

Local Plan Independent Examination

OPDC Response to Matter and Issue 4

Matter 4: Whether the nexus between density/intensity, height and housing targets is justified in the light of uncertain delivery of transport infrastructure (derived from the fourth, fifth, seventh and ninth Key Issues of table 5 of Key document 5 identified at Regulation 19(1) stage and the sixth Key Issue of table 7 of Key document 5 identified at Regulation 19(2) stage and representations 2/G/34 from Grand Union Alliance, 2/SP4/6 and 2/SP2/9 from individual objectors referencing the joint Cambridge/Berkeley University students report, 2/SP2/10 and 2/SP4/1 from LBH&F and 2/SP4/13 from Midland Terrace RA amongst others. This was also an issue with a number of organisations at Regulation 18 stage)

Notwithstanding the officers' response to the Key Issues and representations set out in Appendices E and J to Key Document 5, this Matter would benefit from a discussion at a hearing session.

OPDC response:

This response has been informed by Transport for London.

- 1.1. OPDC considers that the nexus between density/intensity, height and housing targets in light of uncertain delivery of transport infrastructure is justified because when considered against reasonable alternatives based on proportionate evidence, the Local Plan is the most appropriate strategy.

Delivery of transport infrastructure

- 1.2. With regard to the uncertain delivery of transport infrastructure, the High Speed Rail (London – West Midlands) Act 2017 has been enacted and development is implemented on the site. Therefore, it is appropriate to assume that the Old Oak Common Station