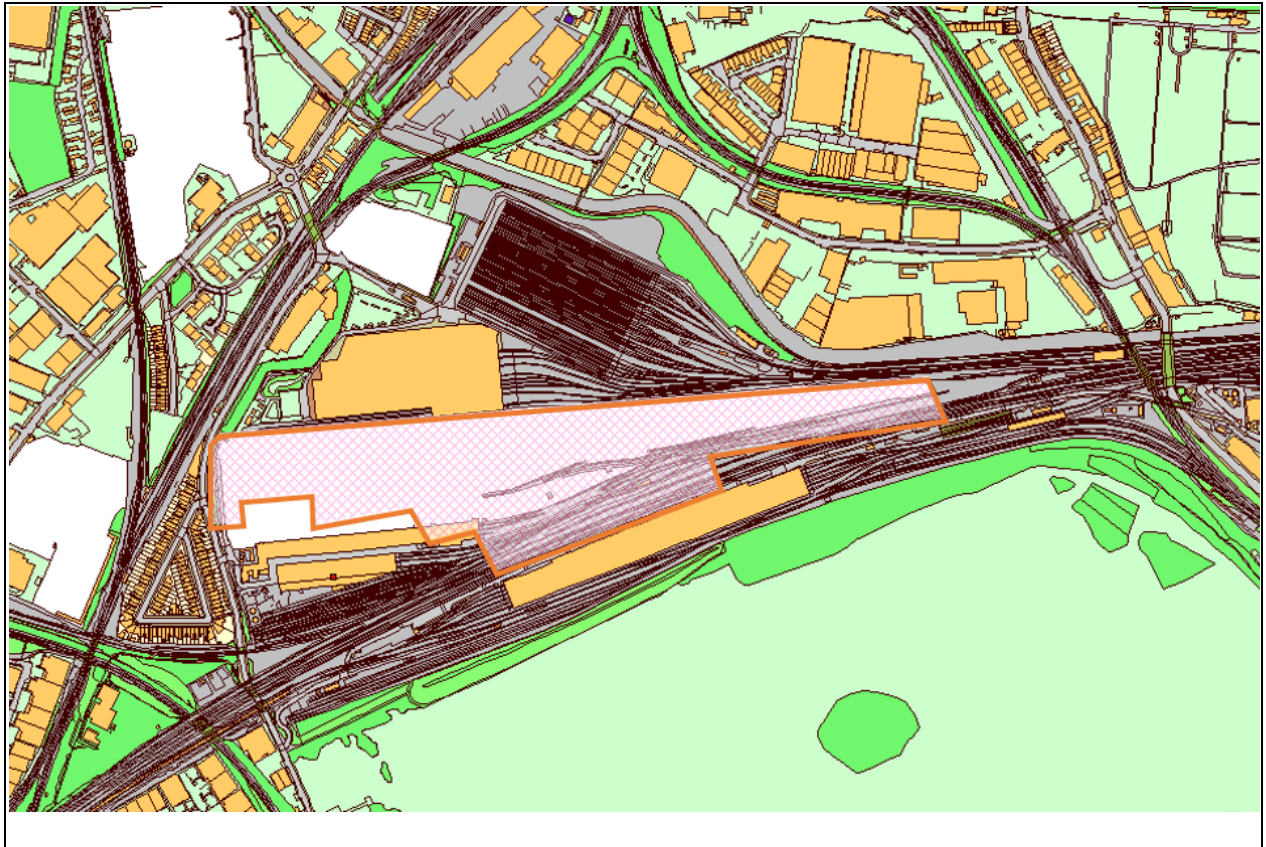

Ward: College Park And Old Oak

Site Address:

Old Oak Common Station, Old Oak Common Lane, London
NW10 6DZ



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For identification purposes only - do not scale.

Reg. No:

2022/01249/OPDOBS

Case Officer:

Sinead Winship-David

Date Valid:

03.05.2022

Conservation Area:

Committee Date:

07.06.2022

Applicant:

Old Oak and Park Royal Development Corporation
Brent Civic Centre 32 Engineers Way Wembley HA9 0FJ

Description:

Consultation by OPDC on 22/0064/HS2OPDC Application under Schedule 17 of the High Speed Rail (London-West Midlands) Act 2017 for works associated with the urban realm for the new Old Oak Common station comprising earthworks; wetland area earthworks; retaining walls; bus canopies; fences and walls; bollards; seating; planters; cycle stands; lighting equipment; a DNO substation; hard and soft landscaping; road vehicle parks and onsite road layout.

