

POLICY SP7: Connecting People and Places



Proposals should support the delivery of the spatial vision by creating or contributing to a high quality, safe and accessible movement network which:

- a) delivers sufficient transport infrastructure required to support the planned growth in the OPDC area;
- b) supports the delivery of OPDC's Sustainable Transport Hierarchy by:
 - i) minimising the need to travel;
 - ii) promoting healthy streets, that appropriately prioritise walking and cycling;
 - iii) delivering a high quality, frequent, reliable and well connected public transport network;
 - iv) minimising the need for use of private vehicles;
 - v) ensuring the efficient servicing of land uses; and
 - vi) supporting the successful functioning and operation of the Park Royal Industrial Estate, through carefully planned servicing arrangements;

- c) delivers an efficient transport network that embraces innovations in technology;
- d) embeds transport infrastructure into the built environment and carefully plans and coordinates utility infrastructure provision as part of delivery of the transport network;
- e) delivers and/or contributes to a new and enhanced street network that connects the Places of Old Oak and Park Royal together and connects into the surrounding areas including:
 - i) enhancements to existing streets;
 - ii) a new movement network across Old Oak comprised of the key streets of Old Oak High Street, Park Road, Grand Union Street and Wormwood Scrubs Street;
 - iii) new connections to Old Oak Common Station for when it opens if proven to be feasible and if it does not affect its timely and cost effective delivery; and
 - iv) new and enhanced pedestrian and cycle connections into Wormwood Scrubs;
- f) supports upgrades to the strategic road network and Transport for London Road Network, including the A40 and A406;
- g) supports delivery of a new Old Oak High Street, by ensuring:
 - i) primary shopping areas are focussed directly onto the street, around rail stations and at key junctions with other key routes;
 - ii) it seamlessly connects the five stations of Old Oak Common, Willesden Junction and Hythe Road, Old Oak Common Lane and North Acton to surrounding neighbourhoods;
 - iii) the street is delivered as early as is feasible and practicable;
 - iv) it delivers continuity along the street in terms of street widths and a high quality public realm;
 - v) it delivers a high quality movement route for walking, cycling and where feasible, buses and other vehicles;
 - vi) it includes a range of high quality green infrastructure, including mature tree planting

- and where feasible, waterspaces that are integrated into wider green infrastructure networks; and
- vii) it optimises the levels of daylight and sunlight that the street receives and minimises other negative environmental impacts such as wind and urban heat island effect;
- h) supports the delivery of a new Park Road, that:
 - h) connects Old Oak Common Lane to Scrubs Lane;
 - i) provides an early all modes connection between Old Oak South and Old Oak North;
 - j) is an active street, including town centre uses at locations identified in the places chapter; and
 - k) includes workspaces and meanwhile town centre uses at the ground floor along its length; and
- i) promotes the use of the Grand Union Canal as a movement route.

POLICY LINKS

- Places Chapter
- Transport Chapter
- Delivery and Implementation Chapter

EVIDENCE BASE LINKS

- Bus Strategy
- Car Parking Study
- Environmental Standards Study
- Infrastructure Delivery Plan
- Old Oak Strategic Transport Study
- Park Royal Transport Strategy
- Public Realm, Walking and Cycling Strategy

SUPPORTING TEXT

3.55. The ambition is to create a state of the art transport network that increases the area's public transport accessibility level to enable an optimised approach to development that can help support the economic sustainability of the UK, London and the

