



The Hammersmith Society

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1 April 2016

Peter Farnham
Local Plan Consultation
OPDC
City Hall
The Queens's Walk
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Dear Peter

OPDC Draft Local Plan Consultation

Please find attached the Hammersmith Society response to the consultation.

The response has been set out following the order of the plan. For easier reference the index below might be helpful.

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Appendix 1 – Hammersmith Society ‘Vision and Objectives’ : October 2015

Appendix 2 – Suggestions for SPD on Tall Buildings : March 2016

We look forward to seeing the revised Draft in due course, but in the meantime we would be pleased to meet and discuss our comments in more detail.

Yours sincerely

Tom Ryland
Chairman

An Amenity Group concerned with Planning and Conservation in Hammersmith since 1962

Patron: The Mayor of Hammersmith & Fulham
Member of the London Forum of Amenity and Civic Societies Founder Member of The West London River Group
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THE HAMMERSMITH SOCIETY

Response to OPDC Draft Local Plan : February 2016

This submission is made on behalf of the Hammersmith Society.

The Hammersmith Society is the over arching amenity society covering the northern half of the London Borough of Hammersmith and Fulham. This is defined by the old Metropolitan Borough of Hammersmith and includes Barons Court to the south and College Park and part of OPDC site to the north. The Society was founded in 1962 and is a member of the London Forum for Civic and Amenity Societies

The Hammersmith Society seeks to promote excellence in the built environment and architecture in the borough, and preserve and enhance the historic environment and assets where they exist. We seek to improve the urban environment in Hammersmith by promoting public interest in townscape, by campaigning and working with the private developers, local and national authorities. Our membership includes both individuals and local groups concerned about the built and natural environment in Hammersmith. More detail about the Society can be found on our website www.hammersmithsociety.org.uk.

Members of the Society have been involved in the general consultation on OPDC since the summer of 2015. The Society is an affiliated member of the Grand Union Alliance. We have attended the majority of the Workshops set up and run by the OPDC planning team following the issue of the Draft Local Plan. These have been well run and informative, and we trust that the many comments made by the participants will be given proper consideration. We have been a party to the detailed response being submitted by the GUA and give our full support to the following documents :

Response to OPDC draft Local Plan February 2016

Response to OPDC draft Local Plan February 2016 – Evidence base documents.

Although we are commenting on the plan as a whole, and raise a number of general comments, we are concentrating our detailed comments to those areas of the plan which fall within the existing boundaries of the London Borough and Hammersmith and Fulham, or the wider interest of our members.

We would also refer to our previous submission ‘Vision and Objectives for OPDC’ on 20 October 2015 and which we prepared as part of the Scoping Consultation. A copy of this is appended for reference. (Appendix 1).

1. INTRODUCTION

We generally support the OPDC as an established entity and accept that it has been set up by the Mayor of London to manage the massive development that is expected to arise from the arrival of Crossrail 1 and HS2 and resultant interchange, and the Mayor’s designation of the area as an Opportunity Area. We support its broad ambition for development, which we agree can be best progressed by such an overarching corporate body. We acknowledge that its planning policies should be in line with those of the NPPF and the London Plan. On this basis, we are concerned that some policies and target figures considerably exceed established guidelines (Eg. Overall housing target figures) and we set out our objections accordingly in the sections below.

We welcome the Chancellor’s statement in his recent Budget Statement that he will assist in the transfer of the 70 hectares of land in public ownership from the various public bodies involved to the OPDC.

Key objectives

The Hammersmith Society considers the following are key objectives for the development of the OPDC area :

- The need for effective community and business involvement in developing the proposals and inhabiting the new development
- The need to balance the global city development values with appropriate local neighbourhood aspirations
- The importance of protecting existing facilities and land uses and delivering a balance of employment space, housing, green spaces and amenities to serve local needs
- The importance of developing walkable neighbourhoods and a sustainable movement network within the Opportunity Area and connecting neighbouring communities
- The importance of learning from the mistakes of previous Mayoral Development Corporations and other Opportunity Areas, also with regard to tall buildings.
- The area must be open to all and not gated in the manner of Canary Wharf : To this end all roads should be adopted.
- The importance of learning from the mistakes of previous Mayoral Development Corporations and other Opportunity Areas, and specifically with regard to tall buildings.
- The future cannot be predicted so the Plan must have flexibility to adapt and change.
- As the Draft Plan states, (para. 12.3), OPDC is in a position to push the boundaries of UK best practice in development and infrastructure and has an objective to be recognized as a leader in sustainability.
- The importance of the canal for open green space, leisure and sport, the attractive environment it can provide for nearby housing and for the preservation of existing heritage buildings.
- The importance of the retention and limited enhancement of Wormwood Scrubs as important open space for the enjoyment of local people as a nature reserve and its many sporting activities.

Infrastructure provision and the funding gap.

The whole basis of the OPDC project relies upon the provision of massive new infrastructure. This involves far more than the HS2/Crossrail project which is one of the main drivers, and the justification for public funding. The development of the OPDC is the equivalent of a new town but with the added complications of it being in an established urban area with pre-existing infrastructure that is not necessarily in the right place or fit for its new purpose.

There is also the added complication that much of the existing land is likely to be contaminated involving huge decontamination costs – something to which there is only a two page reference in the Plan, and no estimates which we have seen.

However, it is already been suggested by others that there is a funding gap in the provision of the new infrastructure, so that it would appear that there is insufficient commitment to the public funding of infrastructure for the area as a whole and that there will be an over reliance on provision from the private sector. Our concern is that the expectations for major investment by developers is too high and will affect detrimentally the high quality of development, which we are all seeking in the OPDC project.

The massive housing and employment targets are made on the basis of assessment of growth for London (and the UK as a whole) but there is no certainty that these growth expectations will be realised nor that there will be the demand in this particular location, nor contingency if the assumptions prove incorrect.

Responses to this consultation

It should be noted as a key factor in compiling and taking account of responses to the consultation that the actual OPDC area has relatively few residents, therefore numerically the number of resident responses will be consequently low. The number of responses should not be taken to assume a lack of concern by residents, whether local or in the surrounding areas. Groups representing the communities around the OPDC area, which will be very much affected by the development, have worked very hard during the consultation and their responses must be given due weight.

DETAILED COMMENTS

2. SPATIAL VISION

We support the general statements but have no specific comments. See our previously submitted 'Vision Statement and Objectives' (Appendix 1) plus objectives stated above. We would emphasise the importance of 'Culture' and 'Places'.

3. OVERARCHING SPATIAL POLICIES

Housing Targets –OSP2 Land Use, and OSP4 Densities and Building Heights

We have consistently questioned the target of 25,500 homes for the OPDC area as a whole (24,000 in Old Oak : 1500 in Park Royal). These figures as set out in para .1.27 of the Introduction and para. 3.11 of OSP2:Land Use seem to be based upon a political objective rather than sound practice or analysis. In our view they are not evidence based. The figures, which have been promoted for some time, and form the basis of the OAPF, came before the establishment of the OPDC and any thorough analysis of the site or consideration of how a plan for the area might evolve. Now that this Plan has been produced - and one that we can largely support in its general ambitions - there needs to be a reappraisal of what the Plan can reasonably provide in terms of housing that is commensurate with all the proposals set out in this plan. The current targets for housing densities and the justification set out in paras. 3.27 – 3.33 of OSP4 have huge implications for heights, which are not reflected in any of the illustrative material so far presented.

