



Your neighbourhood, your views

St Quintin and Woodlands Neighbourhood Forum

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RESPONSE TO CONSULTATION ON THE OPDC REGULATION 19 LOCAL PLAN

Introduction

We are a neighbourhood forum in North Kensington, with 420 members. The neighbourhood plan for our area was successful at referendum, in February 2017 and its policies and site designations are used by RB Kensington and Chelsea in determining planning applications.

As a forum for an area bordering on the OPDC boundary, we have worked closely with the Interim Old Oak Neighbourhood Forum. As a volunteer adviser to the Forum (and also a DCLG Neighbourhood Champion) our chair Henry Peterson is involved with the work of the Forum and attends its meetings.

We wish to be attend the Examination in Public, and will wish to make oral representations depending on the questions posed by the Inspector.

Response to the Regulation 19 Local Plan

We share the view of the Old Oak Interim Neighbourhood Forum that the 2015 London Plan parameters set for regeneration of the Old Oak area, in terms of housing numbers, will lead to unsustainable levels of density and an unsuccessful urban environment.

We support the detailed case made by the Interim Forum, and their view that the current Regulation 19 Draft Plan is not *based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development*. **We do not consider draft Strategic Policies SP2 on Good Growth and SP4 on Thriving Communities to be positively prepared or justified in respect of the housing element of these policies.**

Having attended the consultation meetings on the Regulation 18 and 19 Local Plans, we do not feel that there has been meaningful consultation on any option other than to build 24,000 new homes within the OPDC area, the vast majority to be at Old Oak.

We do not consider draft Strategic Policies SP2 and SP4 to be *the most appropriate strategy when considered against reasonable alternatives*. We do not consider that *alternative strategies for the future of the Old Oak part of the OPDC area have been adequately identified or consulted or that these policies are justified*. There could be an alternative vision and set of outcomes for Old Oak which we believe would be significantly more successful and sustainable.

For our members, living to the immediate south-west of the OPDC boundary, our main concerns relate to the pressures on the local road network, on sewerage/drainage in the area, on local social and community infrastructure, and on views to the west and north of our neighbourhood.

In the Local Plan, we see no evidence that Transport Policies T1-T9 will prove **effective**. Levels of

traffic congestion in the area are already severe. The Plan offers no solution to the traffic pinch point at the exit westwards at North Pole Road/Wood Lane.

The Plan does not explain what is meant by 'tall' and 'taller' buildings and gives no information on the anticipated range of building heights on the series of sites which are allocated housing targets at page 50 of the Plan. Nor does the document include policies on housing density, nor a density map of the kind included in the Regulation 18 Local Plan. **This is not a clear and transparent Local Plan of the kind we understand that the NPPF requires. We consider Policy D5 on Tall Buildings to be inadequately justified and unclear.**

Planning permissions already granted by OPDC in Scrubs Lane, on the basis of emerging policies promoting an artificial concept of 'clusters' which have never been formally consulted on. These residential towers of around 20 storeys (if built) will cause serious harm to views from Little Wormwood Scrubs and the Kensington section of the Grand Union Canal. Our sister organisation (St Helens Residents Association) submitted a series of objections to these proposed residential towers, on similar lines to those submitted by the Royal Borough and by Historic England, to no avail. **We consider the Corporation's reliance on 'emerging policy' to be excessive and beyond what the NPPF intends.**

We see no evidence base or justification for **Scrubs Lane Policy P10m**) on enabling the comprehensive redevelopment of the area south of the Grand Union Canal. Paragraph SL5 refers to regeneration of the Mitre Industrial Estate with the potential for new housing. OPDC models and CGI images show a further cluster of residential towers at this location. The existing industrial buildings are relatively modern (1980s) and the access road was built specifically to provide access to a light industrial estate which operates effectively. Given the priority that the Plan gives to protecting areas of SIL, and excluding any mixed use in these areas, Policy P10m appears illogical. It is not **positively planned** nor **justified**.

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