

Grand Union Alliance

18.09.17

Response to OPDC revised draft Local Plan

Introduction: Grand Union Alliance brings together a network of resident and community groups and individuals mostly from within and around the OPDC area, established in 2014. It aims to influence large scale developments, strengthening a diverse range of local voices. It holds meeting and events to ensure local groups are well informed, fully consulted and engaged in the decision-making about development plans for this part of London.

Collectively it wants to see plans developed that will sustain existing communities, enhance and respect what local communities currently value in their neighbourhoods and which will mitigate the impact of developments. It encourages local initiatives that support bottom up planning.

Grand Union Alliance does not aim to supersede existing local groups or networks but rather to facilitate them coming together to exchange across borough boundaries.

This response is collaborative rather than a definitive collective response - drawing together a wide range of comments from representatives of resident and community groups that have engaged in relevant discussion at Grand Union Alliance seven meetings and a full day conference focused on this consultation and changes since the regulation 18 draft Local Plan. It also draws on the GUA's collaborative response to the regulation 18 Local Plan where comments are still relevant to this consultation.

STRATEGIC POLICIES

SP1: Catalyst for Growth

Policy SP1 Catalyst for Growth (c) ii & iii and paras 3.4 & 3.5: clearly assert that the regeneration of Old Oak and Park Royal will bring tangible benefits for local communities and offers life improving conditions. This clearly follows on from the Spatial Vision which is quite emphatic on the delivery of such benefits. But certainty and clarity as to the effective and meaningful delivery of tangible benefits are absent or not adequately expressed elsewhere.

There are detailed points raised in the responses to Strategic Policies SP3, Sp4 and the thematic policies T5, H2 and E1 which cast doubt on the Plan's ability and capacity to deliver the necessary benefits around transport, housing and employment. There are also criticisms on such issues as social infrastructure, environmental sustainability and implementation, current and planned.

SP2 Good Growth & SP9 Built Environment

These policies are not effective.

For the GUA these 2 policies are intertwined. 'Good Growth' is a rather nebulous concept whose definition and attributes lack precision and measurability. And in this respect baselines and standards for environmental aspects should be specified throughout relevant policies of the Plan. They fail to provide a proper planning framework that will achieve high quality liveable and inclusive, sustainable Lifetime Neighbourhoods, town centres and places of work etc that are accessible to people of all ages, ability/disability and incomes. This is elaborated elsewhere in the GUA response particularly under the thematic policies. NPPF paras 69-70 on facilitating social interaction and creating healthy, inclusive communities will not be realised.

Still relevant from Regulation 18 response: The policy needs to give greater directional steer for creating exemplary developments. Intense, very dense urban developments that are planned through this Local Plan have forms, scales and interrelationships that multiple and concentrate demand and pressures on the environment. The Local Plan needs to and will secure the implementation of the best possible practical means available at the time to create exemplary developments. It is understood that best practical means and other important environmental principles are handed down from the Treaty of Lisbon (not from EU Regulations) and will not necessarily be transposed automatically into UK law.

Policy SP3 Improving health and reducing health inequalities

The policy is not justified nor positively prepared.

This strategic policy and its supporting text is silent on a number of key issues that have significant impact on health and health inequalities in the OPDC area and the wider housing market assessment area - including air quality (with the exception of indoor air quality mentioned in 3.22), overcrowded homes and gypsy and travellers' accommodation.

Overcrowded homes The objectively assessed housing need for the housing market area highlights that 26.7% homes (84,227 in 2011) in the housing market area are overcrowded. Overcrowding has huge impact on health including links with TB, accidents in the home, mental health, respiratory and infectious diseases, educational development and difficulties for children in finding space to study, lack of privacy, anxiety and depression. According to the Runnymede Trust and others, there is a higher prevalence of overcrowding in BAME households.

Gypsy and Travellers Accommodation There are serious drainage problems on the Bashley Road site and associated health and safety problems (including rats) and inadequate basic facilities. Residents suffer pollution including noise and vibration from neighbouring industries sometimes also at night. The entrance to the site is a long and extremely poor-quality road with no paving (worse than other areas in Park Royal) and is poorly lit. Adults and children suffer poor health.

Gypsies and Travellers anyway continue to experience some of the poorest health outcomes in our society, including the lowest life expectancy of any group in the UK (10% less than the general population) and high infant mortality rates.

Air quality Poor air quality can, as highlighted in 6.45 (policy EU4), reduce life expectancy and contribute to a number of illnesses. 6.46 provides more detail relating to the OPDC area.

Policy SP1 Catalyst for Growth (c) ii & iii and paras 3.4 & 3.5: clearly assert that the regeneration of Old Oak and Park Royal will bring tangible benefits for local communities and offers life improving conditions. This clearly follows on from the Spatial Vision which is quite emphatic on the delivery of such benefits.

This policy SP3 must fit closely with this. It must specifically reference in policy that proposals should support reducing the specific existing health and health inequalities (highlighted above) and provide more detail in the supporting text.

Policy SP4 Thriving communities

The policy is not justified not effective

SP4 (a)i doesn't secure housing to meet objectively assessed local need above 'London-wide' needs which could deliver negative impact in the housing market area - particularly relating to affordability for below median income households and family sized homes.

SP4(a)i should be amended to: **'homes that provide a proportionate level of all types of homes to meet objectively assessed need for the housing market area (as required by the NPPF) which will positively contribute to meeting London-wide need.'**

SP4 (a)ii The OPDCs evidence base does not provide evidence to support delivery of a 50% affordable housing target. The target will result in a disproportionately high delivery of intermediate housing and a disproportionately low level of affordable rent housing (compared to objectively assessed need in the housing market area) that is a 30/70 LAR/intermediate housing compared to 86/14% objectively assessed need. This will not provide for delivery of the tangible benefits for local communities stated in SP1 3.5.

SP4 (b) – add after 'population', **'of all ages, abilities/disabilities and income'** (to ensure delivery of mixed and inclusive communities)

Add additional points SP4(c) **securing delivery of active community involvement and ownership.**

Should add (d) **delivering tangible and measurable benefit to existing deprived and excluded community members in surrounding neighbourhoods.**

Policy SP5 Economic Resilience

This Strategic Policy is not sound as it inaccurately depicts the effects of the regeneration in terms of new jobs, and does not accurately relay the evidence contained in the supporting documents, Industrial Land Review, and the two Development Capacity Studies. It does not refer to the Park Royal Industrial Atlas which provides substantial evidence of thriving economic activities across the whole area including the significant successful business and over 3000 jobs in the Old Oak area.

SP5 mentions providing 69, 700 "net additional jobs" in the plan period in the OPDC area, of which 67,900 could be delivered in the plan period. This figure from the Supporting Document 12. Development Capacity Study only refers to NEW jobs, which needs to be clearly stated. Significant job losses are anticipated, as shown in the Industrial Land Review. Furthermore, as it is anticipated that existing businesses and other uses will be

relocated or re-provisioned, preferably within the OPDC area, according to Policy E1 bii), this necessarily detracts from the claim that the development capacity can accommodate the stated amount of additional jobs.

This strategic policy, and the Employment Policies in Chapter 9 are unsound as they do not accurately use their own evidence, and establish unrealistic policies which contradict the statements concerning providing space for additional jobs.

The OPDC Reg 18 Local Plan indicated that 55,000 new jobs in Old Oak and 10,000 new jobs in Park Royal were anticipated. Neither of these were net figures. In fact the Supporting Document 25. ILR indicates a net job gain in Old Oak of only 49,052, assuming the loss of all the existing 5,287 jobs, and a 4,216 net gain in Park Royal. They indicate across all land, including the HS2 parcels, a net employment gain of only 60,843, including 5874 industrial jobs lost across Park Royal and the HS2 parcels (p. 69).

Furthermore, the ILR cautions against expectations that a market exists for intensified use of industrial land in the plan period potentially threatening the expectations of job and firm expansion in Park Royal. Thus the Park Royal additional job estimates are not based on sound evidence.

The Revised Development Capacity Study prepared for the Regulation 19 consultation point 3.2 (p. 9) is clear that the targets of 65,000 jobs across the OPDC area are NEW jobs, not net, or “additional”, which does not take account of job losses expected. This Study does not assess the potential for these jobs to be realized, nor take account of job losses, although relevant information on this is available elsewhere in the supporting documents (Document 25. ILR) and (although without any numbers attached) Appendix A of the DCS (Supporting Document 12) which includes information on active enterprises which currently employ up to 5287 people, some of which do not wish to develop their land or be relocated, and are very committed to remaining in the area as this is the basis for their business e.g. active local authority contacts, or supply and delivery networks. For example, information from Cumberland Business Park site which is expected to contribute a count of 250 houses and 200 jobs. However, they note this is a site in multiple ownership where the landowners – who are businesses – are not all willing to develop their property. Significant job losses will ensue from this site, for example, one of these businesses, Capital Accounting with over 50 employees, and where ownership of the property is a significant contribution to the viability of the business.

The data on jobs created presented in this Strategic Policy therefore makes no allowance for the closure and relocation of businesses and the loss of jobs. This policy and Employment Chapter 9 develops its targets without regard to the loss of significant business clusters, existing uses. It offers unrealistic strategies concerning their potential need for re-provision or relocation in the OPDC area, or elsewhere. Detail as to how these will be realistically achieved are not provided in Chapter 9 (see below).

The damage to the existing economy and loss of jobs significantly detracts from the claims regarding what can be achieved in the plan period. It is substantially unsound because the policies which flow from it in relation to the existing land uses are unrealistic and unfeasible, as given the need to accommodate existing jobs, there is not space for the stated number of “new” jobs. The inaccurate use and incompleteness of the evidence base, renders

this strategic section of the plan, and the related policies in Chapter 9 Employment, unsound.

More than this, the failure to bring forward relevant evidence in the evidence documents under consultation is very serious indeed. It suggests that the OPDC is not being straightforward in its approach to the consequences of the development for local people and businesses, which can lead to a loss of faith and distrust. This is inappropriate for a public body and calls into question the veracity of the Local Plan as a whole, and the public and stakeholder engagement processes of the OPDC.

SP6: Places and Destinations

The policy is not effective.

1. There is a gap in the strategic policy inform how the new places will sensitively knit with and complement existing places within and surrounding the Old Oak developments particularly.

The plan vision (13) talks of new development connecting local communities through high quality walking, cycling, public transport, and vehicular links and vision (10) about well-designed buildings that complement surrounding neighbourhoods. The latter has no defined ways of delivering or measuring this through policy SP6 or other policies such as D1.

However, there is huge risk that in terms of scale, size and type of development in Old Oak particularly (much of which would seem to be synonymous with luxury development) could create a separate defined boundary that is at adjunct with existing building types, its history and heritage (in terms of content as well as style) and communities. There is additional risk that this could create quite segregated rather than mixed and balance communities, with potentially inevitable rises in property prices and displacement of existing businesses, local infrastructure and indeed lower income households.

Serious regeneration that supports existing communities within and surrounding the OPDC area is supported by the many groups and individuals that that engaged in trying to influence policy in the OPDC's local Plan, through attending GUA meetings, forming Neighbourhood Forums and engaging in OPDC consultation sessions over a period of three years. The plan must facilitate this being realised.

SP6 should specifically include – delivery of positive physical and community connections between existing places within and adjacent to the OPDC area, specifically avoiding detrimental impact and segregation.

2. There is potential for the new cultural quarter and catalyst focus on achieving sensitive regeneration in the area – ensuring that it is accessible to new and existing communities within and surrounding the OPDC area in terms of age, ability/ disability and income levels.

In response to the Old Oak and Park Royal Opportunity Area Planning Framework GUA members together suggested something that is multi-use including some community focused amenity spaces. Individual members of the GUA network have made a range of suggestions including cinema, ice skating, lido, community arts based facilities and museum celebrating the history and heritage of the area.

SP6 should provide policy that ensures a cultural quarter and catalyst use building does support in achieving positive regeneration with in an existing relatively deprived area. Proposals should be drawn up in collaboration with local community members and be widely consulted.

3. The policy should also actively support proposals for community empowerment and ownership – across boundaries of the OPDC area and neighbouring areas. Positive examples including those from large regeneration schemes and New Towns should be explored.

Policy SP7 Connecting People and Places:

This policy is not effective and justified.

It should plan for categories of users with different needs and travel objectives. For example, the needs and user experience of the through traveller and that of the local user should be carefully considered and their differing requirements catered for. This should all be within a master planning approach that achieves transport connectivity with clear programming and delivery of upgrades, improvements and new infrastructure. All to minimise scale, complexity and cost and maximise integration with surrounding areas to reduce/mitigate existing congestion and predicted traffic demands. The policy should ensure the provision of both east and west accesses to Old Oak Common HS2 Station.

The scale and nature of proposals for A40 and A406 need to be clarified. The predicted increases in traffic into/out of Park Royal (from Park Royal Transport Study) will overwhelm the network and yet the provision of grade separation schemes is not the answer.

Much is made of the Old Oak High Street, and its offer of seamless connections between 5 stations - clause gii) – but this will now be disrupted by TfL's demands to retain in the medium term the Crossrail/Elizabeth Line Depot as voiced at the OPDC Board meeting of 12 September 2017.

The area wide promotion of minimal parking/car-free developments does not have evidence of precedents on this scale that this approach would function effectively, as parking controls will not necessarily reduce traffic (vans, cabs...).

Still relevant from Regulation 18 response: The Local Plan should align itself to the best analysis of future transport needs and technical infrastructure, even though the subject is full of uncertainty. 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.

There is also a need to cater for a wide range of planning necessities that the OPDC and development will have to provide to create an enduring exemplar of sustainable development that is not locked into heavy inflexible infrastructure. Minimisation of the scale, complexity and cost of transport infrastructure in the area should be a guiding objective of this plan. Clause d) requirement of embedding and integrating transport infrastructure should recognise the need to do this in a sensitive and appropriate way.

All transport policies should be aligned with those of the boroughs, Transport for London and other transport operators so that interventions that the OPDC brings forth are designed where possible to also reduce existing congestion in the surrounding road network. This should be expressed as a policy approach within Policy. Furthermore, this policy and an associated programme of transport schemes, should prioritise the resolution of existing transport problems in Park Royal & Old Oak.

Policies on Walking, Cycling, Rail and Buses have generated many wide ranging, diverse suggestions for improvements, new routes, facilities etc. But given their often-individualistic proposals, it has not yet been possible to form a consensus and aggregate them for this collective submission. The OPDC should enable a continuing dialogue through the plan-making process with communities to allow these detailed proposals to be shared and considered to take these forwards.

SP8: Green Infrastructure and Open Space

This policy is not effective.

Whilst it is recognised that Policy SP8 Green Infrastructure and Open Space requires major developments to produce a wide ranging Green Infrastructure and Open Space Strategy and Management Plan (GIOSSMP), a component of this – the Green Space Factor and Green Points System score - has not yet been elaborated. Policy EU2 Green Infrastructure and Biodiversity' text para 6.31 does not add much.

The policy needs to be amended to include an additional point in (a) providing active play for all ages. Whilst text para 3.21 states that Policy SP8 supports active play for all ages, this is not actually specifically referenced in Policy SP8.

Although the policy at (a) (i) references the Policies Map for existing green spaces and open spaces – to be conserved and enhanced, only MOL and SINCs are portrayed.

Still relevant from Regulation 18 response: To support better connections with nearby neighbourhoods it is proposed that the OPDC work with the boroughs to create additional green corridors, spaces and biodiversity provision throughout and around the OPDC area to mitigate the impact of development and enhance nature.

SP10: Integrated Delivery

This policy is not effective.

This policy is intrinsically linked with Policy DI2 Timely Delivery and Optimised on which the GUA has responded below. Bringing forward as early as possible to meet the targets for housing and jobs, and to build confidence in the development, is not realising the full range of required benefits or contributing to wider infrastructure and sustainable development criteria; and a number of significant barriers to development remain to be overcome in relation to some key sites.

Furthermore, the negative aspects of early development of likely lower valuation of land due to co-existing and unpleasant uses are not mentioned in the Plan, and represents a selective presentation of available evidence. Early delivery, therefore, does not maximize the potential for achieving good policy outcomes and achieves questionable living and environmental conditions for new residents.

THEMED POLICIES

DESIGN

Policy D1 Securing High Quality Design

The policy is not effective.

Policy D1 fails to provide a strong overall development management policy relating to achieving high quality liveable and inclusive sustainable Lifetime Neighbourhoods that are accessible to people of all ages, ability/disability and incomes. This is required to provide development management policy to achieve aspirations of SP2 and SP4 – see also NPPF paras 69-70 on facilitating social interaction and creating healthy, inclusive communities.

How would the OPDC measure whether high quality design is achieved or not?

Policy D1 (a) ii refers to the OPDC's Place Review Group – but it's not clear what criteria they are working to.

The Group is constituted by the Design Council, thus reflecting only one professional and institutional point of view whilst a wider membership including community and other stakeholders would provide more provide essential diversity of views.

Regarding D1 (b) ii and iv, there needs to be some clarification about precisely what these means in order that members of the public might genuinely influence at an early stage - see NPPF para 66. (See also response to Policy D4 below).

We suggest to ensure the policy is effective

- the policy name be changed to **Securing High Quality Design and Lifetime Neighbourhoods**;
- the first sentence of the policy should be amended to 'OPDC will support development proposals where they demonstrate a high quality and comprehensive design process **and positively deliver or contribute to delivering lifetime neighbourhoods. To achieve this:**'
- add in a new point **(a) All development proposal should help to create (i) neighbourhoods that have a sense of community ownership and security where children and older people, abled and disabled can feel safe (ii) adequate community orientated facilities and meeting places to support engaged and empowered communities (iii) adaptable and imaginative buildings that are designed to last for 150 years and use best materials and techniques in terms of sustainability (iv) neighbourhoods that are inclusive, human and beautiful, providing for whole communities with spiritual makers, facilitators and educators at their heart**, then amend the following to (b), (c) and (d)
- add (a iv) **support the OPDC 'framework of principles' for high quality design**. This framework should be drawn up based on 'building for life' and be included in a table in supporting text
- the OPDC Place Review Group should include community members that are 'experts' in respect of their understanding of the area and their community;
- specify more precisely in relation to D1(a) what 'relevant and appropriate' means

Policy D2: Public Realm

This Policy is not effective.

Despite being largely the product of recent and continuing developments that the draft Local Plan seemingly supports, North Acton has a deteriorating, poor quality and discordant public realm. This area sets a most unfortunate and unacceptable precedent for the rest of development within the OPDC and undermines the credibility of this Policy. And this implementation flies in the face of NPPF para 58 which includes a principle of seeking to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.

