

# Old Oak and Park Royal Local Plan examination

## Agenda Session 4: density, intensity, heights and targets

**Participants:** Inspector, Corporation, Grand Union Alliance, St Quintin and Woodlands Neighbourhood Forum, West Acton Residents Association, DB9 (Old Oak park Ltd), HGH (QPR FC)

### Summary of issues

- 1 Whether the nexus between density/intensity, height and housing targets is justified in the light of uncertain delivery of transport infrastructure (derived from the fourth, fifth, seventh and ninth Key Issues of table 5 of Key document 5 identified at Regulation 19(1) stage and the sixth Key Issue of table 7 of Key document 5 identified at Regulation 19(2) stage and representations 2/G/34 from Grand Union Alliance, 2/SP4/6 and 2/SP2/9 from individual objectors referencing the joint Cambridge/Berkeley University students report, 2/SP2/10 and 2/SP4/1 from LBH&F and 2/SP4/13 from Midland Terrace RA amongst others. This was also an issue with several organisations at Regulation 18 stage.
- 2 The following text summarises points made at both Representation 19(1) and 19(2) stages.

#### (a) Densities

- 3 There is a mismatch between quantity and quality, between the ambitions for good growth and the densities being proposed.
- 4 The densities proposed in the Local Plan exceed established guidelines. The Plan is therefore unsound. ArtWest support vision, but densities should not necessarily be high density. Densities are too high and exceed London Plan targets. Development capacity, phasing and densities. Densities are above the existing London Plan density matrix, should be reduced and won't deliver a high-quality environment. Densities have increased during the development of the Local Plan. The indicative densities are buried in the DCS and are not clearly set out in the Local Plan. Proposed densities for each site should be published for consultation based on development capacity of site allocations. Debates at OPDC Planning Committee and OPDC Board have not considered density as an issue. Objections provided as the Local Plan introduces densities above existing London Plan guidance and greater than previous drafts of the Local Plan. Increasing densities has been consistent through the development of the Local Plan. Density levels are not clearly stated in the plan outside of the glossary which does not accord with the NPPF requirements for clarity.

- 5 A review of the Regulation 19(1) Local Plan by Cambridge and Berkeley universities and University of Texas demonstrates average densities of 550u/ha and suggests implications for these densities should be made clearer and a reduction in development. Delivering building typologies and sustainable communities at these densities has not been tested and is opposed by local people. Examination provides last opportunity for this issue to be raised.
- 6 Planning Inspector Mr A Thickett on the 2014 FALP EiP noted that it cannot be assumed that it will be appropriate to increase densities over the existing Density Matrix guidelines in all cases.... Opportunity Areas and large sites have the potential to determine their own character and identity but they should still have regard to their surroundings. Meeting the pressing need for housing in London will require new, innovative and possibly unpopular solutions but care must be taken not to damage its environment such that it becomes an unpleasant place to visit, live and work.

#### **(b) Heights**

- 7 Building heights: Insufficient justification for tall buildings. Demonstration that this will deliver lifetime neighbourhoods has not been provided. The Plan does not provide enough clarity on future building heights, locations of tall buildings or definitions of tall buildings. Without this, the plan lacks transparency and therefore does not accord with the NPPF. A map of tall building locations should be provided. Indicative building heights of 40 storeys + are not justified. Heights should be under 20 storeys and densities below 350 units per hectare. Density information in DCS is not reflected in the Local Plan. This does not conform with London Plan policy 7.7 or NPPF para 58 and 59.
- 8 Need to set out the evidence lies behind the simplistic assertion that 'through high density, transit-oriented development the greatest sustainability benefits can be realised'. While the present London Plan reflects a policy of building at higher densities near public transport nodes, the concept that Londoners either wish or need to live in extreme 'super-densities' in tall buildings around railway stations has not gone unchallenged in recent years.

#### **(c) targets**

- 9 The housing targets should be reduced to be consistent with the 'central' classification in the London Plan or the plan should be found unsound.
- 10 HS2 Station capacity: Development capacity proposed on the HS2 station and surrounds is not justified. This level of development

would not be supported by enabling works currently proposed by HS2. Suggest that policies are drafted more flexibly to allow for a range of development scenarios.

- 11 Old Oak North Densities: Without a commitment to the delivery of Hythe Road Station, the densities in Old Oak North are unjustified resulting in the policy being ineffective. Without a commitment about the delivery of the Hythe Road station, the densities in Scrubs Lane are unjustified and ineffective. Delivery of Hythe Road London Overground Station is not confirmed. Therefore, the increase in PTAL generated by the station cannot be used to justify high densities (and resultant building heights) in Old Oak North.
- 12 Proposals for the 'heart' of a new Old Oak (a high-density commercial development around the HS2/Queen Elizabeth Line station) no longer feature in the document and have been pushed back beyond the 2018-38 plan period. On the other hand, a housing target dating from the 2015 OAPF and included in a brief annex to the 2015 Further Alterations to the London Plan has continued to be treated as sacrosanct. There is concern that the reduced number of homes on the Old Oak Park development will be directed to other sites by OPDC to achieve its housing target.
- 13 Site allocations should identify the scale and density to accord with NPPG paragraph 010. This lack of transparency on density and building heights renders the Local Plan unsound.
- 14 Changes in development capacity aren't justified. Updates to development phasing have not considered impact on viability of delivering infrastructure.

