

Scrubs Lane and Willesden Junction

POLICY P10: Scrubs Lane

VISION

V1. Scrubs Lane will be a characterful and well connected street sitting as a hinge between east and west helping to integrate Old Oak with surrounding areas. Development will continue its employment heritage and will integrate space for living, creating and working.

P10

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

Land Uses

- a) Supporting the delivery of a range of mixed use development along Scrubs Lane by contributing to the delivery of 1,100 new jobs and a minimum of 2,000 new homes during the plan period including early development;
- b) Supporting the establishment of clusters to focus the delivery of active permanent and meanwhile uses at:
 - i) Harrow Road;
 - ii) Laundry Lane;
 - iii) Hythe Road; and
 - iv) Mitre Canalside.
- c) Supporting the local economy and strengthening local identity by delivering attractive ground and lower floor employment floorspace on sites fronting Scrubs Lane consisting of 'small business' B1a, B1c, B2 and B8 uses along its length;
- d) Supporting residential amenity by locating housing:
 - i) above the ground and lower floors onto Scrubs Lane and railway lines; and
 - ii) at the ground floor off of Scrubs Lane where appropriate.
- e) Responding to the surrounding context of Little Wormwood Scrubs by delivering a residential-led area south of the canal to the east of Scrubs Lane;

Public realm and movement

- f) Contributing to and/or enabling the delivery of improved connectivity by:
 - i) supporting Scrubs Lane's role as a connector route;

- This stretches from the Harrow Road to North, past the canal to the South. It did not cross before.
- The policy states that it will be a characterful and well-connected street.
- Characterful means that the planners acknowledge the heritage of the street, notably that there has been industrial activity here but the way it may be acknowledged in practice might just be through the architects' choice of materials that are reminiscent of the past. It doesn't mean that the industrial uses are going to remain.
- Actually, the plan suggests that there will be less industrial employment space and more residential space. So, a first question would be about the displacement of these units.
- They do mention in the text the need for the provision of affordable workspace; but, it is not specified how delivery will be ensured. The assumption seems to be that it will be provided by the property developers as part of the Section 106 agreement.
- It is subject to viability, and other types of social infrastructure such as affordable residential units, which are to be delivered through the same mechanism. It's not stated whether priority will be given to affordable residential or work units should the funds be limited due to viability constraints.
- A well-connected street means they want to strengthen the North-South Corridor: a two-way cycle lane on the west side of Scrubs Lane is planned, improved pavement (large).

- ii) contributing to the delivery of a continuous generous 5 metre wide footpath and 4 metre wide two-way segregated cycle lane with associated junction requirements along the west of Scrubs Lane;
- iii) contributing to the delivery of an improved footpath, with widening where possible, along the east of Scrubs Lane;
- iv) improving existing and creating new east-west routes at each cluster and along Wormwood Scrubs Street that provide access to Old Oak North, Old Oak South, the Grand Union Canal and St. Mary's Cemetery;
- v) contributing to delivering new walking and cycling connections to Wormwood Scrubs and Little Wormwood Scrubs; and
- vi) working positively with stakeholders to deliver new connections over and/or under railways and the Grand Union Canal.

Green infrastructure and the environment

- g) Delivering a high quality, well-connected, network of multifunctional open spaces. This should include:
 - i) contributing to and/or delivering new publicly accessible open spaces and public realm improvements at each cluster and as early as possible;
 - ii) high quality green infrastructure, including street greening, along the length of Scrubs Lane;
 - iii) new publicly accessible open space adjacent to Little Wormwood Scrubs;
 - iv) yards as open spaces to the north of the canal to support employment uses and as communal or private open spaces for housing; and
 - v) contributing to the delivery of green connections into the wider area.
- h) Minimising the impact on the sewer network and reducing the risk of flooding by implementing

