

Old Oak and Park Royal Local Plan examination

Agenda Session 7: Wormwood Scrubs

Participants: Inspector, Corporation, The Friends of Wormwood Scrubs, Wormwood Scrubs Charitable Trust, HGH (Queens Park Rangers Football Club and Stadium Capital Developments), Grand Union Alliance,

Summary of issues

- 1 Whether the effects on Wormwood Scrubs of the policies and proposals in the Plan would be justified and consistent with national policy (derived from the twelfth Key Issue of table 5 of Key document 5 identified at Regulation 19(1) stage and representations 2/P1/12, and 2/P8/7 from Wormwood Scrubs Charitable Trust amongst others. At Regulation 18 stage a number of organisations made representations on this point).
- 2 The following text summarises points made at both Representation 19(1) and 19(2) stages.

Improved access

- 3 Some representations support reference to enhanced access to Wormwood Scrubs for all Londoners. New routes into and through Wormwood Scrubs should be identified. Wormwood Scrubs Park is a valuable London asset, but is isolated from much of the local population and is in a poor condition. A wider landscape plan is needed to improve the space and its connections to surround areas and new development. Welcomes connections from Old Oak Common Station and Old Oak South now exiting onto Wormwood Scrubs Street instead of Wormwood Scrubs.
- 4 Others call for evidence to be provided for the need for any routes and enhancements to the Scrubs. Some claim that the ideas about access from the built-up areas into the Wormwood Scrubs are not clearly described in the Local Plan. There are concerns about ecological effects on Wormwood Scrubs if access is not suitably controlled. There is opposition to the narrative that vegetation restricts walking and cycling access. Vegetation and woodland should not be lost to allow unneeded additional access. There is conflict between providing access through Wormwood Scrubs and keeping the Scrubs as an untamed place. Policy should clearly state that the embankment along the northern edge of the Scrubs should be retained. Location of proposed cycle route along Wormwood Scrubs Street is not clear - if located within Scrubs then it should be opposed. Character of the Scrubs should be retained in the face of increased access,

greater numbers of users resulting from 3 new access points, light pollution and building heights. Playing fields on Wormwood Scrubs should be protected. Walking and cycling routes should not dissect playing fields.

- 5 Some disagree with the need for more than the green bridge connection between Old Oak and Wormwood Scrubs, and don't see the need for a cycling route to the Scrubs from Old Oak. Continued concerns regarding access from Old Oak Common Station to Wormwood Scrubs. Passengers of train services will not require access to Wormwood Scrubs from the station. Access should be moved to the east/centre of the site. The description of the bridge from Old Oak South to Wormwood Scrubs has been changed from Green Bridge to Bridge. Location of this bridge is important. The plan does not justify its location. Policies within the Local Plan identify that delivery of Wormwood Scrubs Street will be after the plan period and after the opening of Old Oak Common Station. The need for a long term connection from the station to Wormwood Scrubs Street is not justified. Figures show access points to the north of Wormwood Scrubs Street. Further feasibility work is required to support the entrance to Wormwood Scrubs from the bridge. An underpass connecting the station to the Scrubs is not suitable. The Local Plan is unclear if such a connection is envisaged during the lifetime of the IEP depot. Greater clarity required on whether development in OON should deliver or facilitate the walking/cycling bridge to Wormwood Scrubs.
- 6 Some argue that access from Old Oak Common Station to Wormwood Scrubs should not be provided at all or that new walking and cycling routes should not be introduced across the Scrubs arguing that communities on different sides of the Scrubs should not be connected by new routes through the Scrubs. P1 should clarify that direct access to Wormwood Scrubs will not be provided. Technology could assist people viewing nature on Wormwood Scrubs. Figure 4.27 should not show any new access onto Wormwood Scrubs.
- 7 Segregated two way cycle lane along Scrubs Lane should not encroach upon the Scrubs. If widened footpath requires loss of publicly accessible open space or vegetation further detailed work will be required. Figure 4.34 should be clear where footpath improvements will be located. No new access onto the Scrubs should be shown.
- 8 Local Plan doesn't resolve the physical connection from Scrubs Lane to North Pole West. Later future bus network (2041) should be referenced.

Views

- 9 Views from the Wormwood Scrubs should be given appropriate protection, and the Plan should clearly restrict building heights along the northern boundary of the scrubs.
- 10 Tall buildings have no place in West London and will blight Wormwood Scrubs.
- 11 Maps should show a buffer zone for lower building heights of 6-8 storeys facing on to Wormwood Scrubs.