Drg Nos:

Application Type:

Observations to OPDC

Officer Recommendation:

The Council raises an objection to the proposed development for the following reason(s):

- 1) Highway Impacts: Additional information is required to fully demonstrate that the road layout and associated features can operate safely and to further demonstrate compliance with the London Plan. Please refer to the attached committee report to read the full assessment of the proposal and the Council's requested revisions should permission be granted.
- 2) Insofar as it relates to the connectivity of Old Oak Common Station with the wider area, the design of the urban realm is unacceptable. LBHF strongly recommends that wider links and connectivity to Scrubs Lane, the Grand Union Canal and Wormwood Scrubs are delivered at an early stage of the development programme. Further details of LBHF's concerns in this regard are provided in the attached committee report.

**LOCAL GOVERNMENT ACT 2000
LIST OF BACKGROUND PAPERS**

All Background Papers held by Andrew Marshall (Ext: 4841):

Application form received: 29th April 2022
Drawing Nos:

Policy documents: National Planning Policy Framework (NPPF) (2021)
The London Plan (2021)
OPDC - Post Submission Modified Draft Local Plan (2021)

Consultation Comments:

Comments from:

Dated:

Neighbour Comments:

Letters from:
None received.

Dated:

OFFICER'S REPORT

1. BACKGROUND

- 1.1. The London Borough of Hammersmith and Fulham (LBHF) have been consulted on the above s17 application by the Old Oak and Park Royal Development Corporation (OPDC). The Council is consulted on all applications within the Old Oak and Park Royal Opportunity Area (the Opportunity Area) that fall within its borough boundary.
- 1.2. The 2011 Localism Act provided the Mayor with powers to set up Mayoral Development Corporations. The OPDC was established by a Statutory Instrument in January 2015, and was granted planning powers through a further Statutory Instrument in March 2015. The OPDC came into existence on 1 April 2015. On this date the OPDC became the local planning authority for the area, taking on planning functions including plan making powers and determination of planning applications. LBHF remains the highway authority for the area within the borough boundary.
- 1.3. The site is within the Old Oak and Park Royal Opportunity Area which is expected to accommodate at least 25,500 new homes and 65,000 new jobs. Policy H1 of the London Plan sets a ten-year housing target for the OPDC of 13,670 completions.
- 1.4. This application is being brought to Planning and Development Control Committee to give Members the opportunity to consider and endorse comments that officers recommend be submitted to OPDC. This application is made under s17 of the High Speed Rail (London-West Midlands) Act 2017.
- 1.5. Members should be aware that the application is scheduled to be presented to OPDC's Planning Committee meeting for a decision on the 7 July 2022 under reference 22/0064/HS2OPDC.

Site & Surroundings

- 1.6. The subject site is approximately 900m long from east to west and is bordered by the Crossrail Depot to the north, further operational railway land to the east, the Great Western Mainline (GWML) tracks and IEP Depot and rail sidings to the south, with Old Oak Common Lane and the Wells House Road residences to the west. The site area is 9.9 hectares.
- 1.7. The proposed Old Oak Common Station will be accessed from Old Oak Common Lane. The site is comprised of operational railway land occupied by the Great Western Railway (GWR) and Heathrow Express (HEX) depots, which have been demolished as part of the HS2 works.
- 1.8. The HS2 route through the administrative area of OPDC will enter LBHF from the Royal Borough of Kensington and Chelsea (RBKC) below Kensal Green Cemetery via the underground twinbore Euston tunnel before crossing under the Grand Union Canal into the OPDC administrative area. The route through the OPDC area will be approximately 4.5km in length. The majority of the route will be below ground with the exception of the HS2 station and associated

infrastructure, known as Old Oak Common station, which is the subject of this Schedule 17 Plans and Specifications submission.

