

Local Plan Independent Examination

OPDC Response to Matter and Issue 2(c)

Matter 2(c): Whether the Plan has been positively prepared) in terms of the need for facilities for sport, leisure and open space (derived from the fourteenth, twentieth and thirty-fifth Key Issues of table 5 of Key document 5 identified at Regulation 19(1) stage and the eleventh Key Issue of table 7 of Key document 5 identified at Regulation 19(2) stage and representations 2/G/12 by Sport England, Old Oak Park Ltd and Grand Union Alliance amongst others)

Although I am content with the officers' response to these Key Issues set out in Appendices E, I and J to Key document 5, a Hearing session will be required if respondents exercise their right to be heard.

OPDC response:

Sports and leisure

- 1.1. OPDC considers that the Local Plan has been positively prepared with respect to need for sports and leisure and is based on an appropriate needs assessment.
- 1.2. The Sports Courts and Swimming Pools Study (document SD55) was published in December 2014, and the growth projections, which the study are based upon, reflect planned growth of OPDC area which have not changed significantly since publication. Although the study was produced for the London Borough of Hammersmith and Fulham (LBHF), it considered the need of a significantly wider catchment area, including the London Boroughs of Brent and Ealing, and including the OPDC area. It should also be noted that the vast majority of new homes in the OPDC are being delivered within LBHF. As such, OPDC consider the study is an appropriate and proportionate measure for assessing the need for sports and leisure provision within the OPDC area.
- 1.3. The study has identified a need for 1 sport court per 3,200 residents, and 1sqm of swimming pool space per 90 residents (document SD55-page 56). Based on these findings, OPDC has identified the need for development to contribute to two public access sports facilities, providing 13 sports courts and two 12x25m swimming pools. While the starting point is to provide two sports centres, each with 1x25 pool, there could alternatively be one larger facility that provides a 50m pool and this could help to meet a deficiency in west London for a facility of this size.
- 1.4. Following the first Regulation 19 consultation, OPDC officers met with Sport England to discuss issues raised as part of their consultation response. In light of this, Policy TCC6 was revised in the second Regulation 19(2) Draft Local Plan to clarify the need to protect existing sports and leisure facilities and to clarify the need for playing pitches to support the needs of development.

Open space

- 1.5. OPDC considers that the approach to open space provision has been positively prepared and meets the needs of future development of the area. Evidence prepared as part of the Environmental Standard Study (document SD20-page 105) has identified that the provision of 30% publicly accessible open space in the non-SIL portion of the OPDC area is necessary to provide an appropriate level of amenity. This has been based on an assessment of open space provision for similar regeneration schemes across London, including the amount of open space per person and employee, and contextual issues regarding densities and land uses.
- 1.6. The 30% public open space requirement has been accommodated development capacities set out in the OPDC's Development Capacity Study (DCS). As such, the requirement will not impact on the Local Plan's ability to deliver the homes and jobs targets set out in the London Plan (document OSD27). A further detailed capacity assessment for Old Oak North has been carried out in the Old Oak North Development Framework Principles (OONDFP) (document SD5-page 29). An additional addendum of the OONDFP has been produced to support OPDC's responses to Matters and Issues. This is appended to OPDC's response to Matter 4. Both OONDFP documents demonstrate that 30% public open space is achievable in Old Oak North without compromising delivery of new homes and jobs, including on the Cargiant site allocation.
- 1.7. As part of the 30% open space provision, Policies SP8 and EU1 have identified the need for three new Local Parks across the Old Oak North and Old Oak South places, each of a minimum 2ha in size. This approach has been based on the recommendations set out in the London Plan (2016) policy 7.18 (document OSD27) and the emerging draft London Plan policy G4 (document OSD14 table 8.1) which require that homes should be within 400m walking distance of such spaces.
- 1.8. As set out in Policy EU1, where it is determined that the targeted level of open space provision may not be delivered on site a financial contribution will be required, which should be equivalent to the cost of delivering 4.1sqm open space per resident and 1sqm open space per employee. These figures have been based on both homes and job projections from OPDC's DCS (document SD56) against the delivery of 30% public open space outside of Strategic Industrial Location (SIL). OPDC consider that this approach reflects the high importance residents place on provision of publicly accessible open space, while also capturing the demand from commercial development.

Wormwood Scrubs

- 1.9. OPDC has determined that it would not be appropriate to include Wormwood Scrubs in addressing the public open space requirements of future development at Old Oak. Wormwood Scrubs is a Metropolitan Park serving all of west London beyond just the OPDC area. Access to the Scrubs is currently constrained, and while sensitive improvements to accessibility of the Scrubs are planned, this would not address the requirement for appropriate public open space within walking distance of residents and workers in the OPDC area. Development of Old Oak will inevitably lead to impacts on the Scrubs, and OPDC is committed to working the Wormwood Scrubs Charitable Trust in delivering sensitive enhancements to the space.

Securing access

- 1.10. It is recognised that some new public open spaces may remain in private ownership and management. As set out in Policy SP8, applicants will be required to set out

management arrangements for open space as part a Green Infrastructure and Open Space Strategy and Management Plan (GIOSSMP). OPDC consider Policy D2 provides sufficient provision for privately owned and management public open space to be temporarily closed for management and safety purposes while ensuring provision of open space is optimised across the OPDC area. This is in accordance with the Mayor's Public London Charter referred to in draft London Plan policy D7. Public access to privately owned and manged public open space can be controlled through section 106 planning obligations.

Urban Greening Factor

- 1.11. OPDC considers that the draft Local Plan is positively prepared with respect the Urban Greening Factor, as set out in Policy EU3. The benefit of a green space factor and green points system was originally highlighted in the Environmental Standard Study (document SD20-page 106), with provision for the same included within the Policy EU2 of the first Regulation 19 Draft Local Plan. Following this, OPDC worked with the GLA on the production of the Urban Greening Factor as part of the Draft New London Plan, which is supported by the Urban Greening Factor for London (document OSD38). OPDC subsequently amended Policy EU2 in the second Regulation 19 Draft Local Plan to reflect this evidence, and the proposed target scores of 0.4 for residential development and 0.3 for commercial development.
- 1.12. In light of representations received as part of the first Regulation 19 consultation, Policy EU2 was amended to clarify that the target score of 0.3 for commercial development would not be apply to industrial development in the Park Royal SIL. However, proposals will still need to submit a UGF assessment and work with OPDC to optimise their score. OPDC is also planning to develop more locally set standards, which would be contained within a future Supplementary Planning Document (SPD).