Upgrading large areas, especially Park Royal, would be dependent on development-led projects. This would not secure the necessary scale of much needed improvement of the public realm. A positively planned proactive programme of proposals for public realm improvement should be prepared to support this Policy. Note that there is a need for lunchtime spaces, particularly in Park Royal and that the public realm for the Canal, towpaths and adjoining areas needs particular attention. Proposals for the activation or animation of the public realm can include markets, exhibition pavilions, performance space – informal and organised.

Incorporating informal play opportunities for younger children within the public realm, as with ‘play fountains’, climbing obstacles etc., and for adults, urban street obstacle courses for workouts; nevertheless remember the aged with seating and low impact outdoor gyms. (This is also included in the response to Policy D9 Play Space).

On ‘publicly accessible spaces’ see Guardian article “Revealed: the insidious creep of pseudo-public space in London”:

<https://www.theguardian.com/cities/2017/jul/24/revealed-pseudo-public-space-pops-london-investigation-map> .

Still relevant from Regulation 18 response: A commitment to separating walking, cycling (to protect children, elderly and disabled people), private, and public vehicles in all streets and public realms should be included. This is also repeated for responses to Policies T2 Walking and T3 Cycling.

Permeability and legibility need to be balanced with creating enclosing neighbourhoods where children, disabled 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.

Develop a strategy for high quality accessible and inclusive hard and soft landscaping throughout the OPDC area.

*Better connections are required both within the OPDC Area and with neighbouring communities to contribute **sensitively** to connecting places **within and immediately neighbouring** the OPDC area and creating new public realm.*

Policy D3 Accessible and Inclusive Design

The policy is not effective.

The following additional points should be added to the policy

- recognise and are inclusive of the different needs of different ages of members of the community
- accessible to people regardless of income
- are flexible and adaptable to meet changing needs (including over individuals' lifetimes)

Policy D4 Well-designed buildings

The policy is not effective.

This Policy should reflect the intent of NPPF para 66 that applicants should evolve designs that take account of the views of the community. Note that Policy D1 (b) iv is limited to major and strategic developments on proactive engagement with the community and potential end users in line with the OPDC's SCI. However, NPPF para 57 refers to the achievement of high quality and inclusive design for all development,

Policy D4 (b) (i) refers to the use of roofs for play space. Paragraph 5.35 explores the potential use of roofs. The promotion of roofs as play space is at odds with the Mayor's SPG on Play Space (see also comments on Policy D9 below). This should not be set as an aspirational policy and should be deleted from this policy. Roofs might exceptionally be set as (additional) play space but it is a very poor planning policy to routinely consign children to play on roofs. Related functions expected to be placed on roofs e.g. elements of heating and other services, are not a good fit with play space and potentially place these sites at odds with EU4 Air Quality and Policy D9 (b) (iv).

Policy D5 Tall buildings

The policy is not justified or effective.

The London Plan 7.7 requires that boroughs (planning authorities) to work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their LDFs and be consistent with the rest of the policy.

There is mention in the OPDC's Environmental Standards Study of building heights typically varying between 20 and 60 storeys and of hyper densities being proposed in clusters of 350-600 dwellings per hectare. However, there is no mention in Policy D5 of what building heights might be expected and where. There is no precise mapping in the plan of where different heights of building are intended, in order to enable informed discussion / consultation. The NPPF para 58 expects robust and comprehensive policies that set out the quality of development that will be expected for the area, and para 59 asks that design policies should concentrate on guiding the overall scale, density, massing, height... of new development in relation to neighbouring buildings and the local area more generally. Policy D5 is deficient in these respects.

Opportunity Areas have a plan-led approach that allows tall buildings and higher densities to be achieved if they satisfy other criteria set out in London Plan policy 7.7

The Environmental Standards Study identifies the building heights and densities proposed as an unprecedented scale and form of area-wide urban development in London.

The result of this will be like slotting one of the extremes of the Central Activity Zone into an outer London area, which the majority view as particularly insensitive and inappropriate. It would not support Cb and Cc of policy 7.7 of the London Plan and will create a physical separation between the OPDC area and surrounding neighbourhoods rather than creating sensitive routes, links and connections.

The regulation 18 Local Plan talked about sensitivity to the existing surrounding areas and neighbourhoods and the need to have gradation from neighbouring areas with low rise housing to higher buildings. However, this seems to have been dismissed, as is exemplified by planning applications that have recently been agreed on Scrubs Lane.

Here, justifications given by the plan for high buildings do not reflect design or policy-led criteria, but the demanding financial, infrastructural and housing targets set by the untested overall quantum of development set for the OPDC area in the London Plan. Thus, the Table in P10 outlines the rationale for one tall building on each site as being to provide legibility (explained elsewhere as marking the edges of the OPDC area and supporting wayfinding) and to secure additional benefits. We suggest that the design and planning arguments are spurious, and were reversed from Reg 18 to Reg 19 versions. The provision of higher quantum of housing, and the extraction of developer contributions (“secure additional benefits”) provides the overriding justification which does not meet design and other criteria.

Indeed, this would seem to be an example of policy being made in response to developers’ needs and the creation of a development pipeline of numbers of homes up rather than solid and sound plan making (including delivery of both good place-making and mixed and balanced communities). Note analysis of housing types in developments that have been agreed in response to policy H2 affordable housing.

Densities and building heights in Old Oak North and Scrubs Lane Places draw on the proposed Hythe Road Station to support high PTALs which are said to justify highest densities/tallest building heights. This should not be part of the justification/evidence base until there is TfL commitment to funding the station.

The other area of concern is the increasing number of high rise buildings at North Acton – adding to those already developed prior to the setting up of the OPDC. Not only is this an area that is in complete contrast to neighbouring low-rise buildings – with no sensitivity and no gradation towards higher buildings, in addition, these contain pretty much mono-tenure housing for students or single person households. This has added pressure on existing social infrastructure particularly health facilities and development of shops and services that does not meet wider needs.

GUA members concern raised previously in response to the regulation 18 consultation are that

- *high-rise blocks, which seem to be synonymous with luxury development, could also be left empty for much of the time – with apartments used more like a hotel than homes. This is not conducive to developing sustainable and lifetime neighbourhoods. The property market at the high end is also collapsing and*

alongside Brexit there greater uncertainty in terms of the strategy for the development;

- *management and maintenance costs are significantly higher in high-rise buildings which may militate against delivery of low cost rented housing;*
- *the OPDC should look at past, including international, examples of optimising density without having to develop high-rise buildings.* This has not occurred and instead the Environmental Standards Study provides examples of International Best Practice in terms of delivering high-rise buildings. It is questionable as to whether it is appropriate in anyway shape or form to take Singapore as a good example to be applied in this part of London.

More recent concerns are that

- caution must be taken until the results of the Public Inquiry into the Grenfell fire disaster in accepting any new proposals for tall buildings. They note with concern that the proposals so far approved for towers at Mitre Yard and North Kensington Gate (each approximately 20 storeys) have been designed with single stair access.
- it is notable that in the light on the Grenfell Tower tragedy even engineering academics from the National University of Singapore’s civil and environmental engineering department are noting that modern high-rise are being built in more complex ways which introduce fire risk that need to be assessed. “For example, the concave structure is currently typical of building facades in architectural design, but it increases the flame spread rate increases,” he explained. “In addition, window glass facades, as the weakest part of a building, may break easily when subject to a fire, significantly accelerating fire spread.”

<http://www.channelnewsasia.com/news/singapore/guarding-against-a-grenfell-like-disaster-in-singapore-8985482>

GUA members are necessarily concerned that the OPDC has insufficient evidence and costings relating to addressing issues such as fire risk in addition to other challenges listed above. The Environmental Standards Study is silent in respect of fire risk. This could further challenge the viability of the development of the OPDC area;

- as highlighted in the Environmental Standards Study the “unprecedented densities and associated tall buildings within Old Oak will make also make both energy demand reduction and ultra-low carbon onsite energy generation additionally challenging”;
- issues relating to safety and security have been raised – including risk of items being dropped from windows or balconies and the impact of this have not been considered in policy terms;

The OPDC must provide:

- mapping of where tall buildings will be considered appropriate and at what heights, in the OPDC area, particularly since the GUA asked the OPDC to provide exact assessments of building heights and density levels across the OPDC area in its response to the regulation 18 Local Plan
- evidence that it has considered fire risk and related costs
- considered alternatives to delivering high-rise building heights proposed in the Environmental Standards Study;
- evidence that it has considered all the additional costs and challenges relating to such high-rise development;

- appropriately produce policy and determine planning applications in a way that conforms to London Plan policy 7.7 and sensitively provide positive routes, links and connections to surrounding neighbourhoods rather than what is currently considered to be negative by many community members involved with the GUA.

Policy D8 Heritage

This Policy is not effective.

We welcome the surveying and recording of heritage assets and areas that has informed the depiction of a variety of protected features and proposals on the Policies Map. However, Wells House Road estate has a relatively undiminished unity and character, together with a planned origin, that merits its recognition as part of the 'historic residential enclaves' OPDC Heritage Themes and its designation as a proposed Conservation Area rather than an Area of Local Character. (Policy P8 would also need to be amended accordingly).

Still relevant from GUA's collaborative Regulation 18 response are: to assist the conserving, enhancing and celebrating the historic significance of the area, by proposals contributing to respecting and celebrating the proud (industrial) history of the area as a starting point for new development and contribute to successful place-making; together with 'memorialising' the local vernacular industrial and social heritage; and promoting community ownership of strategies and places (including a canal-side hub) on the history and culture of the area. NPPF para 58 has a principle of responding to local character and history.

Policy D9 Play Space

This Policy is not effective.

The Policy is prefaced with, "where relevant and appropriate", and yet it speaks to legal requirements relevant to core health issues. Point b) (iv) requires play spaces to be located away from pollution. Close attention in this regard needs to be paid to related policy EU4 Air Quality, paragraph 6.55 which requires public and open space, as well as communal amenity space to avoid polluted areas. This is especially important for young and older vulnerable residents. This policy should be cross-referenced here. It should be entirely clear in the plan that this policy is not optional.

We welcome the specific attention to (younger) child play space in this Policy, but planning for the needs of other age groups warrants comparable recognition and elaboration. Younger teenagers seek 'hangout spaces' as well as space/facilities for both organised and informal activities and sport, including kick about areas, skate-park, BMX track, off-road cycling, basketball, adventure-park etc. These may require larger spaces to enable "adventurous" and boisterous play including team games. There is the opportunity to consider intergenerational facilities given the health and well-being driver to remain active throughout life as related in Policy SP 3 Improving Health and Reducing Health Inequalities. (Note that whilst text para 3.21 states that Policy SP8 Green Infrastructure and Open Spaces supports active play for all ages, this is not actually specifically referenced in Policy SP8. Propose that this Policy SP8 be amended accordingly).

In OPDC planning determinations to date open spaces are provided communally and not in publicly accessible spaces; and children's play spaces are located on rooftops and terraces,

balconies and courtyards with minimum levels of sunlight. This does not reflect the OPDC overall vision of “international excellence in sustainability, health and wellbeing and design quality”. There are many aspects of successful play space outlined in the Mayor’s SPG on Play Space which cannot be provided on roofs and balconies: that they might provide opportunities to “watch the world go by”, that they would be usually overlooked so as not to become sites of anti-social behavior, that children would feel legitimate parts of society and public space, and places where children with disabilities will feel safe and secure (for example, p. 39). It is our view that a much more aspirational view of play spaces should be reflected in this plan, or the OPDC area will become known for setting new low standards for children’s life in London.

Relevant from the response to Policy D2 Public Realm: Incorporate informal play opportunities for younger children within the public realm, as with ‘play fountains’, climbing obstacles etc., and for adults, urban street obstacle courses for workouts; nevertheless, remember the aged with seating and low impact outdoor gyms.

ENVIROINMENT AND UTILITIES

Policy EU1 Open Space

The policy is not effective.

The expression of commitment to securing the delivery of a high-quality network of green infrastructure and open spaces is welcomed. There is a need to recognise the wide range and variety of such spaces in quality, types (both function and character) and contributions they can make to the human and natural environments and, therefore, policy and programmes need to reflect this in delivery. Each site should contribute ‘greenness’ –if only green walls or ‘potted plants’, but overall, area wide of at least 30% open space outside of SIL is an admirable target. However, care has to be exercised with respect to adjoining built development to minimise overshadowing from high rise or blocky buildings.

Whereas the NPPF paras 76-78 enables local communities, through the plan-making process, to identify special protection green areas of particular importance to them to be designated as Local Green Spaces, the OPDC has not notified or afforded communities of this possibility.

Policy confusingly uses both terms public open space and publicly accessible open space. Doubt resides among community members as to the permanence of access to these open spaces given that they are to be privately provided and seemingly not adopted as public parks. Guaranteeing access should be part of the long-term management and maintenance arrangements. The OPDC could facilitate the creation of resourced Parks Trusts along the lines of that in Milton Keynes. On ‘publicly accessible spaces’ see Guardian article “Revealed: the insidious creep of pseudo-public space in London”:

<https://www.theguardian.com/cities/2017/jul/24/revealed-pseudo-public-space-pops-london-investigation-map> .

A particular request has been made for lunchtime spaces in Park Royal for its 30,000 or more workers.

Policy EU2 Urban Greening and Biodiversity

The policy is not effective.

Railway lines function as nature's corridors and together with the canal and open and green spaces have established a green grid type network across the OPDC area. This also serves for visual variety and relief from built up development. However, the Old Oak development and elsewhere, as at North Acton, will disrupt and interrupt this. Existing areas of biodiversity will be placed under threat from loss or displacement and additional provision is necessary to ensure proper and reasonable access to nature by new development. The OPDC's own Biodiversity Action Plan, as promised in the SINCS Study, should be produced as soon as possible to support this Policy.

Whilst it is recognised that Policy SP8 Green Infrastructure and Open Space requires major developments to produce a wide ranging Green Infrastructure and Open Space Strategy and Management Plan (GIOSSMP), a component of this – the Green Space Factor and Green Points System score - has not yet been elaborated. Text para 6.31 does not add much information. Within natural areas, it is important to consider the variability (to promote variety and biodiversity) as well as the amount/scale (to promote biomass). Consequently, it is uncertain how and to what extent 'optimised urban greening' will be achieved.

Other comments include a request to deliberately avoid high maintenance planting etc. and to retain/include semi-wild areas; a local tree nursery/environmental education resource centre (c.f. Welsh Harp) at Wormwood Scrubs (if Trustees/Friends welcome) or elsewhere as appropriate. Trees are important contributors to attractive place-making and environmental mitigation and are best sourced locally having adapted to the local growing conditions.

Still relevant from Regulation 18 response: The Policy lacks necessary strategy, analysis and proposals. It lacks a strategic approach and is not planning positively for it is not supported by up to date information, assessments and proposals about the natural environment/ecological networks that national and regional policy require and guidance advise (NPPF114, 165 & PPG8-04).

The canal warrants particular biodiversity policy focus. Locally appropriate guidance should be developed to address the following: The provision of green roofs, 'living walls' and spaces that will absorb water, rather than using concrete / hard surface materials and will reduce air pollutant concentrations. The greening of areas unlikely to be redeveloped in the near future, particularly Park Royal. Cross borough cooperation to mitigate impact of development and provide additional green corridors and spaces and biodiversity provision at the edges of the OPDC area; facilitate connectivity of networks and access for users of green infrastructure across MDC boundary.

Policy EU3 Water:

The policy is not effective.

Uncertain if (new) local parks and Wormwood Scrubs will be given over to swales. If a strategic approach to SuDs and to the use of the canal is not achieved then developments depending on individual SuDs will have higher infrastructure and amenity costs. Flooding is

not tackled strategically, but on ad hoc development-led basis which is likely to leave parts of Park Royal vulnerable to storm surface water flooding. Generally, utility infrastructure, with sewers maxed out, is inadequate to meet present demands let alone with the additional burdens of the planned amount of development.

Still relevant from Regulation 18 response: “London faces a drinking water shortfall, but at the same time problems of excess water: sewer overflows and flood risk in the event of excess rainfall” (London Assembly Environment Committee Growing, Growing, Gone Report, March 2016)

Policy is uncertain in terms of land take, visual impact, neighbourliness, displacement etc. being unstated. This is a policy lacking clarity, coupled with uncertain delivery. The concern is there will be an expectation that open spaces, including Wormwood Scrubs, would need to have swales. Whilst facilities have been integrated into Olympic Park, these are relatively small scale compared with strategic facilities needed for the quanta of development at Old Oak etc.

Counters Creek sewer catchment has acute capacity issues and is at risk (RTPI London Seminar 23 September 2015). It is unlikely to have capacity even for black water making the development proposal of Old Oak largely undeliverable given the multiple increases in demand. “Local Plan needs to grapple with” this (PPG34-002).

Policy EU4 Air Quality:

The policy is not effective.

It is weak in remedying excess (exceedance) of air pollution as soon as possible as required by Supreme Court. It depends on ad hoc developments to help reduce air pollution. It is imperative to secure ultra-low vehicles and construction machinery and non-polluting transport.

However, remedying this should not only occur within this Policy but also in the Places Policies: **Strengthening place based air quality policies:** The Local Plan acknowledges that: Parts of Old Oak and Park Royal suffer from high levels of air and noise pollution, arising from heavy industrial uses and the primary transport corridors running through and adjacent the area. (p. 304). Specific monitoring, abatement and mitigation measures should be specifically brought forward into each Place Policy.

For example, this is an issue with North Acton and Acton Wells Policy P7 clause (l) which should be strengthened (also, developments should not be permitted where there are air quality exceedances) by bringing into the policy box text para NA.14: To support health and well-being of local people, new development will need to contribute to improving air quality along the A40, Wales Farm Road and Victoria Road through identified measures and in discussions with OPDC. This may include street- greening, shaping the form of development and using specific high quality sustainable materials. Again this form of words, appropriately modified to relate to A40 and A406, could be applied to strengthen the Park Royal West Brewery Cluster Policy P4C1(m).

Low Emissions Neighbourhood (LEN) as a Policy Proposal: The Air Quality Study recommends the adoption of a Local Emissions Neighbourhood Policy (p. 67). Whilst the

LEN is discussed in the supporting text to Policy EU4, relevant wording needs to be strengthened and brought explicitly into the policy box. Such as: ‘The OPDC *will work with TfL to implement a LEN across the whole of the OPDC and neighbouring areas*’. Otherwise new developments simply bring large numbers of people into the most polluted areas.