- 1.9. The area directly to the north of the subject site is occupied by the Crossrail Depot and railway sidings. The Grand Union Canal is located to the north of the Crossrail Depot with large commercial and industrial uses on the north side of the canal. Willesden Junction station and residential uses lie further to the north.
- 1.10. To the east of the subject site are further operational railway lands with the open spaces of St Marys.Kensal Green Cemetery and Little Wormwood Scrubs recreation grounds lying beyond to the northeast and southeast respectively. Further residential areas including Kensal Town, Ladbroke Grove and North Kensington lie further to the east. Directly to the south is the Intercity Express Programme (IEP) Depot, beyond which lies Wormwood Scrubs. HM Prison Wormwood Scrubs is located at the south of Wormwood Scrubs, with additional educational, leisure and recreation facilities also present. Residential areas associated with White City and East Acton lie further to the south.
- 1.11. A number of industrial and commercial uses lie to the south-west with the Wider residential areas of West Acton lying further to the west and south-west. Old Oak Common Lane bounds the subject site to the west with the Wells House Road residences lying on the western side of Old Oak Common Lane. Park Royal Industrial Estate lies further west and northwest from the subject site.
- 1.12. The site is located within Flood Risk Zone 1. The St Mary's Kensal Green Cemetery and Little Wormwood Scrubs recreation grounds lying to the northeast and southeast respectively are designated Local Wildlife Sites. St Mary's Cemetery is within the St Mary's conservation with a number of listed structures (Grade II) associated with the cemetery uses. Wormwood Scrubs lies to the south of the subject site which is a Local Wildlife Site with areas within also being designated as a Local Nature Reserve.

2. PLANNING HISTORY

- 2.1. The below applications relate to HS2 development at this site and are considered relevant to this application. The applications have been determined by OPDC as the Local Planning Authority, however, LBHF was provided the opportunity to comment on each submission.

20/0011/HS2OPDC – Application under Schedule 17 of the High Speed Rail (London – West Midlands) Act 2017 relating to works associated with the realignment of Old Oak Common Lane and replacement Great Western Mainline and Central Line bridges. Approved, LBHF raised an objection to the proposal.

20/0057/HS2OPDC – Application under Schedule 17 of the High Speed Rail (London – West Midlands) Act 2017 for approval of highway routes (conditions relating to road transport) to be used by large goods vehicles associated with the main works stage including main site enabling works, excavation works (main station box), under track crossing works, Stamford Brook Sewer works, piling and diaphragm wall works, installation of tower cranes, conveyor installation, decommissioning works, ground remediation works, satellite site A/B

enabling works, Wycombe line bridge demolition works and all other activities for the purposes and in connection with the scheduled and ancillary works for HS2 at four construction site compounds comprising Old Oak Common Station, Atlas Road, Willesden Euro Terminal and Satellite Sites A/B. Approved.

20/0013/HS2OPDC – Application under Schedule 16 of the High Speed Rail (London - West Midlands) Act 2017 relating to the onsite road layout associated with the new Old Oak Common station. Approved, LBHF did not object but did raise highways concerns.

20/0012/HS2OPDC – Application under Schedule 17 of the High Speed Rail (London-West Midlands) Act 2017 relating to above ground works associated with the new Old Oak Common station comprising main concourse, overbridges, stairs, escalators, lifts to conventional rail, conventional rail platforms and canopies, ventilation structures and associated works. Approved.

- 2.2. A further application has been submitted, ref. 22/0065/HS2OPDC, that will also be determined by OPDC's 7 July 2022 committee. The application is made under Schedule 17 of the High Speed Rail (London-West Midlands) Act 2017 for amendments to ancillary buildings approved as part of Old Oak Common station and associated works (OPDC ref: 20/0012/HS2OPDC) comprising of amendments to headhouses, ventilation structures and the cycle hub. LBHF have been consulted on this application and Officer's recommendations are set out within a separate committee report for Member's consideration at the 7 June 2022 committee (LBHF ref. 2022/01251/OPDOBS).

