**Response to Draft Old Oak and Park Royal Opportunity Planning Framework Consultation**

Page 2 - Section 2 Vision and Objectives

Page 4 – Section 4 Design Strategy

Page 6 – Section 5 Old Oak Places

Page 13 – Section 6 Park Royal Strategy

Page 16 – Section 7 Wormwood Scrubs Strategy

Page 17 – Section 8 Transport Strategy

Page 19 – Section 9 Environment Strategy

Page 22 – Section 10 Delivery Strategy

**SECTION 2 VISION AND OBJECTIVES**

* The Old Oak and Park Royal Opportunity Area Planning Framework has been described by OPDC officers as an early start to the development of a Local Plan as well as providing support for London Plan policy. Local Plans are required to reflect the visions and aspirations of local communities and an early start in developing this should have clear building blocks in place in relation to this requirement.

Without a Sustainable Community Strategy for the area, the Mayor has some documents that he could draw from – the responses to consultation on the Vision to Old Oak Common and also the Sustainable Community Strategies of the boroughs of Brent, Ealing and Hammersmith & Fulham.

* The first paragraph of the OAPF’s Vision mentions ‘smart’ regeneration that will over the next 20 years make a major contribution to strengthening London’s role as a global city. This does not appear to be mentioned in responses to the Vision for Old Oak Common nor in the boroughs’ Sustainable Community Strategies. OPDC should explain and justify its particular approach to ‘smart’ regeneration and how this and other elements of the Vision & Objectives are carried forward within the OAPF document.
* While the Mayor’s London Plan vision and objectives include that London should excel among global cities, it equally talks about tacking deprivation and inequality. Given that, as detailed in Figure 74 of the OAPF shows substantial number of areas of deprivation in and around the OPDC area, the vision should assert its intentions to address this.
* It is incorrect to describe what might be developed here as a ‘new town’. The area has existing residential and business communities with links to surrounding communities. This as well as the potential links, connections, needs and benefits between those with in the OPDC and surrounding the area should be set out more strongly in the vision. The integration of Old Oak, and for that matter the other parts of the Opportunity Area, into the surroundings should be more clearly elaborated.
* The OAPF vision and Objective 1 should highlight how the opportunities presented by the Old Oak and Park Royal Development Corporation Area will regenerate, support and sustain existing communities within and neighbouring the OPDC area as well as new communities that will be live and work here.
* It is essential that the vision and Objective 1 set out aims not just to ensure a mix of housing types and tenures – but also a range of tenures that will genuinely meet existing need, particularly in terms of affordability. It is not clear that homes currently described as ‘affordable’ do adequately meet this need.
* The vision should begin by setting out an aim for the area to be an exemplar in terms of delivering Lifetime Neighbourhoods (London Plan policy 7.1); well-connected and walkable, with a choice of homes, accessible infrastructure and services, places to spend time and to work. It should aim to promote a cohesive community fostering diversity, interaction and social capital. These are issues that are referred to in existing and draft revisions of the~~ir~~ boroughs’ Sustainable Community Strategies.
* The vision and key Objective 3 should set out a realistic and integrated vision around the kinds of new jobs, education, training and skills opportunities that might be created here to support existing as well as new communities. This should build on existing and emerging successful businesses with clear links to and integration with the Strategic Industrial Location of Park Royal and to neighbouring opportunity areas.
* This OAPF should have demonstrated that it is the product of working through options balancing the costs and benefits of varying quanta of development (homes and jobs) to arrive at a proposal that contributes to the achievement of sustainable development and that, for the Mayor, also meets his various statutory obligations and duties. The London Plan hands down quanta of development but these are indicative and/or are qualified (e.g. “could yield”; “subject to demand and capacity”). However, the OAPF in its Vision and Objectives takes these as set targets to determine the nature and scale of development in the Opportunity Area rather than taking the achievement of sustainable development as the starting point and then determine the appropriate and deliverable quanta of development.

**SECTION 4 DESIGN STRATEGY**

D1 Public Amenity Space

**a (iii)** should be strengthened to protect, enhance and rehabilitate existing green spaces in residential areas during and after completion of transport and other developments

**Paragraph 4.1:** The proposed design of green spaces is strongly shaped by the need for connectivity between stations, and linked to the agenda of enhancing permeability of the site. Design ideas for green and open space should begin with the principles of lifetime neighbourhoods to design safe areas for living in which amenities are well located for residents, and not simply for commuters. We are concerned that while green streets will enhance the transport network, they cannot replace dedicated multi-purpose green and open space for play, recreation, healthy exercise, meeting places, greenery, urban wildlife and clean air. Streets should not be included in calculations of green and amenity spaces for the area. The Green Grid should be dealt with under D2 Streets and Pubic Realm, not D1 Pubic Amenity Space.

**Figure 14** should be revised to exclude the streets (“green grid”) from the depiction of amenity spaces so that these can be properly evaluated in their own right. Green streets should be part of the D2 not D1.

Figure 14 should also be revised to exclude Wormwood Scrubs from depiction as an amenity space. Wormwood Scrubs should be excluded from any discussion of required “amenity space” for the OPDC area. Adequate amenity spaces necessary for this development should be provided within the envelope of the Old Oak development area; all amenity and all green spaces required for the Old Oak area should be provided within the Old Oak area, excluding the Scrubs from any such calculation.

There is need for an additional specific design objective reflecting this:

* Adequate green spaces to meet the required standards for the scale of new development planned for the Old Oak area will be provided within the Old Oak area, excluding the Scrubs from any such calculation.

D2 Streets and Public Realm

An objective expressing a commitment to separating walking, cycling, private, and public vehicles in all streets and public realms should be included. Lifetime Neighbourhoods require safety and accessibility for all users. Permeability and legibility need to be balanced with creating enclosing neighbourhoods where children and older people can feel safe; where adequate community-oriented facilities and meeting places are provided. Street design needs to sensitively support a balance in the provision of local services and retail, with those dedicated to the potentially lucrative activities to service high footfalls.

