

The implications for North Hammersmith of adoption of the OPDC Local Plan

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OPDC's 2050+ modelling of development at Old Oak (not shown in the adopted Local Plan)

On June 22nd the first Local Plan for Old Oak and Park Royal limped across the finishing line and was adopted by the Board of the OPDC. Preparation of this Local Plan started back in 2015, when the Mayoral Development Corporation took over planning powers for the northern part of Hammersmith, the eastern part of Ealing, and a slice of Brent around Willesden Junction.

Boris Johnson as Mayor of London [set out in 2015](#) a characteristically ambitious 'vision' for the OPDC area, describing the area as '*poised to become London's next major centre*' which would ensure that that London '*continues to consolidate and strengthen its position as the globe's leading business centre*'. The first OPDC Local Plan was timetabled to be in place by Spring 2017.

Hammersmith and Fulham Council left a blank patch for north Hammersmith in its own 2018 Local Plan, assuming that OPDC policies and site allocations would shortly be adopted. This assumption proved to be false. Adoption of the OPDC Local Plan has run five years behind schedule. Council Leader Steve Cowan was the one member of the OPDC Board to abstain on the vote at the June Board meeting to adopt the Local Plan. He explained that the end product has fallen short of LBHF expectations.

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A member contribution published by The Hammersmith Society

Back in 2015 local community groups across the three Boroughs had high hopes for the output of the new Development Corporation. The public were promised urban regeneration of exemplary quality. OPDC members and officers went on visits to European cities to see examples to follow.

A network of community organisations across the three boroughs was formed (the Grand Union Alliance) to bring together resident expertise and influence. An Old Oak Neighbourhood Forum was formed, combining a handful of local residents associations. OPDC published a [‘Community Charter’](#) promising a Community Champion Working Group *to shape the development of planning policy*.

By 2016 and the outcome of a first round of consultation on a Draft Local Plan, there remained some level of consensus between OPDC and the existing communities at Old Oak and in north Hammersmith. Cargiant Ltd had published several iterations of its masterplan for ‘Old Oak Park’. Each version showed a willingness to listen to local views and to moderate the housing numbers and densities proposed. But it became clear that OPDC was sticking rigidly to ‘indicative’ London Plan targets of 25,000 new homes and 60,000 new jobs for the OPDC area

A year later the much missed Tom Ryland submitted representations from the Hammersmith Society, saying *We are disappointed that despite a Mayoral Review of the project in June 2017, these targets have not been properly reassessed. We do not consider there is an adequate evidence base to support these target figures. Accordingly we consider that the Plan as drafted is unsound.*

A second Regulation 19 Draft Plan followed the first, as OPDC attempted to make progress towards adoption. Doubts about the HS2 project were settled when Government gave a definite go-ahead to this project (the cost benefits of which continue to be questioned).

It was at this juncture, in autumn 2018 when OPDC made a decision that may prove over time to have been highly damaging for this ‘new part of London’. The Board submitted for examination an updated version of its Draft Local Plan, a week after Cargiant Ltd had withdrawn its support for the first major phase of planned housebuilding at ‘Old Oak Park’. The company had decided that it had lost the opportunity to transfer its 45 acre business to a new location, and wished to stay at its landholding at Hythe Road.

This decision, and the consequences for a conditional award of £250m of Housing Infrastructure Funding, did not emerge at the time. The Examination in Public of the Draft Local Plan proceeded, with hearings in early 2019. A crucial hearing in July led to an impasse between OPDC and Cargiant over possible compulsory purchase of the Cargiant sites. The Inspector then issued ‘interim findings’ concluding that OPDC’s masterplan for ‘Old Oak North’ was unviable. The Cargiant land, as potential sites for housing and mixed use development, was removed from the Draft Plan.

OPDC chose to double down on sticking with its Draft Plan and finding alternative sites to meet its 25,000 housing target, rather than to start again. It is not clear if the Mayor of London was ever asked to accept reduced housing targets. The Corporation announced a ‘*shift of focus*’ to sites in what it called the ‘Western Lands’ in East Acton and around the site of the planned rail interchange at Old Oak Common Station.

Since that decision, relationships between OPDC and the Old Oak Neighbourhood Forum/Grand Union Alliance have become increasingly adversarial. In 2021 OPDC undertook a final consultation

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on ‘modifications’ to its 2018 Submission Version of the Plan. Many local people see the resultant changes as a substantially different local plan from that submitted to the Secretary of State in 2018.

Two originally promised new Overground stations, connecting to the HS2 and the Elizabeth Line at Old Oak Common Station, dropped off a long list of necessary infrastructure proposals. Plans for an east west road joining Old Oak Common Lane to Scrubs Lane fell by the wayside. There are now no firm plans for vehicular access to the new station at the eastern end of a 1km long and £1.6bn rail interchange (at Wood Lane/Scrubs Lane).

Dave Hill’s *On London* blog carries [a good article](#) on this stage of events at Old Oak.