3. PROPOSAL

- 3.1. The High Speed Rail (London - West Midlands) Act 2017 (the Act) provides powers for the construction and operation of Phase One of High Speed Two. HS2 Ltd is the nominated undertaker in relation to the works subject to this Plans and Specifications site restoration scheme submission. Section 20 to the Act grants deemed planning permission for the works authorised by it, subject to the conditions set out in Schedule 17. Schedule 17 includes conditions requiring the following matters to be approved or agreed by the relevant local planning authority:

- o Construction arrangements (including large goods vehicle routes),
- o Plans and specifications,
- o Bringing into use requests, and
- o Site restoration schemes.

- 3.2. The relevant scheduled works as set out under Schedule 1 of the Act to which this Schedule 17 submission relates are:

'Work No. 1/1 - A railway (23.48 kilometres in length) partly in tunnel, commencing at a point 235 metres east of the junction of North Gower Street with Drummond Street passing north-westwards and terminating beneath a point 80 metres north-west of the bridge carrying Ickenham Road over the Marylebone to Aylesbury Railway. Work No. 1/1 includes shafts at Cobourg Street, Mornington Street, Granby Terrace, Parkway, Adelaide Road, Alexandra Place, Canterbury Works and Greenpark Way, a station at Old Oak Common

and a Crossover Box at Victoria Road'

'Work No. 1/15 - A railway (22.77 kilometres in length) partly in tunnel commencing by a junction with Works Nos. 1/1 and 1/16 at a point 40 metres north-east of the junction of Stanhope Street with Granby Terrace passing north westwards and terminating at a point 84 metres north-west of the bridge carrying Ickenham Road over the Marylebone to Aylesbury Line, and including shafts at Salisbury Road, Westgate, Greenpark Way, Mandeville Road and South Ruislip, a station at Old Oak Common and a crossover box at Victoria Road.'

- 3.3. The works submitted for approval are a site restoration scheme and comprise the works associated with the urban realm for the new Old Oak Common Station incorporate:

earthworks; wetland area earthworks; retaining walls; bus canopies; fences and walls; bollards; seating; planters; cycle stands; lighting equipment; a DNO (Distribution Network Operator) substation; hard and soft landscaping; road vehicle parks and, the onsite road layout.

- 3.4. The site restoration scheme requires approval in accordance with paragraphs 2 and 3 of Schedule 17 of the Act, and agreement in accordance with paragraph 12 of Schedule 17 of the Act.

- 3.5. The urban realm scheme is made up of a number of elements across the wider Station site as shown in Figure 1 below.