will be delivered by 2026. With regard to the proposed Hythe Road London Overground Station, there will be excellent levels of public transport accessibility and connectivity provided by the rail, underground and bus services available at both the new Old Oak Common Station and at the existing Willesden Junction Station. These will be complimented by planned bus network enhancements and a new and improved high quality local walking and cycling network, which will provide people with fast and easy access to destinations. This will all support the delivery of new development in Old Oak North without relying on the improved public transport access and connectivity generated by Hythe Road Station. Old Oak Common station is also identified within the Mayor's Transport Strategy (document OSD29) and paragraph 2.1.58 of the Draft New London Plan (document OSD14). The policy supports the delivery of the highest public transport levels (PTAL 6B) to support the density of development.

A coordinated approach for justifying the nexus between density/intensity, height and housing targets

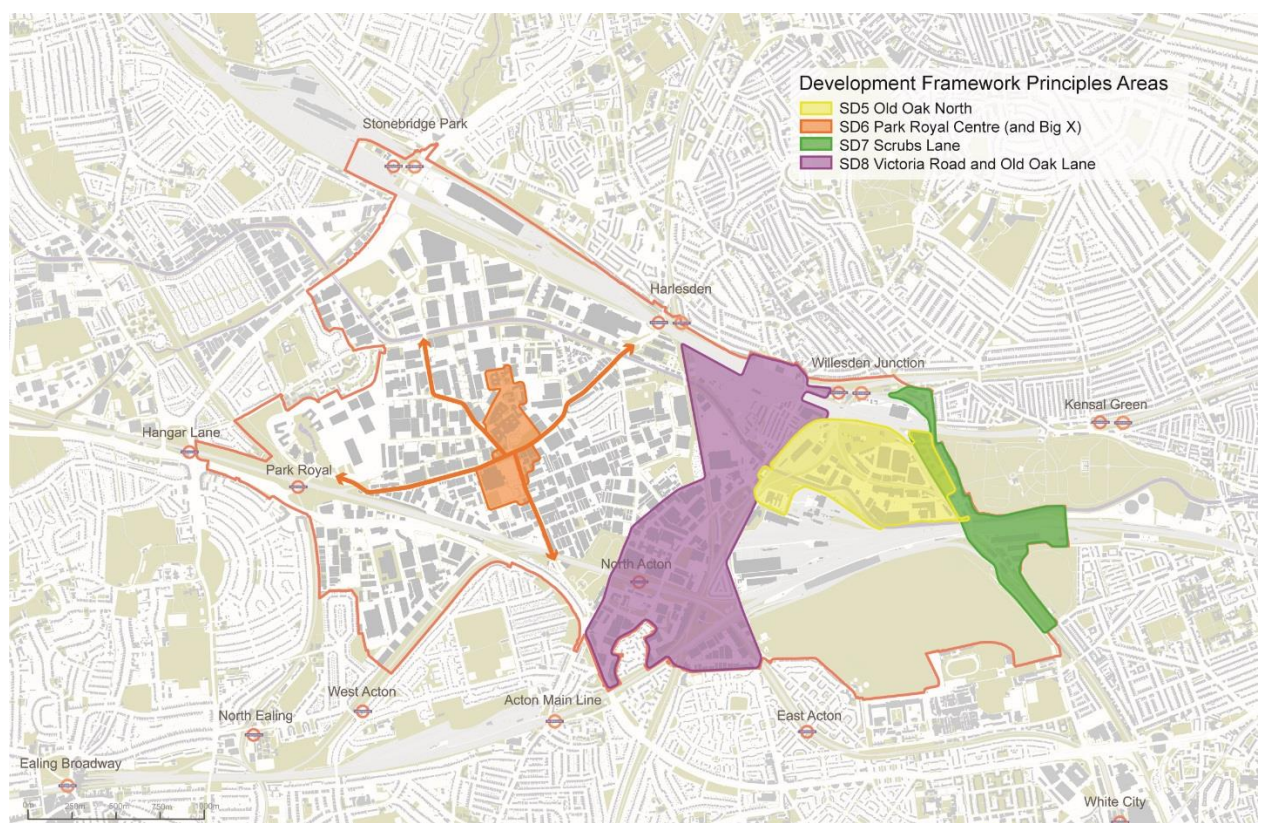
1.3. OPDC recognises that the relationship between density/intensity, height and housing targets is complex but the evidence base for densities and building heights delivers a justified approach. This approach meets the adopted and Draft New London Plan housing targets and enables the Local Plan to demonstrate general conformity. The Mayor has confirmed that the Local Plan is in general conformity with the adopted London Plan and welcomes that the Local Plan has been amended to reflect the Draft New London Plan.