The oft repeated claim of Old Oak as the ‘*best connected location in the UK*’ is now questionable, as compared with (say) Kings Cross/Euston/St Pancras. The ‘catalyst’ effect of the new station remains much promoted by OPDC, and by housing developers who talk of a station ‘*on your doorstep*’ and ‘*coming soon*’. In reality, it is other parts of Ealing which are already benefitting from access to new Elizabeth Line stations.

Old Oak Common Station is scheduled by the National Infrastructure Commission to be operational at some point between 2029-33. OPDC still like to cling to a date of ‘*after 2028*’. OPDC’s Chair Liz Peace uses the language of ‘*In just a few years’ time*’ in her foreword to the OPDC Local Plan.

The main impacts on Hammersmith of OPDC decisions to date have been threefold:

- HS2 construction at the station site, with HS2 taking temporary possession of parts of Wormwood Scrubs to install necessary infrastructure and a decade of noise and pollution for those living at the borough boundary in East Acton.
- The series of developments already granted planning consent by OPDC. The first of these at ‘Oaklands Rise’ is now largely occupied, with incoming residents unhappy at the lack of nearby shops and facilities. Further developments along Scrubs Lane are also ‘car-free’ and built at very high densities, leaving future residents isolated and reliant on bus routes at significant risk of TfL budget reductions.
- The set of extreme tall towers at the ‘North Acton Cluster’. The 55 storey *One West Point* is due to be followed by three further residential towers of 50 storeys and above, within the [development by Imperial College](#) and their partner Frame Re. This planning application has been awaiting an OPDC decision since December 2021. LBHF objected on townscape and heritage grounds back in November 2021, seemingly to no avail.

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CGI image of the North Acton Cluster assuming Imperial's development at One Portal Way is built

Unsurprisingly, the fact that OPDC began granting planning consents for tall buildings, several years before their local plan was adopted, has prompted multiple objections from existing communities. The December 2019 intervention on the London Plan by former Secretary of State Robert Jenrick provided a moment of hope. The Old Oak Neighbourhood Forum assumed that a final OPDC Local Plan would need at least to be honest and upfront about 'suitable locations' and 'appropriate heights' of the tall buildings that were being planned for – in order to achieve conformity with 2021 London Policy D9 on Tall Buildings.

But OPDC has wriggled out of this policy requirement. In the final weeks of the Examination of the Draft Local Plan, the Inspector agreed to hold a further evidence session on Tall Buildings. During the session he asked OPDC to come up with extra modifications on 'appropriate heights' in different 'Places' and locations within the overall area.

OPDC's [response](#) was minimal, but enough for the Inspector to conclude that OPDC's Draft Local Plan would be 'sound' with the inclusion of 464 'major modifications' to text and maps. The adopted and published version will still leave local people struggling to find maps or diagrams of their immediate area which will tell them what to expect in terms of building heights on allocated sites. Plenty of other information is provided, but not this key piece of information.

Robert Jenrick's policy aim in modifying London Plan Policy D9 was clear – to ensure that *Any such locations and appropriate tall building heights should be identified on maps in Development Plans* and that *Tall buildings should only be developed in locations that are identified as suitable in Development Plans*. This aim has been undermined as far as the OPDC Local Plan is concerned. This will not be forgotten in objections from local residents to the spate of tall building proposals that are coming over the horizon in the OPDC area.

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As a final irony, the OPDC Board at the June 22nd meeting when it voted to adopt the Local Plan were treated to a slide presentation showing 3D images of forecast tall buildings in different locations across the OPDC area. This modelling was based on the site allocations and ‘development capacities’ embedded in a suite of local plan documents.

This was the first time that most of these images had been shown in public. It appears that OPDC officers felt that this last-minute exercise would bolster the Corporation’s defences against any legal challenge which might question why last-minute modifications on building heights were never consulted on, or even discussed by the OPDC’s Planning Committee, in the lead up to adoption.

It remains to be seen to what extent an adopted OPDC Local Plan will encourage developers to come forward at a faster pace than over the past seven years. The plan remains a poor and incoherent outcome, in the eyes of many local residents. Hammersmith & Fulham Council thinks it could have come up with something better, exploiting the successes of its Industrial Strategy in bringing global tech and bio-science businesses to this part of London. Much still depends on whether Government views funding for new infrastructure at Old Oak as a priority within its Levelling Up programme.

The 2021 Census figures show only a 0.4% rise in the population of LBHF over the past decade, and 9.6% drop in Kensington and Chelsea. This repeats a pattern of declining populations in Inner west London in the 1980s and early 1990s.

Simplistic assumptions that high-density high-rise new housing is the only possible way forward for this part of London need some challenge. OPDC’s Local Plan now acknowledges a housing target of under 20,000 new units in the ‘plan period’ from 2018-38. Yet the ‘25,000 new homes’ figure continues to be publicised as an inevitable and appropriate longer-term goal, with no sign of any willingness to look at how other European cities are plan-making for a better and more liveable future.

Many of those local activists who have spent much time on these planning battles will not be around in 2038 and certainly not in 2050. Despite the 2015 promises of ‘exemplary regeneration’ the developments at Old Oak are proving to be ‘more of the same’ high-density high-rise as has been scattered across many parts of London in recent decades.

One of London’s last large brownfield areas deserved better.

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