As we understand it, the overall target figures are based upon total available land for housing development of 57 hectares – made up of 54 ha in Old Oak and 3 ha in Park Royal. The quantum of these site areas may be overly ambitious, particularly in Old Oak, as they assume the rafting over of several areas, which may prove to be just too difficult and expensive.

The Old Oak figure equates to an average density across all 54ha as 445 units per hectare. This far exceeds the London Plan top end figure of 405 units per ha (London Plan Table 3.2) for a Central area with PTAL of 4 - 6. Bearing in mind that it is intended that there should be a mix of house types and densities and that not all areas within the OPDC area will be appropriate as 'Central' especially around the edges, the implications are that large parts of the development will have to be built at a density of between 550 and 600 units per hectare (which the London Plan only allows in exceptional circumstances).

To achieve such extreme housing density there are all sorts of implications most notably excessive height (40 storeys or more) and a large proportion of small units which will be prejudicial to the provision of family homes, lack of amenity space and potential unforeseen social problems. We note from the recently published SIL study that there are considerable disadvantages due to the excessive costs of building high.

We understand the requirement to optimize development, but we strongly demand that the targets are reduced downwards to an average density within the Central classification. We would point out for example that a density of 350 units per ha would still provide for approximately 20,000 units. We also note that Car Giant have already reduced the target within their site from 9,000 units to 7,000.

Unless the housing targets are reduced to levels that are within the London Plan, we will request that the Inspector, appointed to examine the plan, finds it neither 'Sound' nor 'Consistent' as it is not in conformity with the London Plan standards.

There are opportunities to build new social housing on publicly owned land and we would support any ways to deter foreign and buy-to-let investment

We note from the recent Housing workshop that a target of 48% of the total units should be affordable, although it is not clear what proportion of these will be reduced market sale, intermediate/shared ownership or low rent. We are also unclear as to how this is to be achieved bearing in mind developers use of viability arguments to avoid the provision of affordable units.

There are a considerable number of existing residential communities in the OPDC area, and the value of these in providing a range of types of housing and retaining existing character of these areas should be recognised. They should be brought back into full occupancy and possibly linked together within their own boundary definition.

See separate sections commenting re Housing Design and Tall Buildings

OSP4 Densities and Building Heights the Preferred Policy Option and justification should make explicit the sort of building heights that are called for the densities being discussed. Figure 18 and the text simply give indicative relative density "lower" to "highest". The emerging picture during the consultation is that heights of 40-50 storeys will be required to support the proposed densities.

We agree with the GUA that OPDC needs to undertake the following urgent action :

1. Carry out a detailed analysis of actual land available for housing supply once all the other requirements for land have been taken into account (for transport, employment, town centre and social infrastructure uses, utilities and open space).
2. Make an exact assessment of the building heights and densities.
3. Analyse the number of affordable and family sized homes that can be provided.
4. Adjust the number of homes that can be realistically be provided.

4. PLACES

We broadly support the Chapter 4 on Places, but accept that many local groups are concerned about the boundary definitions. We again challenge the assumptions presented in para. 4.3 regarding the overall targets for housing and employment as being unrealistic.

There is widespread dismay by us and most members of the Grand Union Alliance at the nature of the development at North Acton. It would appear to be completely devoid of any sense of place, and the predominance of student and buy-to-let accommodation means that any aspirations for it to be a cohesive neighbourhood are impossible. The clustering of the relatively tall buildings is banal and the architectural standard is dismal. We very much hope that this is seen as an exemplar of how not to do it.

We do believe there is merit in creating a separate Place to bring together the areas of existing housing in the Old Oak and eastern part of Park Royal.

P4: Grand Union Canal

The canal and its towpath are owned by the Canal and River Trust (CRT) and indeed their permission will also be needed for any new bridges across the canal.

At the time of writing, we have just received a copy of the CRT submission as a statutory consultee dated 31 March 2016. We support their comments particularly in respect of moorings and provision of new basins, improved towpath, new walkway to the north of the canal, lighting, new bridges, freight transport, green infrastructure and biodiversity.

We are concerned that the canal is not identified as Open Space although it is in the OAPF (OAPF Figure 34) nor included on the Walking Infrastructure map (OPDC Figure 105).

Potential conflict of walking and cycling alongside canal. This could be resolved by some widening of the tow path, subject to the agreement of CRT. CRT do recognize this as a problem along all the London towpaths and has Shared Places signage and leaflets. The part of the canal towpath is however already included in its and the Mayor's Quietways cycling routes (for slower cycling).

The canal represents an ideal opportunity for playing a part in the regeneration of the area and improving the lives of those who live, work or visit the OPDC area by providing a waterside green corridor, which can offer leisure and sporting activities through boating, canoeing, restaurants, cafes and pubs and an attractive environment for new homes to be built near the canal.

Boating on the Paddington Arm is increasing year by year and more short-term moorings are needed and should be provided on the OPDC side of the canal, plus we believe there is a justification for incorporating one, if not two, marinas/basins within the development. Examples as to how this could enhance the area are at Engineers Wharf at Greenford, Abbots Wharf on the Limehouse stretch of the Lower Regents Canal, and enhancements at Kings Cross, Brentford and Tottenham Hale.

The canal is a Conservation Area because of its history, which in particular includes two historic buildings, the waterside warehouses and the Rolls Royce factory. We believe it is important that these be retained, but obviously with alternative uses in them. The L-shape of the rear of the Rolls Royce would present an ideal backdrop for a new marina/basin.

We support the proposal for a continuous green corridor on the north side of the canal in the OPDC area, except it would need to go behind the warehouses which we wish to see retained.

Use of the canal water as part of District Heating should be considered. An example is at the GSK offices in Brentford and examples in Docklands where it heats and cools the offices.

P10: Wormwood Scrubs

Existing Character: The status (and legal protection) as Metropolitan Open Space should be specifically mentioned and emphasized in this section and in the Vision.

Most local groups and residents wish to see Wormwood Scrubs as it is : Its wild character is much enjoyed and urbanization should be resisted. "Potential sensitive improvements" (4.163) should be viewed with caution. The sustainability of visitor numbers should be taken into account with any open space. Wormwood Scrubs will receive much greater visitor numbers in the future from new residents and workers in the OPDC area and priority should be given to preserving its informal character rather than increasing hard-surface walking and cycling routes or attracting visitors from further afield.

Wormwood Scrubs must not be allowed to be assumed as provision of open space by developers, as a substitute for adequate on site provision. It also should not be used as a construction site.

Pedestrian Access from the north: We, together with most other groups, object most strongly to the Green Cross concept shown on earlier strategic maps. (Eg. Figures 8 and 10 : P. 19 and 25) with a large south facing arrow across Wormwood Scrubs. There is no logic to implying a major pedestrian flow in this location. We note that on other maps including the transport assessment maps, this desire line is shown to the east with a route on or parallel to Scrubs Lane connecting with White City. This route should be relocated to the east and related to the canal bridge indicated south of Hythe Road station – This would also provide a logical connection down the east side of Wormwood Scrubs to Wood Lane and White City.

