate land assembly and the acquisition of all necessary rights to carry out the timely, coordinated and comprehensive regeneration of the Old Oak West area and delivery of infrastructure.</p> <p>OPDC looks forward to continued joint working with LB Ealing in delivering the regeneration of Old Oak West.</p> |
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| 15 | 25 | London Borough of Ealing | Acton Wells East area or around Victoria Road would lack a large open space similar to the other two local parks proposed i.e. Channel Gate and Old Oak South local parks. It is a missed opportunity and perhaps necessary to counter balance the level of density and heights proposed near North Acton. In current arrangement the connectivity between smaller green spaces in this area is important. | No change proposed. The illustrative masterplan is in accordance with Local Plan policy EU1(c) which requires that a minimum of 30% of the developable area is provided as publicly accessible open space. It also reflects the locations of the two Local Parks identified in the Local Plan which the SPD must be consistent with. These two parks will be in walking distance of North Acton and Acton Wells. Alongside these parks there will be a network of smaller open spaces to ensure that people have access to a range of high quality open spaces. A new public open space has recently been permitted in 1 Portal Way and planning obligations funding are being used to improve existing open spaces in North Acton. This will compliment nearby existing open spaces that will have access improved through public realm enhancements. These spaces include North Acton Playing Fields, Wesley Playing Fields and Wormwood Scrubs. |
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| 15 | 26 | London Borough of Ealing | Continuation of Old Oak Street west beyond Victoria Road would benefit increased footfall and access to non-residential active uses within Acton Wells. Opportunities for improved integration of HS2 infrastructure within lower levels of masterplan. | <p>Change proposed. The inclusion of updated infrastructure information for the North Acton Station Bridge (TP20) was intended to reflect updated outputs of supporting studies commissioned by OPDC, TfL and Ealing. It was not the intention to change the Local Plan policies relating to the delivery of the bridge. To ensure consistency with the Local Plan, the SPD has reverted to Local Plan proposals.</p> <p>This includes the continuation of Old Oak Street to North Acton Station.</p> <p>No change proposed. Local Plan policy SP10 provides guidance to ensure development and infrastructure is appropriately integrated.</p> |
| 15 | 27 | London Borough of Ealing | Above ground floor uses - all are residential (except near the Oak Oak HS2 station) which is understandable due to values and commercial drivers but suggest allowing flexibility for other non-residential uses commercial, leisure, hotel etc. | No change proposed. The illustrative masterplan illustrates one way in which Old Oak West could be developed. It is consistent with the Local Plan development capacities which focuses the Old Oak commercial centre around Old Oak Common Station. |

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| 16 | 1 | Andy Slaughter MP | <p>To whom it may concern</p> <p>RE: Old Oak West SPD consultation</p> <p>I am writing to respond to the Old Oak West SPD consultation. My sincere apologies this submission is late, although I would be grateful if this could be considered ahead of the review of consultation responses.</p> <p>Most of the Old Oak West area is in the neighbouring Ealing Central & Acton constituency, although there is a considerable part in the Hammersmith constituency – including the Old Oak Common station site - which I represent. I attended a presentation from the OPDC on the SPD and wanted to share my thoughts.</p> | Noted. |
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| 16 | 2 | Andy Slaughter MP | <p>Firstly, I understand this Supplementary Planning Document can't alter the Local Plan, so its function seems to be reclassifying an area without any geographical coherence by giving it a name. Essentially, Old Oak West is a construct that doesn't really exist, it is half a dozen disconnected sites whose common feature is just that they have been taken over by HS2 as part of their build phase.</p> | <p>No change proposed. OPDC considers that the SPD content accords with the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>The Old Oak West area includes a series of large public sector owned development sites that are currently in use as HS2 construction sites for the new Old Oak Common station. There are also several privately owned sites along these routes and next to the public sector owned sites. The sites are connected by key north to south movement routes that connect to existing rail stations, town centres and the forthcoming Old Oak Common Station. The sites are located in six different 'Places' in the Local Plan which are subject to different Place policies.</p> <p>In OPDC's Local Plan, the privately and publicly owned sites are identified for comprehensive mixed use development forming the core of a new and regenerated urban community. In total, the sites are identified to deliver a minimum of 6,905 new homes and a minimum of 268,540 square metres of non-residential floorspace resulting in an indicative 22,365 jobs. Alongside these homes and non-residential floorspace, the sites will also deliver new publicly accessible open spaces, green infrastructure, new and improved healthy streets and social infrastructure</p> <p>The function of the Old Oak West SPD is to amalgamate the relevant place policies in the Local Plan to provide clearer spatial planning guidance for Old Oak West and to support a</p> |
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| | | | | <p>comprehensive and coordinated approach to development in Old Oak West. Local Plan policy SP10 requires that proposals take an integrated and comprehensive approach to the design, construction and management of proposed development. OPDC considers that a comprehensive approach to developing Old Oak West will deliver a variety of benefits. This includes better placemaking to foster sustainable and complementary neighbourhoods, coordinating the delivery of infrastructure to connect the area and support existing and future residents; and potentially delivering more homes and space for jobs than set out in our Development Capacity Study Update (2021) through optimised and accelerated development capacities.</p> <p>As well as supporting comprehensive and coordinated development, this SPD also provides additional supplementary planning guidance for publicly accessible open spaces, the Old Oak major town centre, local character and infrastructure that is shaped by engagement with local communities that has been undertaken during 2023.</p> |