Management and improvement

- 12 P12 policy vision should recognise that the Scrubs is a Metropolitan Open Space. A land use policy within P12 should reflect the sensitivity of habitat and the needs identified in the GIOSSMP and other LBHF strategy documents.
- 13 Wormwood Scrubs is not a strategic site and would benefit from neighbourhood plan guidance. Need local residents input into enhancements to the Scrubs. Removal of the Scrubs from the Neighbourhood Area has curtailed this.
- 14 Consultation with Friends of the Wormwood Scrubs and agreement of the Wormwood Scrubs Charitable Trust and Hammersmith and Fulham Council are essential for any proposals for the Scrubs. The Trust welcomes the statement that the OPDC will agree any proposals with the Wormwood Scrubs Charitable Trust.
- 15 The role of the Wormwood Scrubs Trust in the management of the Scrubs requires greater emphasis, and their role in permitting any future enhancement works on the Scrubs reiterated. Enhancements need to be accompanied by more effective management. Should reference that Wormwood Scrubs MOL derives its protection from an Act but that ownership and management are through LBHF.
- 16 Welcome Chairman's continued support for protecting Wormwood Scrubs, but don't feel the Plan itself properly recognises it's range of habitats and land uses. Policy a) in EU1 which states development in WWS will only be permitted in very special circumstances is inconsistent with other policies in the local plan, e.g.: P12c) which refers to the enhancement of Wormwood Scrubs by providing play space and improving functionality and accessibility in 3.88
- 17 Biodiversity in the north of Wormwood Scrubs should be protected. The sections of Wormwood Scrubs along the west, north and eastern boundaries are particularly valuable habitats for wildlife and woodland and require special protection.

- 18 A tree and shrub community nursery/facility should be established on Wormwood Scrubs. A wildlife/nature water feature could increase biodiversity value and help address flooding. OPDC should work with wildlife groups to ascertain if a wildlife/nature reserve feature such as a pond or marshland could be delivered on the Scrubs. This could include wetlands which could support wilder flood alleviation issues.
- 19 Wormwood Scrubs should not be used as justification for on-site open space and it should not be used as a construction site.
- 20 Only drainage of the pitches should be considered and Wormwood Scrubs should not be impacted by drainage measures within the development area. Add to policy EU3 "ensure sustainable drainage over the whole development area does not adversely affect Wormwood Scrubs, and takes measure to avoid flooding". SUDS is just one way the Scrubs can contribute to Climate change resilience. Its strategic value should be in dealing with on-site flooding issues not receiving run off from other sites.
- 21 Policies for addressing flooding are not justified by evidence base
- 22 A Heritage and Character policy should be should be included within P12 to reflect the heritage value of the Scrubs. Wormwood Scrubs is not designated as a conservation area or an area of local character. Therefore heritage guidance cannot be applied to Wormwood Scrubs. OPDC Heritage Strategy recommends further work to protect the historic core of Wormwood Scrubs. References to supporting studies in relation to Wormwood Scrubs are too simplistic. Supporting text should clarify that the Green Infrastructure and Open Space Strategy Management Plan for Wormwood Scrubs will further consider the heritage value of the Scrubs.

The Corporation's response

Improved access

The Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and security and new play equipment. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-

being. The Wormwood Scrubs Act (1879) states that Wormwood Scrubs should be held "upon trust for the perpetual use thereof of the inhabitants of the metropolis for exercise and recreation".

The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. Providing access to the Scrubs for the new residents, employees and visitors within Old Oak accords with the Act; however, any access would need to be sensitively designed to minimise its impact on the ecological value of the Scrubs and would need full agreement from the Wormwood Scrubs Charitable Trust. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with Policy P12 which requires any proposals to be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 in the protection of Metropolitan Open Land. The supporting text sets out OPDC's commitment to agreeing any proposals with the Wormwood Scrubs Charitable Trust and Hammersmith and Fulham Council and consulting with the Friends of Wormwood Scrubs.

