

Draft Further Alterations to the London Plan

Suggested amendment to Opportunity Area 27 by the Friends of the Scrubs ("The Friends")

27 Old Oak Common

Area (Ha): 155

Indicative employment capacity: 55,000

Minimum new homes: 24,000

OAPF progress: 2

Old Oak Common has significant regeneration potential for new housing and jobs and could make a major contribution to London's position as a world business centre. Regeneration would centre on a new strategic public transport infrastructure hub at Old Oak Common on the HS2 line between London and Birmingham with an interchange with Crossrail 1, other national main lines and the London Overground. Provision of public transport infrastructure on this scale would drive substantial development which could yield 24,000 new homes and, subject to capacity and demand, up to 55,000 jobs and a variety of complementary and supporting uses in a commercial hub around the station and in the wider area. The potential for a network of new open spaces and green links connecting Old Oak Common station to North Acton, Willesden Junction, Wormwood Scrubs and the Grand Union Canal

should be investigated. Public transport accessibility and availability of amenity space should support high density development which could include a cluster of tall (?) buildings around the interchange. ~~Wormwood Scrubs would provide a major amenity to support this scale of development and improved access to the Scrubs is essential to deliver sustainable residential communities.~~ Planning for Old Oak Common should be integrated with the wider Park Royal Opportunity Area, including scope for business relocations. Linkages with Kensal Canalside and White City Opportunity Areas should also be considered, including the Imperial College campus expansion and associated potential for business creation and development at Old Oak/Park Old Oak/Park Royal. A vision document for Old Oak was published in June 2013 setting out a direction of travel for the future development of the area.

Reasons for amendment

Background

1. The full name of the Friends is the "Friends of Wormwood Scrubs Park Association ("The Friends"). The Friends are an association of users of Wormwood Scrubs Park ("the Scrubs"), are recognised as a charity by HMRC and have nearly 3,000 supporters. The objects of the Friends according to our constitution include the protection and conservation of the Scrubs for the exercise, recreation and enjoyment of the public in accordance with the Wormwood Scrubs Act 1879 and the resistance of encroachments and other inappropriate activity affecting the lawful use and enjoyment of the Scrubs by the public.

2. The Scrubs is probably unique among the open spaces of Greater London. (We note its omission from the list of **strategic** open spaces in Map 2.8 at p 76 of DFALP despite the categorisation in Table 7.2 p 264 of Metropolitan Parks as consisting of open spaces of about 60 hectares in size. The Scrubs according to LBHF's Core Strategy occupies some 68 hectares). It comprises a mixture of scrub, grassland and woodland and, because of the variety of plant and wildlife, parts of the Scrubs were in 2002 awarded the status of Local Nature Reserve. Resident species include stag

beetle and common lizard: there is a breeding population of meadow pipits in the grassland (the closest known colony to Central London) and in summer the embankment on the northern perimeter (part of the LNR and the nearest to the likely development on Old Oak Common) teems with migrant warblers several species of which regularly breed there. This embankment was constructed with spoil from excavation of Old Oak Common for the purposes of Eurostar (authorised by the Channel Tunnel Act 1987) in addition to which trees were planted on the Scrubs to compensate for the loss of habitat on the railway side of the boundary.

3. The Scrubs also supports football and other sports pitches. The Linford Christie Stadium to the south is the home of the Thames Valley Harriers and the London Nigerian Rugby Club. The Wormwood Scrubs Pony Centre, a charity and member of the Riding for the Disabled Society, is to the south east.

4. The users of the Scrubs include walkers, dog walkers, games players and athletes (including schoolchildren), pony riders, botanists, birdwatchers, kite flyers and kite-boarders and model aircraft flyers. A major aspect of its appeal is its sense of rural apartness and space with a lack of formal paths and flowerbeds. A proposal by LBHF over fifteen years ago to "improve" the Scrubs with among other things tarmac paths and an arboretum met with such local opposition that it was abandoned.