We believe this is the correct emphasis.

However there would be an opportunity for the canal towpath to be linked with the Scrubs by adding a green corridor between the two near the eastern edge of the OPDC area and this could even be a continuation southwards of the most eastern of the north-south routes that are planned for crossing the canal.

The effects of light from multiple tall towers will be detrimental to amenity in surrounding areas, and particularly to wildlife and amenity on Wormwood Scrubs. This section should address policies to limit light pollution in regard to Wormwood Scrubs

Views from Wormwood Scrubs : Views from Wormwood Scrubs should ensure that the character of the Metropolitan Open Space is not overwhelmed by tall buildings, Views such as Fig28:p61 would permanently damage the character of Wormwood Scrubs

Only drainage to pitch areas should be considered. It is important to ensure that sustainable drainage measure in the development area do not adversely affect Wormwood Scrubs.

THEMATIC POLICIES

5. Sustainable Development

We support the principle of sustainable development but to us this means development that complies with the overall spirit of the plan as a whole and not just meeting what we regard as unsustainable target figures.

OPDC needs to set out much more clearly what evidence it expects from developers and how they need to prove compliance, and how this is to be measured.

6. Design

We support the objectives set out in D1: Strategic Policy for Design pp. 128 – 129.

Please see our specific comments on Housing Design under Section 7: Housing.

We welcome the setting up of a Character Study.

We are very concerned that there should be an avoidance of tick box design.

We deplore some of the terrible OPDC images promoted in the plan – These set completely the wrong image of what we and the local groups are looking for. We would cite the images on pp. 27, 61, 73, 75, 79 and 101 as particularly poor. More suitable examples are shown on pp. 45, 69 and 167.

Design Review : Para 6.7 refers to the OPDC Place Review Group. It is unclear what its remit is and how it would operate. We would wish to see the setting up of a Design Review Group that would monitor and review the design of the more major schemes and provide advice to the Planning Committee, in accordance with the principles established by CABI. We would commend the structure of the reconfigured Design Review Group in London Borough of Hammersmith and Fulham, which has been recently set up in accordance with our recommendations, and has a mixture of architects, other professionals and well informed lay members. (There are many suitable candidates within the GUA).

D2 & D3: Streets and Public Realm and Open Space

We support the objectives set out in D2 : Streets and Public Realm pp. 130 – 132.

The quality of public space will be one of the key factors by which the success of the OPDC project will be judged in the same way that Canary Wharf, Docklands, the Olympic Park and Kings Cross are being judged.

We would like to see clearer definition as to who provides and who manages?

Public spaces must be genuinely public.

All roads/streets should be adopted, not private.

Reference should be made to the possibility of public food growing spaces (see the Edible Todmorden project illustrated at the GUA's Charette) and allotments, including temporary allotments during the building phase, as at Kings Cross.

Open Spaces

We support the objectives set out in D3: Open Space pp. 134 – 137.

We believe that it is most important to provide a variety of Open Spaces and where these relate to residential areas, residents need to be part of them and feel a sense of ownership. There needs to be provision for all age groups but with special attention to play spaces.

We have provided comments elsewhere on specific open spaces including the canal and Wormwood Scrubs.

We would like to encourage wildlife and biodiversity, green chains and corridors.

We would generally commend naturalistic planting as it is cost effective both initially and in the long term (low maintenance).

We would support encouragement of community management of Open Spaces.

Under D3, para. 6.24 P.134 : Second bullet point implies development might be acceptable unless it was considered 'inappropriate' : Remove the word inappropriate from this sentence. Development would only be acceptable in the most exceptional circumstances.

The canal should be identified as an Open Space as it is in the OAPF, but should not be regarded by developers as providing the open space required within their housing developments.

Railway embankments should also be regarded as providing beneficial open space : They may have a role in providing for allotments.

While the North Acton Cemetery and the St. Mary's Cemetery lie adjacent to the ODPC area and are both important spaces, they should not be regarded as meeting the Open Space required by developers.

D4: New Buildings

We support as commendable ambitions the statements and objectives set out in D4: New Buildings pp. 138 – 141. However, we repeat our considerable concerns over density ambitions and what this will mean (see earlier comments).

Where there is reference to 'exceptional design standards and high quality materials' - We question - who is the arbiter? We believe there is a potential conflict of interest between the role of the OPDC as 'Development Corporation' and 'Planning Authority': This is why independent Design Review proposed above is so important.

We share the following concerns with the GUA :

- *There is concern that the high-rise blocks, which seem also to be synonymous with luxury development, might 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.*
- *The management and maintenance costs of high-rise homes are much higher than those of lower-rise homes which would make it difficult to change their tenure at any time and indeed to include low cost rented housing from the start*
- *Community representatives are keen that the OPDC should look at international examples and also past developments to examine both good and bad examples of optimising density without having to develop high-rise buildings.*

Please refer to our proposed criteria and recommendations re location and design of tall buildings – Appendix 2

In addition to our previously stated concern regarding heights of buildings around Wormwood Scrubs, the height of buildings near Willesden Junction should also be curtailed because of their effect on the Victorian houses on the north side of Harrow Road.

We commend projects such as Bosco Verticale in Milan as excellent examples as to how tall residential buildings can avoid being dehumanising.

D5: Alterations and Extensions

We support the objectives set out in D5: Alterations and extensions pp. 142 – 143.

D6: Heritage

We would like to commend John Goodier of the Hammersmith and Fulham Historic for his analysis of the Old Oak Area, and particularly his paper : "Old Oak Outline Historical Area Assessment".

We would also like commend the Photographic Survey by Henry Peterson, Amanda Souter and John Goodier in connection with the recording and possible preservation of buildings/historic assets within the Car Giant owned site.

We confirm our support for the Cumberland Park Factory Conservation area proposal.

We wish to encourage Heritage-Led Development where appropriate.

We would like to stress the importance of Canal Conservation Area : The current Canal Conservation Area is only in that part of the canal in the London Borough of Hammersmith and Fulham. We would like to see this extended to the whole ODPC area, and beyond.

In particular we would hope that at least the Rolls-Royce factory, the canalside warehouses can be retained for alternative uses and the artists' studios can be retained for use by them. This latter will need some slight re-siting of the proposed Hythe Road station and also that which is required by HS2, which we understand is still being discussed with them.

D7: Amenity

The Hammersmith Society has always set great store by importance of good standards of amenity. We support the objectives set out in pp. 148 – 149, and the Preferred Policy Option.

D8: Inclusive Design

We support the objectives set out in pp.150 – 151.

7. Housing

H1: H2: Strategic Policy for housing and Housing Supply

We reiterate our comments on housing targets made under Overarching Spatial Policies. We question both the overall provision and the effect on the quality of housing that will be produced to achieve those targets. The illustrations in Figures 75 and 81 imply that medium density low rise schemes will be the norm whereas the reality will be like the soulless illustration in Figure 76 – but much worse and much higher density.

H3: Housing Mix

We broadly support the housing mix for affordable housing. There is a need in the wider area for family housing and market housing provision should be monitored to ensure it also includes family housing.

H4: Affordable Housing

We favour Option 1 on p169. We regularly see targets in Hammersmith and Fulham not being achieved on viability grounds.