Policies related to Wormwood Scrubs are provided in P12. Policy P12 vision identifies Wormwood Scrubs as Metropolitan Open Land. Policies P12 and EU1 provide guidance to continue to protect Wormwood Scrubs as Metropolitan Open Land and to conserve and enhance the Scrubs in its role as a Metropolitan Park. Policies relating to managing the natural environment are provided in Policy SP8 and in the Environment and Utilities Chapter. Policies SP8 and EU2 seek to deliver a net gain in biodiversity including measurably conserving and enhancing Sites of Importance for Nature Conservation (SINC). Wormwood Scrubs and the embankment benefit from a number of SINC designations. Policies SP8, EU2, P12 and P1 provide guidance to ensure new access points and facilities conserve and enhance biodiversity assets. In light of this guidance to conserve and enhance biodiversity assets, the roles of Wormwood Scrubs as Metropolitan Open Land and a Metropolitan Park, OPDC considers that Policy P12 provides appropriate guidance to ensure Wormwood Scrubs continues to be cherished public open space. Any potential use of Wormwood Scrubs as part of a strategic water management role would be carried out in accordance with policies P12, EU1, EU2 and EU3 to ensure the Scrubs continue to be a cherished public open space, important ecological asset and a protected area of Metropolitan Open Land.

EU1 seeks to deliver a minimum of 30% of the developable area outside of SIL as publicly accessible open space. This does not include Wormwood Scrubs. Wormwood Scrubs would be protected from use as a construction site through the implementation of policies P12, EU1 and EU2.

Policy D7 provides guidance for managing the impact of development proposals on views from Wormwood Scrubs. Local Plan policies SP9, D5,

P1 and P1C1 alongside London Plan policy 7.7, national guidance provides guidance for the location of building heights along the southern edge of Old Oak South. Policy P1 identifies that tall buildings should be located around Old Oak Common Station with buildings heights appropriately responding to Wormwood Scrubs as Metropolitan Open Land.

Policy P1 sets out that development should contribute to and/or enable the delivery of new and improved walking and cycling routes to Wormwood Scrubs, including within the surrounds of Old Oak Common Station. Policy P1C1 also seeks to deliver walking and cycling routes from the station to Wormwood Scrubs Street. The Local Plan does not set out the form of these routes from, or adjacent to, the station. Further work will be required in the design of Old Oak Common Station considering the long-term relocation of the Intercity Express Programme Depot to inform the form of connection from the station to Wormwood Scrubs. This work will inform future versions of the Local Plan.

Policy P12 identifies the locations of new and improved access points into Wormwood Scrubs. The figure sets out the indicative location of new and improved access points to Wormwood Scrubs. This level of detail is appropriate for the role of the Local Plan. The plan indicates a longer term access south from Old Oak station to Wormwood Scrubs to cater for demand from the south to access the station and the new amenities being delivered in Old Oak.

Further work will be required in the design of Old Oak Common Station considering the long-term relocation of the Intercity Express Programme Depot to inform the form of connection from the station to Wormwood Scrubs. This work will inform future versions of the Local Plan. To reflect this, OPDC has amended the supporting text.

Wormwood Scrubs Street is located in Old Oak South outside of the geographic scope of the Old Oak North Development Framework Principles. Wormwood Scrubs Street is currently identified to be delivered after the plan period. Figure 3.10 shows the key route of Wormwood Scrubs Street towards Kensal Canalside as a potential connection reflecting the level of work undertaken in defining its delivery. Following the completion of any future work demonstrating this connection, future versions of the Local Plan will reflect this accordingly. Although Wormwood Scrubs Street will be delivered after the plan period, OPDC considers the existing title to be appropriate. In recognition of the long-term delivery of this street, identifying it for walking and cycling only at this point in time is not considered to be appropriate.

The Local Plan appendix confirms that all figures in the Local Plan should be treated as indicative reflecting the role of the Local Plan. Place policy figures are identified as diagrams in the introduction to the places chapter. OPDC considers that this level of detail within the figures are appropriate to the role of the Local Plan. A future Old Oak North and Scrubs Lane Supplementary Planning Document (SPD) will be developed in due course. This will provide further proposed detailed guidance for the location and design of the cycle and pedestrian route along the west of

Scrubs Lane. A draft of the Scrubs Lane SPD will be subject to public consultation provide opportunities to comment on and shape these detailed proposals. The Scrubs Lane Development Framework Principles document provides further detail for the footpath.