Developments that provide for sensitive receptors should not take place in areas of exceedance for air pollution. Currently the language in the policy indicates that developments should not diminish air quality, and this has been to some extent upheld in planning applications. However, the other aspect of this is that developments should not place people in areas which will damage their health through pollution, but this has not been given weight in OPDC planning determinations (notably Mitre Yard, Scrubs Lane). In addition, green infrastructure is seen as important in diminishing air pollution, but very little has been provided in planning applications approved to date. Strengthening the requirement to meet acceptable air quality standards could set some expectations for (a) absolute maxima for children’s play spaces and outdoor amenity spaces, (b) rigorous monitoring and (c) achieving overall reduction of air pollution prior to developments being inhabited.

Still relevant from Regulation 18 response: The policy insufficiently strategic and emphatic, lacking certainty in remedying poor air quality. It lacks a more strategic area wide approach to securing reductions in the levels of air pollutants by relying on site by site development proposals through individual air quality assessments. The planned transformation in the quanta, extent and nature of development will inevitably significantly change air quality. National policy context requires taking into account AQMAs and cumulative impacts from individual sites. There is now a need to expedite compliance with EU limit values and national objectives. Air quality neutral – a London Plan policy requirement and not simply an Air Quality Study recommendation - may not now be of sufficient rigour to remedy poor air quality. Its implementation through the SPG with its very technical computations is virtually a ‘black box’ operation lacking accessibility and the certainty that it actually delivering the policy requirement.

Promote and proactively use interventions including ‘filter stations’, the planting of trees, shrubs etc., ‘living walls’ that effectively absorb pollutants.

Policy EU5 Noise and Vibration:

The policy is not effective.

Welcome the addition of ‘vibration’, ‘agent of change’ and more on assessments, but there needs to be a more strategic and joined up approach (OPDC with TfL & HS2) to protect existing and new property, mitigating and monitoring. The policy should be broadened to include dust, odour and risk of subsidence and tightened up to specify performance standards. Periodic auditing of the area would usefully provide a monitoring benchmark and reveal changes that may require additional attention (mitigation or cessation).

Still relevant from Regulation 18 response: Policy wording omits improving the acoustic environment and protecting (relative) tranquillity areas.

This is particularly important during the construction phases when noise and vibration are of a distinct and different nature. The build out periods are anticipated to be protracted and, consequently, should be addressed by a specific part of the Policy.

Policy EU6 Waste:

The policy is not effective and justified.

It places reliance on out of date West London Waste plan, out of step with down-sized targets for waste in the current London Plan, with an unnecessary site allocation protection for Quattro facility. It should proactively plan for relocation of waste facilities, including the Old Oak Sidings site (Powerday), and the inclusion of 'compensatory site provision' within policy may assist with this, subject to careful consideration of impacts, particularly on residential amenity. Energy from waste using incineration is a fundamental misunderstanding of circular economy principles.

Still relevant from Regulation 18 response: Policy (a) is out of date and is not justified. The OPDC has adopted the West London Waste Plan, an already out of date plan, which safeguards an overprovision of opportunities to meet identified needs. (See further response to OPDC Waste Strategy evidence paper). However, national guidance only seeks sufficient (PPG28-011) - presumably for the efficient use of scarce land and the proper planning of an area. There is no substantial justification for safeguarding Quattro as a waste site. Local residents have objected and its relocation locally would be problematical. Policy has failed to respond to current higher level policy and guidance.

The safeguarding of existing Old Oak Sidings waste management site (Powerday) with a proposed tripling of the current level of throughput and for it to become Old Oak's construction material reprocessing centre and to meet LB H & F's apportionment targets. The site at one-third throughput is already the object of complaints from local residents, a population which is to be substantially added to through the Old Oak development.

Fully integrate environmental infrastructure (including facilities for minimisation of waste and the maximisation of recycling) within housing developments. Encourage standardisation and co-ordination of procedures around waste and recycling to prevent confusion and duplication especially where developments cross borough boundaries.

Energy from waste using incineration is a fundamental misunderstanding of the Circular Economy concept and would be contrary for an exemplar to secure sustainable environmental standards. There are alternatives, much more environmentally friendly ways and technologies, to achieving local energy production/distribution and dealing with waste

Policy EU7 Circular and Sharing Economy:

The policy is not effective.

Welcome that the Policy has been broadened and that expectations or opportunities are usefully expressed in text para 6.90. But Policy is still reliant on major developments bringing forward a shared and circular economy for which the supporting study has a range of possibilities rather than an implementation strategy/programme. In this sense the Policy

is aspirational only. Comments at the West London Business Group meeting on the Circular Economy were interesting with people feeling that the concept was an excellent idea, but lacking in specific examples around how this might be applied.

Still relevant from Regulation 18 response: The policy misapplies concept to support energy from waste if incineration is proposed. Circular Economy not only facilitates more sustainable ways of managing waste and improves resource efficiency, but also provides for more environmental and business resilience, together with offering job and business opportunities (London Assembly Environment Committee Growing, Growing, Gone Report, March 2016). This LA report gives a more accurate explanation of Circular Economy which does not substantiate energy from waste using incineration. This comment also applies to EU6 waste Management policy.

Policy EU8 Sustainable Materials:

The policy is not effective.

The contribution to resource efficiency is welcomed, but the Policy does not extend the factoring in of embedded carbon beyond materials. A wider application of embodied carbon should be sought ensure a resource efficient development over its life time.

Still relevant from Regulation 18 response: The policy should have greater referencing to 'embodied carbon', with a target with the aim of increasing efficiency in, minimising resource use and to assist in meeting London Plan targets. Embodied carbon does not yet appear in the London Plan, but there is an imperative to go beyond current policy concepts and targets in order to deliver exemplary development. Given the time lines of the Local Plan, the MDC and development build out, it is appropriate to think, for example, beyond zero carbon buildings and plan for buildings that are carbon sinks.

(At time of writing) Note that six local authorities including Brighton and Hove require embodied carbon estimates. Requirements for embodied carbon assessments in both the Netherlands and Germany are soon to be introduced in other countries. Embodied carbon is likely to be an indicator in EU harmonised sustainability assessment framework and the Embodied Carbon Taskforce has been lobbying for the inclusion of embodied carbon abatement as an Allowable Solution.

2 diagrams from Regulation 18 response not copied here

Policy EU9 Minimising Carbon Emissions and Overheating:

The policy is not effective.

Policy is welcomed because the Plan now says more on meeting carbon reduction targets and climate change. But it is underachieving and so will not align with Mayor's Zero Carbon London by 2050 aspiration. Carbon off-setting is not acceptable for an exemplary area-wide development. Need to move to BREEAM 'outstanding'. It is essential to prevent buildings overheating and the unaffordability of higher heating/cooling costs when occupied compared with the costs theoretically predicted at design stage. This is so important for preventing issues around fuel poverty and sustainability.

The requirement for post-construction audits is welcomed and this should include energy performance. Bath University carried out a study (reported in the Times*) that highlighted where utility bills had doubled (despite the energy savings experts and their modelling) and that any modelling had to be tested when flats were finished and occupied. This then relates to

*"Utility bills double because of 'useless' energy-saving experts" by Ben Webster, Environment Editor, The Times, dated 04/05/2017

Policy EU10 Energy Systems:

The policy is not effective.

Ambitions will not be fulfilled: energy supply to area is/will be problematical especially with HS2 demands; and aspirations for renewables, local generation and storage systems insufficient. Energy centres for each development and imported energy will be accepted (Consultant reported to the OPDC Board 11th May 2017). This also has amenity implications given the uncertainty around Energy Centres, their size, distribution are potential levels of nuisance and disturbance unknown.

There is concern over the viability of a decentralised energy network unless a critical mass of users and a range of different users are linked in in order to achieve scale, economy and balance demand and production. There are the cost and lock-in implications to the consumer of a single commercial provider. An alternative could be a networked (street) block by block approach, as in Denmark, so that if there is a supply outage or the costs become unaffordable, they can share energy.

This policy should recognise that distribution systems for cooling may be as equally important as light/heat/hot water and will be increasingly important when the current occasional heatwave will be the norm in future. Energy from waste using incineration would be detrimental to the area.

Still relevant from Regulation 18 response: Policy clause d) is critically important to get correct. It is important to stress the need to provide safeguards for customers who face lock in to one provider. Costs could be negative to households in fuel poverty.

Policy EU11 Smart Technology:

The policy is not effective.

It is reliant on ad hoc developments and, therefore, lacks comprehensive strategy to upgrade broadband to existing deficient areas, particularly in Park Royal to support existing and new businesses.

Policy EU12 Extraction of Minerals:

The policy is not effective.

If extraction is contemplated and realistic then safeguards should be tighter.

Still relevant from Regulation 18 response: The policy fails to safeguard rail and canal facilities. Safeguarding existing, planned and potential rail heads, rail links in minerals policies is sought by NPPF 143. To these should be added the canal as sustainable transport.

Policy EU13 Land Contamination:

The policy is not effective.

We welcome the inclusion of protective requirements and the land contamination assessment procedure with the table and sequence of stages or steps, together with monitoring and evaluation, plus on-site treatment, recycling and reuse. But there is still the need for a strategic approach to remedying the long history of contaminating activities with independent verification, rather than the proposed development-led site by site basis and self-certification. As recent events concerning fire safety, self-certification is problematical.

Still relevant from Regulation 18 response: Such is the long and often unrecorded history of extensive contaminating activities – for example, 1865 OS map shows a Naphtha Works by the canal/Old Oak Common Lane – that the Precautionary Principle should be incorporated in policy and text. OPDC should take a more strategic approach to dealing with potential contamination (PPG 33-005). It is not sufficient to tackle this issue by responding to development proposals on a site by site basis as set out in this Policy. Development proposals should be assessed not only on conditions on that site, but also on surrounding sites, given the protracted build out periods envisaged – for example, Old Oak to 2037 and beyond. Sensitive receptors exist and will continue to exist or will be created through development in the vicinity of contaminated land.

Introduce Governance to ensure proper Implementation of Policy. Verification (Stage 6) and on-going Monitoring (Stage 7) are crucial parts of decontamination, but the knowledge and expertise primarily resides outside of the OPDC, particularly with the boroughs. It is essential that the relationships between the OPDC, the boroughs and EA are formalised in order that duties, responsibilities and resources are clearly allocated to achieve greater certainty that remediation will be secured and policy satisfactorily implemented. Such governance can be seen as contributing to the clarity on the approach to remediation advised by PPG (33-005).

TRANSPORT

Policy T1 Roads and Streets:

This policy is not effective.

‘Healthy Streets’ that are pleasant, walkable, public transport and cycling friendly are supported. However, principal routes appear to have multiple and potentially conflicting specifications/functions. Understanding the hierarchy and functions of the proposed network is hindered by the lack of a map beside this policy. The street map, as a component of the “Policies Map”, is coarse grained and needs to be read with separate maps for

walking, cycling, bus routes etc. Local roads with 20mph limits are not defined and vehicular servicing/access routes are unspecified, particularly to HS2 Station. Given the congested alternative peripheral routes, there should be more definite improved E-W routes to serve the development. The Old Oak High Street, a fundamental element of Old Oak, will now be disrupted by TfL's demands to retain the Crossrail/Elizabeth Line Depot as voiced at the OPDC Board meeting of 12 September 2017. Clauses c) and d) are virtually duplications.

Still relevant from Regulation 18 response: Policy and a programme of transport schemes should prioritise the resolution of existing transport problems which includes the diversion by through arterial road traffic across Park Royal and along the roads around Old Oak. These roads serving the districts of Harlesden, Old Oak, Park Royal and East Acton are regularly congested and at times grid-locked. However, the solution does not necessarily lie with the building of yet more roads and junction improvements, but with the promotion of sustainable forms of transport. This should be made clear in policy.

Old Oak High Street should be accessible only to pedestrians and cyclists with certain essential sections being accessible to buses. Grand Union Street should not be a primary route. Through routes in Old Oak North and South should be minimised.

Provide the main eastern entrance to the Old Oak Common Crossrail HS2 station with a direct road connection to Scrubs Lane. This would direct traffic away from Oak Common Lane and East Acton with their limited traffic throughputs and residential/town centre functions. There is no need for, and should not be provided, any route from Crossrail HS2 Station direct to the Scrubs.

Policy T2 Walking:

This policy is not effective.

There is a need to segregate pedestrian /walking areas and routes from any wheeled transport (including cycling). 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. Pedestrians should be able to roam freely on a dense network that permeates throughout area and developments, preferably away from traffic. The London Plan concept of lifetime neighbourhoods should be applied to facilitate walkable areas and neighbourhoods, and the same principles applied to the business areas to enable and promote journeys/trips on foot to local services, homes or stations. Connectivity with neighbouring districts is particularly important. Ensure that Old Oak High Street is not a switchback of changing levels, challenging gradients and bridges. A recently apparent issue is TfL's demands to retain the Crossrail/Elizabeth Line Depot voiced at the OPDC Board meeting of 12 September 2017, presumably necessitating a long bridge across the depot for the medium term. Programming of Old Oak South will need to be revised accordingly.

Still relevant from Regulation 18 response: A transformational change to the transport and environmental context is required to Park Royal, Old Oak and neighbouring districts if walking is to represent a significant part of the journeys/trips in these areas. Those attributes and features of the walkable provision that is set out in the text are fundamental to this change. Relying upon development proposals as set out in policy will not secure this

transformation, particularly in those parts not subject to development proposals. A positively planned proactive programme of proposals should be prepared to support this policy. This should be signposted in policy.

Some detailed comments are as follows: Footpaths should be wide enough, and kept clear of obstructions – parked vehicles etc. -. Park Royal with its narrow streets is difficult to walk. Encourage the creation of greened/treed routes and a green walking surface as well as hard surfaces. Ensure that the lighting of walking routes is fit for purpose. It is suggested that walking routes should be well-lit, but not over-lit, to keep within ‘dark skies’ design guidelines. Exceptions at perceived danger spots can be made.

There is a need for continuing dialogue to share and consider the diverse suggestions for specific projects.

Policy T3 Cycling:

This policy is not effective.

It lacks clarity on cycling around OPDC street network and integration with cycling proposals by Transport for London and the boroughs. Whilst there is support for the principle expressed in clause b) (subject to the request for pedestrian/cyclist segregation noted below), this needs fuller expression and added definition in the map and an accompanying statement on provision and programming. A similar promised transformational change at the Olympic Park area has not materialised. As presently framed, the policy will not radically change the low take up of cycling, some 3% of trips, in Park Royal.

A greater density of routes and links is necessary to achieve critical mass take off in cycling, widespread connectivity well integrated into surrounding areas and networks. More should be proposed on the provision of alternatives to congested peripheral roads and existing roads into/out of the OPDC area. Routes should be wide enough for a variety of cycling (e.g. commuting, recreational...) allowing passing one another, at the outset and not retrofitted.

Still relevant from Regulation 18 response: As stated in the response to Policy T2 Walking, relying upon development proposals as set out in policy will not secure a transformative take-off in cycling, particularly in those parts not subject to development proposals. A positively planned proactive programme of proposals should be prepared to support this policy. This should be signposted in policy.

Again, forming new and improved links with neighbouring districts is particularly important if the physical and behavioural barriers are to be surmounted. The accompanying map to policy depicts limited cycle network connectivity beyond the boundary of the MDC and relatively few links across the boundary.

Policy (b) should require the segregation of cyclists and pedestrians – as comments to Policy T2 Walking.

Need for continuing dialogue to share and consider the diverse suggestions for specific projects to take these forward. .For example, local knowledge suggests that there is a redundant freight railway tunnel under the A40, just west of the parallel Central Line

(Ealing Broadway branch) tunnel that could be made into a cycling route. Another suggestion is to turn the unused railway alignment beside the Central Line (West Ruislip branch) into a cycling route. These and other alternative options should be further explored by the OPDC actively engaging and involving the community in the design of the cycling routes

Policy T4 Parking:

This policy is not effective.

Car dependency and congestion in Park Royal cannot be tackled only through controlled parking. Park Royal is characterised by on-street and, in places, on-pavement parking and servicing. Vehicles obstruct pavement and highway. For example, to walk parts of Coronation Road is highly problematical. There is no certainty of implementation given that OPDC is not the highway authority. Any parking and loading/unloading provision should be on-site and streets should allow the free flow of buses throughout the OPDC area.

Still relevant from Regulation 18 response: Provision of only 0.2 spaces per new home is very challenging, and may affect successful marketing of housing developments. The OPDC should publish evidence on existing similarly scaled schemes that successfully function with such very low parking standards.

Controlled parking zones within Park Royal should target all-day parking, not the daytime visits that underpin the economic activities of the area. These zones should be coordinated within a management programme to resolve prevailing traffic, servicing and environmental issues.

Policy T5 Rail:

This policy is not effective.

Focusing Old Oak development on the HS2 Station as a destination is not good place-making; it is simply one component of the area. In particular policy clauses e) & h) have consequences for and pre-empt proper place-making and lack clarity on the implications for the design solutions for stations. Old Oak Common Station and its context should not be predetermined by clause h).

Need to relate stations to their rail services and be more specific on how interchange between stations/services is achieved. Connections between stations that are safe, efficient and sheltered are crucial. That Old Oak Common Station has entrances/exits as close as possible to the Overground Stations is essential to easing the interchange and maximising connectivity. Specifically reference the 2 new Overground stations and upgraded North Acton station in Policy to ensure delivery. Hythe Road Station is essential to Old Oak (Car Giant)/Scrubs Lane developments. Protect the potential for Willesden Junction to have a greater local/west London role with more platforms.

This policy, and indeed the Old Oak South proposals, lack flexibility, given that the strategic transport hub, which as explained in Policy SP1 forms the 'catalyst for growth', is dependent on a project largely beyond the ability of the OPDC to control. Programming of Old Oak South will need to be revised following the discussion at the OPDC Board meeting of 12

September 2017 on TfL's demands to retain the Crossrail/Elizabeth Line Depot. This will prevent over-track development in the medium term. Generally, there is a lack of certainty of delivery of all the proposed transport and infrastructure elements. The need to protect railway operational land and secure alternative facilities if displaced should be addressed.

