

CONSULTATION RESPONSE ON A CITY FOR ALL LONDONERS FROM THE OLD OAK INTERIM NEIGHBOURHOOD FORUM

We are a neighbourhood forum made up of residents associations, businesses, charitable bodies and individuals in and around the Old Oak part of the OPDC area.

We have been in discussions with the OPDC over the past 12 months on an application for designation of the forum, for the purpose of preparing a neighbourhood plan for the area. During this period we have been very involved in consultations and discussions with the OPDC and with developers in the area. We welcome this opportunity to comment at this early stage of preparation of a new London Plan.

Our comments relate to each chapter of the *City for all Londoners* document.

PART 1 ACCOMMODATING GROWTH

Population forecasts need rigorous analysis. We appreciate that ONS predictions forecast London's population to rise to 9.8m by 2025 but consider that a new London Plan should contemplate other scenarios, in a post Brexit area.

Figure 1 of the document shows the long period of post-war decline in London's population. The number of residents of inner London decreased by 1 million over the period 1939 to 2015, from 4.44 million in 1939 to 3.44 million people¹.

Housing targets for individual boroughs and Opportunity Areas should recognise that London's future population growth is not a certainty and that projections will need regular re-assessment in a period of likely major shocks to the UK economy, and to patterns of migration and population movement within the UK.

Intensification of development around transport nodes, coupled with protection of the Green Belt, is a direction of travel which remains unchanged from the current London Plan. The results have been appearing across London, in the form of hyper-densities and very tall buildings (such as the cluster at North Acton). Alternative options (including intensifying density and along the main arterial roads in and out of London) need to be explored and consulted on.

We strongly support the comments on housing and mixed use on page 28 of the document. The world of work is changing fast, and traditional planning policies of 'zoning' land separately for employment and residential use do not respond to the key issue for London (expressed in the document) that *the economy is changing and we must use land intelligently*.

We support the idea of swaps of Strategic Industrial Land with planning authorities on the edge of London, as opposed to a blanket protection of every hectare of land designated as SIL in the London Plan. OPDC Draft Local Plan proposals for the ODPC area involve the juxtaposition of Strategic Industrial Land at Park Royal (land to remain at low density and with nil residential development allowed) alongside a new Old Oak due to be developed at

¹ https://data.london.gov.uk/dataset/new_resource/population-change-1939-2015

residential densities significantly above current London Plan Density Matrix levels. This does not feel to us to be an intelligent use of land.

Parts of Park Royal (alongside the Grand Union Canal, and in streets of 1930s light industrial buildings) are well suited to mixed use redevelopment, attracting creative industries to refurbish and extend existing building stock and providing an area where 'living' and 'working' can co-exist, reducing demands on an already congested road and public transport network. Similar contexts are likely to exist in other Opportunity Areas where industrial land remains protected while 'industrial' uses as such have disappeared.

We support calls for an early review of the housing targets in Annexe 1 of the current London Plan, as currently set for 45 Opportunity and Intensification Areas. In many cases the evidence base for these targets appears to be thin. There is a case for a moratorium on approvals of very tall buildings in these 45 areas while such a review takes place.

London's number of traffic congestion hotspots is reportedly the highest in Europe. Page 29 of *A City for all Londoners* refers to *the growth potential of 'metroisation' – a better-quality Overground service in more parts of the city but particularly in South London*. We would argue that the Overground in West London is similarly in need of renewed focus by London Transport.

Gaps between West London Line stations involve greater distances than those that have filled in recent years by new stations on the East London Line, to very good effect. The building of two new Overground stations at Hythe Road and Old Oak Common has recently been called into question by the OPDC Review, because of rising infrastructure costs in the OPDC area as a whole. Meanwhile the major north/south routes in this area reach near gridlock on a daily basis.

PART 2 HOUSING

Page 35 of the document notes that *some 270,000 homes in London have been granted planning permission but have not yet been built*. A period of static or falling house prices in London may well see this figure increase.

We support the theme in this chapter of more direct forms of Mayoral intervention in increasing house building, on TfL land and on public land taken into ownership by the Mayoral Development Corporation at Old Oak. These areas offer potential opportunities for new forms of self-build and custom-build housing.

