**Grand Union Alliance**

01.04.16

**Response to OPDC draft Local Plan February 2016 evidence base documents**

Grand Union Alliance brings together a network of resident and community groups and individuals mostly from within and around the OPDC area. It aims to influence large scale developments, strengthening a diverse range of local voices. It aims 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 a collaborative rather than a definitive collective response - drawing together analysis and discussion from a special Grand Union Alliance event held specifically on the draft OPDC Local Plan evidence base documents on 16th March and a further GUA meeting on 21st March 2016. Analysis of the documents was carried out by eight representatives and workers of community organisations and two UCL academics. Representatives (42) of 27 resident and community organisations listed at the end of this document engaged in the analysis and discussion that contributes to this response.

1. **Cultural principles:**  It is a shame that the OPDC consistently seems to prioritise wider need over those of existing local communities within and neighbouring the OPDC area. In this instance the purpose of this study it to consider culture as an economic resource to boots London’s position as the world’s biggest tourist destination. Many within the existing community are proud of the industrial heritage of the area and want it celebrated and used as a basis for supporting and further developing a distinct and unique place and culture for the area.

More positively, a number of the key recommendations from this document are encouraging. However, it would seem that the OPDC is missing a trick here in suggesting that it wants to ‘consult’ on developing a cultural strategy. It is suggested that instead the OPDC provide some funding to facilitate and support the community to develop the strategy. This could make full use of the existing expertise within the community around the area’s history and heritage as well as around new and developing culture that might be best expressed through the engagement of young people from local schools, youth groups and colleges.

A good start on this would be to facilitate the mapping and surveying of buildings of historical importance (see also below section on the Old Oak Outline Historic Assessment), local venues of history, music and cultural activities and existing creative businesses – both in and around the OPDC area.

**2. Decontamination Strategy:** There is little emphasis in the strategy on site characterisation – i.e. what the contamination is; which is essential in terms of risk assessments and effective remediation. It would be useful for more detail on this to be available prior to putting together the next draft of the Local Plan.

1. **Development Capacity Study:** This document does not provide sufficient evidence to support the Local Plan. It lacks careful and detailed analysis of the capacity in the OPDC area to deliver new homes and jobs – it seems simply sets out how targets set within the London Plan might be squeezed in - regardless of site specific issues or full acknowledgement of the character of the local area.

The level of abstraction in the report – providing figures on new homes and jobs only, is not helpful for local people and businesses to get a perspective on what this quantum of development means, what it will feel like and what the design issues might be like as a result.

Only very broad terms are used to describe heights of buildings – with no specific detail on how high and what this actually means.

An average density of 447 units per hectare (for the 57 hectares of proposed housing land); way above the top of the Central London range is proposed. Some parts are proposed to be at ‘super-density’ levels - in the range of 600 units per hectare. This surely unacceptable in this location where general housing types in and around the area are street property dwellings.

There is concern that statutory space-standards of these super-density homes could be compromised and the likelihood that the numbers of affordable family-sized homes needed (to meet evidenced need) would not be achieved.

It is not clear how much mixed development will be delivered. Will it always be vertical mixed use in each case?

Some detail on the methodology used would be helpful. It is unclear whether the assumptions in relation to floorspace per employee for the different types of jobs takes into account changing working practices in the future, or whether these figures are based on past assumptions.

The document is inadequate. It is essential that a detailed evidence base study is carried out to provide:

1. detailed analysis on land available for housing supply;
2. exact assessments of building heights and density levels across the OPDC area;
3. detailed analysis on the number of affordable and family sized homes that will be provided and where necessary –
4. adjustments need to be made to the numbers of homes being planned
5. **Development Infrastructure Funding Study**

The funding gap The potential impact on delivery of affordable housing is a key concern in terms of the funding gap highlighted in the DIFS. How the £1.5b infrastructure costs highlighted in the DIFS becomes £2b in the Local Plan along with a suggestion that additional infrastructure items emerging from other draft studies and strategies are likely to increase this figure, is not evidenced.

It is essential that updated data is provided prior to the publication of the next draft of the Local Plan and that alternatives are presented in relation to the funding gap that do not present a fete accompli when it comes to (reduced) targets for affordable housing.

Social Infrastructure There is some concern that service providers tend not to play for more than 3 years in advance, so the task of predicting infrastructure needs for the next 20 years is presumably a very inexact science. The worry relates to how realistic the costings are and what margin of error there might be, particularly given the already large funding gap.

To what extent have losses of social infrastructure in surrounding boroughs and gaps in existing provision been taken into account? Clearly the OPDC has a duty to co-operate with neighbouring boroughs and it would be good to see some of the evidence of how this is translates in terms of social infrastructure costing in the DIFS.