Still relevant from Regulation 18 response: This is a new district for London that for railway operational reasons will have a large interchange station on one edge of it. To achieve successful place-making, the HS2 and Crossrail station should not be considered as being the heart, or at the heart of the Old Oak development. The station is 'useful' in the sense that it underpins successful investment in development of the area, so long as that development is appropriate in terms of scale, form and function. But it should be recognised for what it is, an interchange, and, therefore, its primary function and facilities should be to provide for convenient train to train changes by travellers, and to cater for commuters, residents and visitors to Old Oak. Vehicular access to the station is heavily constrained by the congested roads of West London and local roads will be hard pressed to cope with any further development at Old Oak and Park Royal.

The substantial capacity improvements to stations are part of the policy, but are dependent on development proposals coming forward and facilitating them, among other things. Development in North Acton is well on the way to adding 10,000 people locally, creating over capacity problems at the station. The station needs to be changed now, not at some un-programmed time in the future.

The connections between and to/from stations are crucial to their satisfactory, safe, and efficient working. Provide clear, accessible information and signage at stations, subways and connections including where assistance is available to elderly and disabled users.

The relationship of railways with new or more frequent services with neighbouring properties should be carefully considered and any unavoidable adverse environmental impact should be remedied. Proximity, noise, lights, activity and overlooking can significantly diminish amenity. Policy should provide for the safeguarding of amenity, particularly as detailed station and rail link studies are not available to support most of the proposals set out in Policy.

There is need for continuing dialogue to share and consider the diverse suggestions for specific projects to take these forward.

Policy T6 Buses:

This policy is not effective.

It is inadequate to proactively support bus development in a planned and coherent way, on a road network that should facilitate optimum routing, particularly between Park Royal and Old Oak/HS2 Station. This should be made explicit in policy. It is dependent on individual developments coming forward, and this is reflected in the likely indeterminate consequences arising from clause c). It is essential that policy should commit to bus routes that serve and bus stops that are located at stations and other key points to maximise connectivity, as well as integrating with surrounding area. Need also to consider terminating and interchange facilities.

Still relevant from Regulation 18 response: The provision of effective, accessible, convenient, regular bus services is of great significance to the efficient functioning of the area, now and in the future. To achieve this requires studying not just Park Royal and Old Oak, but also the areas beyond, in cooperation with the boroughs, to tackle the obstacles to bus operations. This may require a greater degree of bus prioritisation in the wider area.

The provision of frequency increases, new and extended bus routes and bus stop locations warrants Involvement of the community in their planning. ...the possible bus route map... has not been widely known and studied. Some preliminary comments include, but not exclusively, the linking of neighbourhoods, the provision of links to social infrastructure, shops, medical establishments, stations etc., routes crossing the area, and perhaps within the area, circular routes. The policy should signpost that there will be collaboration with communities on the implementation of this policy. There is a need for continuing dialogue to share and consider the diverse suggestions for specific projects to take these forward.

Policy T7 Freight, Servicing and Deliveries:

This policy is not effective.

The policy should be more emphatic on planning for and the provision of consolidation centres to transfer loads to smaller 'last mile' vehicles with controls on access by HGVs; together with a proactive plan to improve Park Royal's transport and traffic operations. Loading/unloading provision should be on-site and streets should allow the free flow of buses throughout the OPDC area. Reinstate FORS to gold standard.

Policy T7 d): substitute 'canal' for "water".

Still relevant from Regulation 18 response: To avoid pre-empting the selection of consolidation centre(s) and lorry holding areas sites, there should be transparent objective site selection criteria to ensure the proper planning. This is because such facilities will have significant transport and environmental impacts, potentially beyond Old Oak and Park Royal. These, to include, but not exclusively, such considerations as: the reducing already high levels of air pollution and congestion on existing roads; minimising levels of noise, dust and vibration from delivery and servicing; proximity and ease of access from A40 and A406 and/or rail and/or canal facilities.

National planning policy requires policies and measures that maximise sustainable transport solutions (NPPF29). The promotion of rail and canal for freight should be an integral part of this policy and rail links/heads and wharfs should be protected and enhanced. See also response to Policy on Construction below.

The Plan should positively plan for Park Royal to resolve, among other things, the transport issues, many of which are related to servicing and deliveries, but will not be dealt with through development proposals. A clear signpost in this policy, connected with Place Policies on Park Royal, should bring forward a management programme to resolve prevailing traffic, servicing and environmental issues.

Policy T8 Construction:

This policy is not effective.

There needs to be an OPDC overall strategy within which sits this policy which should be more explicit that consolidation centres are essential and that there is a need to regulate emissions as well as traffic. Promotion of use of rail and canal supported. Construction Logistics Plan/Code of Practice need to be monitored and periodically revisited (to ensure that they are fit for purpose over time). Reinstate FORS to gold standard. The text should cite TfL's strategic and detailed approach to Vauxhall Nine Elms Battersea Opportunity area as a model.

Still relevant from Regulation 18 response: See responses above on Policy for Freight etc. on selection of consolidation centres and lorry holding areas and on sustainable transport solutions.

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; and a plan of action for maximum canal use during all construction phases involving engagements with Cross Rail, HS2 and all major planning applications.

Process: There should be meaningful and effective community involvement in the preparation of an OPDC/TfL's Construction Logistics Strategy and development CLP/CofPs. Appropriate method of construction, including related transport, agreements should be part of the planning approval process.

The Strategy, Plan and Code should include: the management of construction phasing so that particular areas are not building sites over prolonged periods of time and/or intensity; developments should follow Considerate Contractor Schemes; these should include good communication with the community to help minimise inconvenience; prefabricated building components should be promoted. A development's Construction Logistics Plan and Construction Code may be required to provide mitigation and prevention measures that extend beyond the actual construction site.

Policy T9 Transport Assessments and Travel Plans:

This policy is not effective.

Implementation needs to be monitored and periodically revisited, and this policy should apply to construction sites, as they will be key features for some time, for this policy to be effective. The text should cite TfL's strategic and detailed approach to Vauxhall Nine Elms Battersea Opportunity Area as a model.

HOUSING

Policy H1 Housing Supply

This policy is not justified.

The absorption rate of 700 market homes (not including affordable homes) per annum which informs this policy makes very ambitious assumptions that there will be numerous

significant development sites delivering at any one time and that any market sales saturation effect from the combination of seven competing developers will not arise.

Policy H2 Affordable Housing

The policy is not sound – it is not justified, it fails to meet objectively assessed need and is not positively prepared

There is inadequate evidence to justify delivery of 50% affordable housing as is made clear in para 8.18. The whole plan viability suggests a more likely general delivery of 35% affordable housing with fingers-crossed that some sites might deliver 50%. The competing demands on developers for necessary infrastructure cost simply add to the problem of this wishful thinking.

The gap between assessed need and likely deliverability is extreme in terms of London Affordable Rent Homes. The SHMA assesses that 86% of the households identified as needing affordable homes that would need to be social rented. The policy sets at 30% (of the affordable homes) target to be London Affordable Rent (the substitute for social-rented homes). This would provide just 10.5% of homes delivered at Affordable Rent Homes (meeting less than a quarter of need) with a scenario of 35% affordable homes delivered. This would rise only to 15% (only a third of need) where 50% of homes are delivered.

There is particular concern that to date (in terms of planning applications approved) delivery is only 22% affordable housing and just 5% London Affordable Rent. The London Affordable rent comprises 21% of the affordable housing. (Note that these figures include conventional and non-conventional homes as the OPDC would in monitoring delivery of housing targets – i.e. includes student rooms and Build to Rent is not included as affordable housing as set out in Policies H2 and H6).

	total private (including build to rent and student housing)	total affordable rent	total intermediate	overall total (units)	Total affordable housing and % of total units	intermediate units (% of total units)	affordable rent (% total)	intermediate units, % of affordable offer	affordable/ rent units, % of affordable offer
OPDC determined to date	715	106	195	1016	301 (30%)	19%	10%	65%	35%
Ealing determined	1067	0	199	1266	199 (16%)	16%	0	100%	0
TOTAL	1782	106	394	2282	500 (22%)	17%	5%	79%	21%

Given that it is assumed the OPDC area will meet a considerable level of the need identified within the SHMA (amounting to some 23% of the housing delivery of the housing market area's identified need) failures by the OPDC to deliver its proportionate level of London Affordable Rent homes will place a heavier weight on the boroughs to deliver these and could have negative impact. How the OPDC will co-operate with the boroughs to meet the objectively assessed need of the housing market area is also notably absent from policy H2.

The policy compromises delivery of a mixed and balanced community in the OPDC area (required - para 50 NPPF).

The cost of other 'affordable housing' will unlikely be affordable to households with below median incomes (that is the bottom half of households by income). The new population would then be predominantly from the top half of households (by income) not constituting a balanced mix of incomes.

The SHMA identifies that only 7% of those assessed as needing affordable housing would be able to meet the cost of London Living Rent Homes. The GLA requires that households accessing London Living Rent homes must be 'middle income' earners that are already renting and able to put money away to meet the cost of buying or part buying a home at a later date. Thus, these would not be accessible to households on the boroughs' housing waiting list.

Policy SP1 3.5, which notes levels of deprivation in areas outside but at the edge of the OPDC area and says 'it is important that Old Oak and Park Royal brings tangible benefit for [deprived] local communities' will also be compromised

There is some fear that delivery of high levels of high cost market housing in the OPDC area will impact on rising property prices in neighbouring areas with the potential of displacing rather than meeting need of lower income households. In April 2017, *The Telegraph* reported that "This nook of north-west London [Harlesden] has seen the biggest growth in property prices in the capital in the past year at 14.6 per cent, according to research by Hamptons. That's more than double the London average of 6.1 per cent."

Given that policy SP1 Catalyst for Growth c)ii & iii and paras 3.4 & 3.5: clearly assert that the regeneration of Old Oak and Park Royal will bring tangible benefits for local communities and offers life improving condition it is essential that the OPDC address the issue of potentially negative impact in terms of housing costs and affordability in neighbouring wards..

Policy H2 table 8.2 description of London Living Rent is inadequate. This should also state that **households must also already be renting and want to build up money to buy their home on a shared ownership basis.**

The description of London Affordable Rent (also table 8.2) should also be amended to say '**Capped**' Target Rents set in accordance with government guidance **and excluding service charges.**

Policy H3 Housing mix

The policy is unsound. It is not justified or positively prepared.

It is disappointing that there has been such a scaling down of proposed target for family sized housing from 53% family sized housing in the affordable housing sector in reg 18 consultation to 25% (across the sectors) in the regulation 19 Local Plan. The SHMA suggests the need for 51% affordable family sized home; around a third of which would need to be 4-bedrooms+ and 64% family sized market homes.

This creates an extremely wide gap between evidence and the proposal of meeting need. Failure to contribute to meeting a proportion of need identified in the housing market will create negative impacts outside the OPDC boundaries.

This is of high concern given the levels of overcrowding identified in the SHMA – in 26.7% homes (84,227 in 2011) homes in the housing market area. Overcrowding has huge impact on health including links with TB, accidents in the home, mental health, respiratory and infectious diseases, educational development and difficulties for children in finding space to study, lack of privacy, anxiety and depression.

The OPDC should set out how will co-operate with the three boroughs to meet the objectively assessed need for family-sized homes in order to reduce rather than increase existing levels of overcrowding.

Given that the OPDC is principally creating a new area here, there are questions around what the future demographic may comprise and whether lifetime neighbourhoods will be created. Will there be sufficient family-sized homes for smaller households moving into the area to grow and stay here longer term? How will the composition of the area compare with surrounding areas? There is an evidence / data gap here as highlighted in the Integrated Impact Assessment.

The OPDC must contribute proportionately to meeting the need identified in the housing market area of Brent, Ealing and Hammersmith and Fulham, or the result will be placing increased need on the boroughs. The SHMA and supporting text 8.32 of this policy suggest a need for a target for 51% for family sized affordable housing and 64% family sized market housing. The 25% target for family housing is much too low and will leave families already living in overcrowded homes to experience ever greater need. In Brent 30% of homes are overcrowded and the SHMA says that 27% of homes across the whole market area are overcrowded.

We are particularly concerned about the need for larger family sized - four and five-bedroom homes. The SHMA shows that 16% of affordable housing should be four and five-bedroom homes.

The London Assembly Housing and Planning Report 'Crowded Homes' of 2011, highlighted in sections 3.3 and 3.4 that while building a small one or two bedroom home will take one family out of temporary housing (impacting on two, three or four Londoners) , building a 6 bed home of an overcrowded family creates a down chain – that could solve the problem for 36 Londoners).

https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Final%20overcrowding%20report%20-%20print%20version.pdf)

Given that there are much greater levels of overcrowding for black and Asian households this also has an equalities impact.

We suggest Policy H3 should include a target for four and five-bedroom sized homes.

Policy H5 Existing housing

The policy is not effective.

It needs to specify how exactly it will resist loss of existing housing. The policy should support retrofitting on new homes. It should also ensure that where a proposal would result in new housing that it re-provides an equal amount of space, rooms and tenure.

Policy H6 Build to Rent

The policy is not sound, it is not effective.

Policy H6 (a) suggests that Build to Rent will provide affordable housing in the form of intermediate rental products. However, the London Mayor's Affordable Housing and Viability SPG says that this product will be delivered as discounted market rent (**preferably** at London Living Rent levels). Preferably does not mean necessarily.

Is the OPDC saying that it will **only** approve developments that include Build to Rent schemes that are in the form of an intermediate rental product and that it would not approve applications for any that are above London Living Rent levels?

If so, Policy H6 (a) should make this clearer – perhaps saying 'only in the form of affordable housing that are no higher than London Rent levels', or if not, it should make it clear that some Build to Rent schemes could be at higher than LLR levels.

For the policy to be effective, the OPDC should set an annual target to measure/monitor delivery. This is important, because if this type of housing can be delivered by the private rented sector (without grant funding), potentially more money could be allocated to deliver Affordable Rent Homes (the nearest we have to social rents).

We have grave concerns that the new Build to Let properties will not be available/affordable for local people and thus could increase rather than alleviate need. There must be delivery of sufficient Affordable Rent Homes to meet need to ensure that private renting is a tenure of choice.

The rental cost of a two-bedroom London Living Rent home in College Park and Old Oak ward (comprising most of the development area) is £959 a month. A household would need an income of £34,524 (based on a third of income) to meet the cost. Median household incomes in that ward are just £30,890, and across Brent are £32,140. It is important for the Plan to show how the needs of households with below median income levels will be addressed within the housing market area.

Policy H8 Gypsy and Traveller Accommodation

The policy is unsound, it is not positively prepared.

Re H8 (a) the Bashley Road site needs to be protected but also needs significant improvements. There are serious drainage problems on the site and associated health and safety problems (including rats) and inadequate basic facilities. Residents suffer pollution including noise and vibration from neighbouring industries sometimes also at night. The entrance to the site is a long and extremely poor-quality road with no paving (worse than other areas in Park Royal) and is poorly lit. Adults and children suffer poor health.

Gypsies and Travellers anyway continue to experience some of the poorest health outcomes in our society, including the lowest life expectancy of any group in the UK (10% less than the general population) and high infant mortality rates.

The OPDC could ensure that, at the very least in the instance of the Bashley Road site, that an evidence base - a full assessment of current conditions (including infrastructure) and proposal for improvements are produced and improvements delivered.

This is an issue that also needs to be referred to in Strategic Policy SP3.

Policy H10 Student Housing

The policy is not effective.

It is unclear how 'vibrancy and diversity' H10a(i) is to be measured or monitored.

To some, large areas of development of student accommodation and private housing such as that around North Acton is actually the creation of a transient community, consisting almost exclusively of one demographic – rather than a diverse lifetime neighbourhood.

There is concern that this area particularly provides over concentration of student and single person dwellings to the exclusion of other forms of housing for which there is greater evidence of need. This also delivers types of supporting infrastructure, shops and services that don't meet wider needs.

The area already accommodates 718 student bed spaces at 'The Costume Store' Victoria Road (former BBC costume store) 657 student bed spaces at NEC House, 1 Victoria Road. The Holbrook House application (approved in May 2017) is for 424 student bed spaces and Lyra Court 184. This is a total 1,933 – meeting 60% of the need across the housing market area (3200 identified in the SHMA) – of the three boroughs. This is an incredible contrast with the targets and intended delivery of London Affordable Rent or family sized homes.

Other developments and recently approved applications have a predominance of one-bedroom flats – adding further to the already the creation of an area that is neither mixed or balanced. The development on the junction of Victoria and Chase Road is 151 residential units 55% of which are one-bedroom flats and only 2% with family sized accommodation. 6 Portal Way with 578 residential units includes 340 one-bedroom flats (59%) and only 5% family sized homes. (Total 432 one-bedroom flats and just 35 (5%) family sized homes).

In consultation events on the regulation 18 Local Plan where residents expressed concerns about over concentration of student housing in North Acton officers said that they would ensure that communities are mixed and balanced and not dominated by one housing typology or tenure. Mention of discouraging student housing in North Acton was made. The current policy fails to protect against a mono-type of housing form developing in the area.

In this respect, what has already been delivered in North Acton should be deemed contrary to policy set out in H10a (iii) and (iv). Again, it's not clear how the OPDC will measure and monitor undermining of conventional self-contained housing supply and 'overconcentration' in any one specific location.

The OPDC is responsible for catering for the needs of students along with the authorities in the housing market area, not those of any one university. We note the officers report relating to the Holbrooke House application (determined in August 2017) not meeting objectively assessed need assessed in the SHMA, but meeting a need identified by Imperial College - "The proposed student accommodation meets a need identified by Imperial College and ensures all first-year students attending the university will be provided with a college managed space".

The policy should provide a map showing where there is existing student accommodation and where it may be appropriate to deliver any more (if meeting objectively assessed need) and where there is already overconcentration of student accommodation, where diversity of area threatened and it is therefore inappropriate to deliver any more. It should provide information of their co-operation with the boroughs in term of meeting objectively assessed need for student housing and what proportion of need the boroughs will provide, to prevent further overconcentration of student housing in the OPDC area and undermining of delivery of conventional self-contained housing supply.

Additionally, the policy should require that student housing developments deliver the associated social and community infrastructure needed in order not to put additional stress

on existing services (including health services). It should ensure delivery of an appropriate quota of publicly accessible green and open spaces.

EMPLOYMENT

Introduction

This Chapter is not sound as the evidence base is inaccurately used: Paragraph 9.2 indicates an assumption that an additional 67,900 jobs will be delivered, when in fact these are only “new” jobs and do not reflect the significant job losses anticipated in the Industrial Land Review. The development proposed in this plan will destroy or displace existing jobs, and thus only generate a net contribution of 49,052 in Old Oak area and 4216 net jobs in the Park Royal area. In addition, the Industrial Land Review indicates that there is limited demand for intensification in Park Royal (see paragraphs 5.35, 5.57), bringing into question the realism of the stated targets.