- Discussion on missing maps – roads, cycling and buses. Q on importance of text and diagrams.
- Text in policy box most important. The text and diagrams simply help to explain or illustrate. The priority is what's in the box. The policy text is also important. Last time in our response to the reg 18 consultation, we highlighted that the transport hierarchy was in the text but not in the policy. This time it is in the policy because it is important and they heard what we said last time.
- Concern expressed about absence of map - they are important. They will be there in the final document. A further version to be published on 13th June (updated). Final version will definitely have maps.
- **SP7 – strategic policy.** Crucial thing (a) talks about delivering sufficient transport infrastructure required to support planned growth (this wasn't in the reg 18 version). If the treasury doesn't co-operate this could be long and drawn out in the OPDC area. Could this be expanded a bit near the bottom to talk about the cohort of users rather than talking about usual transport services. For example, someone coming in from HS2 train and want to get to Crossrail. – may have no interest at all in the Old Oak area (although we may want them to perhaps shop on the high street). Some will be wanting to get to change to the W London line station – 650m away at Hythe Road – especially if doing a daily trip and they will likely want this fairly covered. That route should be wide enough. People who live here of different age groups / family units may have different needs. For example, if you had a family with a disabled child and need a car to get to a specialist school, this is going to be very challenging to only have one car parking space per 5 homes. Businesses in Park Royal who need deliveries and customers throughout the day are another group. But providing parking facilities for all who work there isn't necessarily something we would want to provide. We would want them to use public transport. There are probably about 12 different user groups.
- SP7 is a strategic policy setting an overall tone for the plan on transport. It's about overarching themes that transport policy should address more detail – such as interchange and disabled users. It incorporates the sustainable transport hierarchy starting off with reducing the need to travel, which we previously asked for and has now been incorporated. However, it now places a good deal of emphasis on the street network, especially Old Oak High Street and supports upgrades to the A40 and A406, but we don't know what these upgrades are.
- Would they want to put in a flyover again at gypsy corner to tunnels? They might be referring to the junctions.
- What are you trying to achieve with a greater output of cars / vehicles through those routes?
- They want them to be some sort of smart motorway to make it possible to make some change rather than 'we just want more cars'.
- Technically only parts of the A40 and A406 are in the OPDC area and they are not a highways authority.
- The OPDC is a functional arm of the Mayor. Don't get too hung up on that – we just want clarity on this section (f) on upgrades. We need to do more research on this.
- Do we want to raise issue on untrammelled road improvements? We should discuss this.
- Are we get hung off on this, if it is just providing through routes in the area. Are we interested in doing this for people who are not stopping?

- If people are coming through the site now, don't we want to make easier for them to move thorough? We have some 74% increases in Coronation Road for example and Abbey Road by 47%. These are huge increases. Coming off the A406, you come to a standstill as soon as you get to Abbey Road and there are businesses in the area unloading on the road. There are practical solutions that should be applied, such as moving some businesses to more appropriate areas. 74% increase in cars requires a bit more than tweaking lights. (Source of this date - Park Royal traffic study)
- The other junction you mention is the one that Diageo paid for, just E of the Hanger Lane underpass, a big turning into Park Royal.
- That works quite well in the morning but not in the evening because it introduces a set of traffic lights on the A40 which is a disaster. You could put in an overhead roundabout at that junction. It's a flyover and you could put in a new entrance into Park Royal to ease the traffic in and around the area and then tunnel at Gypsy corner and come out at Savoy Circus.
- Are these not solutions from the 1970's not 21st C?
- What do you do - 'beam me up Scottie?'. You are going to increase traffic in the area with HS2, Crossrail, development of Old Oak and regeneration / intensification of Park Royal.
- That is predict and provide. As we have these figures now we need solutions.
- We were looking at Scrubs Lane the other week. The master planner was talking about walking and cycling ways and we have 3 schemes already in planning pipeline, but there is no mention of these walking and cycling ways and the interface. Are we were talking about with the canal, for instance. The solution is a masterplan with the figures and map of Old Oak and Park Royal including roads to cope with the development.
- This is a good proposal – that there ought to be a masterplan in terms of transport connectivity.
- We should have one now for Scrubs Lane, not after having given permission for current planning applications.
- This isn't elaborated elsewhere in the transport policy. There is reference made to the infrastructure delivery plan. This may give us information on programming and delivery of these upgrades or improvements. This is research that we need carry out.
- Re the supporting text of policy on roads and streets in Old Oak. Previously we have asked for the HS2 station to have vehicular access from Scrubs Lane, but it seems that there will still be access from Old Oak Common Lane.
- NB at meetings we went to in Victoria, TFL was insistent that there was a need for 2 entrances into the HS2 station. I doubt that they would back down on this and will get a route through to Scrubs Lane.
- The 3 towers applications (Scrubs Lane) are going to H&F's planning committee next week. They are objecting and saying this is premature to approve - until exits onto SL are sorted out. I agree we need to be looking at who is going to be using these networks and do it in a non-traditional way. The new population is going to be enormous, ultimately, with no serious proposals for the road network. The homes of the 3 towers are all supposed to be car free. One thing we could be saying is - how realistic is it to have these car free developments? I don't know what the car ownership figures are. They are not huge on SL, but it is a pretty deprived area and a lot of people use public transport. The idea that areas can be car free in an era of deliveries and Uber etc seems unrealistic.