H5: Existing Housing

We strongly consider existing housing should be retained, to prevent loss of existing housing numbers and to keep area character. We endorse the Preferred Policy Option.

H6: Housing in the Private Rented Sector

H7: Housing with shared facilities

We have already stated that we believe that it is most important that the widest possible range of housing and tenures are provided. We think that too often rental options are not offered by either public or private agencies. Private Rented units including HMO's should be encouraged and licensed where appropriate for larger units and where possible with longer durations. We support the Preferred Policy Options in both cases.

H8: Specialist housing

We think there needs to be an effective provision of specialist housing including sheltered type housing for elderly people, and for other vulnerable members of the community that need support including those with mental health difficulties.

H9: Gypsy and Traveller Accommodation

We note the Preferred Policy Option and the potential difficulties of identifying sites.

H10: Student accommodation

We support the approach to the provision of student accommodation, and the highlighting of some of the associated design and management problems set out on pp. 182 – 183. We support the Preferred Policy Option but endorse the cautionary commentary on design in paragraph 7.81.

Housing Design :

We believe it would be helpful if the **Housing section included more specific reference to appropriate policies on Housing Design.**

It is not necessary or appropriate for us to provide a whole treatise on the quality of housing to be provided, as we accept that there is a huge raft of information available not least from the GLA itself as to what constitutes good housing. We have already commented on the need to provide a wide range of house types and avoid excessive densities and heights.

The other major points which we would emphasise are :

- A wide variety of tenures including genuinely affordable rented accommodation.
- Recognition needs to be given to ensure that the housing provided is of a varied style, mix and set in environments to ensure that it is a pleasant place where people will want to live.
- Where units are provided on a market price basis, they are offered to local people and Londoners on a priority basis.
- A wide variety of unit sizes to include for larger family units and single occupants.
- Internal space standards should comply with London Plan recommendations as a minimum.
- Designed as part of local mixed tenure neighbourhoods to avoid isolation.
- Provide where possible for good outlooks, avoid overshadowing and single aspect dwellings especially where north facing.
- Housing schemes should aim to be highly efficient in their use of energy and should aim for zero carbon emissions in use. This can be achieved in part by the use of green roofs, pv panels and solar panels.
- All units should have private amenity space and have access to adjacent open space.

8. Employment

We question the reality of the target of 65,000 new jobs within the OPDC area made up of 55,000 within Old Oak and 10,000 in Park Royal. There does not seem to be a sound basis for this claim.

For example, at a recent seminar organized by the GUA, Jessica Ferm, Lecturer in Planning and Urban Management, Bartlett Scholl of Planning, advised that there was little scope within Park Royal for intensification on the scale envisaged. She also pointed out that the classification of Park Royal as 'Strategic Industrial Land' was a misnomer as there is a whole range of employment uses ranging from offices to industrial, catering to small craft businesses.

We suggest a reclassification to 'Strategic Commercial Land'. Within this use class, there should be flexibility to allow for facilities such as retail, gyms etc. to support the commercial uses.

It is difficult to accurately predict the future employment pattern in the OPDC area. However, in the longer term we do see that demand for office space in such a centrally connected location could dramatically increase which would have an effect on property and rental values which could have an adverse effect on established businesses and workspaces.

In the meantime, the Preferred Policy Option should include provision for open workspaces, micro workspaces and artists' workspaces. We share many of the local groups' enthusiasm for this type of provision. These are often best provided as part of conversions of existing building rather than new build as low cost/low rent is usually an essential ingredient. For various reasons, west London has a particularly poor track record of such provision compared to east London.

Existing businesses should be supported and emphasis given to providing opportunities to young people, start-ups and training.

During the development stage, particular care is going to be required to avoid the displacement of existing businesses.

9. Town Centre Uses

TC1-TC4 We support the Preferred Policies especially where they support 'Vibrancy' in the Town Centre(s). As we have stated below, we believe that town centres thrive best when there is a broad mix of uses including cultural and leisure facilities and an attractive night time economy.

It is important that these centres establish their own unique identity and that they do not try and emulate the Metropolitan Centre that is 'Westfield' nor detract from adjoining centres such as Harlesden. As set out in TC2: Town centre hierarchy, it is important that each centre is appropriate to its function.

TC5 Culture, Sports and Leisure Facilities

In our Hammersmith Society 'Vision and Objectives statement' in October 2015, we stated the following :

"The OPDC is more than the sum of its parts as there are elements of the development which are of wider appeal. This concept was originally identified in Key Objective 3 of the OAPF which stated : 'Potential for large scale catalyst uses such as new educational facility, football stadium, sports complex, health, arts leisure or cultural centre' : This society welcomes the arts, leisure and cultural centres which includes the lido, ice skating, concert hall and general arts facilities".

We therefore consider there should be a policy in favour of a major catalyst uses such as museums, a concert hall, or visitor attractions such as a full-size lido or skating rink. For example, where might there be a local cinema?

We would hope that boating and canoeing can be introduced on to the Grand Union Canal. (See P4: Canal section above).

We commend and support the excellent '**Cultural Principles' supporting study** prepared by the Mayor of London's Cultural Team. We consider that Recommendation 15 of that document should be included, which proposes that the Local Plan requires schemes over 2,500sqm of town centre use floorspace should submit a cultural action plan that sets out how their scheme will contribute to the cultural offer in Old Oak and Park Royal.

We cannot over-emphasise importance of inclusion of cultural elements, but these should be for the benefit of local people, Londoners and possibly users of the railway networks rather than as a global ambition.

We also believe the area should build on existing cultural heritage/industrial legacy.

We note the potential Science Museum proposal for Car Giant site although its extent is still unclear.

Public art: In addition to contribution to the public realm through S106 agreements, the principle of providing or contributing to public art should also be considered as an obligation.

TC7 Evening Night Time Economy: we support a positive and lively night time economy, including proposals for extended opening hours in appropriate locations away from residential neighbourhoods.

10. Social Infrastructure

As the GUA point out, 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.

We would note the following:

- The local police station in Acton and the fire station in West Action 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.

SI1: We support the preferred Policy Option.

SI2: Education: We support the preferred Policy Option. Schools are demanding of space and some safeguarding should be considered now.

SI3: Health: In view of the increase in population, hospital services (Middlesex and Hammersmith), Health Centres, and GP services should be retained and expanded, and any closures of existing facilities prevented.

SI4: Community facilities: we support the Preferred Policy option. However, we draw attention to our comments earlier on about infrastructure and the funding gap. How are community facilities to be paid for? Who will manage them? We presume that in the case of libraries for example OPDC will be the Local Authority responsible.

SI5: It is noted that there are only three existing pubs within the OPDC area. There should be support for new pubs as well as protection of the existing. There should also be resistance to changes of use via Article 4 Directions.

11. Transport

T1 – T10: We support the Preferred Policies with the following comments and reservations. In principle, we do not consider the policies are sufficiently radical or forward thinking.

We support in principle the interchange between HS2 and Crossrail 1 on the site but have concerns that the full implications for the station and the area have not been fully considered or resolved. There seems to be confusion between the role as a pure interchange point for travellers who are likely to have no interest or involvement in the wider site, and its role as a possible destination within its own right. These roles are not compatible and have implications for the accessibility and setting of the new station.