The existing green spaces alongside the canal should be included in the Design objectives as contributing to both the Green Grid and the Public and Amenity Spaces. They should be protected and safeguarded.

D3: Building Heights and Densities

There is no appetite for extensive high rise development. The sensitivity of Wormwood Scrubs, so close to the core of the planned highest densities, suggests the need for a different design solution. There is nothing in the Design section about the quality of design expected. This should be remedied. The low quality high rise buildings in North Acton are not what are wanted in Old Oak.

The highest densities in London are characteristically delivered through the vernacular mansion blocks. The Mayor has the opportunity here to define the characteristic London architecture for the 21st century. The focus of this should not be high rise buildings in areas that are not typical to the current characteristics of this part of London. The objective of “greater height” should be removed to focus on optimising densities.

D4: Built Heritage

The vernacular industrial heritage of Old Oak and Park Royal is an important part of the identity of this area. Due to the functional nature of industrial areas, many valued local buildings may not have been recorded or noted as of local or national heritage interest. Important buildings in industrial history have been torn down in the course of business development. In order to create a distinctive sense of place this local built environment and history is important.

As well as being guided by English Heritage concerns and criteria, close attention should be given to existing local council lists of buildings of merit. In addition, careful and urgent work should be undertaken by the OPDC to determine existing and past buildings and activities which contribute to the local sense of place, in partnership with historic building societies and other community based organisations. This would generate a local list of buildings of merit and of local historic interest to protect and memorialise the local vernacular industrial and social heritage. The text of 4.4 should be amended to include this.

D5 Place-making

It is important to recognise existing positive elements for place-making in the OPDC area. Place-making though is about more than just a sense of place. This section should elaborate on the need to protect, enhance and deliver the elements required for lifetime neighbourhoods. The Park Royal and Old Oak neighbourhoods have seen significant loss of facilities and services over recent decades. The Design strategy should reinforce the need to prevent further loss, and to ensure sufficient delivery of services within local places to ensure their viability as Lifetime Neighbourhoods.

**The following should be added:**

* By protecting and enhancing existing facilities and services, and delivering adequate levels of high quality community and social infrastructure, to deliver Lifetime Neighbourhoods.”

Residential areas within the Park Royal area do not have a designated place-making strategy although the requirements for these areas will differ significantly from surrounding industrial areas (although good synergies could be established).

An additional “place” covering existing and new residential areas within the Park Royal area should be designated to ensure adequate attention is provided these residential areas is.

An additional section is required on ‘High Quality Design’, covering the points below

The OAFP expresses an ambition for development of iconic landmark buildings. This is appropriate in terms of large scale public buildings of local, regional and national importance. Iconic and globally significant architecture can, and often is, delivered without the need for great height. High-rise would be inappropriate in this context. Equally important should be a clear aim to provide high quality sustainable architecture to be delivered in high quality liveable and inclusive sustainable neighbourhoods that are accessible to all ages and income groups.

**SECTION 5 OLD OAK PLACES**

**OLD OAK NORTH**

Vision

The vision fails to set out a clear aim to develop a strong Lifetime Neighbourhood in this significant new residential area in Old Oak North and ignores the links with and needs of existing communities within the OPDC area and at the edges of it.

A proposed alternative vision for Old Oak North as follows:

Development will ensure provision of homes, jobs, retail, services, training facilities, green, social and community infrastructure that will assist in addressing need of existing neighbouring communities within and on the edges of the OPDC area and will facilitate delivering a sustainable Lifetime Neighbourhood. It will provide for large scale catalyst uses of appropriate scale , character and function, positive links to neighbouring communities and a town centre focus at the cross roads near Hyde Road station.

Key Objectives

**KO1**: This infrastructure should include the social and community facilities set out in the Delivery Section of the OAPF.

**KO2**: This should include both a specific target for delivery of homes in Old Oak North and a set percentage of homes that will be affordable. 50% of homes should be affordable in order to meet local need, key workers, assist in addressing the London-wide backlog of need for affordable homes and create a genuinely mixed and balanced community. There should be a requirement to deliver genuinely affordable housing given the social composition of the existing population within and at the edges of the OPDC area. Over-development of high priced apartments and penthouses that may be left empty for years and which do not meet local need must be avoided.

This objective should also include that housing developments should be mixed use at the ground floor level.

It should also specify that building heights in Old Oak North should range from 5 to 10 storeys. There is concern that the development of taller buildings is about development of exclusive prestige type buildings. Evidence would suggest that the levels of density achieved in high-rise blocks can equally be achieved in mansion blocks. This is more acceptable and will achieve a better connection with surrounding areas.

**KO3**: The development of a large-scale catalyst site is a potentially good idea, if of appropriate scale , character and function. This should however also assist in meeting some local needs. It should be a multi-use and should include some community focused amenity spaces. A variety of proposals should be drawn up on this in consultation with the community in and around the OPCD area and there should be formal consultation on the site before any option is taken forward.

**KO4:** The development of a new London Overground station at Hythe Road and of an east-west through road immediately to the south of the station and at the cross roads with a new road from Scrubs Lane (via the crossroads) to an eastern entrance to the HS2 station, provides an obvious focus for the development of a town centre in Old Oak North and this new largely residential area. Making the crossroads part of the district centre should be included as a key objective, and would stop all activity being aligned to the Old Oak High Street slightly further west.

The entrance to the Hythe Road station could be 'shared' between Old Oak High Street and the road from Scrubs Lane, by replacing the embankment between them with a viaduct, and adding a commercial building around this.