- If new homes are being developed near the A40 and close to all the M's don't you think that you would want to get to the motorway and need a car?
- People often use cars or minicabs to do their weekly shops.
- They have to be car-free there is only one carparking space per 5 homes. They will have to change their lifestyles and use the mini supermarkets on the way home from work. But, even if they do, there are still traffic problems. There are and will be a lot of deliveries to homes & businesses. We can't have unloading on the road.
- The current plan is not 'car free' it's minimising traffic going from one side of the development to the other and trying to stop the numbers of households owning cars. Vans, cabs etc will have to come in one way to the development, then reverse to out the same way. Individuals won't own cars, but doesn't mean that they won't use motor vehicles.
- I don't think the modelling being used factors in the number of deliveries and cabs
- People won't use Uber if there is a massive train station there.
- This is outer London and you want people to relate to others here where transport has not been modernised. This isn't just about using cabs to get into central London. If they develop family homes, children growing up here will likely want to relate to the local area – and will have transport needs other than that which perhaps is being planned.
- The strategy before us is neither justified (because we don't have the evidence of precedents) that this kind of scheme could work effectively (perhaps not deliverable).
- Perhaps Greenwich Peninsula has managed to be virtually car free and perhaps the LLDC area, but it doesn't feel like a London reality.
- Still a credible response to the OPDC.
- This doesn't seem out of line with developments in outer London. In Wembley Park for example, parking for new flats may not be as low as it is here, but still its quite normal to be planning for less car ownership. Bit, we should not be confused with access for deliveries and access for taxis and people who need to use cars. This is quite a different subject.
- Is the proposal for club cars a realistic replacement to car ownership?
- It's the way forward, Hong Kong for example, and its workable, has good public transport.
- Problems re access to charging electric cars was mentioned in the discussion on environmental issues.
- There is a section on parking and perhaps there should be access to electrical charging at each parking area / space.
- Since they want this to be an area of good environmental quality perhaps this is a good start.
- The question is whether it is deliverable.
- Cities are not really coping with traffic and there needs to be some careful thinking. We have a lot of problems where traffic has taken over. We should be in a situation where we live near where we work and not transport on a daily basis. We should be thinking of something different.
- I don't think we have acknowledged that traffic is ruining the city.

POLICY T1: Roads and Streets

Development proposals will be supported where they:

- a) support and deliver a street network across Old Oak and Park Royal that encourages and enables behaviour and forms of travel in line with the "Healthy Streets for London" vision.
- b) support the delivery of a range of new and improved streets that help overcome severance, alleviate congestion and optimise connectivity both within the development area and to surrounding areas;
- c) ensure all new streets are built and designed to adoptable standards;
- d) ensure all new streets are built and designed in accordance with all relevant standards, appropriate to local characteristics and demands;
- e) mitigate the impact of development on the surrounding local and strategic road network;
- f) implement maximum speeds of 20mph on all local roads; and
- g) promote effective and integrated management of streets to future-proof for changes in the surrounding context, life-style and technological changes.

- Boris set up the roads taskforce for London. The idea is that the road system should not just be about movement, but also sense of place. You want a pleasant walk from this part of the area to another and if there are roads and traffic they shouldn't distract too much.
- This fits with T1 (last paragraph) and its emphasis on healthy streets.
- Healthy streets also aim to reduce traffic pollution, noise and deliver healthy and people friendly streets. It is well worth a read of the 'Healthy Streets' policy document
- The healthy streets document also strongly emphasises buses in addition to active transport.
- Old Oak High Street is now to go all the way from Harrow Rd. They will get rid of the steps going down and path to the station. That path will close and instead they will run a new vehicle road to the left, parallel to the rail tracks to then go over the W Coast main line (Euston to Watford main line) go underneath the West London line and the Hythe Road Station and reach the side of the HS2 station. Then, it will go west – towards the other over ground station on Old Oak Common Lane, where instead of a tunnel under the tracks, they are thinking of a bridge going over the top. This would mostly be for buses. They are now saying the bridge over the Euston-Watford line to

