

OPDC POST SUBMISSION MODIFIED DRAFT LOCAL PLAN

Agenda 1 for Modifications Hearings

PUBLIC TRANSPORT ACCESSIBILITY LEVELS (PTALs)

10am Tuesday 11th January 2022

The Inspector's agenda ID-39v2 identifies a series of matters for discussion on this subject. His note recognises that concerns over connectivity across the OPDC area was a subject raised by more respondents than any other in the consultation on the Modifications to the OPDC Draft Local Plan. (46 respondents are named in the agenda note).

We see this level of public concern as resulting from the fact that the PSMDLP simply does not work as a coherent and successful spatial plan for a new part of London. Local people, who travel in and out and across the OPDC area regularly, are well placed to flag up what might look plausible on a diagrammatic map, but what will not make for successful placemaking in the real world.

This further representation from two of the local neighbourhood forums is for the 11th January EIP hearing. It covers the following points referred to by the Inspector:

- The need for refreshed PTAL maps and clarity on what measures (infrastructure and otherwise) explain the claimed improvements in PTAL scores shown in figures 7.10 and 7.11.
- The OPDC Bus Strategy, as the primary means of improving PTAL levels within the Old Oak area.
- The proposed location of an extended 'Old Oak major town centre including Channel Gate/Atlas Road, and the relationship and proximity of these sites to OOC station.
- The PSMDLP proposals in relation to London Plan Policy D3(B) and its expectation that *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 covering these points, we have responded in this representation to OPDC's latest document of 29th December 2021 *Public Transport Accessibility Level (PTAL) Forecast, Development Phasing and Tall Buildings Information Note*

PTAL LEVELS - THE CONTEXT

The Inspector has focused this EIP hearing on PTAL levels, and what has changed since the October 2018 submission of the Draft Plan. In ID-39 he asked specifically for *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*). We too feel that this information is critical to the final stages of the examination of the OPDC Local Plan.

Both the Old Oak and the StQW neighbourhood forums are familiar with working with PTAL measures. The PTAL system was a creation of Hammersmith & Fulham Council¹. We have used

¹ See paragraph 2.3 of the Mayor of London/TfL publication **Assessing Transport Connectivity in London** 2015 which reads *PTAL was originally introduced by the London Borough of Hammersmith & Fulham, and was later adopted across London to support various planning processes. The use of PTAL is now deeply embedded in strategic and local planning. A key example for such use is in the London Plan, which is the overall strategic*

PTAL measures and TfL's [WebCAT tool](#) many times when commenting on individual planning applications and on the suitability of specific locations for very high density housing.

While the London Plan Density Matrix² has not been carried forward into the 2021 London Plan, there are a series of 2021 London Plan policies which continue the explicit link between housing density and transport connectivity, including PTAL levels. **We consider that as a result of the changes to the 2018 submitted version of the OPDC Draft Local Plan, conformity with these aspects of London Plan policy is now highly questionable (see further below).**

CONNECTIVITY WITHIN THE OLD OAK AREA – A REMINDER OF CHANGED PLANS SINCE 2015

In our previous representations on the Modifications we commented on the way in which the OPDC Draft Local Plan has in effect become two plans – one for the area on the west side of Wormwood Scrubs in East Acton and North Acton, and one for the eastern part of the OPDC area including Scrubs Lane.

As we have pointed out these areas have remained separated not just by administrative boundaries between Boroughs, but by the physical features of the Scrubs as a large area of MOL and by a shortage of connecting routes that run east to west.

The original vision of the 2015 OAPF was to change this geography for good, introducing a critical new east/west connection (Union Way/Park Road) and also siting the new 'heart of Old Oak' between the two main north/south routes of Old Oak Lane/Old Oak Common Lane and Scrubs Lane/Wood Lane.

The 2019 'change of direction' and the 'Western Lands strategy' was a fundamental alteration to the Local Plan as submitted in October 2018. The Local Plan is now heavily weighted towards the western part of Old Oak. A poorly defined 'major new town centre' stretches from Channel Gate to North Acton. There are no guarantees of eastern vehicular access to Old Oak Common Station, due to be 1km in length. The proposed Hythe Road Overground station has disappeared from the plan. Funding for an Old Oak Common Lane Overground station remains in serious doubt, particularly given TfL's funding crisis.

