

# Old Oak and Park Royal revised draft Local Plan

**ACE consultation response**

**11 September 2017**

## Response structure

ACE has provided comments on the following chapters of the Old Oak and Park Royal revised draft Local Plan (the plan):

- Spatial Vision (Chapter 2)
- Strategic Policies (Chapter 3)
- Design (Chapter 5)
- Transport (Chapter 7)
- Housing (Chapter 8)

In addition to our comments, we have also provided a response on the soundness of policies against criteria provided by the Old Oak and Park Royal Development Corporation ('positively prepared', 'justified', 'effective' and 'consistent with national policy').

We are not in a position to provide comments on the legal compliance or if the plan was prepared in accordance with Duty to Cooperate.

## Summary

The plan provides a comprehensive and exciting vision for the future of the area. ACE agrees that the development provides a once in a lifetime regeneration opportunity to take full advantage of current and future transport connections in the area.

ACE notes the plan is consistent with the broader objectives of the Greater London Authority, such as those presented in the current London Mayor's Transport Strategy.

On the whole, we believe the strategic policies of the plan provide a realistic set of principles on how the Old Oak and Park Royal Development Corporation (OPDC) will achieve the plan's vision for the area in 20 years' time. ACE is particularly supportive of the aspirations for Old Oak and Park Royal to have well-designed and innovative developments. We also support OPDC's desire to assess development proposals through a 'place making' lens.

We support the design policies in the plan and believe these will be critical for ensuring the area is positively developed. OPDC have appropriately encouraged developments to embrace the area's history, whilst ensuring developments allow these historic sites to be enjoyed by a new generation.

The plan's transport policies rightly point out how Old Oak will become one of the most connected areas in the United Kingdom. These transport links, from across London and the UK, are critical to the area's success. We believe the developments provide a unique opportunity for Old Oak Common to become a major catalyst for connecting London to Birmingham as a major development interchange centre. To this end, we see a strong case for a fundamental redesign of the interchange at Old Oak Common between High Speed 2 and Crossrail to create a major hub with future potential for connecting High Speed 1 to the junction.

ACE is also supportive of the 'healthy streets' approach in the plan's transport policies and believe this outlook will help ensure the communities thrive. Focusing transport policies on people, such as the promotion of walking and cycling infrastructure, will encourage a more active, engaging and sustainable lifestyle in the area.

The housing policies in the plan offer a positive aspiration for the delivery of 22,350 new homes over the plan's 20-year period. ACE supports this aspiration and believes there may be potential for OPDC to build further on these numbers to deliver more housing that London desperately needs. We support OPDC to deliver a mix of housing, such as affordable and family homes, and support OPDC's commitment to investigate further if these targets are achievable when full infrastructure requirements and the financial viability of developments are known.

ACE believes the plan is positively prepared and we look forward to following its progress in the next stages.

## Spatial Vision

The spatial vision offers an exciting prospect for what Old Oak, Park Royal and Wormwood Scrubs will look like in twenty years' time. ACE agrees that the area has the potential to become a nationally important location by taking advantage of planned and existing transport connections in London and to the rest of the UK.

We agree that developments in the area present a unique opportunity to pioneer international excellence in sustainability and design quality. This vision has the potential to become a shining beacon on what is possible with sustainable and high-quality designs across the UK.

The challenges identified in the Spatial Vision will need to be monitored and mitigated by OPDC throughout the plan's period. These challenges emphasise the importance of getting the area's developments right up front, by ensuring proposals are well considered and designed to complement the vision of the plan.

ACE believes OPDC should encourage private sector creativity on the development to ensure early conversion of the plan's spatial vision.

ACE considers the Spatial Vision in the revised draft Local Plan to be:

Positively prepared?	✓
Justified?	✓
Effective?	✓
Consistent with national policy?	✓

## Strategic Policies

Comments on the key strategic policies of interest to ACE members are under the sub-headings below.

### Strategic Policy 1: Catalyst for Growth

We agree that developments in the area, particularly the delivery of a new strategic transport hub and interchange at Old Oak Common, will be positive and have a knock-on effect for the wider West London sub-region.

OPDC have appropriately identified a number of opportunity areas in the region from developments, such as White City and Wembley. It will be important for OPDC to remain cognisant of these other opportunity areas during the plan's period to ensure developments are successfully integrated into the wider community, and impacts on other areas are positive.