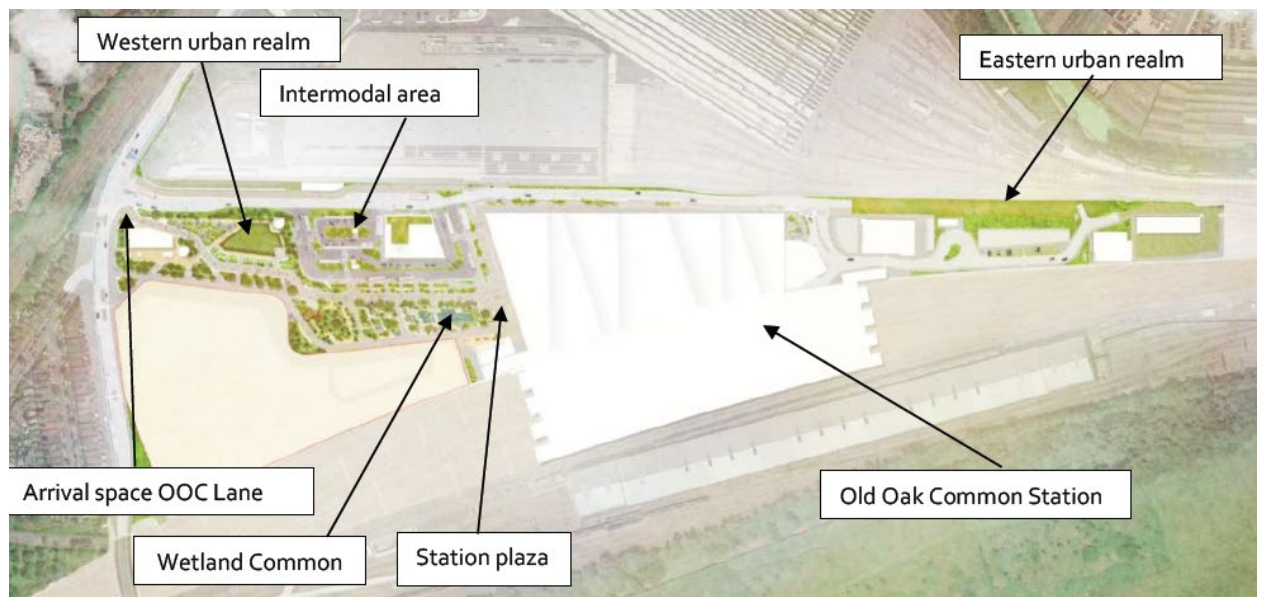


Figure 1 – Proposed urban realm scheme overview

4. PUBLICITY & CONSULATION

- 4.1. This s17 application was submitted to OPDC who are the Local Planning Authority, and it is their statutory duty to consult on the planning application. However, there is no statutory requirement to undertake public consultation on Schedule 17 applications in the Act. Only Natural England, the Environment Agency and Historic England are required to be consulted, and only where the application relates to issues relevant to those organisations.

4.2. Notwithstanding the above, OPDC have undertaken the following additional consultations:

- Neighbour notification letters sent to 326 properties
- Consultation letters sent to relevant stakeholders (including LBHF, LB Ealing, RBKC, Brent Council, TfL and the GLA) and amenity groups

4.3. LBHF have not received any representations in relation to this application.

5. PLANNING FRAMEWORK

High Speed Rail (London – Midlands) Act 2017

5.1. The High Speed Rail (London – West Midlands) Act 2017 (the 'Act') grants deemed planning permission for the construction of phase one of the High Speed Two (HS2) railway from London to the West Midlands. This deemed planning permission is subject to conditions set out in Schedule 17 ('conditions relating to deemed planning permission') of the Act. As the nominated undertaker for the delivery of HS2, High Speed Two Limited (HS2 Ltd) must apply to local planning authorities for the approval of certain details.

5.2. Paragraph 2 of Schedule 17 requires an application to be submitted for the approval of plans and specifications relating to above ground works. Paragraph 3 requires an application to be submitted for 'other construction works'.

5.3. In accordance with paragraph 2(5) of Schedule 17 of the Act, the relevant planning authority may only refuse to approve plans or specifications on the ground that:

(a) The design or external appearance of the building works ought to be modified –

- (i) To preserve the local environment or local amenity,
 - (ii) To prevent or reduce prejudicial effects on road safety or on the free flow of traffic in the local area, or
 - (iii) To preserve a site of archaeological or historic interest or nature conservation value,
- and is reasonably capable of being so modified, or

(b) The development ought to, and could reasonably, be carried out elsewhere within the development's permitted limits.

5.4. Paragraph 3 (6) of Schedule 17 of the Act states the possible grounds for refusal or approval for the various types of other construction works.

Planning Policy

5.5. Planning policies are only relevant to the determination of the application insofar as they relate to the matters prescribed in paragraphs 2 and 3 of Schedule 17.

5.6. The relevant development plan documents for the application site area are:

- London Plan (2021)
- OPDC - Post Submission Modified Draft Local Plan (2021)

6. ASSESSMENT

6.1. Urban Design and Heritage

- 6.1.1. The design principles of the urban realm strategy are generally considered to represent a high quality of design. The scale, variety and detailing of public spaces and landscape features will provide a positive environment for local residents, visitors and those interchanging at the station to enjoy throughout the day. These features would also support the future development ambitions of key sites within the local area.
- 6.1.2. Whilst the general principles of key areas of the urban realm towards the west of the main station entrance are strongly supported, the experience of spaces to the northern/eastern aspect of the station environment would benefit from additional design development to ensure that these spaces maximise opportunities for passive surveillance and activity in order to become safe and attractive spaces overall. Delivery of the second (eastern) station access would also be encouraged in this regard.