These are features of the PSMDLP which local residents (and businesses) readily understand without having to immerse themselves in planning jargon. We can all see that the PSMDLP maps and 'figures' of Old Oak are not what was originally intended. While housing sites and housing numbers have been brought back to the original target figures (more or less) the connectivity of the area has not. This applies to car users as well as those reliant on public transport.

plan for London, that sets out economic, social and environmental goals for the period until 2031. The London Plan uses PTAL as one of the key factors in determining the density of housing that is desired in different parts of London. This is based on the idea that areas with good public transport service are more suitable for intense development.

² The removal of Policy 3.4 and the associated Density Matrix was contested during the examination of the New London Plan. We see the basic planning principle of the matrix, that high density housing should be located where public transport access is good, to be irrefutable. The principle remains in 2021 London Plan policies GG2(B) on *Making best use of Land*, D1(A)4 on *London's form, character and capacity for growth*, D2 (A)2 and B on *Infrastructure requirements for Sustainable Densities*, and the new D3(B) on *Optimising site capacity through the design-led approach*.

Paragraph 10 of ID-39 picks up on this issue. In footnote 2 above we refer to the relevant London Plan policies and particularly the new wording of D3(B) on *Optimising site capacity*. **In its *Statement of Conformity with the London Plan OPDC-44, conformity with London Plan D3 is not addressed other than in relation to ‘well-designed buildings’ – this is a notable omission.*** The same applies to the February 2021 Statement of Common Ground agreed with the GLA.

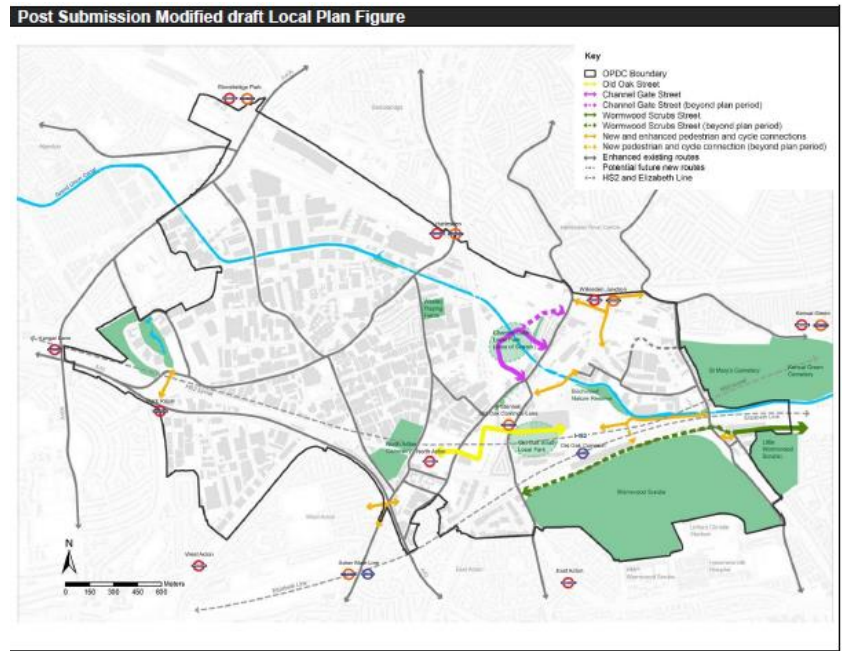


Figure 3.13 on Policy SP8 shows in diagrammatic form the connections proposed in the PSMDLP. At first sight this shows several east-west connections. But Old Oak Street (in yellow) is speculative if no funding is found for Old Oak Common Lane Overground station. Other connections are pedestrian/cycle routes only. Wormwood Scrubs Street is phased at 20+ years.

PTAL LEVELS IN A NEW OLD OAK – OPDC’s BUS STRATEGY

The Inspector asked for a new set of PTAL maps that explain what measures will improve forecast future levels of public transport accessibility, and when these will take effect. This is in scenario very different from 2015. As we see it, the only definite piece of new transport infrastructure within the plan period (and not yet 100% certain of completion) is the Old Oak Common rail interchange providing access to Crossrail, HS2 and GWR lines.