GUA raised this loss of jobs consequent upon the development of the OPDC area as an issue in response to the regulation 18 Local Plan consultation

Policy E1: Protecting existing economic and employment functions.

The policy is not justified or effective

1. Business and job losses are of grave concern to local residents and firms. This policy does not take into account who job and firm losses will impact most. Evidence suggests this will have a disproportionate impact on the local population, who are acknowledged to be living in amongst the most deprived wards in the three OPDC boroughs. This evidence has not been considered in this policy

The evidence from the Industrial Land Review (Supporting Document 25.) shows that the largest proportion of the workforce in the OPDC area lives locally (p. 35; 3.30). Local people will be disproportionately disadvantaged by the closure, loss and potential relocation of existing local businesses and accompanying job losses.

This has a material impact on Policies SP2 to SP5, as impacts on health, “good growth”, thriving communities and resilience are significantly undermined by this. The Socio-Economic Baseline Study also highlights that local residents in and around the OPDC area are disproportionately from poor and of minority ethnic backgrounds.

The IIA (Appendix D table 7) has noted the protection of jobs and businesses to be important in terms of impacts on local residents which are of concern in relation to some key aspects of the impact assessment.

Evidence from the Industrial Land Review (3.30) highlights that while the OPDC area workforce lives across London, the largest proportion of workers are local and live within the three surrounding boroughs. Other industrial areas in London also provide local employment. While there are a large number of people who live across west London and drive to work in the OPDC area, those living locally or further afield will tend to take public transport and other modes of travel to get work. This may be due to weak north-south public transport links in west London as well as the lack of 24-hour public transport operation.

The close work-home relationships which exist in Old Oak firms contributes to a sustainable and efficient set of economic clusters in the area, as well as a sustainable urban form – a key ambition of the Mayor’s London Plan (Policy 6.1A(a)). Evidence of this is not referred to in the Plan

Local residents will not only face rising rents as a result of the development of Old Oak, but potentially also longer and more costly commutes and increasing worklessness if jobs are lost as a result of business displacement. The potential for structural mismatches in skills required between jobs being lost and those being made available through construction or new office and retail jobs is high.

There is a total of 5948 jobs threatened in the Old Oak area

2. The potential dis-benefit of displacing thriving and locally dependent businesses is not acknowledged. Stated ambitions to support relocation out of the area are potentially damaging to a significant proportion of the existing OPDC economy (some 23% of businesses).

Relevant data on jobs and businesses, employment sectors and their distributions in the OPDC area contained in the ILR and other supporting documents should be included in the Employment Section Chapter 9 of the Local Plan for reference and as evidence to evaluate whether there is a sound basis for the proposed policies.

Currently important evidence is omitted from the plan, suggesting a highly selective reading of the submitted evidence base in favour of a certain set of claims regarding job creation; there is a lack of information about the negative impacts of the development on job losses, dislocation, business closures and relocation, and the limited market scope for plans for intensification in Park Royal, and the potential for job expansion there is not discussed. These absences are not a strong recommendation for passing a test of soundness for the policies on employment.

The evidence in the sections above is relevant to all policies in the Employment Chapter.

3. GUA in response to the regulation 18 Local Plan consultation highlighted comments that are still relevant –
 - *There is insufficient discussion of strategically building on the existing firms and jobs in the Old Oak area, and how to approach the disruption (already as a result of developer pressure and intimidation) and possibly relocation which they face as a result of the development.*
 - *Many firms are deeply enmeshed in local services and provisioning (of other firms, of local councils, social services and health care) as well as servicing other firms and activities across the city. The proposal for mixed use provision in Old Oak is supported, but appropriate strategic emphasis in achieving this needs to be given to supporting and strengthening existing firms and activities (including cultural and making activities) and to retaining the kinds of physical spaces on which they depend. A charter needs to be put forward to ensure that businesses who wish to remain in the area may do so, including opportunities to continue to own their own properties. Existing clusters and areas of strength need to be identified and supported.*
 - *Alongside numerous successful and locally dependent small firms, the Old Oak and Park Royal areas have significant clusters of artists and makers, notably at Hythe Road. These can form the kernel of a dynamic cultural core to the new developments. Affordable space for artists is under great pressure in London, and*

the bespoke facilities, abutting the existing rail line north of Hythe Road, could be incorporated as part of the mixed-use strategy (notably point 8.16, which highlights the potential role of such spaces adjacent to the existing and future infrastructure).

4. The policy does not have implementable plans to realise its goals. We suggest
- Deletion of E1 (b) (ii) text – ‘within the rest of London and beyond’. This is considered in the ILR as potentially greatly disadvantageous to firms and most especially to their employees, none of whom currently live outside of London (p79 and p35)
 - OPDC should carry out detailed mapping of existing businesses and jobs in the Old Oak area in order to be able to monitor any relocation displacement. It should also maintain an updated public record of available places for relocation and meanwhile uses in the OPDC area and surrounding boroughs. This would form an important part of monitoring benefit or dis-benefit to existing communities.
 - New policy wording is needed in order to ensure the policy is effective and addresses issues of affordability. We propose:

E1 (b) (iv) providing evidence of (which will be part of planning conditions)

- robust engagement with affected businesses through pre and formal application processes to ascertain whether businesses wish to occupy newly creates spaces;
- support provided to sustain existing businesses and social enterprises in transition to new land uses
- effective arrangements for retaining and re-providing accommodation and compensating businesses as a consequence of redevelopment;

E1(b) (v) ensuring affordability and security of tenure of any employment floorspace re-provision through

- initially taking into account rents prior to redevelopment
- any negotiated uplifts are not as a result of unnecessary enhancement of re-provided space
- any new future rent and service reviews are in line with RPI
- minimum of 10-year leases are provided.

And also additional points:

E1(d) OPDC will carry out regular monitoring of loss of and relocation of businesses and jobs that will be accessible to members of the public.

E1 (e) OPDC will also co-operate with the boroughs in monitoring the loss of businesses and services in areas adjacent to the OPDC area – particularly Harlesden and Stonebridge (highlighted in SP1 text para 3.5 as where the need for bringing tangible benefits for local communities).

These policies will require further explanation and discussion in supporting text:

- Proposed new supporting text 9.12a - Applicants should provide evidence to demonstrate the support provided to sustain businesses and social enterprises in transition to new land uses. Details of businesses on premises, relocation, tenancies terminated and land acquisitions which led to close of businesses since the first public consultation on the Old Oak Vision (July 2013) should be disclosed with applications for pre-application discussions with OPDC officers (and included as

part of supporting documents for applications). Effective arrangements for retaining, re-provisioning accommodation and compensating businesses including for capital, fitting and operating losses as a consequence of redevelopment should be set out as a planning condition. The OPDC will regularly monitor loss of and relocation of businesses and jobs, through desktop research, field observations and visits. Public requests for relevant information for a register of businesses will be made in the usual way, through direct contact or public advertisements. This policy will apply equally to businesses as to social and community uses, including cultural workers and makers, users of affordable workspaces, not for profit organisations, churches, and registered or unregistered assets of community value.

- Proposed additional supporting text:
 - 9.11a. - The OPDC in de-designating long-established SIL land incorporating secure and long standing affordable business, creative sector and not-for-profit accommodation has led to significant windfall gains for a few landowners, and significant income streams for OPDC to direct to the development of the area on behalf of the Mayor through S106 and CIL. In the process, business leases are being terminated (even years ahead of actual development plans) leading to significant losses for individual firms; businesses and social enterprises have been placed under unprecedented pressure from developers to sell; and banks have seen growing benefit in foreclosing early on mortgages. The Appendix of the Industrial Land Review provides a summary of estimated employment per site, and can provide a starting point for pre-application deliberations on re-provision, relocation and compensation. The OPDC acknowledges that the livelihoods, jobs and lifetime efforts of many who have built up businesses in a seemingly secure location are being undermined, which can lead not only to income loss or poverty, but to stress and ill-health.
 - 9.11b. The OPDC will ensure the retention in the Old Oak area as far as possible of existing firms and jobs, including social enterprises, NGOs and community activities, through creating an accurate register and data base, monitoring changes, introducing planning conditions to ensure re-provisioning, and requiring transparency of landowners in relation to businesses facing disruption and dislocation. The OPDC will establish best practice in relation to ensuring that development and regeneration brings benefits to London and local areas, without unnecessarily destroying existing economic activities, undermining economic resilience of the capital, or depleting its distinctive urban vitality (in line with core London Plan visions) in the process.
 - 9.11c. Proposed additional text: [An accurate description of the existing Old Oak industrial and employment clusters and land uses should be provided at this stage, including appropriate evidence from the ILR so that it is clear and plain to the public the nature of the changes being anticipated, and that the potential loss of jobs and businesses can be accurately considered alongside the planned new development and jobs.] The OPDC commits to monitoring changes in employment, firms, ownership and tenancies in Old Oak by creating a regularly updated and publicly accessible data base of firms displaced, or facing relocation, since the opening of the consultation on the Vision for Old Oak prepared by the Mayor and the three affected London Boroughs (July 2013).”

Policy E2: New Employment Floorspace

The policy is not justified or effective.

We were pleased that Officers' responses to issues raised in relation to the Reg 18 Draft have been positive on a number of issues. We recognise that the statements regarding supporting existing businesses are encouraging, including the statements to encourage re-provisioning of different tenure types and sizes of office spaces, creative approaches to meantime uses, including re-provisioning for providers and users of artist's studios and other affordable work space (E2, para 9.18).

However, we feel that these statements need to be backed up with a stronger policy commitment, and monitoring, as well as scope for effective enforcement, and make suggestions below, otherwise they simply render the policy ineffective and unsound. Furthermore, as discussed in relation to SP5 and comments on the Introduction to Chapter 9, this policy does not present or take account of strong evidence of potential displacement of businesses and loss of employment.

The policy is unsound as the evidence base is inaccurately used in relation to job losses and the stated expected provision of "67,900 net additional jobs". This is an error, and the Development Capacity Study figure used here represents only NEW jobs. The net jobs discussed in the Industrial Land Review include taking account of significant job losses, which are of grave concern, given that the Park Royal Industrial Atlas revealed significant clusters of vibrant businesses and substantial employment in Old Oak.

To respond to this deleterious effect of the OPDC local plan, we insist that a stronger monitoring commitment is required to be able to effectively implement the plan's currently vague and unclear statements about supporting businesses who face relocation. Currently jobs data presented in this policy do not allow for any of these jobs and businesses to be accommodated in the OPDC area, even though Employment Policy E1(b)i suggests this is anticipated, and both the IIA and the Industrial Land Review recommend it. The document fails to convey the inequality effects of job loss on the local community who are disproportionately employed locally.

The re-provisioning of premises for existing businesses is anticipated in Policy E1. If policy E2 does not expect re-provision of existing business and cultural uses premises to be potentially included in all developer applications, then there will be a conflict between the two policies, and the policy to support existing businesses and cultural uses will be ineffective, and is unrealistic.

We strongly endorse E2 (d) (iii) which was a specific request of local businesses who might need re-provision on sites, to have a range of tenure and size options.

We suggest

- E2 and text relating to supporting text 9.18 be amended and strengthened similarly to proposals for changes in relation to supporting text 9.12 / 9.12a (GUA response to Policy E1), regarding artist's studios and cultural workers.
- Re policy E2 (d) – delete "over 1000 square meters": All development applications, especially those with existing businesses on site, must make provision for possible accommodation of any existing and potential business and creative sector/artist uses on their site. Failing to expect this of all potential applicants could lead to a systematic lack of possibility to implement policy E1 (b), especially for small businesses and owner-occupier businesses on smaller sites. This will make the policy both ineffective, unrealistic, and with significant equality consequences.
- E2 (d) (i): Wording should request engagement with "existing and potential occupiers"

- E2 (d) (ii): Insert wording: “to meet the needs of and provide for existing and potential small business uses on their site”
- E2 (d) (vi): Move a sentence from paragraph 9.18 and rephrase to ensure policy is effective:
“OPDC will protect and/or re-incorporate studios within new developments, in accordance with Policy E1.”
- Provide additional text Monitoring and evidence of existing users as per policy E1 (b)(iv) [proposed above] “...will be required of all applicants”.
- We welcome text paragraph, 9.18, but recommend that the core commitment to re-provisioning for existing uses be incorporated as the Policy E2(d) (vi) as proposed above.

Policy E3: Supporting Small Businesses

E3 (b) is unsound as it is currently in conflict with that in E2 (d) (iii) and Policy E1(b)

Policy E 3 is welcome for its commitment to supplying new small and affordable and open workspace for small businesses and artists’ studios.

However, policy E3 (b) is not effective as it is currently in conflict with policy E2 (d) (iii) as it does not permit individual ownership of premises. It does not specify the need for a range of tenure options (as indicated in policy E1 (b), including the potential to individually own business premises, which is often a key cost consideration for small businesses. Requiring management of rental premises as the provisioning of small and affordable workspaces implies a lack of ownership options for small businesses which will preclude existing small businesses which own their properties in Old Oak and the Park Royal HS2 reserve area being able to access affordable work spaces consistent with their business model, as indicated in policy E1 (b). More permissive arrangements for provisioning individual sites for individual small businesses in affordable accommodation are required.

Proposed additional text to para 9.24

9.24. There are outstanding examples of local artist’s studio providers in Old Oak already and their potential role in the future of Old Oak North should be directly acknowledged. Insert-after, “...Acme Studios in Southwark, **ACAVA, Hythe Road, Old Oak; Northwest Studios, Hythe Road, Old Oak..**”

Policy E4 Work Live Units

This policy is not effective.

Policy E4 (b) is ineffective as it will not be easily realised within the financial envelope of the development, especially if the options for (a) use of SIL land and (b) reversion to residential use only at some future stage, are not permitted. It misses an opportunity to manage incompatible land uses at the borders of industrial and residential land uses in the OPDC area and proposes only to locate lower value live-work units in high value residential areas, which might not be attractive to developers. We recommend use of some edges of SIL land which are currently occupied by inappropriate land uses to make best use of land for intensification to enhance existing residential environments and maximise land values of existing and new residential developments. This is essential if Chapter 11 (Delivery and Implementation) is to be determined as sound.

Therefore. we recommend: E4 (b) insert text in bold: “they are **usually** outside of SIL”. The opportunity for live-work units on the border between industrial uses and existing and

future residential areas should be kept open, to create an appropriate buffer between incompatible land uses (e.g. heavy waste/recycling and construction waste depots) and existing residential uses (e.g. ~~TTRA~~ those adjacent to the Island Triangle, Old Oak North), and potential re-use of the HS2 reserve area. Given the difficulties associated with intensifying land use in Park Royal, as indicated in the ILR, these kinds of units could be a helpful way to achieve intensified use of well-located SIL land.

E4(g) is not effective in terms of implementation as precise standards and levels or monitoring procedures for noise and air pollution/smell controls on work uses are not stipulated.

Concern exists about how noise and air quality controls will be managed with work units and studio spaces. This policy is not feasible without clear indications of how these will be controlled through circumscribing uses and hours of operation. Text point 9.32 (e) is incompatible with this, and is perhaps an error. It should be amended, as environmental performance criteria for live-work units will need to be more stringent than for residential units given their potential uses.

This policy is unsound as it does not stipulate that residential levels of open and green space provision, and social infrastructure, must accompany these land uses. An additional item in this policy should state this expectation clearly. A variety of bedroom sizes should be provided to enable households with children to benefit from them. This would also support their longer-term potential for and proximity to residential uses. This would also enable them to be more easily brought forward by developers, as a meantime and interim use.

Not identifying live-work units as a possible interim use is unsound as it is in conflict with Policy TCC9, which imagines a quite lengthy period of meantime uses, of which this might be one.

Contrary to 9.34, home-ownership live-work tenures would be essential to business viability of some operations and should be permitted. They might also enhance the viability of bringing these units forward, as developers will be more easily able to realise the value of their investment early on.

Policy E5 Local Access to Training, Employment and Economic Opportunities

The policy is not effective.

Mention of the legal S106 agreement regarding the LLSESMP is only in the supporting text (9.39). The actual policy component needs to be strengthened and expanded, using suitable elements from the supporting text to ensure the policy is effective.

In addition, the policy E5 and-supporting text 9.38 is vague, insufficiently clear, as to which applicants (“major”?) will be required to engage in these activities, and will therefore be ineffective. Similarly, these policy objectives will not be able to be realised where many smaller developments are being brought forward, with a disproportionately strong impact for local residents, leading to equality issues.

Our view is that all developments should be required to propose a relevant form of LLSESMP, as part of S106 agreements, especially concerning training, local jobs and London Living Wage, which should be expected of all employers and subcontractors on all developments. It should be non-transferable against other S106 obligations. In addition, how follow-up monitoring will be undertaken by OPDC needs to be identified.

The following changes and additional text for Policy E5 are proposed:

- "Major" should be deleted from the policy and the supporting text, which should simply read in all cases, "Development proposals will be required to...". Standard minimum expectations for local employment should be set, including matching the proportion of current workers in the Old Oak area from the three OPDC boroughs.
- Stronger implementation directions are needed in policy:
- Added sentence for policy: **"The management plan element of the LLESMP will be secured via a legal (s106) agreement."**
- Added policy sentence: **The developer and all firms and sub-contractors working on the development will be required to confirm to the LLESMP."**
- Section 9.39 should state the need for these agreements as contribution to mitigation of socio-economic impacts of the development on the local residents:
- Insert in 9.39: "...Given these benefits, the LLESMP will form a key part of the measures required to mitigate socio-economic, transport and environmental impacts to make development acceptable. The obligations would be related to the construction and/or..."

TOWN CENTRE AND COMMUNITY USES

TCC1 Locations for Town centre uses

This policy is not sound as it is not positively prepared and does not offer effective implementation approaches.

1. In the Introduction to the Chapter and TCC1 no mention is made of the acknowledged need to assess the potential impact of the location of town centre uses on neighbouring designated town centres, as indicated in the Retail and Leisure Needs Study (RLNS, 8.1.10). This expects:

"the provision of impact assessments for applications that comprise large-scale town centre uses to demonstrate that the effects on the existing hierarchy of centres will be within the bounds of acceptability and, where necessary, provide appropriate mitigation having particular regard to Harlesden."