Affordable workspace, employment and training facilities. The main message of this section of the DIFS is that the OPDC expects the provision of affordable workspace, construction skills training and training facilities to be provided by the market. However, the Local Plan acknowledges that speculative market-led development is unlikely to make adequate provision for small and medium enterprises.

More thought needs to be given to the types and sizes of businesses/activities that will require affordable workspace, what ‘affordable’ means to the OPDC and how this will be delivered in practice through development.

There may be no ‘cost’ to the OPDC, but there will be a cost to the developer. If S106 is to be used as a tool, then some further thought needs to be given to the priority of affordable workspace vis a vis other S106 requirements, and affordable housing. Even if the market will deliver the infrastructure and space, developers need very clear guidance on the OPDC’s position on percentage market rents, and the specification required for workspace providers to take this space on.

It is noted that the Local Plan has a policy on ‘open workspaces’ rather than ‘affordable workspace’. There needs to be further clarity as to what is meant and the implications for developers, as well as better consistency between documents.

1. **Decentralised Energy Strategy**

* No information is provided on the location of the suggested Energy Centre. The size of a Centre would give rise to concern about potential level of disturbance and noise to nearby residents.
* An ESCO will be required for the management of the energy services utility billing and maintenance to all users of the network. The issue of lack of competition around service providers could impact detrimentally on low income households. This needs to be considered further by the OPDC.
* Heat Metering Regulations, which came into force in December 2015 is not mentioned in the study. What impact might this have on users?
* More detail is required on Decentralised Network connections to neighbouring sites is required.
* While the report addressed issues relating to demand for space heating, the demand for hot water supply for domestic use, which will be a considerable load, must be factored in. In addition cooling is very expensive.
* Full investigation is needed into the potential to include retail, commercial, industrial and social infrastructure facilities – to provide efficient use of CHP or CCHP.
* No details are provided on how Renewable Technologies and Innovative Technologies will be incorporated into all factions of design and construction of buildings, landscape and grounds (including phase change materials, shading devices incorporating Solar PV modular fabric construction, Fuel Cell Technology, Battery Storage Technology, R&D product design. Full and detailed evidence is required on this in order to properly assess the proposal for a DES.
* How might Way-Leave agreement for land not owned for par owned by the development site be dealt with?
* The Old Oak development offers incredible scope and opportunities for young people to learn new skills and develop professional careers in construction, engineering and technology – how will the current skills shortage be matched with learning opportunities for local communities in and around the OPDC area?

1. **Gypsy and Traveller Accommodation Needs Assessment**

It would seem that the needs of gypsy and travellers needs have slipped through the net - somewhere between the Government new definition of ‘travellers’ for purposes of planning policy (that might be covered by a Gypsy and Traveller Needs Assessment) and the requirement to have needs of those who don’t fit within the new definition to be assessed within the SHMA.

In the instance of Bashley Road G&T site, the draft GTNA assesses no future need for additional pitches (despite more than half of the persons living on the site being children or teenagers) while the SHMA suggests that gypsy and traveller needs will be assessed in the GTNA. Given that it is ORS that has completed both assessments we feel the assessment to be totally inadequate.

A further concern is that ORS has frequently contacted the London Gypsy and Traveller Unit in respect of GTNAs carried out in other boroughs - including in Lewisham, Greenwich, Hackney and Newham, but has not made contact with them in respect of the OPDC area.

Full and proper needs assessment must be carried out, the Local Plan must be clear about the potential future of the Bashley Road site and if, as seems to be the case, the site is at risk, a new site with sufficient pitches to meet existing and future need must be identified.

1. **Industrial Land Review**

Key issues / concerns:

Re employment sites

* The presence of manufacturing and the food and drink sector is not adequately revealed.
* The complexity of land uses is mentioned (e.g. difficult to categorise in many cases) but this is rather swept under the carpet than tackled in a new way.
* The land use map (p24-25) does not identify manufacturing as a category.
* Hybridity of uses (industrial / office) are not revealed (while this is being highlighted in other studies across London).