Future improved PTAL levels at Old Oak will therefore rely heavily on a Bus Strategy. We do not have the technical capabilities to answer the Inspector’s detailed questions at paragraph 6 and 7 of ID-39 on bus trip generation. Local knowledge tells us that the main north/south bus routes at Scrubs Lane and at Old Oak Lane are already heavily congested and additional bus frequencies will add to this.

Our main concern is the realism of OPDC’s February 2021 Bus Strategy. The contents of this OPDC Supporting Study are heavily qualified at the start of the document, with two statements reading:

- *The interventions considered are ideas and not proposals and are therefore subject to change.*
- *Any proposal will require a detailed cost benefit appraisal and would be subject to funding*

TfL is currently going through a major budget crisis with warnings of major cuts to bus services across London. There is no evidence that OPDC has obtained TfL commitments to these ‘ideas’ for changed bus routes and frequencies as set out in the Bus Strategy.

We are aware that developers at Kensal Canalside, in negotiations with TfL over many months, have failed to achieve all they sought in terms of changes to routes and frequencies to enable the desired levels of servicing for 4,000 new homes in this Opportunity Area to the immediate east of the OPDC boundary.

These proposed developments are at a stage when planning applications are imminent. The developers involved (Ballymore/Sainsburys and Berkeley Homes/St Willia) are major players in the residential development market. But these developers had to acknowledge at a recent RBKC 'development forum' that they have had commitments from TFL only to parts of the amended bus routes and frequencies that they would like to be able to deliver, within a landlocked Opportunity Area immediately to the east of the OPDC boundary. And this is before any heralded TfL cuts in bus routes take effect across London.

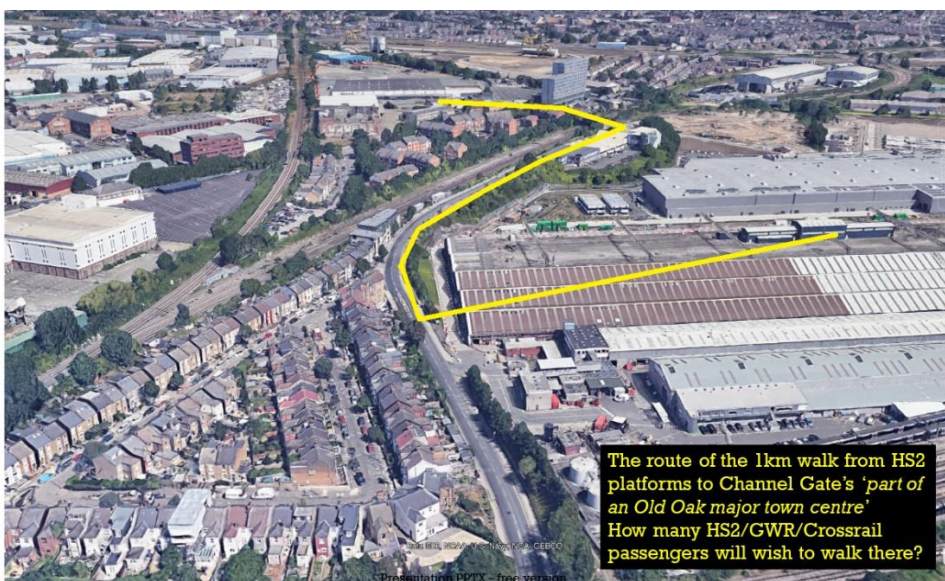
Hence we do not see that serious reliance should be placed on assumptions in the OPDC Bus Strategy, on improved PTAL levels flowing from assumed bus routes and frequencies which may or may not materialise in future.

In terms of the impact of PTAL levels of the opening of OOC station (in 2029-33) any such predictions must also be approached with caution. As a result of major changes in travel to work patterns resulting from the pandemic, no one can forecast with any certainty the position in the 2030s.