2. The only statement in Chapter 10 concerning the potential impact on Harlesden is made in TTC3(f) A Class Uses and supporting text 10.22 and 10.23. However, this policy and these text paragraphs refer to town centre uses in general and not to A-class uses specifically.

The impact on Harlesden concerns issues of vitality, night-time economy, social infrastructure (including churches and pubs), culture and leisure uses, sports and art (reflecting the scope of the RLNS and its various reflections on Harlesden) These general expectations should be relocated to TCC1, and a general statement about the potential for town centre uses and their location to impact on Harlesden should be made at this point. A supporting text outlining the nature of Harlesden town centre, its contribution to meeting the needs of existing residents, and its potential to play a role in and benefit from the developments in the OPDC area, as well as to be potentially negatively impacted by these developments should be made here. The frequency and scope of concern evidenced in the RLNS warrants a specific statement about this so that applicants and readers of this document are aware of the evidence and planning requirements.

The general London Plan aim of “managed growth” for Harlesden should be included here, noting the commitment then of the London Plan to enhance the quality and diversity of shops and to safeguard traditional retail uses (RLNS, p. 33). In addition, local people and many across the city value Harlesden for its distinctive retail offer, including ethnic and minority population shops; the centre therefore performs a wider regional function. Harlesden also offers night-time activities, leisure and entertainment, as well as hosting many community facilities. A clear statement is needed concerning what the potential damage to Harlesden of OPDC development might be across the range of town centre uses, thus in every TCC policy section, and what effective mitigation is required.

Given the distinct overlaps in retail and leisure hinterlands, and the likely functional integration of the existing Harlesden town centre and residents with the northern areas of the OPDC, a stronger consideration and presence of neighbouring areas in shaping the plans for the OPDC area is required, as they will have a material impact, and be strongly impacted by the process of development and the final new OPDC area.

Policy TCC2 Vibrancy

1. TCC2(a)(ii) and Supporting Text 10.10: This is not sound as it is in conflict with policy TCC3(f), which requires the impact of town centre uses on Harlesden to be considered and mitigated (see also TCC9).

While the need for flexibility is apparent concerning the significant changes expected in the OPDC area over the lengthy plan period, clear statements are needed regarding the need to review any proposed changes to town centre uses in the OPDC Major Centre in relation to their potential impact on Harlesden. Failure to reassess changing uses, especially their likely scaling up to larger and more permanent town centre uses, will make the policy TCC3(f) [and our proposed amendments to this] fundamentally meaningless. Additional policy text should be inserted, stating that on applying for change of use, assessment of the impact on neighbouring town centres will be required, and planning permission will be subject to that assessment.

2. TCC2 (c) and (d): We support the desire for vibrant and positive town centre uses, but reflect concern that strict controls on uses in the OPDC area as implied in TCC2 (c) and (d) might result in a stronger concentration of such uses in neighbouring centres. This consequence needs to be mitigated against in consultation with LBB and Harlesden Neighbourhood Forum. This should be reflected in the text for 10.13, and should prove a material consideration in assessing impact of planned OPDC developments on Harlesden.

TCC3 A-Class uses

This policy is unsound. It is inappropriately located in this section of the plan as it does not only concern A-class uses.

It is not effective as it has no implementation strategy.

It is not positively prepared as it does not reflect the OPDC evidence base, the Retail and Leisure Needs Study. The policy does not mention the potential negative impact on Harlesden which is a focus of attention of the RLNS.

1. TCC3 (f): This policy requires a retail impact assessment where more than 5000sqm of town centre uses are provided in OPDC’s Major Town Centre. It is not only concerned with A-Class uses and should be relocated to TCC1.

2. This threshold for assessment of the potential impact on existing town centres (5000sqm of A class uses) does not reflect the advice and analysis contained in the OPDC's Retail & Leisure Needs Study. Here the quantum of "retail, leisure and office floorspace" of concern to assessing potential impacts on Harlesden town centre, is stated as 2500sqm.

There is no foundation at all, either in the NPPF, the RLUS, or in current London Borough practice, for the increased figure of 5000sqm. The Reg 19 plan arbitrarily proposes to increase the threshold for Retail Impact Studies and Harlesden Enhancement Strategies from 2500sqm without justification or evidence.

This impacts also on relevant policies in Places (Old Oak S – P1, Old Oak N – P2, Willesden Junction - P11 (f) which should be amended accordingly. And this policy requirement should be reflected also in all P10 places (Scrubs Lane), following our discussion in point 3 below.

The RLUS notes that "Specifically the impact of a new major centre on the role of Harlesden will need to be carefully monitored." (7.6.12). Harlesden is designated in the London Plan "as a medium growth area capable of taking advantage of regeneration benefits" (7.7.3). Physical and functional linkages need to be improved (7.7.4) to enable Harlesden to benefit from the regeneration. But as the Major Centre of OO High Street will operate at a higher level, it will not be in competition.

Nonetheless, in relation to Harlesden, the RLNS is clear that they recommend a consideration at 2500sqm:

"evidence has assessed the impact of the planned floor space and found it to be acceptable. However, this evidence does recognise that Harlesden could be vulnerable as a centre close to the boundary of the OPDC area. Irrespective of this point, we consider that it will be most at risk from much larger developments and it is not expected that small developments will compete significantly with Harlesden. Therefore, we remain comfortable that a threshold of 2,500 sqm is appropriate."

In relation to the need to produce a Harlesden Enhancement Strategy the RLNS notes,

"Trigger for requirement: over relevant impact threshold (see below) [2500sqm], and subject to the OPDC being satisfied there might be competition with Harlesden due to the application's Location"; this requires consideration that the retail impact of the planned floorspace is addressed, and linkages are in place to secure benefit.

The RLNS continues: "Justification and expected contents: for developments that are located in the northern part of the OPDC area and that may compete with Harlesden, applicants should be obliged to provide heads of terms for a potential strategy to ensure that the retail impact of any additional floorspace is adequately addressed and the benefits from linkages are effectively captured."

"Key criteria: the detail of an enhancement strategy should be agreed with the OPDC and LBB prior to submission and should include (but not be limited to) (1) details of proposed linkages with Harlesden, including how this will be delivered and timescales (2) where justified, the scale of potential financial contributions to mitigate impact, including details on what these monies ought to be spent on (for example, public realm improvements, shop front initiatives, marketing strategies)" (p.76)

This text from the RLNS quoted above needs to be included in the plan, we suggest at TCC1.

Text from 10.23 needs to be moved into policy – and placed together with TCC3 (f) as point “(iii) 2500sqm where the location of the development in the North of the OPDC area indicates it is likely to impact on Harlesden. In addition, a Harlesden Enhancement Strategy will be required when a development in this area would provide over 2500sqm of town centre uses.”

There is no indication in the RLNS to suggest that either a retail impact statement in relation to Harlesden or an enhancement strategy should be required at any higher cut-off than 2500sqm. In some cases, notably Willesden Junction and Scrubs Lane places, the evidence suggests it should be lowered.

3. As noted in the plan, the Old Oak High Street will vary significantly along its length of 4.9km (SP6 para 3.49), and we suggest that special consideration needs to be given to retail uses planned for the Willesden Junction Place, Hythe Road, and Scrubs Lane which will be in very close proximity to Harlesden town centre.

As the RLNS notes, in the “northern part of the OPDC area” smaller retail developments could well have a significant impact on the viability of this existing centre and the many small businesses and retail outlets located there. We also note the RLNS observes that the High Street North area will be more focussed on comparison and convenience shopping to serve local residential population (7.5.8). In this regard, the functions of the high street in this area will be very similar to those of Harlesden, and potentially in competition, especially in those areas which are very close (Willessden Junction, Scrubs Lane and Hythe Road).

Justification for lowering the threshold for retail impact studies in these focal points of development in the north of the OPDC area can be found in the RLNS which observes in relation to expectations for undertaking a retail impact study, that “a smaller threshold is appropriate where sites are competing with smaller centres” (p. 78). In some London Boroughs, including LBB, these thresholds are as low as 500sqm. In the case of Willessden Junction, Scrubs Lane and Hythe Road, the retail mix will require closer attention at lower thresholds in terms of its impact on Harlesden, which will be a very short stroll away.

4. Implementation: We support here the arguments made by the Harlesden Neighbourhood Forum concerning the policy being ineffective as it has no means of implementation concerning the potential negative impacts of the OPDC development on Harlesden town centre. The concerns re: impacts on Harlesden are not reflected in the policy as such, and the supporting text offers no means of responding to any noted impacts, including those which might accumulate across several separate applications.

“The draft Local Plan accepts, in paragraph 10.22, that *“there is a need for a greater degree of scrutiny of town centre use proposals as they emerge, to ensure that any proposals complement designated centres”*. Consequently, there is a requirement for a full retail impact assessment for those applications that are caught by a relevant threshold in policy. However, there is no policy that requires individual development proposals not to have an unacceptable impact, either by themselves or cumulatively with other developments, upon existing town centres.

The mere requirement for an impact assessment provides no safeguard in the event of potential adverse impacts on Harlesden town centre for example. As with out-of-centre development, and because of the potential threats to Harlesden and Ealing outlined in the Retail and Leisure Needs Study, policy should state that where it is likely to have a significant adverse impact on the vitality and viability of an existing centre it will be refused.

A clear statement in the policy section should direct that impacts on neighbouring centres are of concern. The need to provide a Harlesden Enhancement Strategy (10.23) should also be in the policy section.

Furthermore, if cumulative individual and smaller applications will have a significant effect on Harlesden and other neighbouring centres, provision for an impact assessment across co-located or multiple-site applications should be made.

Survey data collected by UCL MSc students along the same lines as the methodology of the Park Royal Industrial Atlas in Harlesden Town Centre indicated that many of these are small family-owned businesses and play a crucial role not only in the vitality of the town centre, but in sustaining livelihoods, income and wellbeing for local business owners and tenants and their families.

This policy is unsound as it is ineffective in relation to implementation.”

5. We also note the Harlesden Neighbourhood Forum concern that the estimates of A class floorspace have increased from earlier supporting studies, but also that they might even so represent an underestimation based on recent planning determinations, which increase the potential negative effects on Harlesden town centre:

“An early published version of the RLNS, in February 2016, concluded that there was a threat to Harlesden based on a total new A Class floorspace in the OPDC area of 64,100 sq metres up to 2037. The total new A Class floorspace has now risen to 68,500 sq metres in the latest published version of the Study (Nov 2016). [In addition, the RLNS observes that: “7.4.7 In terms of total A-Class floorspace, the requirement would amount to up 68,400 sqm gross by 2037, increasing to 85,600 sqm gross when the development is fully built out.”]

There is also a separate assessment of what the potential floorspace for town centre uses within the OPDC area is. This suggests, in table 6.11 of the study, that there is potential for a total of 65,250 sq m of commercial floorspace. The Forum has some concerns that the assessment of potential floorspace within the OPDC area may be an underestimate. The estimate is based on urban design work that was undertaken before the first draft plan was published in February 2016. Since then additions appear to have been made to active frontage, as shown in the Places section of the Plan. For example, the High Street has subsequently been extended both east to the Harrow Road at Willesden Junction and west to North Acton from Old Oak Common Lane. Additionally, some clusters show increases in active frontage, e.g., at Scrubs Lane /Harrow Road where it appears that the active frontage has increased from about 150 metres in length to about 500 metres. The total length of active frontage upon which the Retail & Leisure Needs study assessment was made remains the same and is set out in paragraph 6.6.2 of the study. At the very least there needs to be some clarification of how the diagrams and plans showing active frontage are reflected in the estimates of town centre floorspace, otherwise there can be no confidence that the amounts to be delivered will not exceed that proposed. This is important because an extra 350 metres of active frontage at Harrow Road/ Scrubs Lane could result in over 5,000 sq metres of town centre floorspace, which is very significant so close to Harlesden town centre.

The aspect of the Plan dealing with locations for town centre uses is considered to be unsound on the grounds that it is has not been positively prepared or justified.”

6. We therefore support the changes sought by HNF:

“Policy TCC1 should state that development proposals should not have an unacceptable impact, either by themselves or cumulatively with other developments, upon existing town centres.

A more detailed breakdown of potential commercial floorspace by location, including clusters, should be provided.”

7. We cross-reference here policy P11: Willesden Junction Place, which needs special consideration in relation to the potential harmful impact in Harlesden town centre.

We especially note the potential impact of the plans brought forward for a new “Place” at Willesden Junction. This envisages a level of development that will be potentially threatening to Harlesden, and implies very high densities of homes and jobs – Land East of Willesden Junction (DCS, p. 45) is estimated to have: 700 dwellings, 400 jobs (8100sq m B1a and B1b space) on 1.6ha, in 6-10 years, with a need for decking or relocation of railway depot and rail lines. This latter constraint on development indicates that the costs of developing this area will be very high and viability constraints might be severe. This will place pressure on developers and the OPDC to bring forward high value commercial developments and high value and high density residential. It will place pressure on the potential to introduce planning conditions related to retail offer. In this case, in regard to retail and leisure uses, the thresholds for consideration of retail impact on Harlesden town centre need to be lowered, and the potential to refuse developments on these grounds clarified.

POLICY TCC4: SOCIAL INFRASTRUCTURE

It is not justified, positively prepared nor effective.

The draft Local Plan does not give sufficient attention and prominence to social infrastructure; and does not ensure that adequate, appropriate facilities have been planned and will be provided. Plan viability and deliverability and evidential justification are in question as the DIF Study of 2015 costed social infrastructure at £191 million, but since then, in July 2016, more facility requirements have been added without the DIF Study being updated.

Social infrastructure as planned for by OPDC is not comprehensive, e.g. it does not include faith facilities or facilities specifically for children and young people, and lacks precision within policy and certainty over long-term resourcing.

- The OPDC policy on play space (D9) focuses principally on open spaces and how these might be designed. While this is important, wider needs of young members of the community (which may be quite different from other community members) also need to be included in consideration of infrastructure needs. It is noted that a number of boroughs now plan for and have dedicated affordable ‘youth zones’ with purpose built facilities for young people including sport, music, dance and creative activities. The Roundwood Youth Centre in Brent is one such example.

GUA members note that many aspects of current provision of social needs for existing residents are inadequate and need to be considered together with any planning for new residents.

We are concerned that the existing social infrastructure for the area is barely coping and in many cases, there are either actual or threatened closures.

In response to the regulation 18 Local Plan consultation GUA members highlighted that:

- *The local police station in Acton and the fire station in West Acton are closing down.*
- *There are existing problems with people being able to register with local GP services without taking into account new people moving in from new developments over the next four years.*
- *That some have to go to Brent to access a GP since they cannot access a GP in Ealing.*
- *In Ealing, they are building shopping centres rather than considering the infrastructure needs of local people.*
- *Health services are being closed. Ealing paediatrics has become unavailable.*

Policy TCC4 (a) would fail to protect a “current use” as “or” between i) & ii) would allow marketing for “alternative forms of social infrastructure”.

Where there is no longer an identified use of the facility (a) i), the suitability of premises for other forms of social use (including community ownership) should always be considered. This should be included in the policy.

Many of these assets are of strong historical and local value, including distinctive pubs, valued service providers and sports facilities which host important local institutions, such as educational, nurseries, cycling, football and athletics (and many other clubs). For local residents, these are very significant components of their lifetime neighbourhoods and strong contributors to well-being and identity. There is a strong view that these few remaining assets should be strongly protected.

The limited proposed CIL allocation for community infrastructure was highlighted in responses to the preliminary draft charging schedule.

Policy TCC4 should provide

- an expectation of support for retention of existing social infrastructure (similar to TCC5 (c)).
- an expectation that planning gain will be available to support protection of existing and deliver new social infrastructure to ensure continuity of provision and support for existing and new residents (similar to TCC5(d)).
- Commitment to timely construction of a local list of community and heritage assets in consultation with local residents and groups.

Appendix A, Fig. A1.8 Local Context does not map all existing facilities within OPDC area to be protected (para 10.25) that are crucial to protect. For example, it omits the Pentecostal City Mission Church with nursery and community rooms etc. (the subject of a current planning application lodged with the OPDC for redevelopment) and NADI Old Oak Common Lane, which has courses for young people, gym and is where the OPDC held a Community Tea Dance earlier this year.

- It is key to the effective implementation of this policy that the OPDC knows the full extent and range of existing social infrastructure facilities in order to be in a position to protect them. This must be addressed. The OPDC should work with residents and community groups and local Neighbourhood Forums to ensure there is a comprehensive list and updated Figure A1.8 for social infrastructure that should be protected both in and surrounding the OPDC area.

Fig 10.8 cited in para 10.37 could not be found.

D13 (d) envisages supporting community management, without any implementation proposals detailed. This could be explored further in this policy. This should include support through, planning gain funding and collaborative working with the boroughs for the Community Right to Bid, Community Asset Transfer and establishment of development trusts.

Policy TCC4 is very generalised providing insufficient attention to the issues of health and education. There is little here in the policy on these issues to direct development. We feel these two areas need to be expanded on.

Health:

Great concern has been expressed by community members that the evidence relating to health is unreliable, is insufficiently wide and fails to adequately consider existing needs. Extra pressure on existing services would have a detrimental impact on neighbouring areas rather than bringing benefit. The text of paragraph 10.35 is of concern particularly that on-site facilities may be located on alternative sites if this is agreed by the OPDC and service providers as this asserts uncertainty. GUA members have highlighted that:

- Acute care is being concentrated on fewer, bigger A&Es, but recent, current and threatened closures across most hospital services result in large gaps in geographical coverage and longer journey times which the Local Plan does not address.
- There are current proposals by NHS Strategic Transformation Plan (STP) for a reduction of beds and services, e.g. at Ealing (the loss of 80% of its beds) and Charing Cross Hospitals (loss of 90%), on top of significant reductions in local hospital services, e.g. closure of maternity at Ealing hospital, the A&E at Central Middlesex, and threats of closing the A&E at Charing Cross.
- The OPDC does not seem aware of / has not taken into consideration A&E closures, which could put lives at risk. While there may not be a need for new A&Es, there is a need to stop closure of the existing.
- Primary care proposals requested by Clinical Commissioning Groups (CCGs), and their calculations of need (ref 10.32) have been contested by the Federation of GPs and by OPDC Board members (11th May 2017) as impractical and unrealistic, and the desirability of one large centre at the Car Giant site debatable.
- Early phases of Local Plan dependent on off-site expansions, by 27 GPs, of existing facilities that are already under strain, then a single expanding health centre growing over time eventually to accommodate 33 GPs.
- Not all generations are catered for, including social care needs.
- Concerns that in the recently approved Oaklands development - meeting need for health facilities relating to the new development amounts only to delivery of a pharmacy.