This would also facilitate a more sensible eastern route from central London via Wood Lane to the Old Oak Common HS2 station. It would mean that the main entrance to the HS2 station from the A40 would be via Scrubs Lane/ Wood Lane rather than (as seems to be suggested in the OAPF) a main western entrance via Old Oak Common Lane. This would provide greater protection (including in relation to noise and air quality) for the existing residential neighbourhoods on the western side of the station and simply a shorter route from central London. This should be included in supporting text of Old Oak North and be included in the section on Old Oak Common South.

**KO6:** This should include green and open spaces. Place making to include the retention and repurposing of features and buildings of character and heritage interest, and enhancing the Grand Union Canal conservation area.

**Additional key objectives are required**:

* calculations for new and additional green and open space to be provided at levels appropriate to the new housing targets. It should be made clear that calculations should not include the provision of Wormwood Scrubs;
* a requirement for sensitive relocation of EMR and Powerday away from residential neighbourhoods. These sites already have detrimental environmental impact (noise – including of exploding canisters) and offensive odours and smells, on existing communities.

Relocated waste sites should be replaced with appropriate employment (which might be light industry, medical research, robotics, production of robotic cars or a science park) and training facilities to address employment needs of adjacent communities (within and at the edges of the OPDC). Repurposing as energy from waste site is opposed.

There is a need to devise a full range of possibilities that would support new and existing industry in the Park Royal and Old Oak area and support existing communities, through an integrated approach to skills, training and apprenticeships through to longer-term skilled employment;

* displacement of other existing businesses should be avoided. Where any are displaced they should have first options of sites in the Park Royal Area. This key objective should be applied in other development sections of Old Oak.

**OLD OAK SOUTH**

Key Objectives

**KO1 & KO2:** A specific target for delivery of homes in Old Oak South and a percentage of these homes that should be affordable homes should be set in this section. 50% of homes should be affordable in order to meet local need, key workers, assist in addressing the London-wide backlog of need for social-rented homes and in creating a genuinely mixed and balanced community. There should be a requirement to deliver genuinely affordable housing given the social composition of the existing population within and at the edges of the development. Over-development of high priced apartments and penthouses that may be left empty for years and which do not meet local need must be avoided.

This objective should specify how many and what kinds of jobs will be provided in this area and the extent to which they meet existing local need (within and on the edges of the OPDC area). Target figure should be net total of new jobs to be delivered, taking into account the numbers of jobs lost through displacement

There is concern that there is a difference between the types of jobs that will be provided in this area and existing local need (within and on the edges of the OPDC area). There should be a target for 30% of jobs created to be taken by local residents (from within and around the OPDC area).

A breakdown should be provided of the number of jobs relating to development (construction) and to long term sustainable jobs. The 30% of jobs target to be taken by local residents (from within and around the OPDC area should apply to both.

The OAPF should include some analysis of the evidence of need for training and retraining (from within and on the edges of the OPDC area). Developments should make provisions to address this need.

Developers and construction companies should be required to provide apprenticeship schemes and be required to ensure that at least 30% of the apprenticeships are accessed by residents of the OPDC and surrounding areas.

**KO3:** The main entrance to the Old Oak Common HS2 station should be an eastern entrance (as highlighted in response to proposals for Old Oak North) to facilitate the main route from central London being from Scrubs Lane rather than Old Oak Common Lane. This would provide greater protection (including in relation to air quality) for the existing residential neighbourhoods on the western side of the station.

**KO6:** Following on from the above amendment to KO3, the new street connecting Old Oak Common station to North Acton should be reduced in significance.

**KO8:** It is essential that development is sensitive (the word mindful is not strong enough) to existing residential communities in Wells House Road, Midland Terrace and Shaftsbury Gardens and to Wormwood Scrubs. And the OAPF should set out how this sensitivity is to be achieved. This includes planned Crossrail links which should not pass the bedroom windows of existing homes in Wells House Roads but should be underground.

**KO9:** Access to Wormwood Scrubs should be confined to the eastern part of Wormwood Scrubs in order to protect the ecological value of the Scrubs south of the HS2/Crossrail Station.

**There should be an additional key objective**:

* The baseline for development should be 5 to or 6 storeys rising to no more than 10 storeys high. This would be more respectful and sensitive to existing low rise street properties and small blocks of the existing homes in Wells House Road, Midland Road and Shaftsbury Gardens and the prevailing urban form and character of this part of London.

It is unnecessary and inappropriate to have 50 storey tower blocks in this area. There is much evidence that other urban building types can deliver high densities and quanta of commercial space as high-rise developments. There is huge detrimental environmental impact from tall buildings – including shading and wind funnelling and turbulence. High rise development such as this will compound the isolation of existing residential areas (such as those at Wells House Road).

The preference for high-rise would appear to reflect developers’ desires to create prestige and exclusive developments not to reflect community focused needs for sustainable development and Lifetime Neighbourhoods.

**OLD OAK HIGH STREET**

Key Objectives

The proposal for a tree lined boulevard provides a structure to the site and could be a very positive asset to the place making of this area, but Fig 39 of Tottenham Court Road is an inappropriate model.

Additional key objectives are required:

* building heights adjacent to the boulevard should be no higher than 5 storeys;
* there should be active frontages at the ground floor level with a wide mix of retail, services and community, education and health facilities including those that might be open in the evening as well as during the day – to provide / increase the sense of safety in the area;
* public amenity spaces should be designed to encourage a range of activities such as street markets, outdoor performances and cinema, outdoor gym equipment and other leisure and play activities accessible to people of all ages;
* a segregated cycle path (we are aware that many pedestrians particularly elderly, disabled and those with small children need to have space separate from cyclists);
* that the only type of vehicular movement here should be buses. This should not be a general road for private vehicles.