	<p>be a vehicle bridge is not just a cycling and pedestrian bridge, but will allow buses going in to Old Oak Common from Harrow Road.</p> <ul style="list-style-type: none"> • Lack of a map of the street network at this stage is difficult. The devil is in the detail. There is a wealth of detail that can be extracted from a map. • There is a potential E – W route called Park Road, running between Old Oak Lane and Scrubs Lane through the Car Giant development. That is shown as a through road. There is also a Wormwood Scrubs Road which runs along the northern edge of the Scrubs and into the Little Wormwood Scrubs area. However this is beyond the time line for this 20-year plan – so the planning committee will delete this from this version. • There is talk of that carrying on to Kensal Canal-side. • There are disagreements between their documents about these roads. In T1 they are talking of as huge walkable ways, however in the cycling specification they are talked of as amber routes which means they will also be OK for cycling. I would say these through routes should be red. Somehow, they have messed up and either that road should not be a through route or (can't hear the tape here on this). • There is potential for Park Road to be a through route E-W but this conflicts with suitability for cycling and walking. • Such a route would either look as it does on Station road at this time of night or, do you provide road access to every part of the development but only with dead ends of circuitous routes that you wouldn't want to take? • You can separate buses from other traffic and enforce that you only have buses, walkers and cyclists. • They have talked of having loops off their main Old Oak High Street, but this does not really help to progress through the whole area. They are suitable for deliveries and a small amount of car parking in the development – but indeed you may well get through routes for cyclists and buses. • I think N Kensington residents would probably say although we accept the argument that with more roads you just get more cars filling them up, but if you don't have E-W
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	<p>routes the situation will get increasingly impossible. At the moment, you can't get out of N Kensington onto Wood Lane / Scrubs Lane without very long queues. Without a connection between Ladbroke Grove and Kensal Canal-side Opportunity Area, again with another 3,500 homes, how will they move? To get from one side of the Scrubs to another is immensely challenging by vehicle at the moment.</p> <ul style="list-style-type: none"> • This route could be done independently, as it's not in the OPDC area, or only a small part of it is (Little Wormwood Scrubs). • Note that in policy T1, sub paragraph (c) and (d) are essentially duplicates. The OPDC talks about a street network that encourages and enables behaviour and forms of travel in line with 'Healthy Streets'. I would make the point that we should say 'to simply exist on them in a reasonably enjoyable way'. Surely this is what's in the London Plan – that is that streets are not just about movement but also about sense of place – which is not said here. I think we ought to mention this. • Do they have a definition of 'local roads'? It would be worth suggesting that there should be a 20 mile an hour limit on all new roads rather than local roads (point f)] • 20 mile an hour is not particularly popular in Kensington. There was a petition. They are more popular in Islington and Hackney and H&F has some. • 20 mile an hour only works over large areas anyway, so why shouldn't everything in the OPDC area be this? • The central London route to drop someone at the station – the 'kiss and drop', won't be at Savoy junction and then come up Old Oak Common Lane, (which seems to be HS2's vision for the future), but will come off the flyover at Wood Lane to Scrubs Lane and turn off into the new Car Giant road. • This wouldn't be popular with those who live on the East.
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POLICY T2: Walking

Development proposals will be supported where they:

- a) deliver or contribute to new and enhanced walking infrastructure, in line with Policy SP7 on connections and the walking interventions identified within the Infrastructure Delivery Plan (IDP);
- b) support the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal;
- c) support the delivery of a high quality pedestrian walking environment to and through new and existing rail stations;
- d) connect to existing and planned pedestrian links in the wider area; and
- e) contribute to the network of Legible London wayfinding signage that improves legibility across Old Oak and Park Royal.

- The response to the reg 18 consultation we said that the policy was indeterminate and the new policy is not much better. Walking network map not there (at date of meeting).
- A walking route should be segregated as much as possible from any wheeled transport.
- Informally crossing roads, where there is not much traffic, is OK.
- The segregation required is that relating to cyclists and pedestrians.
- There is a difference between access and specific routes.
- A road is for buses and cars, a cycling lane for cyclists and a footpath for pedestrians (which should be at either side of the road).
- This development is mostly blocks of flats of various heights. In the central area of a block is green space – either public or private. Should there be pedestrian routes through these blocks and green spaces?
- In some instances, where there are no roads.
- At the meeting that we had on Scrubs Lane we were show one slide with short green routes.
- This was diagrammatic lines on a map – when they haven't even surveyed the road. The diagram also put the cycling route on the road.
- At the southern side of the Scrubs Lane developments, at the top of the Lane near the Pentecostal Church, they are talking particularly of having a through pedestrian route at the back of the developments and you won't have to go up onto Harlesden High Street. You would then go West and then South again to Willesden Junction. I think this is an example of where they are trying to use good design to put in a pedestrian route that is taking you away from the road.
- We don't know if they will apply good design principles throughout the OPDC area as we don't have the walking map and we haven't consulted the walking interventions identified in the infrastructure delivery plan.
- There are also walking and cycling evidence based document.
- There is talk of gradients up to one in 20 for cycling. This is the standard for disabled people and you have to have a level platform of a certain length.