Supply and demand:

* In assessing future demand, this section makes the rather erroneous assumption that “general and light industrial land is that used for manufacturing purposes” (p.40) and reproduces the projected change in manufacturing job numbers 2011-2031(GLA, 2011). It suggests that “because of the large stock of manufacturing jobs in the three boroughs the analysis suggested some loss of industrial land is justified” (p.40). Manufacturing actually accounts for less than a third of jobs on industrial land, so surely this is flawed?
* It seems to divide land into ‘manufacturing land’, ‘logistics land’ and ‘waste and utilities land’. But this does not reflect the diversity of uses occupying industrial land, nor does it acknowledge the role of industrial land today as providing low-cost business space in general. In other words, it does not adequately acknowledge the broad spectrum of demand for such land, especially into the future.
* The latest GLA industrial land supply study has not been taken into consideration. Surely the GLA should have made preliminary results available. The latest London figures should be used.
* In assessing the scale of loss and therefore whether industrial land supply will meet the demand (p.43), the study could go much further in terms of providing local evidence from the boroughs on unimplemented planning permissions and sites coming forward for mixed use redevelopment in local plans to provide a much more realistic picture of the likely loss in the three boroughs to 2031.
* It is not clear what the methodology is regarding market trends (p45). Where has the information on industrial occupier requirements come from? Similarly with the section on property market demand 2031, it is not clear how these trends have been identified. Only one literature source is mentioned. No real local

Intensification

* The consideration of some typologies for intensification is a useful addition. However, what is missing is any analysis of the scale of intensification that could be accommodated. How many sites would fit into these different categories? Would they all be viable for intensification? How feasible is it to accommodate all the new jobs and businesses required within this approach? Can this be achieved adequately?
* The study does not really adequately address the tension between accommodating 300 businesses and 6,000 jobs affected by redevelopment at Old Oak/HS2 and the fact that increasing development densities in Park Royal is seen as a challenge due to pressure on parking and congestion and therefore only sites near public transport really have capacity to intensify? Vacancy rate is very low at 2%.

Spatial Scenarios

* Further investigation is needed into retaining some existing light industrial and office functions with the Old Oak site.
* A definition of ‘open workspaces’ needs to be provided and there is a lack of vision around the types of jobs that might exist in Old Oak.

1. **North Acton Station Feasibility Study**

* The suggested new station entrance seems to contradict LB Ealing’s plans for Station Square. Has there been collaboration with LB Ealing on this feasibility study?
* The plans for extra housing on TFL land need to be made explicit.
* There is already a lack of amenity space in North Acton; justification on how further intensive development can contribute to the creation of a lifetime neighbourhood here is needed.
* Regarding the ‘Sword site’ to the north of the station and proposals that this might become raftered over (above the HS2 crossover box) –OPDC needs to clarify is this would remain a SIL location.
* The issue of traffic calming needs to be addressed.

1. **Old Oak Outline Historic Area Assessment**

The report includes a wealth of information, however only includes the Old Oak area in LBHF and a small area of railway land north of Willesden Junction (railway land) in LBB. It includes an area to the east of Victoria Road and an area south of North Acton Station in LBE. It also includes an area in RBKC by the canal with historic industrial and railway use. The rest of the OPDC area (mainly Park Royal in LBE and LBB) is not covered.

It is suggested that an assessment on the rest of the OPDC area also be carried out and that a local listing of buildings of merit needs to be produced.

Building up the base of local historic knowledge could be an ongoing project. War time structures and activities are not covered in this document; a photographic record should be built up and images of lost buildings should be obtained. Photographic surveys of existing buildings should be requested as a condition of planning consent before demolition and rebuild, or conversion. This could and should be part of the development of a cultural strategy for the area.

There is concern that the canal is seen in a rather benign way, while a number of organisations, including the Canals and Rivers Trust, see a more dynamic future for the canal than is suggested in this document. The canal can be made into a major feature in the Old Oak/Park Royal area. Industrial use during the redevelopment of the area and a continuing use for waste handing, involving colleting high value waste by boat in inner London and transferring it to lorries in, for example, Southall. This would overcome the problem, both in transport policy and logistics, of HGVs in central London. The use of the canal in office services as at GSK at Brentford is the model for new factory and office facilities in the area. It might also be applicable to housing developments.

The report mentions that the canal is built as a modified contour canal. The effect of this is that there are 26 miles of lock free broad canal which makes increased commercial use viable.

1. **Retail and Leisure Study**

* The threats to Harlesden are acknowledged. However, there should be more detailed investigation around the retail provision in Harlesden, the extent to which this provision services both local and wider communities, the needs of existing and neighbouring communities and what any loss would mean to them. An impact study should be produced.
* It is suggested that the LB of Brent and OPDC working group should also involve representatives of local communities and traders (including the Harlesden Neighbourhood Forum and Harlesden Town Team).

1. **Strategic Housing Market Assessment**

Generally this is a good assessment of the needs within the housing market area of the boroughs of Brent, Ealing and Hammersmith & Fulham. Importantly it has highlighted affordability of types of housing (including ‘affordable rent’); has highlighted the potential risks in terms of addressing need in relation to further caps in housing benefit and policy around starter homes (Housing and Planning Bill).

The gap around Gypsy and Travellers accommodation needs, however, is highlighted above - in relation to the GTNA.