DISTANCE BETWEEN OOC STATION AND CHANNEL GATE

In ID-39, the Inspector has asked the question: *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?*

The image below shows the walking distance from the HS2 platforms at OOC station to the centre of the Atlas Road/Channel Gate triangle, as measured via Google Earth. This includes the distance from the platforms to the station entrance/exit on Old Oak Common Lane. The remainder of the walk along this road is unappealing and there is little scope for 'activating' this section of street in future. This contrasts with the original 'high street' as visualised between OOC station and Hythe Road station and square, at 'Old Oak Park'.



Other distances quoted in our representations were also measured via Google Earth. We think that these distances are accurate and fair.

At Channel Gate developers Pocket Living has in December 2021 submitted an application for a development of 436 new homes for rent, ranging from studios to larger 3 bed family home at 'Atlas Wharf'. The site is behind the Collective building and on the Grand Union Canal. The scheme involves towers of 28 and 14 storeys immediately to the south of the Old Oak Conservation Area. We consider the proposed densities and building heights to be incompatible with London Plan Policy D3B and will be making representations to this effect.



Pocket Living proposals for Atlas Wharf

THE REFRESHED OPDC PTAL MAPS – WHAT ASSUMPTIONS ARE INCLUDED?

Our starting point is not the two maps shown at Figure 7.11 of the PSMDLP documents (showing PTAL levels in the submission version and those in the Modified Plan). We think it more relevant to look at the TfL WebCAT mapping tool available online to all to inspect and apply to specific locations.

The WebCAT model includes PTAL forecasts for 2031 with the following notes on assumptions made:

All public transport modes in London available in 2031: National Rail, London Overground, Tube, DLR, Tram, Buses

Principal public transport network improvements include schemes held in TfL's committed and funded transport investment programme. New proposals such as Crossrail 2 are not yet fully funded and are not included in this scenario.

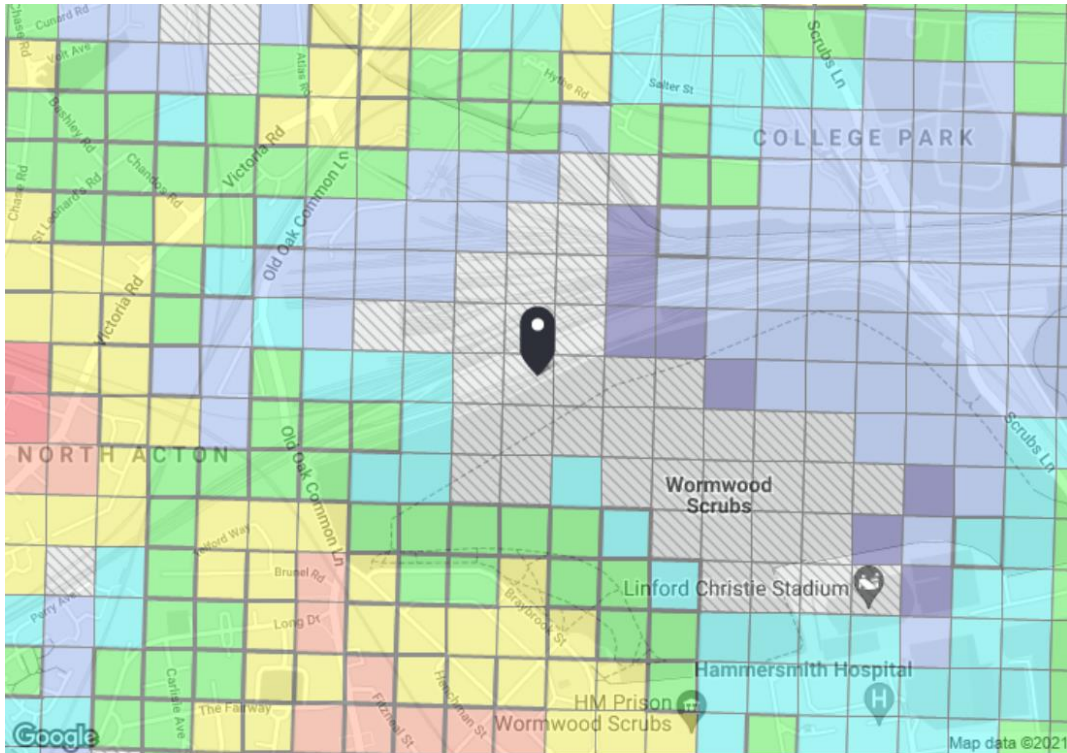
Bus services are based on the base year network with a 3% uplift in frequencies.