The OPDC must identify sites and ensure development of additional health facilities to meet the need of new communities, prior to or as developments are approved to prevent extra pressure on already stretched resources.

Education:

Existing need must be fully identified and planned for before or as developments occur. GUA members highlight that:

- Existing schools are already under pressure and there is concern that there is little room for expansion.

- The one secondary school at Acton Wells site may prove inadequate given that catchments are dynamic and change over time.
- Some children are having to travel to Wembley to access a place at school.
- Early years needs require 5 large nurseries but no sites have been allocated.

There is also concern that Health and Education Needs Study is based on an assessment of school places available in existing schools beyond the OPDC area, including Harlesden Primary School which it is suggested has a current surplus of 303 places. GUA members from Harlesden note however that the School expanded from 1 to 3 forms entry in 2016 – specifically to meet local need. It was anticipated that the additional capacity would not be taken up in total until 2020. It is inappropriate that current capacity should be considered available to meet the needs of the child population from new developments in the OPDC area.

The OPDC must identify locations or sites that will need the need of new development in appropriate time scales.

GUA members also feel that further and higher education, linked to training and (apprenticeship) employment opportunities must be provided for in policy TCC4.

Policy TCC5: Art and culture

The policy is not effective.

Where there is no longer an identified use of the facility (a) (i), the suitability of premises for other forms of social use (including community ownership) should always be considered.

TCC5 (b) should include ‘**provide inclusive access in terms of age, ability/ disability and income**’.

TCC6 sports and leisure

TCC6 (a) should conform with TCC4 (a) and ensure that where there is no longer an identified use of the facility the suitability of premises for other forms of social use (including community ownership) should always be considered.

TCC6 should include an expectation of support for retaining existing facilities.

There should be an expectation that resources, including planning gain, will be available to support protection of existing and deliver new social infrastructure to ensure continuity of provision and support for existing and new residents (similar to TCC5(d)).

TCC6 (c)(i) should add as per addition to TCC5(b) – **ability/ disability and incomes**

GUA members were particularly concerned about the affordable access to sports and leisure facilities issue and about the potential loss of affordable leisure and sports facilities to be replaced by commercial provision (10.50). Policy (a) (i) is not necessarily relevant to existing community facilities provided on a not-for-profit basis, which should rather be supported to continue to provide accessible facilities in the context of proposed new developments. Hostile efforts on the part of potential developers to acquire existing facilities to enable development should be resisted. The OPDC should be more emphatic that the intentions in text paras 10.48 and 10.49 will be delivered through adherence to this Policy.

There are also cultural (and gender) sensitivities that should be accommodated (such as gender specific access to swimming facilities); the Mayor is actively promoting London as a diverse and inclusive place. It is advisable that the community should be involved in the planning/design of these facilities.

This policy could draw more effectively on existing evidence bases concerning the objective need for sports facilities across the neighbouring boroughs and wider region, especially for youth and teenagers for whom provision is lacking.

TCC7: Public Houses

Welcome the attention that this Policy gives to the public houses in the OPDC area, of which there are only 3. These should all be protected for their contribution to social and local life and their architectural expression of community history and heritage.

TCC6 should include an expectation of support for retaining existing facilities.

This should include support through resources, including planning gain funding and collaborative working with the boroughs, for the Community Right to Bid.

TCC8 Catalyst Uses

This policy, notably Table 10.2, expresses the need for proposed catalyst uses to demonstrate how they would strike a balance between viability concerns (meeting housing targets and supporting infrastructure delivery) and ensuring that catalyst uses complement the “wider environment”. GUA members have concerns about catalyst uses which are only episodically used, or which bring heavy footfall and impact occasionally, such as football stadia, which also set severe limits on viability and the capacity to fund social infrastructure and infrastructure. These should not be encouraged. Table 10.2 presents aspects of these concerns under “Quantitative Data”.

Table 10.2 also sets out concerns with the “wider environment”. It would be appropriate to strengthen these concerns by referring to: It does not detract from the quality and use of open and green spaces, leisure and retail functions, as well as active frontages.

Concern is also expressed about the potential development of catalyst uses on the outskirts of the OPDC area e.g. QPR at Linford Christie Stadium. The OPDC should refer to engaging closely with neighbouring London Boroughs, on the basis of a duty to co-operate, to ensure that the quality of the “wider environment”, including green and open spaces, is not negatively impacted by any nearby developments. A policy statement on this should be included to protect the interests of planned OPDC developments, and to ensure that valued assets, such as Wormwood Scrubs, are appropriately protected from excessive and harmful use as a result of neighbouring catalyst uses.

TCC9 Meanwhile Uses

Comments in relation to TCC2 on meanwhile uses and mitigating impacts on Harlesden relate also to this policy.

While the need for flexibility is apparent concerning the significant changes expected in the OPDC area over the plan period, clear statements are needed regarding the need to review any proposed changes to town centre uses in the OPD Major Centre in relation to their potential impact on Harlesden. Failure to reassess changing uses, especially their likely scaling up to larger and more permanent town centre uses, will make the policy TTC3(f) [and our proposed amendments to this] fundamentally meaningless. Additional policy text

should be inserted, stating that on applying for change of use, assessment of the impact on neighbouring town centres will be required, and planning permission will be subject to that assessment.

TCC11 Night-time economy

As part of the broader impact of emerging OPDC major town centre uses on Harlesden, the impacts of emerging night-time economy uses in OPDC, especially in the northern areas (Willesden Junction, Scrubs Lane, Old Oak North) need to be considered.

Harlesden has a number of valued night-time leisure venues, both longstanding ethnic and migrant related venues, and new opportunities associated with changes in neighbouring areas, with potential for growing links to populations in Kensal Green and opportunities for close links with new Scrubs Lane developments. This issue is of concern to local residents, as declining night-time presence in Harlesden town centre not only affects the viability of businesses but also significantly affects issues of safety, security, and community vitality.

A new policy section (e) is needed to require that planning applications for these uses conform to the RLNS requirements to assess the impact of new leisure and retail uses on Harlesden town centre, including the option to refuse applications on this basis (see comments on TCC1 above).

DELIVERY AND IMPLEMENTATION

Policy DI1: Balancing Priorities and securing infrastructure delivery

This is not effective.

The draft Local Plan does not provide evidence to give clarity and certainty on how balancing priorities and securing infrastructure delivery will actually secure affordable housing, decent places, sustainable community facilities as well as the infrastructure necessary to deliver the plan. Much of this Policy simply lists planning financial tools without detailing how they will be applied in an appropriate mix and scale to deliver the benefits and mitigations promised by the Plan; their feasibility is not discussed.

Overall viability of the local plan

1. The plan is not deliverable as it does not have a coherent financial plan. The Development Infrastructure Funding study (DIF - Supporting evidence document No 50.) indicates an infrastructure cost of £1.549bn, with a gap of predicted income from Section 106 and CIL of £821m accounting for 40% affordable housing. However, this study, published February 2016, largely originated by March 2015, and is now out of date as more needs and development challenges have been identified, for example in supporting documents, such as the education and health study.

Furthermore, the Mayor's own review of the OPDC (February 2017) mentions £2.5 billion as the anticipated infrastructural costs, bringing the funding gap closer to £1.821bn. This is hugely ambitious compared to the Mayor's other Development Corporation, the LLDC, which has a funding gap of £63.8m.

There is no objective evidence to indicate how the funding gap will be met, as suggested sources are increasingly to be drawn on for council core budgets and possibly

unavailable for development (e.g. business rates; borrowing against future business rates). Tax Increment Financing (TIF) – to borrow off the back of predicted future revenue returns - would mean mortgaging the future, to be covered by future generations of tax payers. The capacity to sustain this level of borrowing is unpredictable and imprudent in the face of multiple uncertainties regarding the UK and London economies, as well as additional debt burdens already accruing to the Mayor associated with developments across London (such as Vauxhall Nine Elms) and extensive demands for long term infrastructural renewal (London Infrastructure Plan 2050).

The proposals for meeting the funding gap are thus highly insecure and potentially onerous for current and future residents both in terms of a future tax burden, and possible unfulfilled obligations regarding social infrastructure, and quality of environment in relation to this development. Based on the evidence submitted in the DIF, the expectations are that:

- (1) S106 and CIL will provide the most reliable throughput of funding and is well evidenced in this plan
- (2) Service providers for utilities will recoup costs of provision and infrastructure from customer bills payments
- (3) Subsidy for affordable housing (for 30% or 40% affordable provision) – this is not mentioned in DI1 at all, and in the Housing Chapter reference is made to reduced land costs and developer S106 contributions (so element (1) above), as opposed to anticipating any public sector subsidy
- (4) HS2/TfL funding: so far this looks most unlikely – TfL are seeking contributions from S106 towards their transport improvements.
- (5) TIF – borrowing against future income streams (business rates and CIL).

However, business rates are increasingly to be drawn on for council core budgets and possibly unavailable for development; CIL charges have been set very low, we assume to preserve viability and flexibility of income streams through S106 negotiations. There is no evidence that the OPDC development can be funded, except through developer contributions. In this case, huge pressure will be placed on the planning body to respond “flexibly” in order to meet core infrastructure needs, and to significantly undercut the policy commitments of this local plan. We return to this below in our assessment of application determinations to date.

2. The Mayor’s own review of the OPDC board (February 2017) is not referred to in this plan, but brings the feasibility of the project even further into question and highlights the inability to meet core policy commitments.

“2.1 The funding for the infrastructure needed to bring forward development in the area amounts to approximately £2.5bn and Government expects this to be paid for from development.

2.2. The need for such a level of infrastructure will have an impact on the level of affordable housing that can be delivered within each development – and this will need to be recognised within individual planning applications. Without considered infrastructure investment, future developments will be unable to come forward and Old Oak will not work as a coherent whole.

2.3 Discussions with Government departments about gap funding or other financial contributions to reduce the impact of the infrastructure bill have so far proved fruitless. This is in the context of Ebbsfleet receiving £310m. And Birmingham has received

£97m to extend its metro and enhance connections to and from the HS2 Curzon Street station. Birmingham is also benefitting from an expanded Enterprise Zone.

2.4 In addition to impacting on the ability of developments to provide an acceptable level of affordable housing, the high cost of infrastructure may force a quantum and scale of development that is unacceptable in height, scale, density or mass – and at the expense of community infrastructure.” (Mayoral Review of OPDC, February 2017)

3. The feasibility of the policy objectives are also brought into question in the Whole Plan Viability Report.

The WPVR (supporting document 50.) notes that commitments to affordable housing can only be potentially met in some sites, and then on the basis of 30% London Affordable Rents and 70% Shared ownership, which does not meet the objective housing need. Flexibility in affordable housing provision requirements and the extreme nature of the infrastructure requirements on this complex, multi-level brownfield site suggests that the plan will not be able to appropriately balance its policy objectives through the only established funding streams of developer contributions (p. 4).

The viability of the plan is also threatened by the lack of central funding or control of any land (unlike the LLDC, for example). Arrangements with public sector landowners to develop Old Oak South are highly precarious, and the Mayor’s review of this indicates that the landowners wish to derive maximum benefit from their land, on the same terms as private sector developers. This is confirmed in Policy 3, paragraph 11.27. There also remains the uncertain future of key parcels of land (Crossrail Depot, Powerday and EMR, as well as a number of sites in multiple ownership or where the developer does not wish to develop – the Development Capacity Study clarifies this in detail).

The continuing use over many years of some sites for noisy and non-residential uses and the absence of core social infrastructure provision to support early development not only places pressure on existing residential services and limits the delivery of public benefit from new developments, but also decreases the value of early phase developments, making it more likely that (a) affordable housing offers will be low, and the target markets will not be those in need in the boroughs or London as a whole and (b) that unconventional housing offers, such as co-living, and student housing, will be located in core sites. It places restrictions on viability and S106 income, the only real source of income identified for OPDC, and also potentially limits the take from (relatively low) CIL charges. Early delivery also has significant consequences for the burden of poor air quality on new residents.

4. Evidence from Current OPDC Planning Determinations

The GUA are very concerned about the nature of the developments coming forward to date in the OPDC area, and have objected to planning applications on the basis of issues closely related to the limitations placed on development as a result of the overall financial viability of the plan – namely, density, height, affordability, public realm and social infrastructure provision.

We have felt deeply upset by the abandoning of key commitments resulting from extensive policy consultations reflected in the Reg. 18 OPDC local plan, for example in relation to sensitive edges to the development. We discuss this further in relation to DI3 and DI4 below and elsewhere in this and other resident’s submissions (Old Oak Neighbourhood Forum, Hammersmith Society, Wells House Road). In the early planning determinations we argue that we see the result of the poor financial viability of the OPDC development, driving the planning officers working on early development

outcomes to propose higher buildings, more dense developments, and to accept a low affordable housing offer. All this seems to be driven by OPDC income and delivery calculations in the face of an unrealistic, unviable and ineffective financial plan.

The following table sets out the breakdown of housing units determined to date within the OPDC area and demonstrates the current under achievement of affordable/social rent units despite initial lower infrastructure requirements for these sites than others still to come forward. Mayoral contributions to “affordable” (intermediate, shared ownership) housing, have already had to be made directly to developers to be able to claim levels of affordable provision compatible with political commitments.

	total private (including build to rent and student housing)	total affordable rent	total intermediate	overall total (units)	Total affordable housing and % of total units	intermediate units (% of total units)	affordable rent (% total)	intermediate units, % of affordable offer	affordable/rent units, % of affordable offer
OPDC determined to date	715	106	195	1016	301 (30%)	19%	10%	65%	35%
Ealing determined	1067	0%	199	1266	199 (16%)	16%	0%	100%	0%
TOTAL	1782	106	394	2282	500 (22%)	17%	5%	79%	21%

In addition, we can note on the basis of analysis of the OPDC planning determinations to date the very low levels of public space provision, low and often highly ineffective contributions to social infrastructure (e.g. one small unit for a “health facility”, which cannot accommodate actual practitioners and has reverted to a pharmacy; limited extension of educational provision when local schools are extremely oversubscribed; reliance on Wormwood Scrubs as a site for provisioning older children’s play areas when there is a shortage of open and play spaces in Harlesden). Our comments below on early phase developments in North Acton and Scrubs Lane are relevant.

5. Failure to assess alternatives

Given the scale, nature and complexity of the development strategy, it is of great concern that it has not been subjected to full application of the required sustainability procedures, which are essentially that: “The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal.” (Requirements for Soundness, Planning Advisory Service).

But the assessment of the overall OPDC plan, and of strategic options, is not to be found in the IIA, only alternatives for individual policies, such as the Affordable Housing Policy. Given the significant (and indeterminate) costs, funding gap, and weak social outcomes achieved in planning applications determined to date, this IIA should be redone, considering reasonable and realistic alternative development scenarios for the OPDC area.

We point out that the GUA objected to the lack of consultation in relation to the preparation of the IIA Scoping Report. At the time the GUA observed that the local residents had not had the opportunity to propose “community-based realistic alternatives” for the Reg 18 Local Plan. The OPDC has a “Community-Based Vision and

Objectives” which should inform assessment of alternatives to the current OPDC Reg 19 local plan. This is submitted together with this consultation response.

Policy DI2: Timely Delivery and Optimised Phasing

This policy is not positively developed or effective, and is therefore unsound.

It results in outcomes which are at odds with other policies in the plan, including affordable housing, social infrastructure, heritage and air quality.

Policy DI2(a)

We are especially concerned with DI2(a) (linked to SP10) which seeks to bring forward development as early as possible to meet the targets for housing and jobs, and to build confidence in the development. We feel that excessive attention to early development is also being encouraged to meet financial and infrastructure delivery targets.

It is far from clear that early delivery is ensuring the full range of required benefits or contributing to wider infrastructure and sustainable development criteria; and a number of significant barriers to development remain to be overcome in relation to some key sites.

Furthermore, the negative aspects of early development are not mentioned in the plan, and represents a selective presentation of available evidence. This concerns the likely lower valuation of land due to co-existing and unpleasant uses (e.g. DCS, 1.45 on the value effects of current uses and implications on financial flows). Early delivery therefore does not maximize the potential for achieving good policy outcomes through OPDC income streams (and causes defective policy outcomes through balancing priorities). More than this, at a human level such lower valuation also reflects poor living conditions for new residents, including noise, poor air quality, traffic congestion, extremely limited public transport provision.

The IIA notes:

“Going Local Narrative 3: benefits from early development

The narrative seeks to capture and generate benefits from early development for local people. This will positively benefit IIA objectives in relation to place-making, social inclusion and promoting economic investment and encourage investors to develop in the area. The description text does not provide much information so it cannot be certain that this objective will have other positives against other IIA objectives”. (p. 57)

However, contrary to this positive assessment, phasing for early development under conditions of low viability has placed pressure to increase densities, raise heights to levels which intrude on existing development and threaten the quality of heritage assets, to diminish public space offers, push play spaces to roofs, and rely on non-public, communal and private spaces to fulfil open space planning requirements. Affordable accommodation provision has been very low, and largely limited to intermediate rents and shared ownership offers (see Table above). Overconcentration of student accommodation at North Acton has already resulted in significant overcrowding on trains – without the delivery of transport improvements, permitting developments as if they had the highest possible PTAL levels (for inner London) many years before such transport improvements come forward leads to transport and traffic bottlenecks and overcrowding, notable already at North Acton Station and anticipated on already jammed roads such as Old Oak Lane and Scrubs Lane when the currently approved developments are brought forward. This comes at a time when

increased construction traffic from HS2 is expected, and already overcrowded and highly polluted roads will become even worse (as the Air Quality Study predicts). Residents and GUA members have made extensive comment on these issues in consultations on specific planning applications – with no effect at all. We discuss this in relation to policy DI3.

Specifically, we can note that early development of dense high rise residential accommodation adjacent to continuing heavy industrial uses, such as waste recycling, in areas of significantly poor air quality places a large number of new residents in potentially life-threatening situations. In Supporting Document 4, the Institute of Air Quality Management is quoted as recommending that “new development should be designed to minimise public exposure to pollution sources” (p. 60). However, the key early development phase of Scrubs Lane, for example, is in a high NO₂ pollution area (above 40ug/m³). While existing methods do not indicate high particulate matter, modelling of particulate matter does not include pollution from industrial sites, and existing planning applications documents also note that stationary vehicles are not modelled (p. 53). Waste-bearing heavy goods vehicles largely diesel – at the rate of over 1000 per day – populate these sites of early development (notably Scrubs Lane and Channel Gate). Exceedances are highest on the ground level (play spaces) and rooftops (heating systems). A recent planning application required habitable rooms to be permanently closed with mechanical ventilation to reach acceptable pollution levels; the play spaces receive no such protection implying that the residents most vulnerable to air pollution – young children – will be most exposed. The planning guidance referred to indicated that noise exceedances in some urban developments are inevitable. However, all developments in these areas will be contrary to the Mayor’s noise and air quality policies and ambitions. Serious reconsideration needs to be given to the viability and public health impacts of such early developments.