- The text also talks about improving East-West connections; this means linking the new development on the Car Giant site and the existing residential neighbourhoods.
- They recognise that at present it is difficult to go from East to West and want to have new connections. One issue maybe people want to discuss is the amount of traffic these new connections and development will bring. They make the assumption that the nature rather than the amount of traffic will change; this is based on the belief that the relocation of Car Giant business will result in a decrease in commercial traffic and the development of residential blocks will lead to an increase in personal vehicle traffic, although this is envisaged to be a moderate increase as many will be car-free developments.
- There is only one bus at the moment, will it be more?
- Mitre bridge might finally get fixed which would be nice.
- From E side access to Car Giant site will be through Scrubs Lane but other new access points may be developed through the creation of new bridges across the canal. The Oaklands/ Genesis scheme, for example, is planned so that later on can get the bridge.
- Heights of buildings – an issue?
- Scrubs Lane is to act as a hinge between the old and new communities. Will this work as a connector rather than a barrier between the two communities, and if so what would that would mean?
- The regulation 18 consultation version of the Local Plan said that Scrubs Lane was a sensitive edge and lower

sustainable drainage systems (SuDS) connected to the Grand Union Canal, and new water infrastructure;

Heritage and character

- i) Strengthening local identity and character by:
 - i) conserving and enhancing St. Mary's Cemetery, Grand Union Canal, Cumberland Park Factory conservation areas, Kensal Green Cemetery Grade 1 Listed Historic Park and Garden and their settings; and
 - ii) ensuring future local character is informed by the area's existing heritage including the cemeteries, railways, Grand Union Canal and industrial heritage.

Building heights

- j) Contributing to a variety of building heights which respond to public transport access and sensitive locations by delivering:
 - i) north of the Grand Union Canal, generally 6-8 storey heights onto Scrubs Lane and the Grand Union Canal and 6-10 storey heights onto Harrow Road;
 - ii) south of the Grand Union Canal, generally 6-10 storey heights onto Scrubs Lane with lower heights adjacent to Little Wormwood Scrubs;
 - iii) generally lower heights opposite the Cumberland Park Factory Conservation Area;
 - iv) increased heights of 8-10 storeys adjacent to the railway;
 - v) a single tall building in each cluster identified in P10(b); and
 - vi) visual permeability between tall buildings.

Infrastructure

- k) Contributing to the delivery of infrastructure requirements, as set out in the OPDC Infrastructure Delivery Plan (IDP);

Development and phasing

- l) Working positively with landowners to ensure the phasing of development supports the delivery of the new footpath and segregated cycle lane on

densities were envisaged. Not low but lower, with a gradient from the edge to the core development area.

- Many agreed with the principle. They still qualify the area as a sensitive location but the implications have changed. It is now perceived as acceptable to have one tall building in four locations along Scrubs Lane.
- The policy caters for 4 clusters which are conceived as activities cluster: pubs, cafes. The rationale for having activities clustered in a limited number of locations is that previous attempts at having commercial space located on the ground level of residential blocks and spread along the full length of these new streets of buildings has resulted in some space not being taken up.
- They believe this will result in less shops ending up being boarded-up premises. Another justification is that it consists in attributing a way-finding quality - to the tall buildings in a new emerging area.
- This is a strange concept that we need a tall building to find our way, we all managed quite well so far without them
- Since the announcement of the OPDC, half a dozen developers have got sites and quickly developed applications including tall buildings. This policy has been re-written around developers' needs.
- The OPDC would contest that interpretation, but yes applications for Scrubs Lane approved or submitted have tall buildings in them.

the west of Scrubs Lane; and
m) Enabling the comprehensive redevelopment of the areas to the south of the Grand Union Canal by working positively with stakeholders to support the relocation, reconfiguration and/or development over and around railway infrastructure on the North Pole Depot where feasible.

