

ADDENDUM REPORT

Subject: Addendum to Planning Committee Report – Submission of late comments
Meeting date: 28 September 2018
Report to: Board
Report of: Will McKee, Chair of the Planning Committee
Author: Tom Cardis, Interim Assistant Director of Planning

FOR NOTING

This report will be considered in public

1 Summary

- 1.1 This addendum report provides information regarding a late submission of a letter setting out comments by Hammersmith Society, Grand Union Alliance and St Quintin and Woodlands Neighbourhood Forum in relation to the draft Local Plan.

2 Recommendations

The Board is invited to:

- 2.1 **Consider** the contents of this addendum when considering recommendations 2.3, 2.4, 2.5 and 2.6 of the OPDC Board Report Item 8 – Planning Committee Report.

3 Addendum information

- 3.1 A late submission of a letter summarising concerns of the Hammersmith Society, Grand Union Alliance and St Quintin and Woodlands Neighbourhood Forum was provided to OPDC on 27 September 2018 in relation to the draft Local Plan.

3.2 OPDC officers have reviewed the concerns and consider that these reflect issues previously raised through the Second Regulation 19 Local Plan consultation. The consultation issues and officer responses to these are set out in the Statement of Consultation (Appendix F of the Board Report).

3.3 The table below summarises the issues within the letter and provides references to the relevant sections of the Statement of Consultation which include officer responses.

	Officer summary of concern	Statement of Consultation reference
1	Delay of development of the Elizabeth Line Depot will not enable the delivery of the Old Oak and Park Royal Opportunity Area Planning Framework vision.	2/SP4/11
2	Local communities are concerned that the housing target will not deliver a sustainable place.	2/SP5/2
3	The Local Plan's Integrated Impact Assessment (IIA) has not adequately assessed options for alternative development capacities and should not rely on the London Plan IIA to inform the IIA process.	2/IIA
4	Densities have increased during the development of the Local Plan. Insufficient detailed information for densities has been provided.	2/SP2/9
5	The Old Oak Masterplan should be published.	2/SP4/1
6	Population growth in London is being revised downwards. Local Plan should reflect this.	2/SP4/13
7	High densities cannot rely on Overground Stations that are not funded.	2/SP7/17
8	Officers have not responded adequately to issues raised by student studies of Old Oak.	2/SP2/9
9	Further information for building heights should be provided.	2/SP9/26
10	The Local Plan should acknowledge uncertainties for Old Oak and consider a more evolutionary approach.	2/G34

Appendices to this Report:

Appendix: Letter summarising concerns submitted on 27 September 2018.

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HAMMERSMITH SOCIETY, GRAND UNION ALLIANCE, ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM

Dear OPDC Board members,

September 26th 2018

OPDC DRAFT 19.2 LOCAL PLAN

We are writing to you to summarise concerns of local residents and community groups in the Old Oak area, prior to the discussion of the Draft Local Plan at the Board on September 28th. We are three organisations which have been following the progress of the Local Plan since the formation of the Development Corporation and the 2015 Opportunity Area Planning Framework.

Each of our organisations has submitted comments on the Regulation 18, 19.1 and 19.2 draft documents. Very few of these views and suggestions have been taken on board. We are worried that previous discussions at the Corporation's Planning Committee, and at the Board, have not recognised a set of issues raised by local people throughout this process.

- The Planning Committee discussion on the 19th September made no reference to the fact that development of public land at Old Oak South (the area expected to be the 'heart' of a new Old Oak) has now been deferred beyond the Local Plan period. What has become of the original 2015 OAPF vision of a regeneration area which *will surely become one of London's most exciting areas in which to live, work and play*.
- As shown by responses by the 19.2 Draft there remains huge doubt amongst the local community that the OPDC's minimum housing target of 24,000 new homes can be planned and delivered, successfully and sustainably, at Old Oak. Officers rely heavily on the fact that the 2015 Further Alterations to the London Plan included this figure, in a single paragraph in an Annexe. It has since been treated as sacrosanct.
- Officers now argue that the Integrated Impact Assessment for the 2015 London Plan adequately 'tested' alternative options for development capacity at Old Oak. This 2013 IIA document, prepared by consultants AMEC, sets out a 'preferred option' of an additional 300,000 homes across *all* London's Opportunity Areas. Old Oak is mentioned only once, in a comment (page 6) which notes *the number of homes projected for Park Royal / Old Oak Common / Willesden Junction increasing from 1,500 to 19,000*. This is not a testing of alternative options.
- The officer response to this issue being raised in representations on the 19.2 Draft plan is disingenuous (see at page 42 of the Board agenda, right hand column).
- A series of key strategic policies have been carried through successive iterations of OPDC planning documents (OAPF, Reg 18, Reg 19.1 Reg 19.2). Each of these sticks to the minimum target 24,000 homes at Old Oak. The fact that this figure has been restated in each iteration does not mean that it was ever based on any proper analysis of 'reasonable alternatives' as required by EU law.
- To accommodate this target, proposed densities have been raised in each version of the Draft Plan. The Regulation 18 version mapped out 'sensitive edges' with expected densities of 300 units per hectares. This map has disappeared from later versions, along with ideas for a transition or 'buffer zone' between areas of very high density new build and the existing residential areas surrounding Wormwood Scrubs.
- Adequate 'testing' of alternative housing targets could be achieved through masterplanning. Local people were promised sight of work by the AECOM consortium in late 2017. Nothing of this work has yet been released to the public (as far as we are aware). Work on the masterplan should be preceding a Local Plan of this level of detail.