	<ul style="list-style-type: none"> • They did say the High Street will be a bit of a switchback – with all the necessary dips under railway lines, bridges over canals etc and changing levels of ground generally will create ups and downs, although probably not at a gradient that you wouldn't notice (not 1 in 20) – but it's certainly not level. • What about the SW – route into N Acton station? • They are proposing a very long bridge – a cheaper alternative for now. • Is this good design? • That would be the way to get from HS2 station and Old Oak Common Lane over ground station as well. • A continuation of Old Oak High St which is supposed to be a significant public realm feature. The walking policy should say a bit more about that – easy walking gradients.
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POLICY T3: Cycling

Development proposals will be supported where they:

- a) deliver and/ or contribute to new and existing cycle networks, ensuring they connect into and support the wider cycling network including on Grand Union Canal, National Cycle route 6, the cycle superhighway and Quietways programme and infrastructure interventions identified within the IDP.
- b) deliver a comprehensive, safe, attractive and inclusive cycle network across Old Oak and Park Royal;
- c) deliver and/ or contribute to new and improved cycling connections to and through rail stations ensuring sufficient cycle infrastructure allows seamless interchange between public transport and cycling;
- d) deliver and/ or contribute towards signage to improve cycle wayfinding and legibility;
- e) provide high quality, secure, well located, convenient and accessible cycle parking facilities in accordance with London Cycling Design Standards that meet and where possible exceed the standards set out in the London Plan; and
- f) deliver and/ or contribute towards the provision of cycle hire across Old Oak and Park Royal, including from independent providers.

- Of greatest concern is the discontinuity in what the OPDC says. They don't seem to have defined the roads they need and therefore have no idea of what infrastructure they are going to put in place, except for Scrubs Lane (in a different document) of which some bits are worse. They don't seem to have a statement that all red routes will have this on and amber routes will have these requirements and therefore we will do this.
- Nor how this fits in with the network being built now across the Scrubs – from N Kensington and an E-W route, designed by another bit of TFL.
- We welcome through-routes for cyclists across the Scrubs.
- Is there sometimes a conflict in terms of design around people who are commuting at great speed (as there is on the canal between cyclists and pedestrians), between serious cycling and more localised cyclists (perhaps including children)?
- Where the infrastructure is designed suitably there isn't, but where inadequately designed, yes. It requires cycling routes to be sufficiently wide to allow passing.
- Is there something we need to add in, requiring exemplary design meeting requirement of different types of cycle users' needs?
- For a new area, there is minimal cycling provision.
- They don't know what they are doing so are simply doing nothing. This can't all be retro-fitted. The example from central London of separate cycle Lanes at least on main roads as well as separate cycle routes, is good.
- The policy (section b) is good – 'deliver a comprehensive, safe, attractive and inclusive'. It's a perfect policy. but without a map and a statement of what the roads would look like is not good. This can result in things going wrong in the more detailed planning stages. Similar fantastic statements were made at the Olympic Park site, but it hasn't turned out all that well.
- Can cyclists here take an educated guess on the permeability of the OPDC area and connections to surrounding areas and networks – given the canals and rail and major highways in the OPDC area?

	<ul style="list-style-type: none"> • The biggest problems are access to the north, where all routes currently have too great a volume of traffic, similarly, to the south and Park Royal. The E-W route, because of the canal, is thought to be quite good by cyclists. The canal tow path is currently shared use, but we support this being separated. Superhighways also need to be delivered. • There is room for a cycling corridor on the N side of the canal. • The map of the development shows the canal as pretty much the single 'green' route – both the n and s corridor. • If you go back to the 1819? Enabling Act for the Grand Junction canal, it had tow paths on both sides. • Will the policy and text enable a taking up of cycling to and from the Park Royal industrial estate, beyond the current rate of only 3% of employees cycling? • Nothing here would indicate this.
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POLICY T4: Parking