North of the canal, generally 6-8 storey heights onto Scrubs Lane with 6-10 onto Harrow Road	To provide an appropriate sense of enclosure to the street in response to the width of Scrubs Lane, with increased height onto Harrow Road. Within this overarching approach to height, the context of each individual plot will also need to be taken into account when considering the most appropriate arrangement of heights on each site.
South of the Grand Union Canal, generally 6-10 storey heights onto Scrubs Lane with lower heights adjacent to Little Wormwood Scrubs	To provide an appropriate scale of massing that reflects the existing railway infrastructure and sensitive locations of Wormwood Scrubs and Little Wormwood Scrubs.
Lower heights opposite the Cumberland Park Factory	To conserve and enhance the Cumberland Park Factory Conservation Area.
Generally 6 to 8 storey heights fronting onto the Grand Union Canal	To conserve and enhance the canal's designation as a Site of Importance for Nature Conservation and conservation area and provide an appropriate sense of enclosure to Mary Seacole Gardens as a public open space.
Increased heights adjacent to the railway	To help manage the impact of railway noise on local amenity, respond to less-sensitive locations and respond to the increased massing in Old Oak North.
A single tall building in each cluster identified in P10(b)	To support legibility and secure additional benefits, through additional development capacity for the community (this could include a mix of greater affordable housing delivery, community uses and public open space) and new infrastructure. Any proposal for a tall building will need to be of the highest design quality. These will be determined on a case by case basis and will be subject to the detailed assessment of its impacts in accordance with all relevant policies and guidance. Specific consideration will need to be given to impacts on views from surrounding areas. A single tall building is considered to be appropriate rather than multiple tall buildings to maintain the character of Scrubs Lane and manage impacts on the townscape and heritage assets.
Visual permeability	To help create a high quality townscape and visual amenity. This will enable views across Old Oak as well as to and from surrounding areas.

- In the previous consultation, policy did not mention clusters but possibility of tall buildings in appropriate locations is vague enough to give grounds for approval.
- Tower are not the best way to house people, according to morning speaker.
- Also, one participant stated that managing mix-tenure blocks is a real challenge, while another ask to clarify the tenure.
- Generally private with some affordable. The North Kensington Gate South development is for 164 private units, 44 affordable, split : 37 shared ownership, 7 London Living Rent and no social/affordable rent.
- This has been approved because it is policy compliant. Maybe a question about the policy.
- There is the issue of deliverability when you rely on developers. This is a problem similar with other developments. In one scheme that was supposed to have 20% social housing; they built the expensive end first, then were to build the social housing units on less valuable land. Existing tenants in the higher priced units objected. Developers pulled the S106, it did not matter to them as they had built their units, the housing association lost its grant for the development of the social rented homes.
- The issue is that the policy states that you need to provide the maximum amount that the developer can reasonably deliver and have a viable scheme. The policy does not say you have to deliver a set percentage. The London Mayor's target (40% affordable housing, now aiming for 50%) is

	<p>listed but it is clearly stated that this is subjected to viability. The planning application can't be refused just on the base of not achieving the target.</p> <ul style="list-style-type: none"> • Does it say what an acceptable profit is? • Viability assessment are not publicly available, but if you read some of the documents: the full plan viability study you see what the assumptions made are. This suggests a normal profit margin is a figure between 17.5 and 20 %. The OPDC tend to argue for 20% because of Brexit and banks not lending much. • For the scheme we are discussing, the figure being made public is that is profit margin will be 7.1%. So, you can't ask for more affordable units. • If the information is not public we can't check it's true; so the figures could be massaged. • Even if they were public, I'm not sure we would have required expertise to assess validity of the assumptions made. • Where is the council in this, why aren't they developing housing for local people? • The council does not own land here so can't develop housing. • This is piecemeal development and Car Giant is banking land which is an issue. • How can planning applications be granted when we are in the middle of defining policies for the area • It's difficult for a planning authority to delay a decision on these grounds.
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	<ul style="list-style-type: none"> • They also have to take account of the current planning policy for the relevant area. • The draft plan accrues weight as time passes, so this version (reg 19) has further strength than the previous (reg 18) version. • The draft direction of travel document for Scrubs Lane, not consulted on yet, but was on the agenda of a planning committee meeting. • There will be diggers in the ground before the Local Plan is approved. • Objections should still be made to the draft plan. • Confirmed that Genesis is not developing any of the clusters. • Q on impact of Brexit. • Not sure if extra stations will be delivered, so it is an issue if all the planned units are delivered and accessibility not improved. More buses might be an alternative. • Some of the planning gain, S106 money will be used to improve the public realm and accessibility. • Q on access to details on Section 106. • The OPDC site - find planning application for the site, information can be found in the planning report.
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POLICY P11: Willesden Junction

VISION

V1. Willesden Junction will be a busy destination within Old Oak, becoming an increasingly well used node on Old Oak High Street. It will be a focal point that connects Harlesden with Old Oak. Station upgrades will create a fit for purpose intermodal interchange.