The base year for WebCAT is 2015. Forecast maps are provided for 2021 and 2031.

When we examine the WebCAT forecast PTAL for 2031 we see a different picture from that shown in either Figure 7.11 of the PSMDLP and labelled '2038 PTAL'. It is also different from the 2032 PTAL map shown in the latest OPDC note.

The 100m squares shown with a heavier line in the WebCAT map for 2031 are those where changes are predicted by TfL between the base year (2015) and this forecast date. As shown below, changes are predicted for some locations on the western side of the Scrubs (such as Acton Wells and Old Oak Common Lane). But for College Park and Scrubs Lane the position remains static.

Naturally, the assumptions built into the model affect the outcome. Without full clarity on the assumptions used by OPDC and TfL in its latest forecast maps, it is impossible to assess their realism.

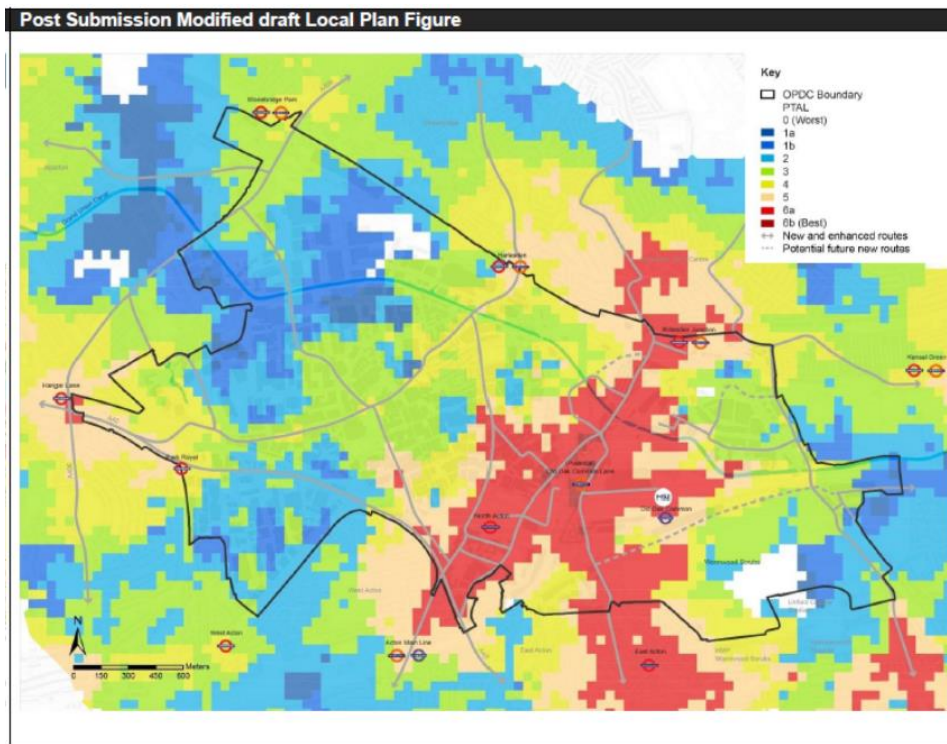


PTAL output for 2031 (Forecast)

0

Easting: 521867, Northing: 181946

When we compare this WebCAT map with that in the modified version of the map at PSMDLP Figure 7.1 we are puzzled by the fact that the latter shows large areas of PTAL 6A along Victoria Road and Old Oak Common Lane. This area extends into the southern part of the Atlas Road area.



Drilling down using the WebCAT tool, we have focused on two of the areas where site allocations in the PSMDLP plan for significant volumes of new high density housing. These are Scrubs Lane/Mitre Bridge/North Pole Depot and Channel Gate/Atlas Junction (also including a potential second site next to the completed Oaklands Rise development).