In addition, we can refer to the approval of tall buildings on the sensitive edges of the OPDC area – sensitive for existing residents, and in relation to heritage assets. English Heritage has opposed these developments along with residents. Here, justifications given by the plan for high buildings do not reflect design or policy-led criteria, but the demanding financial, infrastructural and housing targets set by the untested overall quantum of development set for the OPDC area in the London Plan and the lack of financial viability of the plan as a whole. Thus, in relation to the early development place of Scrubs Lane, the Table in P10 outlines the rationale for one tall building on each site as being to provide legibility (explained elsewhere as marking the edges of the OPDC area and supporting wayfinding – in place of maps?) and to secure additional benefits. We suggest that the design quality and way finding arguments given to justify tall buildings in this context are spurious, and were reversed from Reg 18 to Reg 19 versions. The provision of a higher quantum of housing, and the extraction of developer contributions (“secure additional benefits”) provides the overriding justification for intensifying development which does not meet design and other criteria to the long term detriment of the neighbourhood. Nonetheless, these developments are still not delivering on the public, open space and social infrastructure expectations of policies in this local plan.

Many other issues along these lines could be raised based on evidence from already approved planning determinations which indicate that “balancing the priorities” across the plan is not delivering outcomes consistent with this plan’s policies within the financial envelope proposed here, and is therefore ineffective and unsound.

Policy DI3 Stakeholder Engagements and Being a Proactive Planning Authority:

This policy is unsound as its engagement strategies in relation to delivery are ineffective in positively influencing plan delivery.

DI3 (a) Working with stakeholders: Engagement in planning and delivery

Engagement in planning applications is important for residents' groups, given that the overall shape of the Local Plan is a developer prospectus, in which all priorities are in question (to be "balanced") and delivery relies on developer contributions. The early delivery along Scrubs Lane reveals the financial pressure shaping poor outcomes which will affect our daily lives for decades, and exemplifies the challenges facing stakeholder engagements including community participation in relation to delivery specifically.

Given the scale of development which is forthcoming, and the challenges of financing the planned scale of development, the scope for resident participation in delivery needs to be significantly expanded to ensure that harmful outcomes can be avoided and to contribute to delivering good outcomes for the new part of the city we will be living in. In this case we value the acknowledgement that local people are experts in planning their areas (11.34): this needs to be followed through more effectively if it is to shape planned delivery in the OPDC area.

The Policy overall indicates a commitment to: "encourage active participation in the planning and delivery of development in the OPDC area".

Policy D1 (a)'s "balancing the priorities" approach will have significant impacts on the development outcomes. However, community voices are not being heard or are seemingly discounted in the planning determinations to date. The policy objectives and intentions of Policy D3 (a) and (b), text paras 11.34 and 11.35 are not being met. A stronger and more targeted approach is required with key commitments to transparency and responsiveness to community concerns with developments.

In relation to "planning", GUA members have been positive about the processes of consultation concerning the OPDC Reg. 18 local plan. And note the open events for information and questions in relation to this Reg. 19 local plan. They also note however that the timing of the consultation (over the summer break) and staff shortages during the consultation period for this plan meant that a limited amount of engagement took place.

In relation to "development", the process of participation for residents is far from acceptable. The GUA welcome the SCI and the consultation process on that, which encourages good practice amongst developers in relation to early consultation on their proposed plans. However, this has been presented in a very brief format for the Reg 19 consultation and does not present the range of concerns which were raised during the consultation and presented in draft form.

Furthermore, important expectations which were set in the draft SCI have not been met, such as the Development Management Forums which were meant to be held at an early stage in the development application process and which would, amongst other achievements, allow for community input in the presence of officers. And high standards for developer consultations established in the early and current drafts of the SCI have certainly not been met. Most developer consultations are perfunctory, and rather late in the process, although at least one major developer has responded positively to the expectation of early and sustained engagement expected of participation in planning decision-making with some consequences for the plan making process. We would welcome stronger expectations of consultation and clear scope for early responses to resident's expressed concerns. Our

view is that the legal precedents established in the Gunning Principles on ‘fair consultation’, endorsed by the Supreme Court in 2014 (*R (on the application of Moseley (in substitution of Stirling Deceased)) (Appellant) v London Borough of Haringey (Respondent) [2014] UKSC 56*) and requiring early consultation should be clearly affirmed in the SCI and should be referenced in the Local Plan to mandate early and effective participation in deliberations on development – on “balancing the priorities”.

We suggest that applicants should be required to submit a response to local resident’s concerns early in the pre-application discussions so they can have a material effect in shaping the plans and so officers who are exploring options with developers can be made aware of community concerns. In addition, officers should seek to inform themselves of community concerns and represent these in their negotiations with applicants concerning how priorities might be balanced in the particular development they are concerned with. Open engagement with the reasoning behind certain calculations of priorities might be expected, if public participation is to have any meaning at the delivery stage.

The statement in the SCI is clear on this:

“5. Early involvement

a) Arrangements should be made for the community involvement process to begin at the early stages of a plan or development proposals process. This should occur before issues such as the height and scale of development are fixed when significant options are still open and while there is still the potential to make a difference to the plans.”

We would like to see this text included in the local plan, DI3 to strengthen its application. However, we would like to see the OPDC make their own commitment to consultation on specific proposed developments as currently discussions between the OPDC and developers reach a very advanced stage over a long period of time, with no clear lines of influence from community views to officers’ inputs to the design and viability discussions. We do not see mention of the innovative “Planning Forums” which the OPDC was hosting for some developer applications which might have been one way for officers to hear of community concerns. How, for example, can officers be informed of residents or businesses desires to protect local assets, prior to negotiating that away to secure a piece of road?

GUA members have been exceedingly exercised by the poor outcomes, and the limited consideration of their concerns in the delivery process. Residents, for example, submitted multiple objections to the height and density, public space provision and design elements of the first OPDC determination, brought forward by Genesis and QPR. Here the “priorities” were balanced in the following way (as far as we can make out):

- During the planning committee, the presenting officer noted that the financial contribution towards the provision of educational facilities was falling short of the required amount to (quote) “offset the full educational impact of the scheme” 13/7/16. However, the contribution was deemed acceptable for two reasons. First, contributing more would render the scheme unviable. Secondly, this lacunae was downplayed on the ground that the scheme is making a major contribution to the regeneration of the area through the provision of a new road. The delivery of the Genesis road was repeatedly mentioned as forming part of the planning gains during the planning committee discussions. The OPDC is highly reliant on the developers for the transport infrastructure delivery as it does not receive a public budget to this effect. Transport infrastructure is costly and the prioritization of this type of community benefit result in an erosion of the amount of S106 remaining to finance social infrastructure such as community centers and schools. The risk is that in other forthcoming schemes a

disproportionate share of the section 106 is allocated to transport, leaving a gap in social infrastructure funding. In the Genesis scheme case, reference was made to public funding to top up the developer's contribution towards schools; however, no clear stream of funding was mentioned.

Over time, the cumulative choices against delivering social infrastructure will very negatively affect existing and future residents. In this case presented here, the developers' SCI concluded that there were no objections to their development – despite multiple concerns being brought forward by communities. These were invited too late in the day to have any effect whatsoever, as by that time the developer and OPDC officers had agreed on the terms of the development.

Compared with other stakeholders, community groups have very limited opportunities for engagement in delivery planning processes, which often go on in repeated pre-application meetings for more than a year. Together with our elected officials (who are outvoted on the OPDC planning committee and board or who are consulted late in the day in the case of MPs), we are unable to have any effective influence on outcomes. This is shaped by the limited information available as the development progresses. By the time the issue is sent out for consultation, or heard before the OPDC Planning Committee, the officers concerned have already determined the grounds of the case together with the developer, and residents' concerns have no impact. This does not represent effective or adequate participation.

Information on pre-application discussions between OPDC and developers, which includes other stakeholders, providers and decision-makers, is mostly published along with the planning application submission, as are some viability assessments. We regard this as good practice and would like to see a policy statement confirming this open book approach to design and viability discussions in DI3 to ensure this continues as good practice and applies to all developer applications.

However, this is far too late for any effective participation to influence outcomes. Limited effectiveness of engagement results and the impact of community concerns in relation to developer applications is negligible – there is certainly a need for open book approaches, and transparency of S106 discussions, but these need to be aired in advance of the conclusion of pre-application discussions, in order for informed engagement on development options to take place.

Without an effective approach to public engagement in relation to delivery as well as planning, the “balancing of priorities” across this plan will not meet policy expectations. Current evidence on applications to date suggests that this will systematically disadvantage local existing and new residents.

DI3 (c) and (d)

Currently this policy is unsound as it has absolutely no indications as to how it can be delivered.

There is a need for clarity on how Neighbourhood Forums, community ownership/management will be supported – initiated, funded in order to endure – and how community involvement can be sustained.

However, reference in the text para 11.37 of the Diocese of London's The Engine House as a model is welcomed, but how this can be emulated and quite what the level of support that would be forthcoming is not explained in this era of diminishing local authority resources and services. Another example is a Canoe Club at City Road Basin, Islington which is

understood to have been granted leases from the surrounding development as an income stream. These references are helpful and interesting to residents' groups. However, to run social infrastructure, the capital income to set it up and ongoing income to keep it going is needed. An explicit statement on the willingness to support such considerations in relation to the use of S106 and CIL funds from particular developments is required.

For example - the canoe club at City Road Basin was negotiating to get a long lease in a high-rise development – providing a flow of income to fund their activity. Could something similar be reproduced here? A developer could contribute x amount of office space to the community, for example, for a certain period (perhaps as an interim use) and revenue could be used to pay for their activities. We would recommend exploring whether this kind of arrangement could be secured as a planning condition? This might open up opportunities for protection of community assets, and provision of new elements of community based infrastructure. A financial proposal is essential here, as sources of funding for social infrastructure are very limited indeed, especially since local authorities don't have the finances to offer grants or sustain facilities.

Similarly, in order to be considered meaningful and sound in planning terms, positive statements regarding support for Neighbourhood Forums also should include the need to be mindful of the potential for financial flows from the overall development through the share of CIL entitlements to be directed to enabling the neighbourhood plan implementation. We are opposed to top-down determination of neighbourhood forums' delimitations, and request that a form of words to require a commitment to respectful working with local forums, and openness to ensuring that the required income streams for enacting the local plan are provided through sensible and negotiated border delimitations.

Policy D4: Planning Powers and Monitoring

(d) Monitoring: Scale, nature and mitigation of impacts.

Intrinsically linked to monitoring impacts is the essential prerequisite to first fully understand the scale and nature of likely impacts. While it is acknowledged in the IIA that the proposed development will have a significant impact on existing residents and surrounding areas, the impacts and considerations of the loss of businesses, loss of trade, loss of access to services, loss of quality of air and environment, due to the proposed development, are inadequately set out. Significant benefit will accrue to private developers and may ultimately to the OPDC and to the public bodies holding land in the area. This benefit should be used to explore ways to address the significant dis-benefits which displaced businesses, enterprises and impacted residents will experience.

To a limited extent, this acknowledgement of considerable impacts and ways to mitigate and compensate for impact on local residents and businesses are explained in the IIA and Plan. The following from the IIA narrowly frames the Plan's response to construction related considerations.

“However, such a volume of development will not be without its challenges. The existing transport network, businesses and residents will be impacted by with a significant amount of change in their area over a long period of time. This natural conflict is acknowledged within the Local Plan policies, and addressed with specific policies aimed at ensuring proposed development can adequately deal with effects on residential amenity including noise, air quality and construction impacts.” (IIA, Study no.27, p. v)

The degree of adequacy and soundness of the Plan in dealing with such construction impacts are the subject of detailed critical commentary elsewhere. As to mitigations and

how the plan-making process has dealt with their generation, the IIA as published remains incomplete. The IIA on p52 notes on mitigation that:

“Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Local Plan. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified. Recommendations within Appendix G are italicized for clarity. As the Regulation 19 Draft Local Plan has been developed in parallel to the SA process, mitigation measures have been incorporated on a continual basis into the Local Plan.”

Appendix G is missing from the papers presented to the OPDC Planning Committee which signed them off for Board approval of the draft for public consultation. This not been remedied as it is missing from the document subjected to public consultation.

Monitoring Impacts: KPIs

The range of Key Performance Indicators (KPIs) is separate from the Local Plan, in a supporting evidence document, disconnecting the Plan from the monitoring process.

The proposed KPIs for these aspects of the Plan are inadequate. There are IIA Objectives whose effects are recommended to be monitored, but which are not reflected in the KPI, or at best partially or superficially dealt with. In particular, for the Objectives to: “Maximize the health and wellbeing of the population, reduce inequalities in health and promote healthy living; to improve the education and skills levels of all members of the population particularly vulnerable groups; maximize the social and economic wellbeing of the local and regional population and improve access to employment and training”. (p 85- 87).

Equality and fairness based monitoring of impacts on residents is weak or missing. Monitoring targets do consider, for example, net gain/loss (jobs, A-grade office space etc) which will incorporate something of the changes, but monitoring of the wider impacts of the development on surrounding residents, and boroughs in terms of inequality, health impacts, employment impacts, housing impacts, are not considered and should be monitored. For example, for the IIA Objective “Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare”, possible Indicators are: “Number of offices converted to residential under permitted development rights; Schemes to reduce the impact of construction on the local community; Connectivity of pedestrian linkages across the area - Targets to be developed”.(IIA p 85)

Which residents lose jobs, and who gains jobs, for example, (or businesses) will have equality and fairness implications and should be monitored (see comments on Policy E1). This is made all the more necessary with the Mayor’s direction of travel for London in ‘A City for all Londoners’ for a fair and just city which are being manifested in the draft Diversity & Inclusion Strategy; with many relevant values to likely figure in the new London Plan.

Applicant Expectations

The text in 11.43 should be modified as it represents an unsound approach, inconsistent with other policies and thus will be ineffective.

11.43 “For major applications As part of the pre-application process....”

The cumulative scale of the development is such that all applicants should engage in community engagement. In addition, given the location of many smaller pieces of land adjacent to existing and continuing uses, the smaller applications may be the most significant in terms of community concerns. Without this change, the nature of planning and delivery deliberations will not meet the expectations of community participation set out in DI3 (a) and will be in contradiction with the SCI.

Grand Union Alliance -A community based vision for the OPDC area

The OPDC area has exemplar, sustainable, well-connected and walkable, lifetime neighbourhoods supporting both new and long established residential communities, well-linked with surrounding areas.

OPDC neighbourhoods promote cohesive communities, foster diversity, interaction and social capital. They provide the homes, jobs, training, amenities and services that meet the lifetime needs of local communities and comfortably accommodate those who work, spend leisure time or pass through the area.

They provide exceptionally high-quality architecture and buildings that relate sensitively to the built and natural environmental qualities of long-established residential and business areas within and surrounding the OPDC area.

Valued buildings, features, social facilities and amenities that have had long-term importance to communities' sense of place and history have been retained and integrated into new developments.

The life chances of residents in and around the OPDC area are increased through strong local economic activity and employment, supported by an integrated approach to skills, training and apprenticeships through to long-term skilled employment.

Long-established Park Royal Strategic Industrial Location businesses are successfully sustained alongside new industry. Start-up workspaces are provided and affordable business premises have been protected.

Large-scale natural environmental infrastructure that is valued by both local communities and people across London – specifically Wormwood Scrubs and the Grand Union Canal – has been sensitively enhanced and its integrity has been protected. Nature is thriving throughout and beyond the OPDC area.

Appropriate means of transportation and movement in and from the OPDC area put pedestrians central to a user hierarchy. Access to extensive new transport infrastructure sensitively interacts with local neighbourhoods and local transport needs.

Key multi-use catalyst buildings which support the local community and are attractive to visitors are situated in Old Oak North. A new historic and cultural hub (focused in part on the physical re-use and memorialisation of the industrial heritage of the area) developed beside the Grand Union Canal.

Careful phasing of development has meant that individual neighbourhoods have been completed with an appropriate compliment of social and community infrastructure and amenities. Reasonable protection from undue disruption during construction has been achieved. Detailed coping strategies, around having a transient workforce during of construction phases have assisted in this respect.

Local communities have been actively involved early in visioning and planning processes, and continue to play an active role in decision-making in the OPDC area.

Representatives of resident and community groups and individuals (listed below) that engaged in GUA events relating to the regulation 18 and 19 Local Plan from which contributions have been drawn together into this collaborative response:

Acton Alliance; Art West; Brent Mencap; Brent Cyclists; Canal and River Trust; Chelsea Close Residents Association; City Mission Church; Diocese of London Strategic Development Team; Ealing Passenger Transport User Group; Friends of Kensal Green Cemetery; Friends of the Wormwood Scrubs; Friary Park Preservation group, Hanger Hill Garden Estate Resident Association; HEART; Hammersmith and Fulham Urban Studies Centre; Hammersmith Society; Hammersmith and Fulham Historic Buildings Group; Harlesden All Souls Church; Harlesden Methodist Church; Harlesden Town Team; Harlesden Neighbourhood Forum, Harrow Road Business Alliance; Just Space, Lift People (Brent); London Gypsy and Traveller Unit; London Tenants Federation; New Glory International Ministries; Old Oak Neighbourhood Forum, Pentecostal City Mission Church; Pioneer Way Tenants Association; Regents Network; Save Ealing's Centre; Sobus, St Martin's Church; St Quintin and Woodlands Neighbourhood Forum and Residents Association; Stonebridge Somali Centre; Stonebridge and Park Royal Centre Neighbourhood Forum; The Island Triangle Residents Association; Wells House Road Residents Association; Wesley Estate Residents Association; West Acton Residents' Association; West London Line Group; West Twyford Residents Association and individual residents from Old Oak Estate (H&F); Midland Terrace and Shaftsbury Gardens (within the OPDC area) and various parts of Harlesden.

Comments were also received (by email) and have been included in this response from Hammersmith and Fulham Disability Forum Planning Group.