V2. New high density development will be encouraged, where feasible, and will provide a mix of land uses to support the emergence of a new mixed use neighbourhood. New and enhanced public realm, streets and open spaces through and around the station will seamlessly integrate this Place into its surroundings. Architecture and urban design will celebrate the area's railway heritage, whilst responding to surrounding residential areas.

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

Land uses

- a) Contributing to the delivery of a minimum of 600 new homes as early development to contribute to OPDC's 0-10 year housing supply;
- b) Contributing to the delivery of 200 jobs and delivering a range of high quality B1 workspaces across Willesden Junction including:
 - i) focusing B1a and B1b uses along Old Oak High Street and around Willesden Junction station to support its role as a key destination; and
 - ii) B1 uses at other locations where residential uses are less appropriate.
- c) Contributing to the delivery of Old Oak High Street as part of a new major town centre by delivering a range of town centre uses along its length, where feasible, and within and around Willesden Junction station;
- d) Supporting the delivery of residential uses as part of a new mixed use neighbourhood, where appropriate and feasible;
- e) Encouraging activation of the area, particularly along Station Approach, Old Oak High Street, within and around Willesden Junction and the new station square by:
 - i) delivering a range of active and/or positive frontages on ground floors; and
 - ii) supporting a range of permanent and meanwhile active uses.
- f) Supporting the neighbouring Harlesden district town centre by submitting a Harlesden Enhancement Strategy where an application provides over 5,000 sqm of town centre uses;

Public realm

- g) Contributing to and/or delivering a permeable,

- This will be a be a busy destination. Concern is that there is no mention of it being Harlesden main station.
- The policy actually offers little to Harlesden and to its town center; in fact, it turns its back to Harlesden
- There are considerable changes from the reg 18 consultation document. That showed active frontages on WJ station and said the main link to Harlesden would be via station road. The current version, shows the High Street diverting off to the bottom of Harrow Road. Very little change is shown on the west side of the station. It shows the main entrance remaining there and the new entrance and square in front on the E side. For Harlesden residents, it seems nothing is being offered in terms of improving access / quality of access to the station.
- The roads are too large.
- The OPDC should facilitate better access into Harlesden town center from the station. NB the OPDC commissioned a retail study which states that there are potential threats to Harlesden from town center development in Old Oak. That study concluded that in order for Harlesden to capture regenerative benefits from investment in Old Oak it is critical for physical and functional linkages to be improved. If the linkages are not improved there will unlikely be any significant benefits to Harlesden from development within the OPDC area. **It's what their own commissioned report says – but they seem to have ignored it.**
- The main link now goes to Harrow Rd, not Harlesden. It's a further distance to travel to reach Harlesden from station.

inclusive and accessible street network that:

- i) provides a legible, comfortable and publicly accessible 24-Hour route(s) east-west pedestrian and cycle route(s) through and/or adjacent to Willesden Junction station;
 - ii) supports new and improved connections between Old Oak and Harlesden, including delivery of Old Oak High Street;
 - iii) contributes to and enables early delivery of new and improved connections south over the railway lines towards Old Oak North; and
 - iv) provides any other necessary routes across this place to support comprehensive redevelopment.
- h) Supporting the potential delivery of new platforms on the West Coast Main Line;

Green infrastructure and the environment

- i) Delivering a high quality, well-connected, network of multifunctional publicly accessible open

spaces, including:

- i) Willesden Junction Station Square; and
 - ii) embedding green infrastructure along Old Oak High Street, Station Approach and within other streets to enable their use for amenity purposes;
- j) Supporting health and well-being by ensuring sensitive uses are located away from pollution sources and that new development mitigates the impacts of noise and air pollution generated by rail transport and the surrounding uses including Old Oak Sidings waste facility and access road, and associated rail and road vehicles;

Heritage and character

- l) Strengthening local identity and character by:
 - i) conserving and enhancing, the Willesden Junction substation, other identified non designated assets and their settings; and
 - ii) encouraging the retention and reuse of heritage assets for meanwhile and

- Existing pathway to Harrow Road is unpleasant. It will likely be closed and the access to the station would likely be through the new High Street.
- There is probably only a 30m difference; the High Street is going to come out where the petrol station is. There is a material benefit to the change and increased access on this end. It would do a lot for the top end of the High Street. It would open new development opportunities. Nothing is deemed worth keeping there (up to current job center). It may change the balance. It may pull the center down more. The heart of Harlesden is by Harlesden clock (where supermarket and High Street are).
- **This is likely driven by WJ feasibility study.** It is critical to look at this. There could be objection to the station arrangement.
- Station Rd needs improvements. It is congested, narrow & full of traffic. To date a succession of shops open and then close shortly after before being replaced by new tentative businesses. The footfall is not sufficient, people don't stop because it is not a welcoming environment.
- Issue is that it's a difficult crossing and a space to decant from buses.
- HNF keen to get rid of the bus garage, maybe have it put across the railway lines, in Park Royal. OPDC not going to have any of it. So still designated as SIL. There are lots of severances in the area.
- Was relocation of recycling plant agreed as part of the redevelopment?

employment use where appropriate and feasible.

m) Ensuring local character is informed by the area's existing railway heritage;

Building heights

- o) Contributing to a variety of building heights that respond to public transport accessibility and surrounding sensitive locations by delivering:
- i) tall buildings around Willesden Junction Station and at points of the greatest activity along Old Oak High Street;
 - ii) a range of building heights across the Place including:
 - tall buildings in less sensitive locations adjacent to railways;
 - generally lower heights in more sensitive locations close to lower rise existing residential buildings;
 - iii) determining building heights using all other relevant planning policy in the Local Plan and London Plan.

Infrastructure

- p) Supporting local and regional connectivity by ensuring the timely delivery of upgrades to Willesden Junction station;
- i) to address issues with current rail capacity;
 - ii) to support anticipated future growth in demand associated with new development;
 - iii) to deliver new station entrances:
 - that relate directly to surrounding routes and open spaces; and
 - designed to be easily accessible from its surroundings; and
 - iv) that integrate the station seamlessly with the wider movement network;
 - v) where it would support:
 - delivery of adjacent development sites; and
 - the ability to reintroduce platforms on the West Coast Main Line railway.

- Powerday thought to be kept but metal recycling and smaller plants to be relocated. OPDC thinks Powerday would be useful during the construction phase (20 years).
- There is a site allocation to the E of the station. Policy states it will be high density development with mixed uses. It talks about new and enhanced public realm, streets around the station, will seamlessly integrate this place into its surroundings.
- Not convinced that includes Harlesden.
- They also talk about the delivery of a minimum 600 new homes. They are using the word 'contributing' to 200 jobs.
- The word 'contribute' suggests they are not certain how this can be developed, maybe not sure of what the capacity of it can be or will be.
- Where would those new homes be?
- To the East on railway land.
- Would that land not be needed for the redevelopment of the station.
- The diagram doesn't show any development of the station to the East; just a new square.
- An area then where you would then put the housing?
- The reg 18 consultation document, with bending to the left, would imply demolition of the station.
- The new option is good for the development of Old Oak but not for Harlesden
- Harlesden residents who come down to the station are going to have pretty much the same as before.

- q) Supporting the delivery of an enhanced intermodal interchange that:
- i) can successfully manage the demands of competing transport modes and interchange requirements for walking, cycling, buses, rail, taxis, private vehicles and the impact of future modes; and
 - ii) is phased to deliver early enhancements to the current interchange facilities along Station Approach.