- a) OPDC will ensure that Old Oak and Park Royal will promote a modal shift towards more sustainable modes and becomes an exemplar of low carbon development, by:
 - i) limiting car parking to a maximum of 0.2 spaces per residential unit for residential development;
 - ii) strongly encouraging car-free development for developments located in areas with PTAL between 4 and 6B;
 - iii) requiring car-free for non-residential developments, unless in certain cases limited car parking can be justified when operational or business needs and access to public transport are taken into account; and
 - iv) securing appropriate blue badge provision for both residential and non-residential uses.
- b) New residents will be prevented from applying for parking permits for CPZs;
- c) When providing car parking, proposals should:
 - i) incorporate 20% active and 80% passive electric charging points for electric vehicles at all new parking spaces;
 - ii) include provision for car club vehicles;
 - iii) be sensitively designed and not take precedence over other street users, or the design and quality of open space, public realm and building frontages; and
 - iv) be adaptable and demonstrate how they can be replaced by other uses in the future;
- d) Proposals should provide suitable facilities to cater for anticipated demand for taxis and coaches. However, proposals should not take precedence over other street users, or the design and quality of open space, public realm and building frontages.

- This does mention electric car points (c)(i).
- The OPDC has an aspiration to reduce the number of people coming into Park Royal by car, but how are they going to enforce that? There will be deliveries and visitors by car. It should not be chocked by people driving there in the morning to work and then home again in the evening. How politically popular would it be to control?
- We should note that the OPDC is not the highways authority so doesn't do the controlling of parking. The policy is all very well – but it is not they who will put in the CPZs in and control the parking and monitoring this, for example, in College Park.
- Their main concern is parking by new buildings.
- While these buildings are supposed to be car free there is nothing to stop people parking up in College Park beyond restricted hours.
- Does the OPDC recognise that it is limited in what it can do in terms of car parking in general – as a planning authority.
- Supporting text 7.32 says they will work with the highways authorities, businesses
- Politically whether the highways authority will do this in Park Royal is another matter – it would be very unpopular.
- One thing they don't say, which is important, is whether parking will be on road or off-road. Fundamentally, new developments should be off road. This should be stated in the policy.
- Concern raised that in Coronation Rd they park on the pavement as well as on the road – which means people cannot walk there. How should we address this?
- We should have a standard set out here – with good road width (where two buses can pass), a cycling route and pedestrian pavement. At First Central there is a CPZ that stops people parking there 24 hours a day (except Saturday and Sunday), but the road is not wide enough to allow a bus to pass if a delivery vehicle or cars are parked there. We do need a typical section through, showing what will be expected. In Germany, there is two cycle lanes with arrows showing direction, one on both sides of the road.

	<ul style="list-style-type: none"> • The fundamental point that we need to see these cross sections through the different types of roads before any detailed planning is good. • Some routes are 'mixed traffic' (but not through routes). • Park Royal as already highlighted is stricken with traffic congestion and conflicts and has parking / off-loading issues for non-residential developments. • What would also be important is to have consolidation centres on the edges of Park Royal. There are opportunities for this on either side from which items could be transferred to smaller, perhaps electric, vehicles. This would help to solve some of the existing problems. • Would this tremendously push up the costs? • Not with economy of scale, and PR business group would be in favour of this. All the current congestion results in costs. • This is covered in T7. • The only think to add to this is that Park Royal is predominantly a consolidating centre now, where the large lorries come in and deliver to warehouses and then the small white vans come to pick up and distribute from there. • Still consolidation centres for raw materials would still be important (especially coming from the midlands where it may well have already been transferred to several consolidation centres along the way). • New York has a principle that large lorries have to be in the city before 6am in the morning. This could be imposed here. • This is already implemented in large part of NW London.
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POLICY T5: Rail

Development proposals will be supported where they:

- a) deliver/ contribute towards rail infrastructure and capacity, including the range of rail interventions identified within the Infrastructure Delivery Plan, which aim to enhance rail capacity within Old Oak and Park Royal;
- b) design new rail stations to deliver outstanding design quality and enable future proofing of station design to facilitate future technological advances, rail connections and service changes.
- c) ensure stations contribute to the creation of a destination where people want to spend time and include the provision of retail, culture, leisure, town centre and meanwhile uses;
- d) appropriately manage the demands of competing transport modes and interchange requirements for walking, cycling, buses and taxis, ensuring adequate space is provided and embedded into the public realm;
- e) ensure all station entrances have a prominent street presence;
- f) ensure routes and spaces within stations are integral parts of the local street and movement network, and incorporate active frontages, where feasible and appropriate;
- g) provide step free access from all entrances to platforms to ensure any route to, from or through the station is accessible to all;
- h) optimise development opportunities on and/or adjacent to the stations and tracks, where feasible and appropriate;
- i) ensure the impact of new development on existing rail infrastructure is minimised and mitigation is provided where appropriate;
- j) ensure new rail infrastructure is sensitively designed to integrate with surrounding development and existing communities; and
- k) support the design operation of stations in Old Oak and Park Royal by ensuring they pioneer and respond to technology, innovation and behavioural change.

