

OPDC DRAFT LOCAL PLAN

HEARING STATEMENT FROM ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM (REP 82) AND OLD OAK NEIGHBOURHOOD FORUM (REP100)

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.

We see this question as fundamental to the ambitions of the OPDC to create a sustainable and successful new part of London, and to the soundness and effectiveness of the current Draft Local Plan.

Our concerns are fourfold

- Proposed housing densities at Old Oak (and specifically at old Oak North and Scrubs Lane, destined to be the first major phase of development) have increased at each iteration of the Draft Local Plan. In the 19.2 Plan and supporting studies they far exceed the 2015 London Plan policy 3.4 and Density Matrix (Table 3.2) even when allowing for significant intensification within an Opportunity Area.
- The prospects for new roads and public transport infrastructure at Old Oak have diminished since earlier stages of plan preparation and must now be viewed as very uncertain.
- The OPDC's own Development Framework document for Old Oak North acknowledges that *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.*
- On Development Phasing, the same document admits that *phasing of development is reliant on delivering new and enhanced key routes and supporting infrastructure. This is expected to be delivered initially along Park Road from the west and along Hythe Road from the east.*

OPDC have commented at pages 4 and 5 of KD5 Appendix 1. These comments seek to justify their stance of making 'no change' on relevant policies to the 19.2 Draft Plan. In response to these comments we make the following points:

a) we do not accept that the targets set for Old Oak in Annexe 1 to the Further Alterations of the London Plan '*have been subject to their own examination through the London Plan development process*'. We do not see evidence of any serious examination of these targets in the report of Inspector Mr Anthony Thickett on the FALP (published Dec 2014). The fact that '*an opportunity area has been designated*' at Old Oak and Park Royal, and that '*an approach has been approved by OPDC Board and Planning Committee*' are nothing more than comments on process, rather than outcomes.

b) in its comments at 2/G34, 2/G41, 2G/46 and elsewhere OPDC has stated *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 supporting text.*

c) The IIA document referred to is a consultation document prepared by AMEC and titled *Integrated Impact Assessment: Further Alterations to the London Plan (December 2013)*. At paragraph 2.3.1 this includes a brief analysis of four 'spatial development options' for London. There is reference to a separate document which we believe to be a *Further Alterations to the London Plan: Integrated Impact Assessment Scoping Report (December 2013)* which includes a similar analysis, with little by way of additional detail. We do not see either of these documents as a sufficient 'testing' of four pan London options for London's growth.

d) OPDC comment on the fact that *Old Oak and Park Royal are specifically referenced as an example of this in the supporting text* (referring to the AMEC report). The relevant paragraph reads (in full) *In addition a review of the housing potential within the Opportunity Areas shows significant potential for additional housing capacity. For example, the potential investment and alterations resulting from Crossrail and HS2 has resulted in the number of homes projected for Park Royal / Old Oak Common / Willesden Junction increasing from 1,500 to 19,000.*

e) We view the Cambridge/Berkeley study to be at least as plausible a testing and analysis of development capacity at Old Oak as the material published by OPDC. This study (undertaken by postgraduates and overseen by professorial staff) is referred to by OPDC as 'student' work. The published report concluded *The target of 24,000 dwellings together with the 15 million sq ft of commercial space needed for 55,000 jobs will result in net residential densities higher than anything ever built in London. The team measured the gross site area and then calculated the net residential area after excluding land for the transit-hub and land for commercial space, open space and other uses. The net result was that an average net density of over 550 dwelling units per hectare (240 dwelling units per acre). This is more akin to residential densities in Shanghai or Hong Kong than the densest parts of London. The proposed densities would result in every block having a high-rise tower. The team demonstrated the implications of such high densities in terms of sunlight access on streets and blocks as well as the impact on the surrounding neighbourhoods. They recommended a 25% reduction in the overall number of units to 18,000 and a similar reduction in jobs in order to maintain the original jobs/housing balance.*

f) The fact that this recommended 18,000 figure is closer to the 2013 London Plan IIA figure than is 25,500, and that the Cambridge/Berkeley 'average net density of 550 units/ha' is close to the 'average 600 units/ha' in the OPDC Development Framework Principles for Old Oak North lends credence to the Cambridge/Berkeley work. What is missing from the OPDC Draft Local Plan is an acknowledgement that these are *net residential densities higher than anything ever built in London*. OPDC language of 'a new London typology' is less stark, and less honest with the public.