1.4. The densities and building heights evidence base is represented in the following supporting studies:

- a) Old Oak North Development Framework Principles (document SD5)
- b) Park Royal Development Framework Principles (document SD6)
- c) Scrubs Lane Development Framework Principles (document SD7)
- d) Victoria Road and Old Oak Lane Development Framework Principles (document SD8)
- e) Development Capacity Study (DCS) (document SD56)
- f) Tall Buildings Statement (document SD13)

1.5. The four Development Framework Principles supporting studies have geographic areas which cover the majority of areas of housing development. This are shown in figure 2.

Figure 2: Coverage of Development Framework Principles

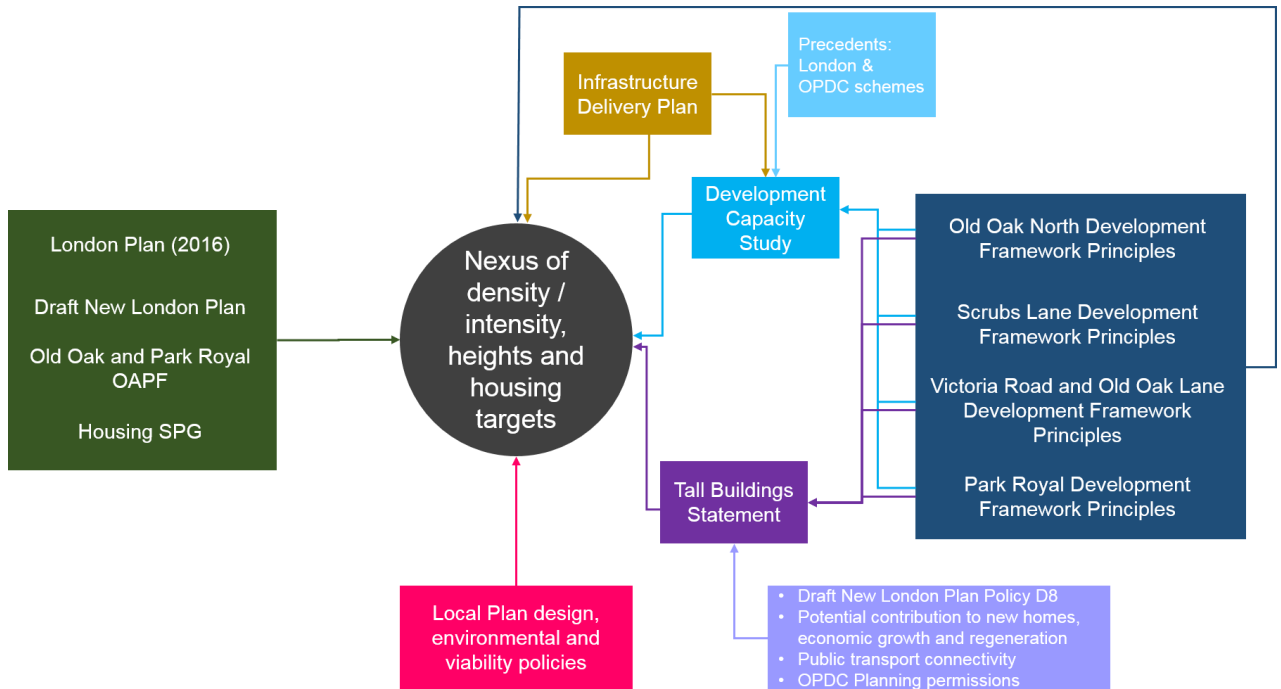


1.6. The Development Framework Principles have assessed the deliverability of housing target figures for their respective geographic areas (the Development Framework Principles Areas) in developing the development capacity and resultant densities and building heights for those areas. The development capacities established through the Development Framework Principles provide the basis for relevant sites within the DCS. For areas outside of the Development Framework Principles Areas, the methodology within the DCS has been used to identify development capacities including the housing figures for the Old Oak

Common Station and surroundings site (DCS site 22). The Development Framework Principles have further been used to inform the Tall Buildings Statement. In turn, these studies have informed the relevant Local Plan policies.

1.7. This relationship is illustrated in figure 1 below.

Figure 1: Illustration of the nexus of density/intensity, heights and housing targets



Housing targets will require high densities

- 1.8. The London Plan (2016) (document OSD 27), Draft New London Plan (2017) and Draft New London Plan showing minor suggested changes (2018) set out a combined housing target of a minimum of 25,500 new homes for the Old Oak Common and Park Royal Opportunity Areas. This reflects the future excellent national, regional and local public transport links to be provided in the area and the targets have been subject to their own examination through the London Plan development process.
- 1.9. The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified the preferred option as being to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. Old Oak and Park Royal are specifically referenced as an example of this in the FALP IIA supporting text on page 6. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the GLA developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015. The FALP, together with the OAPF set a strategic development capacity target for the OPDC area. The current London Plan and Draft New London Plan continue to include these targets.
- 1.10. Opportunity Areas are London's main reservoirs for growth. As such, the current London Plan 2016 (Policy 2.13) and the Draft New London Plan (Policy SD1 – Opportunity Areas) support development in these areas that potentially exceeds defined targets, by optimising development densities. The Draft New London Plan policy SD1(B)(4) also recognises the potential for Opportunity Areas, such as Old Oak, to define their own

character and density. The GLA's Old Oak and Park Royal Opportunity Area Planning Framework (document OSD30), the Local Plan's supporting studies and the wider policies of OPDC's Local Plan define the elements of housing and jobs growth for Old Oak and Park Royal. The Mayor of London's Housing SPG (2016) (document OSD18) paragraphs 7.5.7 and 7.5.8 state that targets should be considered as a minimum, to be exceeded and accelerated where possible and that densities in Opportunity Areas may exceed the relevant density ranges in the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2).

- 1.11. The Draft New London Plan Policy D6 (Optimising Density) removes the density matrix and instead requires a broader approach that requires development to the most efficient use of land and be designed at optimum density taking account of the site context, the site's connectivity by walking and cycling and existing and planned public transport.