- A lot of this seems to be related to land use. For example, T5 (h) optimising development opportunities adjacent to the station and tracks. It gives too much opportunity for retail on top of the HS2 station. Is the wording correct here? The development of Old Oak common is guaranteed to be a success because it has an HS2 station which is nationally important. But the HS2 station should be the heart of the development. The heart of it is to the north. There are other parts of the policy such as (e) that talk about stations having a prominent street presence and ensuring that they are an integral part of local street and movement networks. The whole of this is about viewing Old Oak Common station supporting superstructure and this new part of London should not be like that.
- This is the problem at Kings Cross – it has no heart. The last place you want here is the station to be the heart. We also don't want it like one of these dreadful airport terminal shopping centres.
- The policy is all about stations. The previous (reg 18) consultation version was about stations and routes. They have dropped mention of the services.
- They have also dropped mention of the two over ground stations. They are not in the policy any more (or are not identified). What about N Acton? We had previously commented that this was reaching capacity.
- There are supporting documents, one a year old, on how N Acton could be rebuilt, basically having a walking and cycling route at the level of Victoria Road straight across the whole station and having a new ticket office to one side when you get above the platforms – with stairs and lifts – and the current station closed. They haven't updated that. They have produced a Willesden Junction document.
- The policy should identify the stations. We don't want them missed out or forgotten.
- The policy talks about interchange from rail to other modes of transport, but not rail to rail, which is very important here where there are different stations on different lines. There should be something here saying how this will occur – in the policy.

	<ul style="list-style-type: none"> • The OPDC was initially talking about travellers to whiz people from one to another – as 600 m is too far for people with a couple of cases. • They talk about a second station entrance to the E, where the stairs are / might be, which shortens the distance by about 200m. • It is an interchange. • Yes, if they did want it as a terminus there would need to do a complete redesign. • Issue of extension to Euston noted. It is assumed that this will be done by 2026. • Are you content with what they say about Willesden Junction? • Can they fund this whole development? When we were last talking about this, there was suggestion of the need for more funding from the treasury to get the whole thing underway – on the basis that it would increase the whole GDP of Britain and they would get pay back over some decades. If they don't do that, you cannot squeeze enough out of developers to put in all the infrastructure required. Infrastructure kills the scheme at the moment. If this is the case, plus a brand-new Crossrail in the wrong place – they will inevitably look towards Willesden Junction to start the development. There is still some doubt as to whether Hythe Road Station will be built, although this would be a disaster if not delivered (important for a brand-new district here). • Is it not necessary for the policy to state that replacement rail depots will be provided? • It's not really within their gift. • Not anything to do with their planning remit? • If its operational railway land you don't need planning permission to do things. • But as part of this plan they are going to displace essential rail depots, shouldn't the plan say something about that? • Yes – we need something here about the necessity to protect operational railway land for future land and depots.
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POLICY T6: Buses

Development proposals will be supported where they:

- a) facilitate, deliver and contribute to bus infrastructure, including the range of interventions identified within the IDP to provide a comprehensive and coherent bus network across Old Oak and Park Royal that is connected into the surrounding area, including priority measures where appropriate;
- b) ensure that all residents in Old Oak and Park Royal live within 400m of high quality, convenient, safe, sheltered and personally secure passenger waiting and information countdown facilities;
- c) ensure that, streets are designed flexibly to enable them to be served by buses;
- d) ensure that impacts to bus operations resulting from construction activity are mitigated;
- e) provide temporary provision for buses, during the phased development of the OPDC area; and
- f) support the roll out of low and zero emission buses.