Connectivity and permeability

- 6.1.3. The design of the urban realm strategy serves to create strong and meaningful pedestrian and cycle route connections between the station and Old Oak Common Lane. However, as has been discussed throughout pre-application discussions, it is disappointing that more strategic opportunities to integrate additional connectivity to Scrubs Lane, the Grand Union Canal and Wormwood Scrubs are not to be delivered by the urban realm from day one of the railway operations.
- 6.1.4. These wider links and connectivity would, (alongside provision of a secondary station entrance), be of particular benefit to Hammersmith and Fulham residents and support the ongoing regeneration and economic development activities within the White City opportunity area.
- 6.1.5. Although it is noted that the future provision of these routes is considered within the current supporting documents accompanying the Schedule 17 Submission, it is strongly encouraged that these connections are delivered at an early stage of the development programme to provide a robust and complete connectivity strategy.
- 6.1.6. The proposals do not raise any heritage considerations.

6.2. Highways

- 6.2.1. The highway works sought by this application are summarised as follows:
- Onsite road layout;

- Provision of a car park;
- Bus shelter, drop off/pick up, taxi bay and accessible parking canopies;
- Cycle stands

6.2.2. LBHF have previously commented on a proposed onsite road layout (ref. 2020/00301/OPDOBS). This application was made under s16 of the Act, however, it is now necessary to secure consent under s17 owing to a change in land ownership. LBHF did not raise an objection to the previous application, however, concerns were raised regarding wayfinding, servicing, construction logistics, car parking and cycle storage. The road layout now proposed is largely the same as that previously consented, with some minor amendments in response to a Road Safety Audit and the development of the urban realm scheme.

6.2.3. LBHF Highway's officers have reviewed the proposals and raised a number of objections that are detailed below. These detailed comments are intended to inform OPDC of LBHF's objections.

Walking

6.2.4. The proposed access / movement strategy for pedestrians is unacceptable. Pedestrians approaching the site from the south may utilise the zebra crossing on Old Oak Common Lane (OOCL), as shown on drawing GA S8. There are no dropped kerbs indicated on plan and therefore it has not been sufficiently demonstrated that pedestrians or cyclists would be able to easily access the site. The applicant should provide further information regarding access to the site from OOCL from the south of the site access.

6.2.5. Pedestrians accessing the site from the north on Old Oak Common Lane are required to use the proposed staggered crossing to access the site facilities. It is unclear from the submitted information whether the island for the proposed staggered pedestrian crossing between the northern and southern footways is of sufficient width to accommodate pedestrian demand. There are concerns over the space provided for pedestrians to cross the proposed service road on OOCL. The applicant should provide additional information regarding the proposed crossing design to ensure that the proposed junction caters for future pedestrian demand.

6.2.6. The pedestrian crossing facilities, presented on drawing GA S1, on Old Oak Common Lane are proposed to be staggered. This approach is not supported as LBHF in conjunction with disability groups have committed to the provision of single stage crossings across the borough. The applicant is advised to revise the crossing design to meet the needs of disabled road users.

6.2.7. Pedestrians accessing the site from the north on Old Oak Common Lane, may enter the site utilising the footway to the north of the proposed bi-directional cycle path (drawings GA S1 & S2). Pedestrians would head eastbound on the footway adjacent to the cycle path and it is considered that there are insufficient opportunities for pedestrians to cross the service road and head towards the interchange facilities such as bus stops. The applicant should provide additional crossing points for pedestrians heading southbound across the service road from the northern footway to the public realm.

- 6.2.8. Drawing GA S5, presents a section of footway to the south of the proposed cycle path which measures 1.8 metres in width. The future connectivity between the site and Scrubs Lane could result in a significant increase in footfall to and from the east of the site. The Highway Authority (LBHF) expects all proposed footways/footpaths to measure at a minimum of 2.9 metres in width, in accordance with Transport for London's latest Pedestrian Comfort guidance (2019). The applicant should provide details relating to the pedestrian modelling undertaken to inform the proposed footway and crossing widths across the application site.
- 6.2.9. Sections of the proposed pedestrian route from the east of the application site to the station entrance is substandard (dimensions), convoluted and unattractive. The pedestrian route is within an area which is presented as back-of-house and lacking any future planning for an eastern connection to the site. It is unclear from the information submitted how pedestrians would access the train station in a convenient and safe manner. It is also noted that this route would not accord with Healthy Street principles and would require significant mitigation measures if included in a future Active Travel Zone assessment. The applicant should engage with the council to seek a satisfactory design which enables attractive, safe, and inclusive access to the site from the east.