North Acton already has good PTAL levels and these will improve when Crossrail becomes operational at Acton Mainline station. We have no argument with maps showing North Acton as a well connected location, albeit that platform congestion on the Overground is already a major issue. It is not clear whether the latest OPDC not assumes that planned improvements to the station will have been achieved.

On these more detailed WebCAT maps, we added the locations planned for new housing (the red lined shapes). These include consented schemes, those where planning applications are imminent or under consideration, and PSMDLP site allocations.



TfL WebCAT tool for 2031 shows PTAL levels at Scrubs Lane and North Pole Depot staying at PTAL 1b (second lowest level) in 2032.



TfL WebCAT tool for 2031 shows PTAL levels at Channel Gate/Atlas Road as ranging from zero and PTAL 1b (blue) to 4 (yellow) nearest to old Oak Lane.

In answer to the Inspector's question 11 in ID- 39, we do not consider these two sets of PSMDLP site allocations to 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)*. We maintain our view that (at these locations) *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*

In our response to the Modifications we commented that **Mitre Bridge** is a location with very poor connectivity and low PTAL levels 1b. Planning applicants in the early years of the OPDC insisted that schemes at North Kensington Gate and Mitre Yard would have much improved PTAL levels of 5 and 6a by the time these developments were completed. We argued that OPDC consents on these schemes were premature. That at Mitre Yard is now at the early stages of construction. Schemes at North Kensington Gate (North) and at 2 Scrubs Lane have stalled.

Developers London Green have recently been undertaking consultation on a proposed development at 'Mitre Wharf' adjoining the canal. This involves 137 housing units plus 752 sq m of flexible commercial space.

The site allocations 27,28,29,30 and 31 in Scrubs Lane (at table 3.1 in the PSMDLP) add up to 1,047 new homes. The sites south of Mitre Bridge (32-34) would add a further 400. Despite London Plan policies for 'intensification' in Opportunity Areas, **we think it a serious distortion of the planning system to allow adoption of a local plan** which consigns some 2,500 future residents to living in high-rise and 'car-free' buildings at a location with no certainty of PTAL levels rising significantly from 1b (the forecast WebCAT figure for 2032).

This disposition of high-density/high rise housing would never have come about had there not been a stage when speculative developers fastened on Scrubs Lane as part of a vision for 'Old Oak Park' which failed.

We see every likelihood that the amenities, shops and facilities promised by developers in their 'activated' ground floors will not materialise. Scrubs Lane will remain an unappealing residential environment due to a poor public realm and a 'haul road' giving access to waste disposal sites which will continue in operation with HGVs queuing to enter and exit these sites.

There are many other locations in London where new housing would be better located. OPDC's unwillingness to accept the need to re-negotiate targets with the Mayor, in late 2019 risks consigning large numbers of BTR tenants to the wrong type of development in the wrong place.

Channel Gate and Atlas Road

A similar situation will arise at Channel Gate/Atlas Road. This site is allocated for 3,200 new homes in the PSMDLP. We have commented above on the walking route to and from OOC station, when the interchange becomes operational. Residents taking up occupation in the 'car-free' development at Oaklands Rise are already showing a reluctance to live without a car, leading to new parking pressures in Wells House Road (where restricted hours are currently limited).

THE OPDC NOTE OF 29TH DECEMBER 2021 ON PUBLIC TRANSPORT ACCESSIBILITY LEVEL (PTAL) FORECAST, DEVELOPMENT PHASING AND TALL BUILDINGS INFORMATION

We comment briefly below on why we feel this OPDC material should not be accepted at face value, in a final assessment by the Inspector on issues on PTAL.

The OPDC note explains that its PTAL Maps shown for the years 2020, 2027, 2032 and 2038 are based on four supporting studies:

- Bus Strategy Update (2021)
- Development Capacity Study Update (2021)
- Infrastructure Delivery Plan (2021)
- Tall Buildings Statement Update (2021)

We contend that these documents, as is the case for many elements of the PSMDLP, are highly aspirational and reflect scenarios which OPDC officers would like to see but for which there are more questions and doubts than there are certainties.