It will be important to carry out a detailed assessment regarding the further HB caps and the impact of the Housing and Planning Bill when at is passed in co-operation with the boroughs.

1. **Waste Strategy**

As part of the evidence of the Local Plan Supporting Studies Summary, this document is advanced as a study. However, the OPDC is both a local planning authority and a waste planning authority with a duty to prepare a local waste plan. Therefore this document, as a Waste Strategy, has a greater import and wider directional effect than the term study would convey. Throughout the plan-making process, the emphasis has been on creating an environmental and sustainable exemplar. This all makes it imperative that the Strategy is soundly based, delivers sustainable development and supports the proper planning of the area.

From the draft Local Plan Supporting Studies Summary document, the *key outputs and recommendations* have been responded to:

*Identification of OPDC’s adoption of the West London Waste Plan (WLWP) which deals with apportionment targets for the LBs of Brent and Ealing:* Adopted by OPDC in July 2015, even though the OPDC did not have any significant input into it, the WLWP commits the OPDC to safeguarding the Twyford Waste Transfer Station and Quattro, Victoria Road waste sites. The Quattro site is included in the WLWP as “a contingency… for the latter period of the Plan although it is not essential to meeting the apportionment targets of the London Plan 2011” (para 5.1.4 WLWP). The FALP revision of the London Plan published by the Mayor in March 2015 has substantially lowered the apportionment targets from those that informed the WLWP by about 30%. Eventually, the WLWP will be reviewed, but it is clear that the justification for safeguarding Quattro as a waste site has greatly diminished. It is sufficient opportunities – not overprovision – that national guidance advice should be identified (PPG28-011). The Waste Strategy has failed to take the opportunity to respond to the current policy context and simply reiterates what is now an out of date plan. Local residents have objected to Quattro’s operations and its relocation within the MDC area would be problematical for neighbouring uses, non-residential as well as residential, and would not be a productive use of land given competing demands and opportunities.

*Identification of ability of sites in the Old Oak to meet the LB of Hammersmith & Fulham’s apportionment targets:* The Strategy envisages early relocation of European Metal Recycling (EMR) and 3 waste sites in the Scrubs Lane area. Relocation within the MDC area would be problematical for the reasons given above in respect of Quattro, particularly in light of adverse environmental impacts described in the Strategy’s paras 3.26 & 3.29.

*Powerday waste site should be safeguarded/ the Local Plan should promote energy from waste to ensure that waste treated in the OPDC area is recycled (sic) within the area:* This site is presently operating at one-third of its capacity, but is the object of complaints from local residents. Intensification of this site’s waste management operations would be most unwelcomed and would be likely to be detrimental to the optimisation of development opportunities. It is noteworthy that the National Planning Policy for Waste includes in the site suitability criteria: “the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community, including any significant impacts on environmental quality, social cohesion and inclusion or economic potential”. Much of the reasoning advanced against EMR in the Strategy’s para 3.26 equally apply to Powerday.

Underpinning the justification for energy from waste is a fundamental misunderstanding of the Circular Economy concept. A circular economy is one that minimises the use of materials and minimises waste by using and re-using materials efficiently. (See London assembly Environment Committee Growing Growing Gone Report, March 2016). Energy from waste is next only to landfill at the lower, least sustainable, end of the waste hierarchy. The waste hierarchy of the Waste Management Plan for England should have greater expression in the Strategy. The Strategy is too narrowly based in that it is effectively a site allocations document for a particular activity, waste management, and does not address the wider spatial planning and sustainable development agendas by driving waste management up the hierarchy. The OPDC has devised a waste strategy that is confined by pre MDC administrative and planning boundaries and by demonstrating that the boroughs can continue to meet their apportionment targets. In doing so, has failed to realise a more sustainable and efficient approach to resource use and management and the proper planning of the area. It does not achieve sustainable development.

The Supporting Studies Summary document incorrectly conflates energy from waste with recycling in its key recommendations.

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Representatives of the following resident and community organisations and individuals contributed to analysis and discussion on the evidence base documents published with the OPDC draft Local Plan (regulation 18) consultation at GUA meetings on 16th and 21st March 2016.

Art West; Brent Mencap; Canal and River Trust; Chelsea Close Residents Association; City Mission Church; Diocese of London Strategic Development Team;Friends of the Wormwood Scrubs; 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;Just Space,Lift People (Brent); London Gypsy and Traveller Unit; Regents Network; Save Ealing's Centre; Sobus, St Martin’s Church; St Quintin and Woodlands Neighbourhood Forum and Residents Association; 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, along with individual residents from Midland Terrace and Shaftsbury Gardens (within the OPDC area) and from various parts of Harlesden.

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