Cycling

- 6.2.10. The proposed access strategy for cyclists is unacceptable. The right-turn from OOCL into the application site is proposed to take place over two-stages (see GA S1), with cyclists bearing left into a dedicated cycle lay-by to wait before turning right across the left-hand lane into the service road. The proposed right-turn manoeuvre for cyclists from Old Oak Common Lane onto the proposed service road could result in confusion for cyclists and therefore conflict with other road users and would have highway safety implications. In addition, it is not clear from the submitted plans how cyclists leaving the site would access OOCL safely from the northern cycle path. Further details are required regarding priority for pedestrians and cyclists using the junction. Clarification is sought regarding the proposed signalisation of the junction on OOCL and the service road.
- 6.2.11. Sections of the proposed cycle path within the site are shown on plan (drawing GA S4) as measuring 2.5 metres in width. The proposed width is substandard, and the council would expect all cycle paths to measure a minimum of 4 metres in accordance with the latest version of the London Cycling Design Standards.
- 6.2.12. It is not clear how cyclists using the northern cycle path would access the station and proposed cycle parking facilities. The submitted plans do not provide a comprehensive strategy for cyclists accessing the southern areas within the site. Further information is required to demonstrate how cyclists would use the interchange and access the cycle parking facility.

Micro-mobility

6.2.13. The proposed interchange / public realm doesn't include or safeguard space micro mobility parking / storage / charging facilities. The development proposals are insufficient regarding parking provision for micro-mobility vehicles. The uptake of micro-mobility vehicles such as e-scooters and e-bikes are increasing in the borough and London-wide. It is therefore considered that parking provision for micro-mobility vehicles should be included within the designs for the application site. The applicant should update the site-wide parking provision to include provision for micro-mobility vehicles.

Internal Layouts

6.2.14. The proposed internal layout / public realm would be a vehicle dominated environment that doesn't prioritise pedestrian and cycle movements which is considered unacceptable. The design and internal layout of the proposed is considered to have been primarily dictated by location of internal roads and infrastructure for taxis and buses. It is evident that pedestrian and cycling movement within the interchange were a secondary consideration within the design. For example, the proposed service road creates severance between the northern footpath and segregated cycle path and the wider interchange. In addition, no crossing points are provided to facilitate north and south movements across the service road. For example, the design would not allow pedestrians travelling on the northern foot path to access bus facilities to the south.

6.2.15. The transport interchange area which includes the proposed bus stands, taxi rank and kiss and ride areas are presented on drawings GA S2 & S3. It is proposed that space for up to 18 taxis for pick-up are provided and will be accessed from the service road via a proposed taxi loop. Space for 12 private vehicles will be provided for kiss and ride purposes, also to be accessed from the service road and via the proposed private car loop. Space for up to 6 bus stops and 4 bus stands will be provided, to be accessed from the service road via a separate bus loop.

6.2.16. The transport interchange area is to be dominated by vehicles as demonstrated in swept-path analysis drawings and as a result the interaction with pedestrians must be managed carefully. This is contrary to Policy T1 of the London Plan (2021). The applicant should provide information regarding the Interchange audit and information on pedestrian modelling within the interchange area as required by Transport for London's Interchange Best Practice Guidelines (2021). These details are required to ensure pedestrians and cyclists have been prioritised in the design.

6.2.17. The information submitted does not include any specific information relating to Hostile Vehicle Mitigation measures. Further information is required as these measures may result in amendments to the public realm design.

Futureproofing

- 6.2.18. The proposed design of the public realm (internal layout) doesn't satisfactorily futureproof / safeguard pedestrian and cycle routes; routes from the east. LBHF and the OPDC have aspirations of delivering a connection between the east of the application site and Scrubs Lane in the future. As previously noted, the eastern area within the proposal is interpreted as a back-of-house area, with convoluted pedestrian routes to the station which would not be attractive for the use of pedestrians and does not satisfactorily futureproof the route from the east. It is further considered that inadequate land has been safeguarded for a future walking and cycling route from the east. This is contrary to London Plan policy T3(b).
- 6.2.19. The applicant should engage with the council to seek a satisfactory design which enables attractive, safe, and inclusive access to the site from the east. Drawing GA S5, presents a barrier on the carriageway which would prevent future access from the east for cyclists. Any approved gate should be removed once a connection from the east of the site has been established.