We would hope that GLA, TfL and OPDC officers all maintain complete objectivity when making assessments and judgments built into the OPDC Local Plan. But after five years of dealings with the Corporation on the Local Plan process and on decisions on individual planning applications, our level of confidence is not what it was. The fact that all three bodies are part of the Mayoral family and subject to pressures to meet Mayoral objectives and targets, we believe has had an impact over the years on the culture of the organisation and continues to do so. This view is no secret from OPDC officers and has been raised on several occasions with the Chair and CEO.

The OPDC note says *PTAL forecasts have been produced by TfL based on information contained within the studies outlined above*. This does not make sufficiently clear exactly what assumptions have been fed into TfL modelling for each of the maps shown. We think this level of detail is needed if these maps are to be accepted as a credible picture of future PTAL levels. They show significantly higher levels of PTAL than in the WebCAT map for 2032, for which TfL state they have taken into account all budgeted infrastructure projects in their forward programme.

We don't accept the validity of the 2038 PTAL ranges given in paragraph 8 of the OPDC note (Channel Gate at 6b to 3, and Scrubs Lane at PTAL 3 and 4). Unless much more detail is available on the changes that have been fed into the model to achieve these levels of improvement, we urge the Inspector to place more faith in the WebCAT figures for these two locations, as shown in the previous part of this representation.

Paragraph 9 states *For Scrubs Lane in particular current bus services, walking and cycling routes enable people to reach Willesden Junction Station within 14 minutes by foot*. This claim shares the wishful thinking of the developers of North Kensington Gate and Mitre Yard. From doorstep to a platform at the station, this walk takes several minutes longer by whichever route chosen.

Paragraph 10 states *The approach to optimising development ahead of planned infrastructure has been common practice in planning authorities elsewhere in London. Examples include the planned delivery of development at Vauxhall Nine Elms ahead of the delivery of the Northern Line extension and plans from various local planning authorities along the Crossrail 1 Line which have identified growth/regeneration areas around planned Crossrail stations and encouraged early and optimised development of these sites ahead of the opening of Crossrail*. We do not see VNEB as a good example of urban renewal to be followed, and are far from alone in this view.

Paragraph 12 acknowledges that the 'Mitre Way' location will not have a new connection to Scrubs Lane until the 11-15 year period, while continuing *However, in the interim, these sites would benefit from the new all modes route of Wormwood Scrubs Street connecting to Kensal Canalside Opportunity Area, the new walking/cycling connection to Scrubs Lane to be delivered in the 6-10 year*

period and existing and enhanced bus services along Scrubs Lane and a new route along Scrubs Lane terminating at the North Pole East Depot.

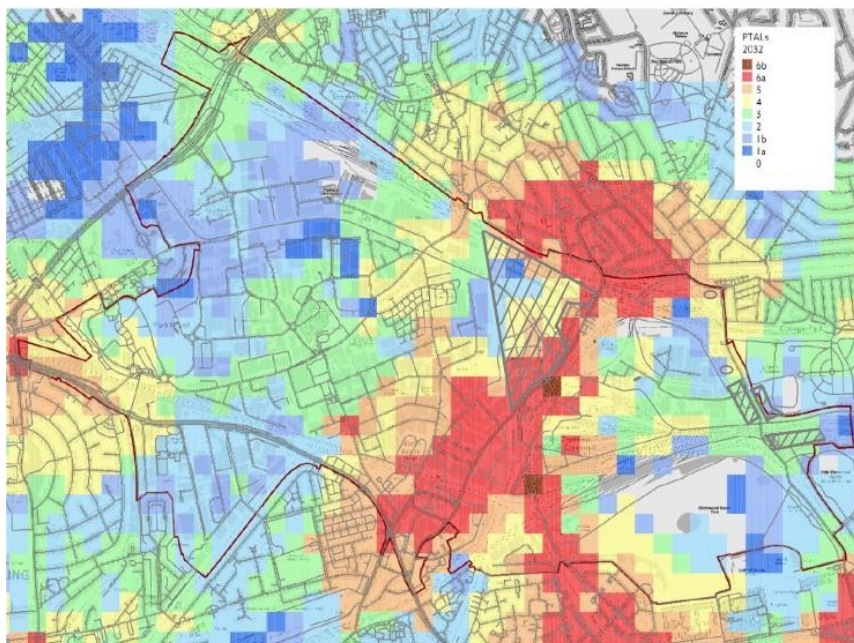
Our understanding of the Infrastructure Delivery Plan (and the 2021 RBKC SPD on Kensal Canalside) is that the eastern section of 'Wormwood Scrubs Street' is dependent on DfT/Network Rail releasing for development the strip of land to the south of the main GWR rail lines - on which there are no firm dates. Projects for all mode routes TV3 and TV4 as shown at Figure 4.3 of the Infrastructure Delivery Plan rely on the availability of this strip of land and are shown as 'necessary' while also 'unfunded'.