**OLD OAK COMMON STATION**

Key Objectives

**KO1:** There should be no access to Wormwood Scrubs via the HS2 station. The final part of KO1 should end prior to ‘including south towards Wormwood Scrubs. Supporting text referring to a South access into the Scrubs from the station -in paragraph 5.55 should be removed.

The more appropriate access point to the Scrubs is from the residential area to the east of the Scrubs.

**An additional key objective is required**:

* The main entrance to the Old Oak Common station should be at the East side of the station to facilitate the main route from central London being from Scrubs Lane rather than Old Oak Common Lane. This would provide greater protection (including in relation to air quality) for the existing residential neighbourhoods on the western side of the station.

**NORTH ACTON**

Vision

There is need for any development at the edges of the OPDC area to be sensitive to and to relate to the communities outside, as well as within, its boundaries.

In the case of North Acton, much of the recent development has been high-rise, meeting the needs of young single people, particularly students, who are relatively transient. While some of this type development is entirely appropriate near to the station, we do not feel that that a continuation or expansion of more high-rise could be described as “successful regeneration”. We feel that this would be unsympathetic to the character of existing and more stable residential neighbourhoods to the south side of the A 40 as well as to the existing communities of Wells House Road, Midland Terrace and Shaftsbury Gardens.

There needs to be a gradual reduction in building heights as development moves out from North Action and a need for development of homes that will meet need, include family sized dwellings, and will support in sustaining existing communities. (See also comment on Key Objective 5).

This should be reflected in the vision for North Acton.

Key Objectives

**KO1 & KO2:** There is a degree of support for the idea of mixed use intensification, but feel there is a need to consider more carefully the kind of employment that might be encouraged here (as well as more generally across the OPDC area).

The OPDC should look at the potential spin off from existing and new and academic centres, including Central Middlesex hospital – for example - advanced manufacturing, medical research, robotics and potentially production of automatic cars.

It is essential that existing communities inside and on the edges of the OPDC area are able to benefit from new employment rather than the residual or low end jobs such as cleaning and security jobs.

There is a need to devise a full range of possibilities that would support new and existing industry in the Park Royal and Old Oak area and support existing communities, through an integrated approach to skills, training and apprenticeships through to longer-term skilled employment.

There should be encouragement for the development of further education facilities that might support apprenticeships schemes relating to existing Park Royal industries and support development of new incubator light industrial units.

**KO4:** The OPDC needs to elaborate more clearly how proposals will be appropriate to and relate well to the existing residential areas and North Acton Cemetery. Proposals should be sensitive to adjacent residential areas both within and on the outside edges of the OPDC. We note that Acton Cemetery is already designated as a sensitive area. The section of West Acton including the section from Park View and Cloister Road on the southern edge of the A40 should also be considered a sensitive area. There should be more viewpoints for Figure 27 Local Views from these streets and Wells Farm Road.

**KO5:** The proposed ‘defined frontage’ and ‘gateway’ approaches to urban design are too ambiguous and may be interpreted to promote ‘cliff edge’ or out of scale massive ‘landmark’ blocks. These together with inappropriately high buildings are strongly contested. There should be a graduated step change in urban scale and grain particularly as expressed in building heights.

**KO6:** There should be a green, connection / walking, cycling route between North Acton and the Old Oak area and vehicular access to Old Oak Common HS2 station should be on the East side; both ensuring sensitivity to the existing residential area including Wells House Road, Midland Terrace and Shaftsbury Gardens.

**SCRUBS LANE**

Key Objectives

**KO1:** This should include – provision of a significant access point (as a main road route in from Central London) to a main eastern entrance to the HS2 and Crossrail stations from Scrubs Lane. This should be via the more northerly of the two proposed accesses to Old Oak North. Traffic from the A40 should be encouraged to use this as the main entrance – rather than Hythe Road.

**KO4 & KO5:** To achieve these two objectives Scrubs Lane should become an attractive boulevard (down to the A40) with segregated cycle paths with narrow trees planted along the middle of the carriageway and anywhere else they can be planted.

**KO6:** Insert into this objective the retention and repurposing of the period buildings which are illustrated on p18 of the OAPF.

**An additional key objective should be added**:

* Existing businesses here should be protected. Where, however, any existing businesses are displaced they should be accommodated within the Park Royal area.

These points should be included in the vision.

**GRAND UNION CANAL**

Key Objectives

**KO2:** It is essential that a full survey of the existing buildings along the canal is carried out to ensure that industrial heritage buildings are identified and protected. There may be opportunities for a historical or cultural hub to be created on the canal.

Development should be set right back from the edge of the canal, to ensure it is accessibility to everyone and to ensure there is a continuous wildlife corridor.

Only low rise development of no more than two or three stories in height should be acceptable.

The tow path should be wide enough for segregated cycling and pedestrian routes.

**KO3:** New basins, side docks and wharfs along the canal should be encouraged – particularly in order that development may occur in cul-de-sacs away from the edge of the canal. These might also provide the potential for facilitating active usages on the canal such as a canoe club.

**In addition** paragraph 5.73 should be added as a key objective.

The OPDC should establish good relationships with active canal freight companies particularly relating to the potential for use of the canal in respect of transportation of building materials over the next 20 years or more. It has been suggested that there could be a concentrator site next to the M4 (perhaps in Heston) and that goods from there could be transported from there by barge into the Old Oak area.

This provides potential for positive impact on the communities living in existing poor air quality / pollution areas along key main roads at the edges of and into the OPDC area.

**OLD OAK LANE**

Vision

An alternative vision for Old Oak Lane, to that of a busy connection between the A40 and Harlesden Town Centre, is for a less busy street; one that is principally for buses and local residents’ access. One proposal that this can be achieved by is a new link road from the West Coast Main Line bridge to a proposed Harlesden bypass.