g) OPDC state that *The Draft New London Plan 2017 removes the density matrix and instead requires a broader approach that optimises densities*. The New London Plan is under examination and removal of the density matrix and related density policies have been a much contested issue at EIP hearings. The outcome on this issue is not yet known.

h) OPDC state that *The Development Capacity Study 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 document and the Victoria Road and Old Oak Lane Framework Principles document. The fact that the Corporation has prepared and published a pyramid of self-reinforcing studies, all pointing to a conclusion that average densities of 600 units/ha are an acceptable and viable way developing Old Oak North, does not of itself mean that this is a sound basis for a local plan. The 'Development Framework Principles' documents have not been through any consultation process, and do not as yet have the status even of SPDs.

i) Representations from the Old Oak Neighbourhood Forum, the St Quintin and Woodlands Neighbourhood Forum and others have pointed to the essentially circular approach which OPDC has adopted in assessing development capacity. This has involved working backwards from a figure first thought of, rather than building up a total through adequate analysis of available individual sites.

j) in terms of funds available for transport infrastructure investment, including '*Park Road from the west and along Hythe Road from the east*' the OPDC is awaiting Government decisions on a £250m Housing Infrastructure bid, originally due to be announced in late 2018. Transport for London funding for capital investment on new Overground stations at Hythe Road and at Old Oak Common Lane (both costed at figures approaching £200m) seems unlikely to be forthcoming given costs of delays on opening of the Queen Elizabeth Line and TfL budget shortfalls overall. The landowner of the 46 acre Cargiant site at Old Oak North has made clear that Cargiant/London Regional Property plans for regeneration of 'Old Oak Park' are on hold if not abandoned.

k) In 2017 and 2018 OPDC planning Committee granted planning permissions to a series of residential towers in Scrubs Lane (two sites at North Kensington Gate, Mitre Yard, and 2 Scrubs Lane). Although S106 Agreements on these schemes have been concluded and permissions issued, not one of these developments has started on site.

m) Despite local objections, all these schemes were approved on the basis of assurances by OPDC (accepted by the GLA at Stages 1 and 2) that the sites involved would in future have very high PTAL levels. The 22 storey scheme for North Kensington Gate (South) scheme (117-129A Scrubs Lane) was approved at a density of 435 units/hectare at a site with a PTAL level of 1b with no certainty (then or now) of improved public transport infrastructure.

n) At the time the scheme was granted approval, comments from TfL were *However, there are extensive planned transport improvements for the Opportunity Area, which will enhance the site's access to public transport e.g. the proposed Hythe Road station will be located approximately 250m to the west of the site, giving access to the London Overground network.* TfL has since made clear in responding to the 19.1 Draft that these stations must be described as 'potential' infrastructure for which no business case is yet agreed (T5/24 and T5/25).

p) North Kensington Gate (south) was the third planning application considered by the OPDC Planning Committee. The meeting took place on April 5th 2017. The same meeting approved a *Scrubs Lane Direction of Travel* document which introduced the concept of a set of 4 'clusters' along Scrubs Lane, as locations appropriate for tall buildings. The OPDC Local Plan was at Regulation 18 stage at this time, and the Direction of Travel document had not been consulted on. The officer report on the planning application accepted that this document did not form part of the development plan. Despite this, the document was referred to in discussions and the committee chair asserted that the scheme was 'within the policy framework' before the application was approved (see Stage 2 representations seeking call-in by the Mayor of London, from the Hammersmith Society and St Helens Residents Association (April 2017)).

Conclusion

We believe the overall housing target in the Draft Local Plan to be unjustified and hence unsound. It is based on a 2015 London Plan figure that was not tested at the time, and which has subsequently been adhered to in the face of significantly changing and use constraints and site availability. A wide range of representations during the three consultation exercises on the Plan have had no impact whatsoever on this target, other than in some rephrasing of target numbers.

Pushing back part of this total beyond the 2018-26 plan period makes no difference to the extreme and unprecedented densities that will be needed to conform with Local Plan policies as currently drafted, and as shown within the table of site allocations at Table 3.1 of the Draft Plan. These targets are then imported across into the Place policies in Chapter 4 of the document in a manner which renders the Plan overly prescriptive and inflexible – requiring early as well as frequent review.

Modifications required to the current OPDC Draft Local Plan

A re-assessment of the overall housing target for the OPDC area, and reduction of site specific housing targets in table 3.1 to a revised total of 16,000-18,000 new homes and maximum average densities of 400-450 housing units/hectare

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