Views

High quality tall buildings at appropriate locations will be a component element of the built character and environment of the OPDC area. This is set out in OPDC's Tall Building Statement. The Draft New London Plan Policy D8 also recognises that Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. Policy D5 sets out guidance for delivering high quality tall buildings with SP9 and place policies providing guidance for their locations. Policy P12 sets out guidance for managing impacts on Wormwood Scrubs.

Policy SP9 identifies Wormwood Scrubs, being an open space, as a sensitive location. The Local Plan figure 3.15 map shows sensitive locations and areas where tall buildings are "an appropriate form of development in principle". SP9 requires development to respond appropriately to these sensitive locations. This is considered to be appropriate for the context of Wormwood Scrubs given its functions and its proximity to Old Oak Common Station. This also recognises that development along the north of Wormwood Scrubs is currently envisaged to be delivered beyond the Local Plan period (2018-2038).

Management and improvement

OPDC's Statement of Community Involvement sets out OPDC's commitment to deliver high quality community consultation and engagement. This would include any proposals to enhance Wormwood Scrubs and any further relevant planning guidance.

Policy P12 provides guidance to secure resources to deliver effective management. Use of these resources will be agreed with the Wormwood Scrubs Charitable Trust and the London Borough of Hammersmith and Fulham. Reference to the need for the WSCT and LBHF to agree any proposals is made in Policy P12. P12 identifies that any proposals affecting Wormwood Scrubs will need to be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land. Policy P12 recognises that sensitive new walking and cycling connections to Wormwood Scrubs are required to improve access from surrounding communities, and ensure that it fulfils its function as a Metropolitan Park and it's requirements under the Act. The Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham are preparing a management plan for Wormwood Scrubs which will address deficiencies in access to the Scrubs, and inform a wider series of ecological and landscape enhancements.

Policy P12 provides guidance to ensure the biodiversity value of Wormwood Scrubs is preserved and enhanced. The supporting text also recognises that Wormwood Scrubs' character as a publicly accessible open space that is more wild than tamed, will inform how the regeneration of Old Oak relates to Wormwood Scrubs. The Local Plan sets out and defines the habitats and uses of the Scrubs as appropriate for a strategic planning document. The Policies Map, which supports the Local Plan, provides detailed locations of relevant habitats. The urban greening corridors identified in figure 3.13 reflect new and existing routes through urban spaces and the need to incorporate urban greening measures within them.

Playing fields are a component element of Wormwood Scrubs. As such they benefit from policies P12, SP8 and EU2 to conserve and enhance publicly accessible open space. As social infrastructure, these are also protected by Policy TCC4.

OPDC's Integrated Water Management Strategy identifies that there is a tendency for surface water on Wormwood Scrubs which needs to be addressed as part of proposals. The use of sustainable drainage will have to be designed so that it does not adversely impact on the area as a whole and MOL is already protected in Policy EU1 and EU2. The potential for delivering strategic SuDS on to Wormwood Scrubs as sensitive interventions will only be necessary if identified to be required and agreed by the Trust.

Wormwood Scrubs does not benefit from any heritage designations. OPDC's Heritage Strategy identifies Wormwood Scrubs as a heritage theme, and this is reflected in Policy D8 (Heritage). Policy D8 requires proposals to demonstrate how they respond to the OPDC heritage themes. This would apply to Wormwood Scrubs regardless of it not having a formal heritage designation. No change proposed. Policy D8 provides guidance for the whole OPDC area. Specific references to the Green Infrastructure and Open Space Strategy Management Plan are being provided in supporting text to Policy P12.

OPDC does not consider that policy EU1, which provides the strongest protection for MOL and conforms with the London Plan, conflicts with the enhancement of Wormwood Scrubs. The two policies are not mutually exclusive. The Local plan does not seek to deliver new development on Wormwood Scrubs given the protections that are in place, so proposed land uses are not considered appropriate within the policy. Future uses of the Scrubs will be informed by relevant evidence base studies, including the proposed Management Plan.

Matters for discussion

- 1)** Have I correctly understood the thrust of the representations?
- 2)** The volume and range of representations seems to cover more than is actually included within the plan as a proposal. Can I be made clear about exactly what changes to the plan representors are seeking?

- 3)** Should there be enhanced access into Wormwood Scrubs?
- 4)** Are views from the Scrubs given adequate protection?
- 5)** Is the relationship between the Scrubs and tall buildings justified?
- 6)** Are enhancements to the Scrubs needed and /or justified?

P. W. Clark

Inspector

12.02.19