Development capacity and resultant densities

- 1.12. Local Plan supporting studies (as set out in paragraph 1.5) have undertaken development capacity assessments in light of the housing targets and the need to deliver a high quality built environment to support sustainable communities. These assessments align with the policy considerations set out in Draft New London Plan Policy D6 and have informed the density ranges set out in the Local Plan and the DCS.
- 1.13. OPDC's DCS has been developed in accordance with the National Planning Practice Guidance on Housing and Economic Land Availability Assessments (PPG 006 Reference ID: 3-006-20140306) and demonstrates how the London plan targets can be delivered. The DCS includes development capacity information set out in the Old Oak North Development Framework Principles, Park Royal Development Framework Principles, the Industrial Land Review, Future Employment Growth Sectors Study, Scrubs Lane Development Framework Principles and the Victoria Road and Old Oak Lane Framework Principles. The DCS sets out the changes between the Regulation 19(1) and Regulation 19(2) versions of the Local Plan.
- 1.14. The Old Oak North Development Framework Principles is a key supporting study as it provides information and recommendations for the core development area within Old Oak for the plan period. This document has been developed by OPDC based on the outputs of the AECOM masterplan consortium of consultants. The consultants undertook a robust assessment of the technical constraints within the Old Oak North area and parts of Scrubs Lane. The deliverability of the development capacities set out in policies P2 (Old Oak North) and P10 (Scrubs Lane) were also tested. This assessment has resulted in amendments to policy P2 to adjust the minimum numbers of new homes (6,300 to 6,500) and numbers of new jobs (5,100 to 3,600) and to P10 to adjust minimum numbers of new homes (2,000 to 2,600) and numbers of new jobs (1,100 to 1,200).
- 1.15. An addendum to the Old Oak North Development Framework Principles has been developed to outline how additional work undertaken by the AECOM masterplan consortium has built upon the principles set out in the original document. A key element of the additional work has been to further demonstrate the deliverability of OPDC's draft Local Plan requirements within Old Oak North. This includes further evidence for how identified homes and jobs capacity can be delivered whilst meeting or exceeding other policy requirements relating environmental performance and quality of place. Key among these are the requirements to deliver 30% publicly accessible open space, necessary utilities infrastructure and improved levels of amenity.
- 1.16. The addendum also provides additional information which further demonstrates deliverability of Local Plan policies for Old Oak North through an assessment of a number

of relevant London based precedent developments. The precedent analysis further demonstrates that delivery of similar densities in Old Oak can be delivered in a London context while achieving a high quality of place and exemplar environmental standards.

High densities and the relationship with building heights

1.17. The development capacities set out in the evidence base and resultant densities will deliver a range of building heights including tall buildings. These building heights are identified in the Development Framework Principles documents referred to in paragraph 1.5 to 1.7 and the DCS. Where relevant, building heights are reflected in Place Policies and / or will be defined in future Supplementary Planning Documents.

Locations of high density development and tall buildings

1.18. In addition to defining building heights as set out in paragraph 1.15, the Development Framework Principles documents referred to in paragraph 1.5 to 1.7 define locations of these building heights. In relation to tall buildings, the supporting studies identified in paragraph 1.5 and the methodology set out in paragraphs 3.4 to 3.10 of the Tall Building Statement provide the justification for the locations where tall buildings are an appropriate form of development in principle within the Local Plan. Where relevant, appropriate locations for tall buildings are reflected in Place Policies and / or will be defined in future Supplementary Planning Documents.

Ensuring high quality design

1.19. The adopted London Plan, Draft New London Plan and Local Plan provide policies to ensure that high density typologies and tall buildings, required to optimise development capacity to meet targets, are of the highest design quality to support sustainable communities and appropriately address issues. Relevant Local Plan policy topics include context and townscape (SP9), access, inclusivity and Healthy Streets (D2), amenity (D6), provision of 30% publicly accessible open space (EU1), air quality (EU4), high quality social infrastructure provision (TCC4) and noise and vibration (EU5). These policies will be supplemented by future Supplementary Planning Documents.

Summary

- 1.20. OPDC considers that the nexus between density/intensity, height and housing targets in light of uncertain delivery of transport infrastructure is justified in light of:
- a) development capacities in Old Oak North not solely relying on improved public transport access generated by Hythe Road Station but on the Old Oak Common Station, delivery of Park Road, improvements to Willesden Junction Station and existing/planned bus routes;
 - b) the evidence based approach for defining densities and building heights that meet the existing and emerging London Plan housing targets (including as set out in the Old Oak and Park Royal Opportunity Area Planning Framework); and
 - c) the range of London Plan (including emerging Draft New London Plan policy) and Local Plan policies that facilitate the delivery of high quality design and an appropriate standard of amenity.