A Harlesden Bypass, avoiding the current A404 route

* joins the North Circular Road at Abbey Road;
* goes east joining Premier Park Road to Waxlow Road;
* crosses Acton Lane and the canal;
* continues via Atlas Road with a junction to the proposed Old Oak Lane bypass to the current crossroads with Victoria Road-Old Oak Lane: and
* continues beyond the eastern side of the existing Old Oak Common Lane Bridge over the North London Line to cross the canal again via a new bridge highlighted in the OAPF to Hythe Road and onto Scrubs Lane.

The advantage of such a route would be to avoid extra traffic going through neighbouring Harlesden.

The Harlesden Bypass proposal would fit well with proposals made to other ‘Old Oak places’ that the main entrance to the HS2 station, including from Central London, should be on the East side, via Scrubs Lane, not the west side, via Old Oak Common Lane.

It would also prevent further resultant detrimental impact in terms of traffic and poor air quality for existing residents at Wells House Road, Midland Terrace and Shaftsbury Gardens.

Key Objectives would need to be amended to fit with this proposal.

**SECTION 6 PARK ROYAL STRATEGY**

* A dedicated place-making plan is needed for the residential components of Park Royal. These existing and planned communities are sometimes ignored in the plans for transport, communications, services, amenities for this area. A dedicated residential place strategy for Park Royal is proposed. This should also consider the Bashley Road Gypsy and Traveller site.
* Closer attention needs to be paid to the sharing of services and facilities between businesses and residents in and near Park Royal. A stronger sense of the connectedness is required between residents in Park Royal and those from surrounding neighbourhoods who have significant existing use of services and facilities in the Park Royal area (including key assets, such as the Central Middlesex hospital, recreational areas, shops, workplaces and businesses).
* The viability of the Park Royal town Centre area would be significantly enhanced with more attention to this. Social and community facilities and amenities which provide opportunities for community interaction are essential in make lifetime neighbourhoods. Many facilities have been lost in Park Royal over the years: a dedicated place-making plan for Park Royal residents is required. Further opportunities to provide integration of land use and transport functions across Old Oak places and Park Royal would more appropriately reflect the ways in which local communities are already linked into, travel through, and use the Park Royal areas, including green space and services. Community-based research on this is needed.
* The OPDC should look at the potential spin off from existing and new and academic centres, including Central Middlesex hospital, for example, advanced manufacturing, medical research, robotics, to sustain and evolve the economic activities and employment opportunities of Park Royal over the next 20 years.
* It is essential that existing communities inside and on the edges of the OPDC area are able to benefit from new employment rather than the residual or low end jobs such as cleaning and security jobs.
* There is a need to devise a full range of possibilities that would support new and existing industry in the Park Royal and Old Oak area and support existing communities, through an integrated approach to skills, training and apprenticeships through to longer-term skilled employment.
* There should be encouragement for the development of further education facilities that might support apprenticeships schemes relating to existing Park Royal industries and support development of new incubator light industrial units.

PR1 Land Use

**PR1 (bi)** must be amended to provide priority for relocation of businesses that have displaced from other parts of the OPDC area subject to there being no detriment to other existing businesses within Park Royal or to the residential and non-commercial areas within and beyond Park Royal. Procedures to protect and support displaced businesses need to be clarified.

Changes in industrial uses and employment through relocation and intensification are of concern. There needs to be discussion not only of the (NET) numbers of jobs likely to be created, but also of the types of jobs and who is able to access them. Care needs to be taken with regeneration to protect affordable business premises, which are an important locational advantage of Park Royal at the moment. But care also needs to be taken to protect and encourage the kinds of jobs which local people can access. The loss and creation of certain kinds and categories of jobs should be closely monitored. We note that the Employment Lands Review will provide an important base line for this assessment. A good match between local skills and local jobs should reduce travel needs and contribute to a sustainable future for London. In addition, the kinds of services and businesses in Park Royal provide essential services to London and their displacement through regeneration by higher-end, more intensive, office-type jobs would be unwise. The OAPF could reflect these desired futures.

**PR1(e) and paragraph 6.8** are inadequate. The existing residential area is considered in isolation, and the rest of the area is planned as if they did not exist. This section proposes some minor improvements to the quality of the area, and does suggest the need for cycle and pedestrian new links to the canal, but mostly imagines this neighbourhood as self-contained. Residents need to be consulted over their understanding of possible links with Heart of Park Royal, Old Oak places, and suburbs to the North of the OPDC area.

The industrial areas to the East of Wesley Road residential area, the Heart of Park Royal and the residential areas should be considered together. Transport congestion is especially concerning and stronger circulation and accessibility across the area needs to be considered in addition to the designated main roads. How will traffic congestion be dealt with at the intersection of these roads, since all traffic through Park Royal is being directed there with the proposed arrangements?

**Paragraph 6.4** notes that Park Royal should deliver waste, logistics and land for transport functions. The Old Oak-Park Royal area has had a terrible experience with very poorly located waste facilities. Although the character of the area is currently shaped by recycling (waste and cars), care needs to be taken in developing a better interface between existing and planned residential and industrial uses to prevent situations such as currently exist, leading to noise, smells, flies and terrible conditions for residents in close proximity. The relocation of some of these heavy industrial uses from close proximity to residential neighbourhoods to more suitable locations in Park Royal would be welcomed by many community members.

PR2 Infrastructure

* A proposal for a Harlesden Bypass that would improve Park Royal’s connections both within the Opportunity Area and with other places and major routes could be considered.