ACE considers Strategic Policy 1 (Catalyst for Growth) to be:

Positively prepared?	✓
Justified?	✓
Effective?	✓
Consistent with national policy?	✓

### Strategic Policy 2: Good Growth

We believe OPDC's 'Good Growth' policy is well considered and positive. We are pleased to see the plan promote the concept of place making and to make the connection between good quality and well-designed developments and pride in a community.

ACE notes that community engagement is an important component of successful place making. We therefore support OPDC's commitment to develop and regularly update a Statement of Community Involvement throughout the plan's period.

Smart infrastructure will be critical for the area's success and to meet the objectives of a forward-looking innovative community. We support OPDC's development of a Smart Strategy and believe it's successful implementation is instrumental for achieving good growth in the area.

ACE considers Strategic Policy 2 (Good Growth) to be:

Positively prepared?	✓
Justified?	✓
Effective?	✓
Consistent with national policy?	✓

#### Strategic Policy 4: Thriving Community

The target of a minimum of 22,350 additional homes between 2018-38 and a 50% affordable housing target is positive, however we believe OPDC could aim for more housing in the area. Further information could also be provided on how OPDC will strategically influence and encourage proposals to meet these targets.

ACE also agrees that social infrastructure plays an important role in thriving communities. We are therefore pleased with OPDC's commitment to work with developers and service providers to ensure new and improved facilities meet the needs arising from future developments in the area.

ACE is very focused on how consulting engineers can contribute to place making, and how the built environment can help communities thrive. ACE has recently commenced work seeking to establish an All-Party Parliamentary Group on Building Community, and would be very interested in engaging further with OPDC on this topic.

ACE considers Strategic Policy 4 (Thriving Community) to be:

Positively prepared?	✓
Justified?	✓
Effective?	Unsure
Consistent with national policy?	✓

#### Strategic Policy 6: Places and Destinations

ACE agrees that the relatively small size of the area (650 hectares) does highlight the importance of having well planned places and clusters. We therefore support the approach that OPDC have taken with a town centre hierarchy.

ACE is excited by OPDC's ambitions for the proposed Old Oak High Street and agrees that it has the potential to become a significant destination in London. The success of the high street will also be critical for other developments in the area. High quality designs that focus on the 'healthy streets' approach will help ensure the proposed Old Oak High Street is a success.

ACE believes the purpose of a place and destination is critical to its long-term success. An area needs a driver and core activities to be a successful, as this creates a pull factor for the location. For example, the focus on the finance industry in Canary Wharf and the legacy of the 2012 Olympics in Stratford have been critical to their ongoing success. ACE believes the proposed Old Oak High Street could follow a similar path, for example through a focus on high-tech innovation or modern manufacturing.

We believe Strategic Policy 6 (Places and Destinations) meets the following criteria:

Positively prepared?	✓
Justified?	✓
Effective?	✓
Consistent with national policy?	✓

### Strategic Policy 9: Built Environment

ACE agrees with OPDC's view that the built environment is an important determinant in how well a society integrates. Developments that are high quality designs and fit for purpose can improve quality of life, increase productivity and enhance health and well-being. Old Oak and Park Royal provide a unique opportunity to embrace this outlook on a large scale and optimise benefits from regeneration and growth in the area.

We also support OPDC's approach for high density development and tall buildings. ACE believes it is logical to take advantage of excellent transport connections by delivering high density developments and tall buildings in the locations identified in this plan. However, as noted in GLA's 'healthy streets' approach, people need to be at the heart of the built environment and any development decision, such as a high density or tall building proposal.

ACE considers Strategic Policy 9 (Built Environment) to be:

Positively prepared?	✓
Justified?	✓
Effective?	✓
Consistent with national policy?	✓

## Design

ACE believes the nine design policies in the plan are well balanced and provide an effective framework of principles to ensure developments are positively designed.

We are pleased to see OPDC's focus on the quality and functional designs, particularly to ensure developments are accessible for all users and provide an appropriate standard of amenity.

ACE supports the approach to conserve and enhance the historic environment by ensuring successful proposals positively respond to and promote the significance of heritage in the area. OPDC have usefully provided practical examples on 'precedent developments' for particular policies throughout the plan. We agree that the German Gymnasium in Kings Cross is a good precedent development for conserving and enhancing heritage assets in the area.

Lastly, we agree with OPDC's design policies on the 'key views' of the area and how tall buildings have the potential to positively shape the skyline. An attractive skyline for Old Oak will make it a noteworthy destination, similar to Canary Wharf.

ACE considers the nine design policies in the plan to be:

Positively prepared?	✓
Justified?	✓
Effective?	✓
Consistent with national policy?	✓



## Transport

We agree that current and planned transport connections are the catalyst for the comprehensive regeneration of Old Oak and for strengthening and intensifying Park Royal. They make the proposed developments feasible.