Development and phasing

- r) Ensuring station upgrades are delivered in a phased and co-ordinated manner to best facilitate a comprehensive station redevelopment;
- s) Optimising development on and/or adjacent to the station and tracks;
- t) Supporting the long term redevelopment of the Willesden Train Maintenance Depot (located on the eastern side of the station) provided an appropriate solution for the relocation, reconfiguration and/or development can be agreed;
- u) Supporting early development on the western side of Willesden Junction station that contributes to a coordinated delivery of Willesden Junction Station upgrades, the enhancement of Station Approach and new connections across this Place; and
- v) Supporting the integration of the station with surrounding areas by ensuring it is designed to be resilient and adaptable to respond to a changing context.

- The OPDC's focus was always going to be about the East part but we said we wanted links. This is disappointing. We do also need to put pressure on LBB, to improve traffic lights and generate regeneration.
- Harlesden will be left to rot - as suggested by this policy.
- One of OPDC's objective is to benefit surrounding areas, so this contradicts that aim.
- The policy on tall buildings states a mix of height – but with tall buildings in less sensitive locations - thus close to rail.
- Lower height close to lower-rise existing housing according to this policy.
- The area opposite the western entrance is going to be a yard with people filling up trains of spoil for 10-15 years, but then it will be a significantly new development, no?
- Yes, a large available site.
- They are talking about a transition area between industrial Park Royal and residential Old Oak that might be improved then, but it ought to be looked at before then.
- The point in the policy that talks about conserving and enhancing WJ sub-station is a bit contradictory, with the later statement being less about conservation but about early development of the western side of WJ station which is to contribute to the delivery of the station upgrade.
- Clarification of the text might be needed: conservation or early development?
- In the written text they say it is critical to provide good quality bus cycling, walking routes to connect Old Oak with WJ and Harlesden so that the surrounding residents and

	<p>businesses can benefit from the regeneration. They recognise that this is critical but then don't do anything to facilitate this being brought forward.</p> <ul style="list-style-type: none"> • They talk about cycle routes but on the diagram, they don't go to the town center. • If there is no access, in a sense it re-direct people away from Harlesden town centre. • Nonetheless it will help the redevelopment of other parts of Harlesden. • Yes, but it's neglecting the heart of the centre It moves it to the East and lots of businesses won't benefit. • The distance difference is 400m versus 1 km to reach clock depending on the access point chosen. • The approach to the centre of Harlesden also needs to be attractive. If you come from Kensal Green end, Park Parade has got to be functioning and buzzing. You are not going to walk past a whole lot of run down shops, just to get to the centre. It's the same coming out the Harrow and Station Rds. You won't cross all those run-down parts with betting shops to get to the town centre, especially as you turn left (atlas roundabout) there is going to be a cluster around the Collective. That will be busy (300 yards crappy roads to grip with nonetheless). • There is just not enough benefit for Harlesden • Ideally you would improve access on both side, not leave Harlesden and the station for re-development in 20-year time.
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	<ul style="list-style-type: none"> • Gentrification, is pricing local people out. This t is exactly what they don't want and have been clear about that from the beginning. We want the local businesses to flourish through the redevelopment, not to be priced out. GUA had research done about the local businesses and about the very high proportion of independent businesses in Harlesden town centre, we don't want them to disappear. The research was very informative. • This is outside the OPDC area. The OPDC seems very tunnel-visioned about staying within that development area and not allowing any of the benefits to filter out. • We had some success with the planners in the early days when they were talking about gateways, which we managed to get rid of and adopt vocabulary of transition. That is we transition from one neighbourhood to the other rather than them being a gateway to a gold gated area. Harrow Road, Station Road: transition area. Plus, transition from one residential area to the other. • The High Street is not going to be a traditional high street: it will not have department stores – as you have Westfield not far away. It will have Tesco Metro, things like that, so there won't be appetite for same shops to settle close by. • Is it a through road? • Is a question what retail offer are they envisaging?
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