As we have argued previously, the design and organization of the station must be of world class quality : We believe that this might best be achieved through an international architectural competition. The importance of extremely high quality of design is not just essential for the predicted 250,000 users a day but will be essential in setting the design bar for the whole OPDC project.

Comments on the other Rail Projects

We support the various proposals for new London Overground stations at Old Oak Common Lane at Hythe Road (subject to moving the proposed site for the station to allow for retention of the existing artists' studios. See also section on Employment) and the improvements and upgrading to Willesden Junction and pedestrian linkages to Old Oak Common, connecting the West Coast Mainline to the HS2 and Crossrail. We welcome the proposed upgrading and improvements to North Acton and Park Royal.

We do not support the proposal by the West London Line Group for the West London Line that involves construction over Little Wormwood Scrubs.

We very much hope that the railway network in the area is used to maximum advantage in the construction stages so that both materials and spoil are transported by rail or the canal, rather than by road, thus relieving local residents and the local road network of the burden and disruption,

The question of decking over the major stations for development appears to be a major element that must be resolved between the Government, HS2, Network Rail and OPDC as a matter of urgency – together with agreement on who bears the cost. Similarly we understand that agreement has recently been reached on partial relocating (and decking over) the Crossrail 1 depot currently under construction, although it is not clear re. the funding and whether this further impacts on the ‘Infrastructure Funding Gap’ referred to earlier.

Transportation Generally

Transport accessibility around the site

The OPDC area will be one of the best connected sites in Britain if you want to get in or out but there is currently no provision or apparently ambition to provide an internal transportation system within the area, connecting up each of the main places/neighbourhoods, commercial/shopping centres and transport stations. This could be at its most basic be a simple single storey bus system – but as we are talking about an exemplar new quarter for London then something more ambitious such as a driverless system should be considered – and considered urgently before the design of sites such as Car Giant have become fixed. The important qualities should be that it serves the whole community, should be accessible to all potential users, frequent and preferably free of charge.

There is still a presumption within the plan for reliance on traditional motor transport whereas walking/cycling should be prevalent. We note that the ‘OPDC Walking, cycling Assessment Document’ is still not prepared. We would encourage the ambition to explore smart technologies as set out in Chapter 12.

We, together with most other groups, object most strongly to the Green Cross concept shown on earlier strategic maps. (Eg. Figures 8 and 10 : P. 19 and 25) with a large south facing arrow across Wormwood Scrubs. There is no logic to implying a major pedestrian flow in this location. We note that on other maps including the transport assessment maps, this desire line is shown to the east with a route on or parallel to Scrubs Lane connecting with White City. We believe this is the correct emphasis.

Other detailed points in connection with Transport :

Scales should be shown on all plans : This is a particularly important on ‘Walking Infrastructure’ map. (Figure 105 : P. 257).

This same map should be redrawn to add the canal (The towpath is shown on other drawings) and remove A40 and A406 as designated walking routes.

There is not a map with the report showing existing ‘Bus Routes’ although we are advised one has been prepared. We understand that OPDC are in discussion with TfL with a view to rationalizing these to reflect the proposals.

We support the view that where possible there should be segregation of heavily used cycle and pedestrian routes. Our preference is that this achieved by use of slightly raised kerbs or levels.

Although we agree with the premise that the emphasis on motor transport should be played down, there needs to be adequate means of access and egress to the OPDC area :

On this basis we consider the proposed upgrading of Old Oak Common Lane and Scrubs Lane to be completely inadequate. While we endorse any objectives to make Scrubs Lane into a more pleasant road with the departure of many of the employment uses along the road, there will instead be vehicle movements from within the Old Oak area and no alternative route for all the through traffic which currently overwhelms the capacity of the road. Scrubs Lane and Old Oak Common Lane cannot be considered in isolation either to the road capacity in Harlesden and should be reviewed as a whole.

A policy should be added to address existing traffic problems, in particular on the north-south axis. This is an acute problem for the area and simultaneous congestion in Scrubs Lane and Old Oak Road can lead to the development area effectively being cut off at peak times. Any such policy should prioritise bus lanes.

We note that on the map Figure 102 : P.253, Old Oak Common Lane is incorrectly shown as connecting up with East Acton Station.

We would urge that OPDC urgently complete their proposed supporting study : **'OPDC Walking, cycling, streets and public realm strategy'**.

Cycling

We have previously noted the potential conflict between cyclists and pedestrians on the canal : We believe that can be a more general problem and it was clear from the group discussions that most people favour routes that are segregated.

On Figure 110: Cycle Network, the Super Cycle Highway from the south east appears to fizzle out. We suggest that the route is extended to the west alongside the Piccadilly Line.

We also recommend the formation of a dedicated route adjacent Chiltern Line

12. Environment and Utilities

EU1 – 12: We broadly support the proposals and ambitions set out in this chapter of the plan with the following comments and reservations. See also our comments re **Sustainable Development**.

Table 13: Environmental sustainability targets for the OPDC area : Add reference to the embodied carbon/energy in buildings. This is particularly relevant when considering whether an existing building can be converted rather demolished and replaced.

The encouragement of smart technology should sit well with the background and heritage of Old Oak and Park Royal as industrial powerhouses. Consideration must be given at an early stage as to the ownership, management and storage of data.

EU3: SUDS and water attenuation schemes : The Preferred Policy Option should include extra points to ensure that planning and sufficient attenuation measures are in place to avoid flash storm flooding and to “ensure sustainable drainage over the whole development area does not adversely affect Wormwood Scrubs, and takes measure to avoid flooding”. Reason : Wormwood Scrubs will be vulnerable to run-off and other water consequences of new development unless attenuation measures are put in place at early planning stages.

We would also expect this chapter to include the potential for using canal water for heating and cooling of buildings. See also section on the canal.

More value should be placed on the importance of Tree planting – quantity and species. We commend the guidance provided in “Trees in Hard Landscapes : A Guide for Delivery” published by Trees and Design Action Group 2014

We would expect that street trees will be planted where and whenever possible : Developers should be required to provide evidence that there is a clear hierarchy between the provision and routes for services and the provision of trees.

As the highway authority and development agency, the OPDC will similarly be responsible to ensure that there is accurate mapping of utilities across the area.

There should be temporary greening during the construction phases.

EU8: Green infrastructure and biodiversity : We very much encourage these policies recognizing both the difficulties and the importance in such a urban area.

Figure 127 : Allotments – temporary and permanent – should be encouraged generally. For example, temporary allotments at Kings Cross - an early win – were in skips so could be moved as development happened.

Lighting of streets and public spaces : This chapter should also address policies to limit light pollution. The effects of light from multiple tall towers will be detrimental to amenity in surrounding areas, and to wildlife and amenity on Wormwood Scrubs

EU10: Air Quality : This is becoming an increasing public concern in urban areas. We query who will be the controlling and monitoring bodies.

EU11: Noise pollution and controls : Vibration should be added to this section. As above, we question who are the controlling and monitoring bodies? Ie. OPDC or LAs?

EU12: Land Contamination : We have already touched on our concerns under ‘Infrastructure and the Funding Gap’. We were surprised to learn recently that there has not been a comprehensive assessment of the potential extent of the land contamination. Now that it is confirmed that all the public land ownership will be transferred across to OPDC, they must instigate a thorough assessment of the extent and costs as a priority. (in accordance with the Environmental Protection Act 1990 : Part 2A : Contaminated Land – Statutory Guidance).

