

# Old Oak and Park Royal Local Plan examination

Agenda 1 for Modifications Hearings: PTALs

10am Tuesday 11<sup>th</sup> January 2022

**Participants:** Inspector, Corporation, Old Oak Neighbourhood Forum & St Quintin and Woodlands Neighbourhood forum.

Representations from: Amanda Souter, Anne Robinson, Belinda Shand, Carmel McLoughlin, Catherine Sookha, Chris Peyton, Cllr Pat Healy, Eric Alan Leach, Faye Thomas, Sir Stephen Waley-Cohen (Friends of Wormwood Scrubs), Gennaro Picardi, Melanie Whitlock (Hammersmith Society), Heun Wee Koo and Yu-Lan Hsu, Mark Walker (TITRA), Jane Greenhalgh, Jason Salkey, Jennie Marshall, Jenny Cogan, Jeremy Aspinall, Kim Evans, Linda Hartley, David Gawthorpe (LBH&F), Maren Strandevold, Marianne MacDonald, Mark Packwood, Mark Walker, Martin Murphy, Martina Margetts, Nicholas McNulty, Nicky Davies-Williams, Nigel Brockman, Nye Jones, Oliver Carricart, Peter Chapman, Rose V Parr, Rosemary Cleary, Ruth Hillary, Sandra O’Sullivan, Sheela Selvajothy, Sophie Neville, Henry Peterson (St Quintin and Woodlands NF & OONF), Suzie Page, Thomas Newman, Tom Dark, Wells House Road RA, John Haston (West Twyford RA)

## Summary of issues

- 1 The plan is predicated on capitalising on the transformative effects of public transport infrastructure; principally the HS2 and Elizabeth Line station at Old Oak but also including investment in enhanced bus services (particularly in early years). The corporation’s responses to representations make frequent references to the improvement in PTAL scores shown in figures 7.10 and 7.11 as a justification for the high density mixed use development proposed but the Modifications remove some proposed transport infrastructure proposals.
- 2 Paragraph 4.6 of the Industrial Land Review Addendum explains that candidates for release from SIL (and allocation as housing) focussed on areas that have the greatest access to sustainable transport modes. Table 3 of that document includes proximity to improved PTALs as a selection criterion.
- 3 Paragraph 3.12 of the Tall Buildings Statement Update records that it is based on PTAL levels of 4+.
- 4 A number of representations to the Modifications argue that the proposed additional site allocations would not be well served by public transport.
- 5 In this session I want to explore the degree to which changes in PTAL (Public Transport Accessibility Level) scores justify the Modifications to the Plan.

**Matters for discussion**

- 6 The Bus Strategy Update document records (on page 9) that between now and 2027, new developments focussed around Scrubs Lane, Old Oak Lane, Old Oak Common Lane, North Acton and Park Royal (Centre and West) will add up to 1,860 trips in the peak hours; the equivalent of 18 double decker buses. The Strategy Update records that up to 2038, further development at Old Park Royal, Park Royal West, Channel Gate and Old Oak South will add an additional 3,000 peak hour trips equivalent to 40 double decker buses and that by 2048, sites at Old Oak South and North make up most of the remaining demand, with further sites at Scrubs Lane and Willesden Junction to come forward by then. This will add a further 2,100 peak hour trips, equivalent to 28 double deck buses. Do these calculations of trip and bus generation allow for the Corporation's car-free and car-reduced policies?
- 7 To what extent do the roads which are used for the principal bus routes have the capacity to accommodate the increased bus flows?
- 8 How do the incremental changes in bus services set out in the Bus Strategy Update and the other public transport represented by the opening of the HS2 and Elizabeth line stations and the potential Old Oak Common Lane station influence the PTAL levels over time? (I need to see a series of PTAL maps showing how the various proposed interventions get us from figure 7.10 to figure 7.11, and how these changes relate to the phasing of development as Modified and to the areas identified as suitable for tall buildings as Modified).
- 9 Henry Peterson's representation obo OONF & STQNF makes the points that North Acton and Channel Gate sites are both 1km or more from Old Oak HS2 station, that walking distances to Old Oak Common station from Scrubs Lane will be at or above the 960m outer limit used by TfL for PTAL assessments and that Willesden Junction is 750m from the centre of the Channel Gate site and 950m from the Atlas Road site. Is this correct?
- 10 In the view of OONF/StQW 2021 London Plan Policy D3(B) includes a new section reading Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate. Channel Gate, Atlas Road and Scrubs Lane do not meet recognised criteria of being 'well connected', however much the PSMDLP material attempts to make this case.

11 Nor (In the view of OONF/StQW) do these PSMDLP site allocations meet the requirements of 2021 London Plan Policy D2 A (2) 2) to be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services). OPDC's proposed site allocations and densities, as revised in light of the 2019 interim findings, are driven solely by an attempt to meet an adequate 10 year housing target and will lead to unsuccessful and unsustainable new development.

*P. W. Clark*

Inspector

17.11.21