Further Details Required

- 6.2.20. Travel Plan - The applicant is required to submit a Framework Travel Plan in accordance with Policy T4 of the London Plan (2021). The Travel Plan is required to ensure that measures and targets are in place to encourage and promote sustainable travel to and from the site. The Framework Travel Plan must be in accordance with Transport for London's latest guidance on Travel Plans.
- 6.2.21. Delivery & Servicing - The applicant is required to submit a Delivery and Servicing Plan in accordance with Policy T7 of the London Plan (2021). The Delivery and Servicing Plan is required to ensure that the delivery and servicing requirements of the proposed development can be accommodated without adversely impacting the public highway. The Delivery and Servicing Plan must be in accordance with Transport for London's latest guidance on Delivery and Servicing Plans.
- 6.2.22. Cycle and Car Parking Management - No information has been included regarding the management of car parking and vehicle waiting areas across the site. The shortfall of information raises concerns of potential abuse of the proposed private car loop associated with the proposed kiss and ride. The applicant is required to submit a cycle and car parking management plan.
- 6.2.23. Electric Vehicle and Low Emission Infrastructure - No information has been provided relating to electric vehicle and other low emission charging infrastructure. Electric vehicle charging is required by London Plan policies (2021). In addition, some of the latest Transport for London buses are hydrogen powered and therefore details on any associated infrastructure are required to be submitted.
- 6.2.24. Wayfinding - No information has been provided relating to wayfinding across the application site. The development proposal will result in high levels of pedestrian footfall across the site to various destination points and the lack

of wayfinding information is contrary to Policy T3 of the Local Plan (2018). The applicant is required to submit updated site plans including wayfinding information.

6.3. Other Environmental Matters

6.3.1. In line with HS2 Planning Forum Note 5 (Model Conditions) and Schedule 17 Statutory Guidance, the local planning authority may also only impose conditions on a Schedule 17 consent if they are relevant to the matter subject to the consent, relevant to the grounds referred to above and providing that the conditions do not seek to replicate other controls or commitments regarding HS2 (such as HS2 Phase One Environmental Minimum Requirements) or pre-empt future requests for approval or agreement.

6.3.2. The Environmental Minimum Requirements (EMR) are a suite of documents which sets out overarching environmental and sustainability commitments for the HS2 project. The EMRs include the following:

Environmental Memorandum – sets out the overarching requirements in relation to various environmental impacts of the scheme including nature conservation, ecology, water resources, flood risk, geological features, recreation and amenity impacts, landscape and visual, public open space, soils, agriculture and forestry, excavated material, waste management and climate change. It also sets out the approach for key environmentally sensitive worksites along the route, although none of these are within the OPDC area.

6.3.3. LBHF's Land Contamination team have requested a suite of conditions which would require the submission of details of site investigation, remediation and on-going monitoring. Contaminated land matters are dealt with through the Environmental Memorandum EMR and mitigation measures are detailed within the HS2 Phase 1 Environmental Statement. Accordingly, it would be unreasonable to request that OPDC attach conditions relating to contaminated land to the consent, should it be granted.

7. CONCLUSION & RECOMMENDATION

7.1. Given the highways issues identified within this report, and the concerns regarding the lack of connectivity to Scrubs Lane, the Grand Union Canal and Wormwood Scrubs, Officers consider the proposed urban realm strategy to be unacceptable.

7.2. Officers therefore recommend that the Council raises an objection to the proposed development for the following reason(s):

- 1) Highway Impacts: Additional information is required to fully demonstrate that the road layout and associated features can operate safely and to further demonstrate compliance with the London Plan. Please refer to the attached committee report to read the full assessment of the proposal and the Council's requested revisions should permission be granted.
- 2) Urban Design: Insofar as it relates to the connectivity of Old Oak Common Station with the wider area, the design of the urban realm is unacceptable.

LBHF strongly recommends that wider links and connectivity to Scrubs Lane, the Grand Union Canal and Wormwood Scrubs are delivered at an early stage of the development programme. Further details of LBHF's concerns in this regard are provided in the attached committee report.