ACE is a strong supporter of the use of the 'healthy streets' approach in the transport policies which we believe is critical for creating vibrant communities. To this end, we support the requirement for development applicants to use the Healthy Street Guidance to inform the design of streets.

The focus on walking infrastructure is positive. Investments in walking infrastructure will encourage people to use this more sustainable mode of transport when travelling short distances. We also support OPDC's commitment to support proposals that contribute 'Legible London' wayfinder signs to the network as this is a simple solution to make streets friendlier for pedestrians.

ACE supports OPDC's cycling policy, particularly the delivery of a comprehensive cycle network connecting cyclists to other transport infrastructure. As noted in the plan, the vast majority of current workers in Park Royal live within cycling distance yet only 3% chose to commute by bike. We agree that more well-designed cycle routes will help increase this number.

ACE is particularly interested in the plan's rail policy. Rail connections to other places in London and across the UK are critical for the area's success. The developments provide a unique opportunity for Old Oak Common to become a major catalyst for connecting London to Birmingham as a major development interchange centre. We believe Old Oak Common should be viewed as a single transport corridor, connecting London to the Midland's Engine and beyond to the Northern Powerhouse. We therefore see a strong case for a fundamental redesign of the interchange at Old Oak Common between High Speed 2 and Crossrail to create a major hub with future potential for connecting High Speed 1 to the junction.

By becoming one of the most connected places in the UK, we support OPDC's desire to ensure Old Oak Common Railway Station is a world class facility and we believe this should be reflected in its design. We note that Rotterdam Central Station was flagged as a 'precedent development' for Old Oak Common Railway Station and we believe a similar ambitious design could be showpiece for the British industry.

Lastly, OPDC's transport policy on construction vehicles during redevelopments and requiring proposals to demonstrate how they will reduce construction trips is prudent, however some level of disruption during the construction phase will need to be accepted. We are also interested in OPDC's suggestion that developers could maximise the use of water infrastructure during construction, particularly the Grand Union Canal, and believe this could be a precedent for increasing the use of our canal network for freight.

ACE considers the nine transport policies to be:

Positively prepared?	✓
Justified?	✓
Effective?	✓
Consistent with national policy?	✓

## Housing

The ten housing policies support OPDC's aspiration for the delivery of a minimum of 22,350 new homes over the plan's 20-year period, and ensure the housing supply caters to a wide mix of needs. As the area will be one of the most connected areas in the UK, we believe there is potential for more than 1000 houses to be developed each year in the area to deliver a greater proportion of the 99,000 homes required in the three local boroughs.

We support OPDC's efforts in ensuring the housing supply will be mixed. The 50% affordable housing target, if viable for residential developments, will provide opportunities for some Londoners struggling to get in the housing market. OPDC will need to monitor if this target is achievable when full infrastructure requirements and the financial viability of individual developments are known.

We support OPDC's efforts in ensuring existing housing is not lost unless it is located within a Strategic Industrial Location, would result in new housing at an equivalent or higher density or it critical to unlock regeneration of the area. This policy will ensure that any changes to the existing housing stock will only occur if it adds a benefit to the overall community.

ACE considers the ten housing policies to be:

Positively prepared?	✓
Justified?	✓
Effective?	Unsure
Consistent with national policy?	✓

## About ACE

As the leading business association in the sector, ACE represents the interests of professional consultancy and engineering companies large and small in the UK. Many of our member companies have gained international recognition and acclaim and employ over 250,000 staff worldwide.

ACE members are at the heart of delivering, maintaining and upgrading our buildings, structures and infrastructure. They provide specialist services to a diverse range of sectors including water, transportation, housing and energy.

The ACE membership acts as the bridge between consultants, engineers and the wider construction sector who make an estimated contribution of £15bn to the nation's economy with the wider construction market contributing a further £90bn.

ACE's powerful representation and lobbying to government, major clients, the media and other key stakeholders, enables it to promote the critical contribution that engineers and consultants make to the nation's developing infrastructure.

Through our publications, market intelligence, events and networking, business guidance and personal contact, we provide a cohesive approach and direction for our members and the wider industry. In recognising the dynamics of our industry, we support and encourage our members in all aspects of their business, helping them to optimise performance and embrace opportunity.

Our fundamental purposes are to promote the worth of our industry and to give voice to our members. We do so with passion and vision, support and commitment, integrity and professionalism.

## Further information

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