Developers St William, about to submit an application for their site at the western end of the Kensal Canalside OA, acknowledge the landlocked nature of this OA with its sole entrance/exit on Ladbrooke Grove. The canalside cycle/footpath from Kensal Canalside to Mitre Bridge and beyond will be the only east/west connection to Scrubs Lane for the foreseeable future.

'Channel Gate Street' is a loop road into Atlas Road/Channel Gate triangle which joins again with Old Oak Lane south of the bridge to Willesden Junction. If this becomes part of a bus route, this would improve PTAL levels for the northern part of the Channel Gate triangle. But this assumes that TfL will be willing for certain buses to take this loop, at the cost of extending travel times for buses on Old Oak Lane. At Kensal Canalside only certain buses on Ladbrooke Grove are expected in future to be taking the loop around the Opportunity Area.

Under the PTAL map at 2038 at page 15 of the latest OPDC note is the statement *In 2038, Old Oak Common Lane station, which provides overground services will be operational. The new station will be supported by new bus stops.* This is a bold assertion, given that at present there is no sign of this Overground station attracting secure funding. Or that new development in the area would generate S106 or other funding for a station costed at £155m in the Infrastructure Delivery Plan (Project TR4, included in the IDP as 'Desirable' and phased for 21+ years). In any event, it is important to be clear whether the 2032 PTAL map shown below assumes an Old Oak Common Lane Overground station?

We can only surmise that OPDC and TfL have fed in optimistic assumptions on all these factors and more, to achieve the illustrated improvements in PTAL levels shown below for 2032 as compared with the standard published WebCat map for 2031.



OPDC latest map of PTAL levels in OPDC area, with sites at Channel Gate/Atlas Road and at Scrubs Lane/North Pole Depot superimposed (grey hatched areas).

Scrubs Lane remains at PTAL 3 and 2, as does North Pole Depot.

Channel Gate/Atlas Road ranges from PTAL 1a to 6a near Old Oak Lane.

Conclusions on PTAL levels

We do not see that the *realistic* likely improvements in PTAL levels for sites at Channel Gate/Atlas Road and at Scrubs Lane/North Pole Depot (by 2032) support the statement at 3.12 of the Tall Buildings Statement, on public transport connectivity (to which the Inspector refers at paragraph 3 of ID-39). Very high density residential towers need to be located at location of at least PTAL level 4.

Developers have to date acquired sites and obtained planning consents at Scrubs Lane with misplaced confidence that 'Old Oak Park' would be delivered. In two cases such consents have been 'optimised' with added housing units to restore viability, worsening still further the gulf between density and connectivity.

New housing units at 'Oaklands Rise' continue to be marketed by Genesis/QPR with the claim that the new HS2/Crossrail station is '[coming soon](#)'. We fear that some developers will continue to pick off a small number of sites ay Old Oak where they think a very high density housing scheme will bring an adequate return – despite inadequate access to public transport or adequate walking/cycling connections.

An adopted Local Plan that allows for (or encourages) these misapprehensions to continue serves no one well. The OPDC Local Plan in its final form needs to be honest and accurate on PTAL levels, as it does for the locations and heights of tall buildings.

Old Oak Neighbourhood Forum and St Quintin and Woodlands Neighbourhood Forum

January 5th 2022

Post Submission Modified draft Local Plan Figure