The bypass would avoid the current A404 route,

- join the North Circular Road at Abbey Road;

- go east joining Premier Park Road to Waxlow Road;

- cross Acton Lane and the canal;

* continue via Atlas Road with a junction to the proposed Old Oak Lane bypass to the current crossroads with Victoria Road-Old Oak Lane: and
* continue beyond the eastern side of the existing Old Oak Common Lane Bridge over the North London Line to cross the canal again via a new bridge highlighted in the OAPF to Hythe Road and onto Scrubs Lane.
* Add to **(b)** pedestrian and cycle routes from the Wesley Road residential area to the main developments in Old Oak and the Grand Union Canal.
* Add an additional point to deliver local community centre/s connected to the existing residential community

**(6.10)** Enhanced communications networks should be used to build Lifetime Neighbourhoods, empowering local communities. Further Education and Continuing Education, as well as accessible internet facilities and training should be a priority to ensure the investments in infrastructure can be more widely used.

PR4 Streets and Public Realm

1. Active frontages along the canal at this point should respect the highly valued green and open spaces in the Park Royal section. In addition, local community valuation of industrial and heritage resources needs to play an important role in place-making. Current and former workers and businesses who use the spaces of Park Royal for travel and recreation should also be consulted. The meaning of these places to local people and workers and businesses should be a starting point for protection and design to ensure that a meaningful place can be made, in close touch with the rich industrial heritage, but also with the residents long life experiences there.

**Add an additional point (c)**

* improved accessibility to the main developments to the East (including safe pedestrian and cycle access into different points of the Old Oak development), and pedestrian access across the canal should both be a priority.

Figure 49 should show this

Heart of Park Royal

1. The detailed design for this proposed place takes almost no account of the existing and future residential communities. Existing valued services and facilities (including hospitals and existing retail) need to be carefully accounted for and the linkages between these and the planned development need to be developed.

**SECTION 7 WORMWOOD SCRUBS STRATEGY**

There is wide concern that:

* development should not encroach onto Wormwood Scrubs;
* development should not impact negatively on its natural environment and wildlife. The twin approaches of protection and enhancement are endorsed subject to their appropriateness and sensitivity;
* the character of Wormwood Scrubs is protected. Whilst enhancement of the ecology and as an area for exercise and recreation is welcome, this must not be at the expense of the retention of this unique open space;
* there is no negative impact on the view from the Wormwood Scrubs looking North towards the development. Achieving a satisfactory, sensitive, scale and relationship of the new development to the Scrubs is critically important;
* there is no need for any route from HS2 Station direct to the Scrubs – see below;
* there is no negative environmental impact on the Scrubs from noise, dust and light impact as a result of construction and development.

**(c)** In order to protect the integrity of the Scrubs, particularly the area of ecological value/meadow habitat south of the proposed station there should be no direct access to Wormwood Scrubs via the HS2 station. The more appropriate access point to the Scrubs is from the residential area to the East of the Scrubs.

**(f)** Insert ‘Work in collaboration and’ prior to ‘agree’.

**Additionally** add text of 7.3 ‘retain the scrubs as an amenity space that is more wild than tamed’ as an additional point to WS1.

**SECTION 8 TRANSPORT STRATEGY**

Strategic Transport Study & Transport strategy overview

* Regarding the evidence base / modelling on the transport strategy; it is not clear how robust the assumptions are concerning the origin of trips to and from Old Oak. For example, it is predicted that 7% of trips by public transport will come from Croydon, which is likely to continue to have relatively poor public transport to Old Oak Common. Has sensitivity analysis been carried out to test how much predicted demand on the network varies with changes in assumptions of where people live and work? There should be more information on modelling tools and growth rates used to predict volumes of travel in 2031 and assumptions concerning the range of modes and costs in 2031.
* A reasonable percentage of jobs should be for local people (at least 30% during construction phases and 30% longer term) from within and surrounding the OPDC area. This would have beneficial impact on the deprived communities highlighted in Chapter 10 and would have an impact on any assumptions on numbers of transport users.
* A range of scenarios with more visionary approaches to the nature of the network and available transport should be carried out and be made available for public scrutiny/consultation. The current proposals are quite traditional given the transport changes (driverless cars and demand-responsive transport for example) that are likely to occur between now and completion of development. The lengthy and disruptive construction phase across much of Old Oak for the OAPF time span may be decisive in the selection of options.
* Existing transport problems do not appear to have been addressed. This includes: problems of the A40 often being at full limits and, as a result, increased use of Du Cane Road which then also becomes grid locked and the route from the A40 into Park Royal being a rat run. The main north-south road is Old Oak Common Lane. There is little possibility of expansion of usage here and attempts to do so (as suggested in the strategy) would have detrimental impact on existing communities.
* The hierarchy being applied in the strategy is rail, roads, cyclists then pedestrians while the Manual for Streets focuses on a user hierarchy, with pedestrians at the top and “other motor traffic” at the bottom. The latter should be applied here.
* The focus on commuters generally in the OAPF, rather than on existing and new residential communities, is inappropriate. The Strategy follows on from a transport operator led system rather than being part of a broader creative master-planning approach. The balance needs to be shifted to a focus on developing thoughtfully designed lifetime neighbourhoods.
* The scale, complexity and cost of the infrastructure, including relocations, much of which is unfunded, uncommitted and speculative, and the impact this may have on delivery of affordable housing is a significant issue of concern.

T1 Rail & Underground

In addition to the general points above,

* There is a need to consider carefully some of the health and safety issues relating to the proposals including – (i) elderly and disabled people and (ii) tunnels between connections. Information and signage should be widely accessible and should include information relating to the assistance that elderly and disabled rail users may be able to access. Long tunnel spaces can be quite frightening for a range of community members either when there are many or few passengers using them. There is a need to ensure that tunnels are wide enough to include other public / overviewing areas;
* Any Crossrail link towards Wembley should not be in the vicinity of houses / bedroom windows on Wells House Road.
* Should there be contingency plans in the event that HS2 does not go ahead?

T2 Roads

* There is a need to provide more detail in T2 or to reference the roads specified in the Old Oak Places section.