5. The Scrubs is designated MOL, is a registered common and protected by the Wormwood Scrubs Act 1879 ("the 1879 Act").

Tall Buildings

6. The Friends **would not oppose tall buildings north of the interchange going towards Willesden Junction but** are concerned that "tall buildings around the interchange" could lead to such buildings close to the northern perimeter of the Scrubs (as seems to be envisaged by the vision document) which would dominate the Scrubs. This would be inconsistent with Policy 7.7 of DFALP "LOCATION AND DESIGN OF TALL AND LARGE BUILDINGS" which includes

"Strategic

A Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings

Planning decisions

B Applications for tall or large buildings should...meet the criteria below

C Tall and large buildings should

b only be considered in areas whose character would not be affected by the scale, mass or bulk of a tall or large building

E The impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include...the edge of Green Belt or Metropolitan Open Land..."

7.22 includes "New development, especially large and tall buildings, should not have a negative impact on the character or amenity of neighbouring sensitive land uses..."

- Tall buildings close to the northern border of the Scrubs would destroy its character of rural space and apartness which is a major attraction to its users.

7. Wormwood Scrubs would provide a major amenity to support this scale of development and improved access to the Scrubs is essential to deliver sustainable residential communities.

The Friends cannot and would not seek to impede public access to the Scrubs which is enshrined in the 1879 Act. The Scrubs should not however be regarded as a substitute for the creation of appropriate green space *within* the new development. Opportunity Area 27 seems to envisage such green space with its reference (above) to “a network of *new* (our italics) open spaces and green links connecting Old Oak Common station to North Acton...”

8. Policy 2.18 GREEN INFRASTRUCTURE of DFALP says

Planning Decisions

E “Development proposals should:

- a incorporate appropriate elements of green infrastructure that are integrated into the wider network

Policy 5.10 URBAN GREENING of DFALP says

Planning decisions

C “Development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm.

Policy 7.18 PROTECTING OPEN SPACE AND ADDRESSING DEFICIENCY of DFALP says under **LDF preparation**:

C “When assessing local open space needs LDFs should:

- c ensure that future publicly accessible open space needs are planned for in areas *with a potential for substantial change such as opportunity areas* (our italics), regeneration areas, intensification areas and other local areas

9. The Friends contend that the above citations demonstrate that planning for Old Oak Common should include appropriate open/amenity space as part of the development without resort to an existing amenity elsewhere (i.e the Scrubs).

“Amenity” is defined in the DFALP Glossary as “element of a location that helps to make it attractive or enjoyable for residents and visitors”. “Wormwood Scrubs” to “provide a major amenity to support this scale of development and improved access to the Scrubs *is essential* to deliver sustainable residential communities” could lead to a fundamental change in the character of the existing amenity provided by the Scrubs. The numbers mentioned of 24,000 new homes and 55,000 new jobs, while welcome in the context of an Opportunity Area, are daunting in the context of the Scrubs.

- To become an amenity for the Opportunity Area, the character of the Scrubs would be likely to be altered to that of a formal park.
- “Improved access” would presumably be to encourage residents and others from Old Oak Common to use the Scrubs as opposed to open space within the Opportunity Area. With an increase of many thousands of users, the Scrubs could not survive in its present form.

- If access from north of the Scrubs is envisaged, this would mean cutting through part of the LNR and an important breeding ground for birds
- There is plentiful existing access to the Scrubs from much of Old Oak Common Lane on the west and Braybrook Street and Du Cane Road on the south. There are public car parks to the north of the hospitals in Du Cane Road and in the south eastern corner of the Scrubs. There is additional pedestrian access on the east in Scrubs Lane about 80 metres from the boundary of the top of the Scrubs
- Existing access would be ample for anyone from the Opportunity Area wishing to use the Scrubs for recreational purposes.

Stewart Dalby, Chair, The Friends of the Scrubs

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