13. DELIVERY AND IMPLEMENTATION

Infrastructure provision

We note the statements set out, and we have already raised our concerns in our section above entitled ‘**Infrastructure provision and the funding gap**’.

We note the various mechanisms whereby funding might be raised. We understand that it is also possible that under the CIL formulation, there may actually be a disadvantage to building excessively high blocks due to the associated high costs of construction and maintenance. We hope this will mitigate against the threats of the very high towers about which so many of us are concerned.

Determining Planning Applications: We note the intention to set up the Place Review Group. As we have said under “Design” above it is unclear what its remit is and how it would operate. We would wish to see the setting up of a Design Review Group that would monitor and review the design of the more major schemes and provide advice to the Planning Committee, in accordance with the principles established by CABE. We would commend the structure of the reconfigured Design Review Group in London Borough of Hammersmith and Fulham, which has been recently set up in accordance with our recommendations, and has a mixture of architects, other professionals and well informed lay members. (There are many suitable candidates within the GUA).

How will Planning Applications be considered in the short term before the OPDC Local Plan is fully operational? Car Giant and Genesis are taking their plans forward quickly. As a matter of urgency OPDC must have a strategy in place for ensuring early planning applications are consistent with the Draft Plan, and that the Ealing or Hammersmith & Fulham Plans contain strong enough policies in key areas.

The OPDC will need to carefully manage development so that existing communities are not unreasonably disrupted or isolated as different areas or schemes are built out. Access to local facilities, social infrastructure and open space must be safeguarded. Noise, dirt and vibration will need to be controlled.

Finally, in view of the size of this development and the long time scale involved, we consider a 20-30 year long term vision AND a short term Local Plan are required. This will ensure flexibility in the event of economic fluctuations which could affect housing markets and infrastructure development. The form of a 20-year Plan is commendable as a vision but is not flexible enough for a project billed as “the largest regeneration opportunity in London”, nor a format which is adaptable to changing external situations or needs. As one simple example, housing projections based on ultra –high private residential blocks might need to be adapted to affordable housing – in which case the high maintenance costs/charges of very high-rise would no longer be available and a lower-cost form of housing would need to be envisaged.

Footnote :

NEIGHBOURHOOD PLAN

This is not included in the draft Local Plan although it was included in the Scoping Report. We support evolving proposals for a Neighbourhood Plan.

We are pleased that OPDC appear to embrace the principles.

The Hammersmith Society
March 2016

Appendix 1 – Hammersmith Society ‘Vision and Objectives Submission’ (October 2015)

HAMMERSMITH SOCIETY VERSION : VISION AND OBJECTIVES FOR OPDC

Based on the GUA model responses to the OAPF and conference report November 2014

Vision (of what the OPDC area will be like in the future) (Note : This vision statement refers to the eastern half of the OPDC area : The western half – previously the Park Royal Industrial Estate – has retained and enhanced its function as a thriving industrial/ employment zone).

- The greatest achievement of the OPDC has been to successfully integrate the differing requirements of a major transportation hub with a local residential and business area so that both could function harmoniously, and enabling the development of an exciting and vibrant venue to visit whilst retaining its core as a attractive place to live and work.
- The OPDC is more than the sum of its parts as there are elements of the development which are of wider appeal. This concept was originally identified in Key Objective 3 of the OAPF which stated : ‘Potential for large scale catalyst uses such as new educational facility, football stadium, sports complex, health, arts leisure or cultural centre’ : This society welcomes the arts, leisure and cultural centres which includes the lido, ice skating, concert hall and general arts facilities.
- 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.
- The neighbourhoods have been well considered with moderate urban densities using a variety of dwelling types : Excessive heights of above 10 storeys have been avoided : Space standards are in excess of the Mayor of London’s minimum standards : All dwellings have their own private open spaces that are commensurate with the use anticipated : Family homes have access to larger garden spaces that allow for children’s play.
- OPDC neighbourhoods promote cohesive communities, foster diversity, interaction and social capital. They provide the homes, local jobs, training, amenities and services, green and play spaces and accessible social and community infrastructure, which includes schools, medical facilities and a wide range of retail that meet the lifetime needs of local communities, and that comfortably accommodate those who work, spend leisure time or pass through in the area.
- Locally distinctive neighbourhoods provide high quality and sustainable urban design, 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 existing buildings (Listed and otherwise), features, social facilities and amenities that are important to communities' sense of place and history have been retained and integrated into new developments and enhanced with additional facilities. The characteristics of existing Conservation Areas have been respected, protected and enhanced.
- The life chances of residents, particular those of relatively deprived areas in and around the OPDC area, are increased via the delivery of strong local economic activity and employment and support for an integrated approach to skills, training and apprenticeships through to longer-term skilled employment.
- Long-established Park Royal Strategic Industrial Location businesses are successfully sustained alongside new industry. New start up workspaces and existing affordable business premises are protected. Long established and valued retail shops and services including local hospitals within and on the boundaries of the OPDC area are sustained and enhanced.
- Large-scale natural environmental infrastructure that is valued by local communities in and near to the OPDC area as well as by people across London specifically Wormwood Scrubs and the Grand Union Canal - have been sensitively enhanced while their integrity have been protected. Nature is thriving throughout and beyond the OPDC area.
- Appropriate means of transportation and movement in, and to and from, the OPDC area are provided putting pedestrians central to a user hierarchy to support the provision of walkable, lifetime neighbourhoods. Access to new transport infrastructure sensitively interacts with local neighbourhoods and local transport needs. This has meant that both the needs and user experience of the through traveller and that of the local user have been carefully considered and their differing requirements catered for.
- The architectural design and detailed planning of the transport infrastructure buildings are of exceptionally high quality (The main interchange building having been the subject of an international design competition has won many awards). The new stations have proved to be a delight to use by the huge numbers that pass through them every day.
- Key multi-use catalyst buildings supporting the local community and also attractive to visitors are situated in Old Oak North and a new 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.
- The various venues that were introduced to provide recreational and sports facilities have proved popular and are well used. (Note : The proposed relocation of Queens Park Rangers football ground was rejected at an early stage as not being in the best interest of the OPDC and its communities as a whole).
- The standard of hard and soft landscaping of all the new developments has been of the highest quality and has developed and matured successfully. This has been due to the choice of simple but robust materials and well designed street furniture and imaginative and comprehensive planting schemes incorporating extensive tree planting.
- 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, and this has been a major contributory to the OPDC's success.

- Careful consideration of the phasing of development with the OPDC area meant that individual neighbourhoods were completed with an appropriate compliment of local facilities (Eg. Educational, medical, retail and recreational) and that they were protected from undue disruption in the construction of follow on phases.

Objectives (to achieve the vision)

1. Establish and support well connected mixed use lifetime neighbourhoods that are well-linked with surrounding neighbourhoods.