We welcome the new Draft SPD on *Affordable Housing and Viability*, and greater transparency and openness in the assessment of viability of developments at planning application stage.

The *City for all Londoners* document refers to new forms of good quality private rented development, and it is clear that the PRS part of the London housing market has been growing fast. We ask for more focus in a new London Plan on policies which support PRS development for older people, working with the more specialist housing associations, including forms of supported and extra care housing. .

PART 3 ECONOMY

As acknowledged on Page 35 of the document, the impact of Brexit will be an enormous test of the resilience of London's economy.

As a new Draft London Plan progresses through the remaining stages of consultation, we suggest that the current upbeat and ambitious assessment of London's economy, and of Mayoral infrastructure plans, is accompanied by a 'Plan B' scenario. This would retain all the necessary policy linkages between employment, housing, and transport, while repositioning these for a future London which may well lose part of its attractions to international business, and its influence as a global city.

The introduction to the document argues for a more 'compact' London, in which people use cars less. A Plan B scenario in which the capital's planners take a step back from global city aspirations, and work up an alternative vision of a 'more modest London' by 2028 (lower contribution to GDP, reduced income divides, lower housing costs and values, healthier urban living, less congestion and better air quality) is surely one that Londoners should at least be allowed to think about? Depending on the reaction from other nations to Brexit, London's citizens may not have much choice.

PART 4 ENVIRONMENT, TRANSPORT AND PUBLIC SPACE

This chapter comes across as very aspirational, in that many of its ambitions are not easily reconciled with a London of increasing housing density and where land is prioritised for housing and economic use - as envisaged in earlier chapters.

For the public to have confidence in a new London Plan, its policies and proposals need to be realistic and achievable. If a zero-carbon city by 2050 is unachievable, when set against the economic ambitions outlines in Part 3 of the document, this should be recognised.

We note the statement on page 65 which reads *But tall buildings will only be permitted if they can add value to the existing community – in line with the principles of 'good growth'. That means they must make a positive contribution to the streetscape and skyline...*

Our experience of planning approvals under the previous Mayor and GLA regime is that very tall buildings were frequently approved with little or no consideration of the value they added to the local community, but instead on the basis of 'developer/planner' justifications such as their role as 'landmarks' or 'gateways' and their supposed contribution to 'legibility' and 'wayfinding'.

Policy 7.7 in the current London Plan has been set aside on too many occasions. Public reaction to the changing skyline of London continues, with many citizens unaware of further tall buildings already approved and not yet built.

This is an issue (and one widely recognised and visible to the public) where a new London Plan cannot have it both ways - much increased density as well as 'good growth'. While a case can be argued that high densities can be achieved without very tall buildings, there comes a point when 'high-density medium rise' is unachievable on any given site.

2000-2016 (the period since a London Mayor has been in place, and involved in all decisions on tall buildings) seems unlikely to be looked back on as period in which London's new buildings have added successfully to centuries of London's heritage. A clear change of policy direction is needed in a new London Plan.

PART FIVE A CITY FOR ALL LONDONERS

Widening gaps in wealth and income levels, and the consequent increasing lack of social integration in London, are 21st issues for London on which a Mayor has some levers of influence, but few.

The document refers to encouraging greater participation in civic life, but makes no mention of neighbourhood planning as the local and participative layer of the English planning system. There are over 100 neighbourhood forums active in London. The growth of neighbourhood planning has been slower in the capital than elsewhere, but is now picking up. A new London Plan needs to give positive support, and to explain clearly the relationship between the London Plan, Borough Local Plans, and neighbourhood plans as all parts of the development plan for an area.

On London's environmental assets, we support 'green/blue' policies and would like to see the Grand Union Canal become more of a London-wide asset. Building on proposals which are coming forward for the Old Oak stretch of the canal, the London Plan could usefully provide a framework within which the Canals and Rivers Trust could develop specific proposals.

OLD OAK INTERIM NEIGHBOURHOOD FORUM
DECEMBER 2016