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| 16 | 3 | Andy Slaughter MP | <p>In addition, there is no masterplan or timetable for development (especially compared to other local sites such as ECDC or Kensal Canalside). Presumably the sites will become available when released by HS2 any time from 2030 to 2040, but this is unclear in the SPD.</p> | <p>No change proposed. An illustrative masterplan is appended to the SPD. The figures in the SPD are based on the illustrative masterplan. The illustrative masterplan reflects one way in which Old Oak West could be developed.</p> <p>The SPD must be consistent with the Local Plan. Figure 12.4 supporting Principle DIP2 provides phasing information as per the Local Plan. These reflect the HS2 phasing at time of writing of the Local Plan.</p> <p>Paragraph 12.22 sets out next steps for delivering Old Oak West. This states that OPDC:</p> <ul style="list-style-type: none"> - working collaboratively with both Department for Transport, Network Rail, High Speed 2, Department for Levelling Up, Housing and Communities and Homes England to enable the delivery of comprehensive regeneration and optimising the public benefits achieved; - is progressing masterplanning activities and the delivery of Old Oak West; - is actively engaging with major stakeholders within Old Oak West to support the delivery of Old Oak West; - is preparing a Regeneration Strategy, Land Assembly Strategy and a Relocation Strategy to sit alongside this SPD which will set out further details of proposals for the delivery of development in Old Oak West; and - secured substantial enabling funding from both the GLA and DLUHC to support plans for comprehensive development in Old Oak West, |
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| | | | | including site acquisitions and sustainable energy and strategic infrastructure. |
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| 16 | 4 | Andy Slaughter MP | <p>In the SPD, there is no town planning – heights, densities, open space, amenities and services designed in a way to create a new townscape are all absent. There is also no evidence of input from the boroughs to give the site some coherency.</p> | <p>No change proposed. The SPD sets out a range of principles to enable an optimised, complementary, comprehensive, timely and integrated approach to be delivered in delivering a diverse and sustainable new mixed-use part of London. These are consistent with Local Plan policies and comprise:</p> <ul style="list-style-type: none"> DP2 - Building heights EUP1 - Urban greening, green streets and biodiversity EUP2 - Open space location and design TP1 - Movement network, wayfinding, walking and cycling TP3 - Buses TP5 - Stations and station public realm TCCP2 - Social infrastructure and sport facilities TCCP3 - Meanwhile uses and early activation DIP3 - Infrastructure delivery and phasing <p>Minimum development capacities of sites are consistent with the quantum identified in the Local Plan. Local Plan paragraph 3.78 and the Local Plan Glossary identify an indicative density range of 300 to 600 units per hectare. However, the London Plan and Local Plan do not provide density-based policies. Therefore, the SPD cannot provide density-based supplementary guidance. In accordance with London Plan policies a design-led approach will be required to optimise site capacity. This process will be informed by development plan policies and material considerations.</p> <p>The host boroughs were engaged during the</p> |
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| | | | | <p>development of the SPD through updates provided at monthly Duty to Cooperate meetings. Regular updates have also taken place with the host boroughs at a senior level. A summary of host borough planning guidance is set out in paragraph 2.11 to ensure SPD guidance aligns and supports with borough proposals.</p> |
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| 16 | 5 | Andy Slaughter MP | The OOCL station is shown as 'possible' but its inclusion is not linked to the development but a separate feasibility by TfL. | <p>Noted. The potential Old Oak Common Lane Station is supported in the SPD and the Local Plan. Policy P7C2 provides specific guidance for development adjacent to the station. This includes safeguarding land for the delivery of West London Orbital services. SPD figure 11.14 reflects this guidance in relation to the illustrative masterplan.</p> <p>OPDC is continuing to work with stakeholders including the host boroughs and TfL in processing feasibility work to inform the potential delivery of the station.</p> |
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| 16 | 6 | Andy Slaughter MP | Furthermore, the SPD does not consider the effect of the changes to HS2 – axing phase 2 and possibly the Euston link (pending private funding) – are not considered. | No change proposed. The contents the SPD are not impacted by the recent HS2 announcements and we have been reassured by HS2 that the delivery of Old Oak Common station is on course, which will support the phased comprehensive delivery of Old Oak West. Old Oak Common station opening as a temporary terminus has been the working assumption for a few years now and the Government’s announcement in autumn 2023 confirms this. The change to the HS2 delivery programme does not impact the planned opening of Old Oak Common Station and trains will continue on from Birmingham but not at High Speed. Old Oak Common Station’s role as a temporary terminus strengthens the need for local regeneration, since it will be the sole interchange for passengers who would otherwise have continued into Euston. At this stage, and based on all advice given, we are not expecting significant revisions and, in any case, the SPD is sufficiently flexible to adapt to changing circumstances. That said, should potential revisions be required, they would be made within a future Local Plan review as the SPD cannot revise content within the Local Plan. |
| 16 | 7 | Andy Slaughter MP | My apologies again for the delay in submitting this response, although I would be grateful for consideration. | Noted. |