### **The Corporation's response**

**(This is summarised from the Corporations responses to representations made at both Regulation 19(1) and 19 (20 stages)**

#### **(a) densities**

To deliver the development targets set out in the London Plan development within Old Oak and Park Royal will need to be high density. London Plan and Local Plan policies provide guidance to ensure high density development is high quality.

OPDC considers that the densities proposed are consistent with the principles of good growth. The Local Plan shows that the future public transport access will create a highly accessible part of London. OPDC considers it appropriate and both consistent with the NPPF and in general conformity with the London Plan to promote high density development in this location.

It is a well understood planning principle that high density development should be delivered in the areas of high public transport access. This helps to reduce journeys by less sustainable transport modes and reduces the need for urban sprawl. There is a need to ensure appropriate quality to this form of development, which the Local Plan policies have sought to achieve. However, the text has been amended to 'some of' to note that there may be some strands of sustainability may not realise the greatest benefits through transit orientated development.

In the light of the future excellent national, regional and local public transport links to be provided in the area, Old Oak is considered suitable for high density development and Park Royal is considered suitable for protected and intensified industrial uses. This approach is supported by policies set out in the London Plan and reflected in the designation of two Opportunity Areas with a combined target for a minimum of 25,500 new homes and 65,000 new jobs.

Opportunity Areas are London's main reservoirs for growth. As such, the current London Plan 2016 (Policy 2.13) and the Draft New London Plan (Policy SD1) supports development in these areas that potentially exceeds defined targets, by optimising development densities. The Mayor of London's Housing SPG (2016) paragraphs 7.5.7 and 7.5.8 state that targets should be considered as a minimum, to be exceeded and accelerated where possible and that densities in Opportunity Areas may exceed the relevant density ranges in the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2).

The Draft New London Plan 2017 removes the density matrix and instead requires a broader approach that optimises densities. The density range set out in the Local Plan remains unchanged from the Regulation 18 draft Local Plan.

The Mayor of London's Housing SPG (2016) states that targets should be considered as a minimum, to be exceeded and accelerated where possible and that densities in Opportunity Areas may exceed the relevant density ranges in the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2). Policy SP9 in this Local Plan requires development to respond to local character and context but to reflect local context only and not the evolving context would be inappropriate, especially given the area's identification as opportunity area and potential as set out in the London Plan, for the area to deliver high densities.

Paragraph 10 of the NPPF (2012) requires that "Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas." The average density has been provided in policy SP9 supporting text. The density ranges are set out in the glossary based on information provided in the Development Capacity Study. Providing densities for each site allocation is not considered to be required to fulfil the role of a Local Plan as a strategic planning document. OPDC considers policies SP9 and D5 are consistent with the requirements of NPPF regarding clarity of Local Plans. Density ranges are defined within the DCS to define the

development capacity of the OPDC area in accordance with national guidance. Policies SP9 and D5 provide guidance for the location of sensitive areas where densities and buildings should provide an appropriate response. Further wording has been inserted into the supporting text of SP9 to clarify the average densities expected in the OPDC area based on DCS outputs to achieve homes and jobs targets.

The student reviews are noted and reflect the average density of 600 units per hectare for Old Oak North set out in the Old Oak North Development Framework Principles. The Local Plan provides series of policies to ensure that high density typologies, required to optimise development capacity to meet targets, are of the highest design quality to support sustainable communities and appropriately address issues such as, inter alia, context and townscape (SP9), access, inclusivity and Healthy Streets (D2), amenity (D6), provision of 30% publicly accessible open space (EU1), air quality (EU4), high quality social infrastructure provision (TCC4) and noise and vibration (EU5). These policies will be supplemented by forthcoming supplementary planning documents.

The Spatial Vision and the Going Local Narratives set out aspirations to benefit local people's quality of life and ensure development complements surrounding neighbourhoods. These aspirations are embedded in the policies of the Local Plan. Particularly, Policy SP2 provides guidance to deliver Good Growth and sustainable development, Policy SP3 provides guidance to improve health and reduce health inequalities, Policies SP4 and SP5 provide guidance for the delivery and distribution of a wide range of homes and jobs, Policy SP6 provides guidance to celebrate local context, Policy SP7 provides guidance to ensure new streets and routes connect to existing neighbourhoods, Policy SP9 provides guidance to ensure development is high density, high quality and positively responds to local context, character and heritage. In addition to the strategic policies, policies D6, EU4 and EU4 provide guidance to deliver an appropriate standard of amenity.

In parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG and in the Old Oak and Park Royal OAPF. The Draft New London Plan does not include a density matrix as it has been recognised by the Mayor that it did not appropriately recognise local context. The draft London Plan policy D6 recognises that appropriate densities should be determined through consideration of the site context, access to public transport accessibility and the capacity of surrounding infrastructure.

### **(b) Tall buildings**

Policies D5 and SP9 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas.

High quality tall buildings and high-density development at appropriate locations will be a component element of the built character and environment of the OPDC area and will be supported where they accord with the relevant development plan policies. OPDC's Tall Building Statement provides information supporting this approach. Policy D5 sets out guidance for delivering high quality tall buildings with SP9 and place policies providing guidance for their locations. OPDC's Development Capacity Study sets out the methodology undertaken to define the development capacity of the OPDC area based on Local Plan supporting studies and development scheme precedents that meets London Plan homes and jobs targets.

An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8(B) as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings, but within Old Oak North and Old Oak South there is a need for flexibility in the approach to achieving homes and jobs targets that will enable a response to site specific circumstances and the longer-term development trajectory.

### **(c) Targets**

OPDC's Development Capacity Study has been developed in accordance with the National Planning Practice Guidance on Housing and Economic Land Availability Assessments to demonstrate how the London plan targets can be delivered. The Development Capacity Study includes development capacity information set out in the Old Oak North Development Framework Principles, Park Royal Development Framework Principles, the Industrial Land Review, Future Employment Growth Sectors Study, Scrubs Lane Development Framework Principles document and the Victoria Road and Old Oak Lane Framework Principles document.

Explanations for the changes in development capacity are set out in OPDC's Development Capacity Study in accordance with the National Planning Proactive Guidance for Housing and Economic Land Availability Assessments. A summary of these changes was provided within the Development Capacity Study and Summary of Supporting Studies document.

Updates in phasing of development have been used to inform OPDC's Infrastructure Delivery Plan. OPDC consider the viability work completed to date by OPDC is to the level of detail appropriate to inform policy work and in accordance with the requirements in National Planning Policy Guidance. The Local Plan is supported by a Whole Plan Viability Study and Affordable Housing Viability Assessment which assesses the deliverability of its policy requirements including infrastructure. OPDC's Infrastructure Delivery Plan supporting study sets out the infrastructure required to meet the needs of development and potential funding sources for each.

The capacity for the HS2 triangle site has been revised following further development capacity work to align with the proposed HS2 enabling works.

Development capacities and densities for Old Oak North are informed by a range of elements including existing and planned transport capacity. This includes improvements to existing stations and proposed new stations such as Old Oak Common Station and Hythe Road Station. The Public Transport Accessibility Levels generated by Old Oak Common Station, improvements to Willesden Junction Station and existing/planned bus routes supports the development capacity identified for Old Oak North without solely relying on improved public transport access generated by Hythe Road Station. The policy supports the delivery of the highest public transport levels to support the density of development.

Should Hythe Road Station not be delivered, high density development would be appropriate based on public transport accessibility improvements offered by Old Oak Common Station, improvements to Willesden Junction Station and bus services along Scrubs Lane. Relevant policies support enhancements to public transport accessibility levels.

The development capacity of sites within the Old Oak Park area is defined using the methodology set out in OPDC's Development Capacity Study which is defined in the National Planning Practice Guidance. This considers relevant existing development scheme precedents to inform density levels and therefore capacity. As such, the capacity for sites in the Old Oak Park area within OPDC's DCS and Local Plan are not reliant on capacity shown in the emerging Old Oak Park proposals.

The Elizabeth Depot site is expected to continue to be delivered but after the Local Plan period (2038). Development of the sites adjacent to the Old Oak Common Station continue to be included in the plan period. The published Further Alterations to the London Plan (FALP) (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. This target is for the total development beyond which includes phases after the plan period. This target continues to be included in the current and Draft New London Plan. To demonstrate how these targets will be met and ensure general conformity with the London Plan, OPDC's Development Capacity Study has been developed in accordance with the National Planning Practice Guidance on Housing and Economic Land Availability Assessments. The Development Capacity Study includes development capacity information set out in the Old Oak North Development Framework Principles, Park Royal Development Framework Principles, the Industrial Land Review, Future Employment Growth Sectors Study, Scrubs Lane Development Framework Principles document and the Victoria Road and Old Oak Lane Framework Principles document. OPDC's plan period overall target is for 20,100 new homes.

### **Matters for discussion**

- 1)** Does the evidence indicate that the densities envisaged in the Local Plan can be justified?
- 2)** Does the evidence demonstrate that the identified capacity can be supported by the infrastructure envisaged?
- 3)** Does the evidence demonstrate that the locations identified for tall buildings can be justified?
- 4)** Is the quantity and location of development proposed sufficiently linked to the provision of infrastructure to justify the quantity of development intended?

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Inspector

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