- The previous reg 18 policy was very thin and the current policy is mostly about developments facilitating bus infrastructure. It doesn't seem to be an overall or coherent plan for pro-actively supporting bus development.
- It's not a bus policy it's just a list of suggestions about developments and what they would want from them to support buses.
- (c) is a strange statement – you wouldn't expect most streets to be served by buses.
- They may have in mind Old Oak High Street here.
- It also misses out that in terms of future developments some buses may need to terminate here – so there may need to be bus stands.
- The study seems to suggest that existing buses can be diverted in some way to service the area. Surely, they will also need new bus routes.
- Shouldn't we be talking about avenues (rather than roads and streets)?
- Issue on miscalculation on number of homes that might be delivered here. Some reductions in numbers could help in providing space for infrastructure.
- I'd be happy to call some roads streets boulevards.
- What about stressing the need to improve connections between Old Oak and Park Royal? The severance of the two sites is something people have often mentioned particularly to improve the connection to Park Royal from the new HS2 station. Buses are an appropriate means of travel for people having arrived by train. For example, T6(a) could say - across 'and between' Old Oak and Park Royal.
- Should the policy specifically say that buses will stop close to the stations and other critical facilities – such as the health centre with 37 GPs?
- Plans are to keep the existing bus depots. Re stands, should you terminate routes on site where the driver has a ten minute break? On high value land you may not wish to do that.

POLICY T7: Freight, Servicing and Deliveries

Development proposals will be supported where they:

- a) provide measures to coordinate and reduce freight, servicing and delivery trips by:
 - i) providing a forecast of delivery activity associated with the development and relevant movement data that OPDC and TfL can use for dynamic modelling purposes;
 - ii) producing and implementing a Delivery and Servicing Plan;
 - iii) utilising freight consolidation centres where appropriate;
- b) where possible, provide off-street servicing facilities within all existing and new developments;
- c) deliver and/ or contribute towards the provision of click and collect space;
- d) maximise the use of more efficient and sustainable ways of delivering goods including consolidation, the use of rail, water, electric vehicles, cargo bikes and last mile deliveries by sustainable modes;
- e) ensure that the operators of all freight vehicles operating in the area have attained the Silver Fleet Operator Recognition Scheme (FORS) accreditation; and,
- f) implement and safeguard for future innovative and smart technologies in relation to freight, servicing and delivery that maximise the efficiency and interoperability of the transport network, including measures such as holding bays optimisation and demand responsive deliveries.

- Earlier discussion above re consolidation centres.
- (d) should say waterway not water. It could actually specify the canal.
- NB. they have dropped the fleet operators recognition scheme – from gold to silver. (This is a government scheme with standards on how well a fleet is maintained) Why have they dropped this?

<p>POLICY T8: Construction</p> <p>Development proposals will be supported where they:</p> <ul style="list-style-type: none"> a) provide measures to reduce construction trips by: <ul style="list-style-type: none"> i) providing forecast vehicle trip information to OPDC; ii) producing and implementing a Construction Logistics Plan and Construction Code of Practice; iii) utilising construction consolidation centres and lorry holding areas, where appropriate; b) coordinate and phase construction projects to enable the transport and environmental impacts to be effectively mitigated; c) ensure new utilities are planned in such a way as to avoid or minimise the impacts of future utility works on the road network; d) make maximum use of rail and water transport for construction deliveries; e) activate the space adjacent and around the edges of construction sites to mitigate impacts on surrounding land uses to create successful connections and meanwhile uses; f) ensure that the operators of all construction vehicles operating in the area have attained the Silver Fleet Operator Recognition Scheme (FORS) accreditation; and g) take appropriate measures to ensure the safety of pedestrians and cyclists while construction is happening. 	<ul style="list-style-type: none"> • Consolidation centres are also very important in terms of construction (as in T7). • NB they have dropped the fleet operators recognition scheme – from gold to silver. (This is a government scheme with standards on how well a fleet is maintained) Why have they dropped this (as above)? • Also want to know that construction vehicles are not big polluters using diesel. TFL said they will look at this. • Can you get enough energy density from electric vehicles? • Unlikely but even petrol is better than diesel. Imposed emission controls would be good. • T8(a) – people have noted before that often in practice this does not happen. We should suggest the inclusion of transparent and ongoing monitoring. • A delivery and servicing plan may be fit for purpose now. But over time we would want periodic revisiting of these plans (T8 and T7) These things have to be regularly / periodically reassessed. • The use of canal still hasn't been properly considered. • NB in the discussion on environmental issues – request had been to consider construction and phasing in one policy. Don't know if this adequately covers issues raised previously. • They have taken on issue raised about phasing and mitigations beyond site boundaries – but we must look carefully at this and be properly monitored.
<p>POLICY T9: Transport Assessments and Travel Plans</p> <p>Transport assessments and travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance.</p>	<ul style="list-style-type: none"> • Monitoring in practice also required here around what is proposed by developers and OPDC. • So, they have taken out reference to construction logistics plans and moved to T8. • We need to ensure that they are being responsive to all points made on this.