**(a)** A distinction should be made here between pedestrianised streets/boulevards, roads that do and don’t provide private car access and each should be listed in T2. The High Street for example should be almost exclusively for pedestrians and cyclists with certain essential sections being accessible to buses. This would also facilitate the bridge across the canal being a light pedestrian-only bridge. It might also make the extension of the high street to Willesden Junction across the rail route unnecessary.

1. The main entrance to the Old Oak Common HS2 station should be an eastern entrance to facilitate the main road route from central London being from Scrubs Lane rather than Old Oak Common Lane. This would provide greater protection (including in relation to air quality) for the existing residential neighbourhoods and roads on the western side of the station.

For consideration:

* An alternative vision for Old Oak Lane, to that of a busy connection between the A40 and Harlesden Town Centre, is for a less busy street; one that is principally for buses and local residents’ access. One proposal that this can be achieved by is a new link road from the West Coast Main Line bridge to a proposed Harlesden bypass

A Harlesden Bypass, avoiding the current A404 route

* joins the North Circular Road at Abbey Road;
* goes east joining Premier Park Road to Waxlow Road;
* crosses Acton Lane and the canal;
* continues via Atlas Road with a junction to the proposed Old Oak Lane bypass to the current crossroads with Victoria Road-Old Oak Lane: and
* continues beyond the eastern side of the existing Old Oak Common Lane Bridge over the North London Line to cross the canal again via a new bridge highlighted in the OAPF to Hythe Road and onto Scrubs Lane.

The advantage of such a route would be to avoid extra traffic going through neighbouring Harlesden.

T4 Taxis, private hire and coaches

* While there is acknowledgement that there will be a level of demand for taxis, private hire and coaches, this should be minimised and use of public transport encouraged. T4 should clearly state this.

T5 Buses

* There is concern that there should be very careful planning around bus routes. The frequently mentioned failures around this at Kings Cross/St Pancras should be avoided.

T6 Walking and Cycling

1. It is essential that cycling and pedestrian routes are segregated. It is very difficult for older and disabled people and those walking with small children to navigate places where cyclists are not segregated from pedestrians.

In addition H6 should highlight the importance of developing ‘walkable’ lifetime neighbourhoods.

T7 Construction Freight, Delivery and Servicings

1. This is essential in terms of minimising pollution and poor air quality. The bullet point should state that the OPDC will work closely with other GLA agencies, especially TfL and the Mayor, to progress the London Plan commitments to enabling canal freight. There should be a statement committing the OPDC to make positive relationships with canal freight companies and relevant public bodies in order to maximise possible use of the canal and minimise transportation of construction materials by road. A commitment to developing a plan of action for maximum canal use during all construction phases should be stated here involving engagements with Cross Rail, HS2 and all developer planning applications. Given access, environmental and site constraints, as with Terminal 5 construction, off-site consolidation facilities are essential and the use of prefabricated building components should be promoted. Appropriate method of construction, including related transport, agreements should be part of the planning approval process.

T7 should also include an additional point on minimising noise and vibration relating to delivery and servicing.

**SECTION 9: ENVIRONMENT STRATEGY**

* While it is good to have a dedicated section on the environment, environmental issues and solutions should also be addressed throughout the OAPF.
* The environment strategy is focused very much on new development. It is also essential to provide policy on retrofitting of existing buildings to assist in ensuring that the Old Oak and Park Royal is an exemplar of low carbon development.

E1 Water

* There is much good intent expressed in E1.
* Encouragement of green roof and walls and predominance of green public spaces that will absorb water rather than of concrete / hard surface materials should be included.

E2 Waste

* Both location and nature of dealing with waste are important – but not adequately addressed here. The adoption of the Further Alterations to the London Plan with its revised section on waste mean that the emerging West London Waste Plan will no longer be adequately aligned with the London Plan.
* E2 and supporting text should be altered to require relocation of waste sites in the Old Oak Common area (Powerday and EMR) away from residential communities. These sites already have detrimental environmental impact, including noise (such as from exploding canisters) and offensive odours and flies, on existing communities.
* There appears to be conflict between land uses. There is a proposal for a school beside the Quattro waste management site. This is inappropriate.
* Clearly specify the way in which energy will be extracted from waste. Energy from Waste (EfW) Incineration would be contrary to securing sustainable environmental standards necessary for the realisation of OAPF’s Vision & Objections and Strategies. There are alternative, much more environmentally friendly ways and technologies to achieving local energy production and distribution.

E3 Air Quality

* Whilst there is acknowledgement that there is a need to minimise the generation of air pollution, both during and post construction, there is little here to suggest how that will be done.
* E3 and supporting text should be expanded to include monitoring processes that will be used (including that relating to health impacts) and response systems.
* E3 should state that the Mayor, with the boroughs of Brent, Ealing and Hammersmith & Fulham, will minimise the impact on communities, both residential and business, within and surrounding the OPDC area in respect of potential increases in air pollution (as a direct result of development in the OPDC area), will monitor it and propose adequate responses to address detrimental impact.
* The use of filter stations; the planting of trees, shrubs and other plants; and other interventions that are effective in absorbing pollution should specifically be encouraged.
* The Mayor and the OPDC should establish good relationships with active canal freight companies particularly relating to the potential for use of the canal in respect of transportation of building materials over the next 20 years or more as a means of minimising levels of dust and pollution through the use of trucks.
* E3 should be renamed ‘Air Quality and Noise’ and provide direction relating to noise and vibration relating to construction and the impact this will have on existing communities within and surrounding the OPDC boundaries. This should include compensation, retrofitting and acoustic barriers to mitigate any detrimental impact. Alternatively Noise should be covered in a separate policy.