- Create high quality liveable and inclusive sustainable neighbourhoods, accessible and affordable to all ages and income groups.
- Housing targets to be properly evaluated as to what can provided to a medium urban density and set to ensure a mix of housing types and a range of tenures that will genuinely meet existing need (within and surrounding the OPDC area), particularly in terms of affordability (at least 50% affordable housing).
- Set housing targets to meet the needs of families, older and disabled people, as well as younger couples and single people. Consideration to be given to delivering additional pitches for gypsy and traveller communities.
- Deliver housing with a range of long-term secure tenures that are conducive to creating lifetime neighbourhoods, with the OPDC working with neighbouring boroughs, co-operative and community-based organisations
- Deliver social housing that is indistinguishable from other tenures.
- Provide homes that exceed the Mayor of London’s minimum space standards and meet lifetime standards.
- Monitor displacement of existing communities in and around the OPDC area as a result of increases in land values and consider safeguarding measures.
- Provide appropriate mixed uses at the ground floor level of housing developments
- Retain public land for publicly owned development to accrue long-term financial investment and management benefits.
- Fully integrate adequate provision of social & community facilities within housing developments.
- Locate dedicated new large and small scale green and open space for play, recreation, healthy exercise, meeting places, greenery, urban wildlife within and adjacent to housing developments.
- Protect and enhance long-established neighbourhoods within the OPDC area to deliver elements required for lifetime neighbourhoods.
- Protect and enhance existing green and play spaces.
- Provide social and community spaces and other amenities and services that are currently lacking in established residential areas.
- Create adequate new green spaces to meet the required standards for the new developments that exclude the Scrubs from any such calculations.
- Include separate routes and spaces for walking, cycling, private and public vehicles in all streets and public realms.
- Balance permeability and legibility with creation of neighbourhoods which have a sense of community ownership and security where children and older

- people can feel safe; provide adequate community-oriented facilities and meeting places to support engaged and empowered communities.
- Balance the provision of essential local services and retail with those dedicated to the potentially lucrative activities, to service high footfalls.
- Protect and safeguard existing green spaces alongside the canal to contribute to public and amenity spaces and the natural environment.
- Work with neighbouring 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.

2. Establish locally distinctive neighbourhoods that (i) provide high quality sustainable urban design, architecture and buildings, (ii) relate sensitively to long-established residential and business areas in and surrounding the OPDC area and (iii) retain and integrate buildings and features that are important to communities' sense of place and history.

- Record, retain and integrate valued buildings and features of local merit and historic interest as well as those of designated heritage assets (such as the Rolls Royce Factory and other industrial buildings in Park Royal) and/or on a local list to contribute to the provision of a distinctive sense of place.
- Drawn on local history to define street names and heritage activities.
- Understand the distinctiveness and integrity of existing Conservation Areas so that they may be preserved and enhanced.
- Provide exceptionally high standard of architecture and environmentally friendly design and set challenging targets for lifetime embodied carbon emissions.
- Consideration be given to the appointment of a design champion to set and oversee design standards throughout the OPDC area.
- Create adaptable and imaginative buildings that are designed to last for 150 years and use best materials and techniques in terms of sustainability.
- Create exemplar low carbon developments with minimal environmental impacts.
- Promote retrofitting of existing homes, businesses and other premises.
- Fully integrate environmental infrastructure (including facilities for minimisation of waste and the maximisation of recycling) within housing developments.
- Relocate waste sites to Park Royal.
- Encourage standardisation and co-ordination of procedures around waste and recycling to prevent confusion and duplication especially where developments cross borough boundaries.
- Provide green roofs and walls and green public spaces that will absorb water, rather than using concrete / hard surface materials and will reduce air pollutant concentrations.
- Deliver building heights in range from 5 to 10 storeys except where tower heights are warranted.
- Sustain the character of existing and stable residential neighbourhoods through avoidance of high rise development. Harmonise the siting, scale, bulk and height of new development to sensitive locations and views.

- Achieve London Plan density ranges in mansion blocks as a sensitive alternative to high-rise development. Demonstrate that high density does not mean high rise.
- Adhere to London Plan supplementary planning guidance on the control of dust and emissions during construction and demolition.
- Rigorously monitor (with the boroughs) processes and responses to any detrimental impact of existing and any increased levels of air pollution.

3. Increase the life chances of residents, particularly those of relatively deprived areas in and around the OPDC area, via an integrated approach to skills, training and apprenticeships through to longer-term skilled employment.

- Sustain and evolve economic activities and employment in existing industry of the Strategic Industrial Location (SIL) of Park Royal, particularly those that meet the needs of existing more deprived communities in and around the OPDC area.
- Build on existing and emerging successful business with clear links to and integration with the Park Royal SIL and to neighbouring opportunities.
- Sustain and enhance existing valued services (including hospitals and existing retail shops).
- Maximise potential spin off from existing and new academic centres, including Central Middlesex hospital - relating to advanced manufacturing, medical research, robotics..
- Support development of new incubator light industrial units.
- Encourage development of further education facilities to support apprenticeship schemes relevant to Park Royal industries.
- Protect affordable business units / premises.
- Replaced relocated waste sites with appropriate employment (such as light industry, medical research, robotics and production of robotic cars or a science park) and training facilities.
- Set targets for the net total of new jobs to be delivered, taking into account the number of jobs lost through displacement.
- At least 30% of jobs should be for local people with a target of at least 30% during construction phases and 30% longer term.
- Provide local skills training, assessed via needs analysis of communities within and on the boundaries of the OPDC area, to ensure targets are met.
- Provide a breakdown of jobs delivered.
- Monitor displacement of existing businesses in and around the OPDC area as a result of increases in land values and remedy adverse economic and employment consequences.
- Protect or re-provide industrial premises.
- Accommodation of displaced businesses from Old Oak to Park Royal should take into consideration the impact of disruption to the existing businesses. This should be addressed at the Employment Land Review for Park Royal.
- Protect or re-provide premises for valued local social and community activities and assets. In any case of re-provision should be in close proximity to the communities currently using the facilities.

4. Protect and sensitively enhance existing large-scale natural environmental infrastructure – Wormwood Scrubs and the Grand Union Canal.

- Development must not encroach onto Wormwood Scrubs.
- Development should not impact negatively on the natural environment and wildlife of Wormwood Scrubs.
- Protect the character of Wormwood Scrubs.
- Sensitively enhance the ecology and as an area for exercise and recreation with agreement and support by the WS charitable trust; this should not be at the expense of the retention of this unique open space.
- Ensure satisfactory, sensitive scale and relationship of new development to the Scrubs.
- Ensure no negative impact from new development on the view from WS looking North.
- Prevent any route from HS2 Station direct to the Scrubs.
- Ensure there is no negative environmental impact on the Scrubs from noise, dust and activity and light as a result of demolition and construction and the development as occupied.
- Protect and enhance established green spaces alongside the canal.
- Protect and enhance the Grand Union Canal conservation area as a site of importance for nature conservation.
- Carry out a full survey of the existing buildings along the canal to ensure that industrial heritage buildings and features are identified and protected.
- Create publicly accessible public facilities (including but not exclusively restaurant, cafes and bars) that utilise and enhance the existing heritage, including the canal.
- Create a new cultural hub/arts centre within the OPDC area that allow for development of the arts including film, theatre, music and creative arts.
- Create facilities for recreation and physical exercise, which might include a unique facility not otherwise available in the area (Eg. Lido, skating rink, tennis etc).
- Set back development from the edge of the canal, to ensure it is accessible to everyone and to ensure there is a thriving continuous wildlife corridor.
- Set acceptable height of development at no more than two or three storeys.
- Provide segregated cycling and pedestrian routes on the canal tow path.
- Encourage new basins, side docks and wharfs along the canal in order that development may occur in cul-de-sacs away from the edge of the canal.
- Ensure that where possible bridges over the canal are light and pedestrian only.
- Provide the potential for facilitating active usages on the canal such as a canoe club.
- Exploit potential for use of the canal for transportation of building materials for developments and the servicing of the OPDC and wider areas.
- Develop a strategy of very high quality hard and soft landscaping throughout the OPDC area. Hard landscaping should involve a restrained palette of good quality durable materials and there should be extensive tree and shrub planting.