- Anticipated levels of population growth in London are being revised downwards in light of later rates of family formation. A Local Plan which goes through a series of iterations should be taking on board new facts, as well as heeding feedback from the public.
- TfL has made it increasingly clear that the proposed new Overground stations at Hythe Road and Old Oak Common Lane are not funded. The Local Plan now insists rather than just recommends building a railway viaduct at Hythe Road. However, according to OPDC officers TfL says that a station there *is not needed in transport terms*. Assertions by OPDC officer that the highest PTAL levels can be achieved for Old Oak North without these stations, by relying on bus routes, are questioned by TfL. Those who live in the area know all too well the existing traffic congestion, for which no major changes are proposed to reach Willesden Junction station to the north and with an uncertain route south to the HS2/Elizabeth Line interchange. These issues, and their relationship to extreme housing densities, have not been adequately aired at the OPDC Planning Committee.
- Without high levels of access to public transport, and with proposed **average** densities of 600 units per hectare for this part of the OPDC area (*Old Oak North Development Principles* p.47) the outcome of the Local Plan looks likely to be an urban regeneration disaster that Londoners will not forgive.
- In their response to comments on the 19.2 version, OPDC officers have dismissed the study on development capacity by teams from the universities of Cambridge and Berkeley as 'student work'. Officers have not explained whether the conclusions of this study (that densities and building types at Old Oak would be equivalent to those in Hong Kong and Shanghai) are in any way unrealistic or incorrect?
- Page 47 of the OPDC Development Principles document mentioned above states *These densities are of a scale that have only recently been delivered in London and will contribute to the form of a new London typology*. Was creating this 'new typology' one of the OPDC's original aims? Or is this the unplanned consequence of overly rigid adherence to a housing target that was never realistic?
 OPDC officers have declined, for the second time of asking, to include in Table 3.1 of the Local Plan the densities and likely building heights that will result from the housing targets allocated to each named site. This basic information is said by officers to be 'inappropriate' for a 'strategic' level plan. Why then has it been 'appropriate' for OPDC to use the same Local Plan to impose minimum housing targets for a set of 34 specified sites? The resultant projected density for each site is a simple arithmetic calculation, a set of figures which would add one column to a table in a lengthy document. This is a set of figures which the public would very much like to see and which OPDC seems reluctant to publish.
- We fully understand the Mayor's aim to maximise numbers of affordable housing units at Old Oak. We appreciate that high densities help with development viability, and the proportion of housing that developers can deliver in the various tenure types currently deemed by the Mayor as 'affordable'. But this ambition cannot become a justification for urban regeneration that leaves its future occupants stranded in clusters of residential towers of 40 storeys and more, with poor transport connections. London has seen enough of this. The OPDC area was meant to become something different and not 'more of the same'.

We ask that the Board addresses at least some of these points, before the Draft Local Plan is submitted to the Secretary of State.

- Please publish the masterplan work for Old Oak North, before the Local Plan is examined in public, so that local people can see the reality of what is proposed.
- Please include a set of figures for the densities that will result from the housing targets allocated to each site in Table 3.1 and restore a map of different density areas.
- Please ensure that the document is more honest and open about expected building heights, a topic largely evaded in the current draft (and at many public consultation sessions).

- Please acknowledge in the Plan that huge uncertainties remain for Old Oak, in terms of infrastructure costs and London's housing market. The 19.2 Plan has already dropped many significant ambitions. A more evolutionary Plan B may still be needed for Old Oak. Local people could contribute more to this, if given the opportunity.

Yours sincerely

Melanie Whitlock, Hammersmith Society
Henry Peterson, Chair St Quintin and Woodlands Neighbourhood Forum
Robin Brown and John Cox, Grand Union Alliance

Copies to London Assembly members
Nicky Gavron, Chair Planning Committee
Navin Shah, Deputy Chair Regeneration Committee and member for Brent
Tony Devenish, member for Hammersmith
Dr Onka Sahota, member for Ealing