E4 Energy Strategy

* E4 and supporting text should provide greater detail and clarity around the potential sources of waste heat and other ‘energy sources’.
* The supporting text of this policy (paragraph 9.20) should provide detail on the interconnection between Old Oak and Park Royal in term of ‘achieving a diversified energy demand’.
* Paragraphs 9.21 and 9.22 express intentions for future evidence and plan making and consequently do not presently provide the support that E4 requires.
* Paragraph 9.21, bullet point 1 refers to the potential for use of waste heat. A link between proposals in E4 and E3 is required on this.

E5 Green Infrastructure

* Provide an accurate assessment of the new levels of need for green and open space relating to the new population of Old Oak and Park Royal and to provide greater detail around the green infrastructure that will be provided.
* Specify that evidence-based surveys of bio-diversity needs will be carried out and that the needs and opportunities will be addressed.
* E5 should state that the Mayor will work with the boroughs of Brent, Ealing and Hammersmith & Fulham in respect of impact of development on need for additional green corridors and spaces and biodiversity provision at the edges of the OPDC area.

E6 Land Contamination & Remediation

Given thatit is the boroughs of Brent, Ealing and Hammersmith & Fulham who will have the responsibility to deal with the sources of contamination and remediating the land, this should be referenced, explaining how the ODPC, as planning authority, will cooperate with these local authorities.

**SECTION 10: DELIVERY STRATEGY**

Development Infrastructure Funding Study (DIFS)

* The authorising Director’s Decision DD1169 sought its commissioning “as part of the OAPF” giving the final report date as October 2014. In the interests of transparency and justification, this evidence should have been made available. This would have assisted in understanding the drivers and deliverability underpinning the OAPF’s Delivery Strategy.
* An early progress report on the preparation of the DIFS was made at Place West London Conference, June 2014. From this it seems that the strategy, as then communicated, is to create value, with the opportunity to prioritise infrastructure that raises the value of development; to emphasise predictability for developers and to have developer contribution towards necessary infrastructure low early on to get early momentum. If this is still reflected in the completed DIFS then this would be likely to result in development at variance with the Vision & Objectives and the other Strategies of the OAPF and would not contribute to the achievement of sustainable development.
* The viability and deliverability of the OAPF is in question given the information within Director’s Decision DD1318 ‘Preparation of a Financial Model to support OPDC Growth Strategy’. In the view of the GLA the need for this study was evident before public consultation commenced on the OAPF. DD1318 reveals that the DIFS demonstrates a funding gap of about half of the total cost of infrastructure required to unlock development at Old Oak and Park Royal. In addition, a significant proportion of this infrastructure must be funded and delivered at the outset of the project to unlock development sites (para 1.5).

DL1 Working with Stakeholders

* For a comprehensive and inclusive approach to be taken to the regeneration of this area it is essential that the voluntary and community sector and local businesses, both within and on the edges of the OPDC area, are treated as equal stakeholders. DL1 should note the importance of the active engagement and partnership-working with the voluntary and community sector and local businesses, including in the development and monitoring of the OPDC’s Local Plan.
* Regarding bullet point (c), there is some concern that public land should not be sold to developers with an expectation that the necessary infrastructure and some ‘affordable’ homes might be delivered (where viable) but instead there should be opportunity for public land to deliver publicly owned or community led/owned low-cost rented homes and social and community infrastructure.
* A variety of potential scenarios around the delivery of homes, jobs and social and community infrastructure should be considered to ensure the maximum delivery of the kinds of homes and jobs that will address deprivation and inequality as set out in the London Plan’s vision and key objectives. There are increasing concerns that little of the housing currently being delivered in London is genuinely affordable.

DL2 Infrastructure

* The infrastructure already assessed as being required should be listed more explicitly. The steps and elements of the phasing of the development should be amended to take on board the specific comments made and changes sought elsewhere in this response, i.e. on the Vision & Objectives and the Strategies.
* A target for the number of homes should be derived from the achievement of sustainable development through the creation of Lifetime Neighbourhoods, including the provision of necessary environmental, social and economic infrastructure. The number, or percentages, of genuinely affordable homes that will be delivered should be specified.
* The viability assessments and developers rates of return mentioned in the supporting text should be expanded on. A reasonable rate of return for developers should be set in the OAPF at a maximum of 15% (the norm prior to the economic crash). Developer viability assessments and rates of return should be compared with that of a public body delivering affordable housing and social and community infrastructure. The OPDC should independently assess viability of sites and put its own viability assessments in the public domain. A definition of viability and how this will be assessed by the OPDC should be included in the OAPF.
* Transport related infrastructure proposals should be subject to close scrutiny, particularly given the impact of this on the levels of affordable housing that may be delivered.

Health

* This should include assessing and accommodating additional demand and access to hospital based health care, including emergency care.

Community and Sports Facilities

* There is already a relatively high level of need amongst the existing communities for a range of smaller meeting spaces. The text of DL2 should highlight the need to address this. The need for a range of youth facilities should be mentioned in this section.
* This section should specifically propose the desirability of community-led / owned / managed community centres.

Open Space and Play Space

* There is need to quantify the total amount of new open space required (of both smaller and larger provision).
* This section should state the need for provision of youth facilities.
* The need to create new habitats or use design to enhance bio-diversity in the OPDC area should be mentioned.

Economic Infrastructure

* The OAPF should detail how the proposals to ensure that local residents and businesses will benefit from construction work and post construction development, will be secured and monitored. Targets should be provided together with clear delivery mechanisms and monitoring arrangements.
* The importance of affordable workspace within the growth of new tech and other sectors, such as green economy, should be recognised.

DL3 Smart London

* While there is some support for improved access to high-speed broadband, there is a need for much wider debate within the voluntary and community sector on extent to which Smart London will:
* support local more deprived communities (large numbers of who may not currently have access to the internet);
* provide open access to the kinds of information that may assist local people in making decisions around what is best for their community, or will
* assist in decision-making being more or less transparent.