5. Provide appropriate means of transportation and movement around and to and from OPDC area

- Apply a user hierarchy with pedestrian priority to provide walkable, lifetime neighbourhoods.
- Clearly analyse and plan for the differing requirements arising from Old Oak's function as a major transport hub and its local and neighbourhood provision.
- Segregate vehicle, cycling and pedestrian routes – to protect older and disabled people and those walking with small children.
- Rationalise the scale, complexity and cost of transport infrastructure in the area.
- Ensure that 30% of jobs are for local people, particularly from deprived sections of the community in and around the OPDC area, including during construction phases to support pedestrian movement to and through the OPDC area.
- Address existing transport issues with the boroughs and the Mayor; including – the A40, the route from the A40 into Park Royal and Du Cane Road.
- Address the problem of Old Oak Common Lane being the main north-south road in the area.
- Involve community members in the planning of bus routes.
- Encourage use of public transport particularly to minimise use of taxis, private hire and coaches.
- Provide clear and accessible information and signage in rail and underground stations, tunnels and connections including where assistance is available to elderly and disabled users.
- Ensure any essential road, pedestrian and cycle 'tunnels' are spacious and provide a secure, safe environment.
- Provide contingency plans in the event that HS2 does not go ahead.
- Prevent any rail links being close to bedroom windows of residential buildings.
- Ensure the high street is accessible only to pedestrians and cyclists with certain essential sections being accessible to buses.
- Provide a main eastern entrance to the Old Oak Common HS2 station, with a road connection to Scrubs Lane so as to relieve the use and dependency on Old Oak Common Lane
- Maximise use of the Grand Union Canal for transportation of materials through all demolition and construction phases and thereafter the functioning of the development. Provide off-site consolidation facilities and use of prefabricated building components. This aims to reduce already high levels of air pollution and congestion on existing roads and minimise on levels of noise dust and vibration from delivery and servicing.

Appendix 2 - Suggestions for SPD on Tall Buildings

Tall Buildings : Where it is decided to implement tall buildings :

This is a subject which exercises many people greatly : Here are a few suggestions as to how the criteria might be set up.

Tall buildings should not be accepted as a norm but specific case needs to be made for them

We would suggest that where any building is proposed taller than 30 metres (equivalent to approximately 10 residential storeys), there should be an automatic trigger for special assessment, whether it is significantly taller than those around it or not, including extensions to existing buildings.

There needs to be allowance for different floor heights for different uses, therefore the actual height including any visible roof top equipment should be quoted.

In a Parliamentary enquiry in 2002, it was concluded that tall buildings are not essential to the urban renaissance : They are only one of several ways to increasing building densities.

The location of tall buildings is of paramount importance and special attention should be paid to the historic context.

Tall Buildings Historic England Advice Note 4 : 2015

This Historic England Advice Note supersedes English Heritage/CABE guidance 2007 and seeks to:

- Enable areas appropriate for tall buildings to be identified in advance within the local development plan or framework;
- Enable proper consultation at the plan- making stage on the fundamental questions of principle and design;
- Reduce the scope for unnecessary, speculative applications in the wrong places;
- Protect the historic environment and the qualities which make a city or area special;
- Highlight opportunities for the removal of past mistakes and their replacement by development of an appropriate quality;
- Set out an overall vision for the future of a place.

Location of Tall Buildings

Tall buildings should not be positioned where they:

- Obstruct views from key vantage-points
- Have a detrimental impact on the historic environment*
- Have a significant adverse impact on the amenity of nearby occupiers

Tall buildings may be appropriate:

- Close to good public transport infrastructure
- Close to other tall residential or commercial clusters of tall buildings where it can be demonstrated that a new tall building serves to raise the quality and coherence of the cluster
- At locations where the provision of a landmark building would clearly improve the legibility of the city

We would like to see the Planning Authority support the view of bodies such as Historic England that the location selected for a tall building should be suitable in terms of its effect on the historic environment at a city-wide as well as a local level. If the location is not suitable, then no tall building will be acceptable, however good the design. Only if it can be demonstrated that the location and context are appropriate will other factors including design quality be addressed. This guidance specifically relates to locations where the special historic character makes it sensitive to change of any kind, particularly any change to the existing balance of dominance between structures and open spaces. In line with good conservation practice such an assessment should be based on a comprehensive assessment of historic character and not simply assumptions about how well a place could or could not accommodate a tall building.

A key failing of tall buildings in the past has been the way they meet the ground and therefore how they are perceived/experienced at the short- distance.

Ultimately the aim should be to create a public realm with a human scale. Human scale need not necessarily be prejudiced by high buildings, provided that these are carefully located, designed with a top and a bottom and have regard to the effects on the microclimate. This often involves the following:

- Stepping down a large mass to its neighbours;
- Ensuring that the ground level most relevant to the pedestrian experience is as active and interesting as possible;
- Ensuring that the public realm is naturally overlooked;
- Providing legible and accessible entrances;
- The scale, form, massing, proportion and silhouette of the building.
- The design of the top of a tall building. This will be of particular importance when considering the effect on the skyline.
- The relationship of the building to other structures.
- The materials used to face the building. Material samples will need to be submitted.
- The assessment will be looking for buildings that are far better designed than previously and be icons of architectural quality in themselves.
- Creating Excellent Buildings – A guide for clients (CABE, 2003)
- Design Review – Guidance on how CABE evaluates quality in architecture and urban design (CABE, 2002) – See below.
- Views Assessment (see Appendix E on the preparation of Accurate Visual Representations)
- Design Statement Physical Model Material samples.

In addition tall buildings must also be assessed on :

- An evaluation of the overall density in a particular area
- Effect on the general environment and microclimate
- Effect on the historic environment
- Their accessibility to public and road transport
- Their contribution to legibility/permeability of the wider area
- The public accessibility of the building
- Sustainability

Objectives of the Tall Buildings Policy

To summarise : The overall objectives of the policy should be to meet the following objectives :

- To ensure that any proposed new tall building would reinforce the attractive and varied qualities of the areas built environment in order to create a positive image and identity.
- To provide a satisfactory living environment both for the occupants, users and the local neighbourhood.
- To ensure any new proposed tall building would be of a high standard of design and of architectural excellence, ensuring that it is sympathetically integrated within the local and city context, and respects principal views across the city and adjoining boroughs.
- To ensure any proposed new tall building satisfies sustainable development objectives (as expressed through sustainability appraisal).
- To ensure that any proposed new tall building would preserve and enhance the character and appearance of Conservation Areas, and other areas such as Wormwood Scrubs, and listed buildings of special interest and character.

End.