

**Wormwood Scrubs Charitable Trust
First Floor
77 Glenthorne Road
London W6 0LJ**

Registered Charity Number 1033705
Contact: Mark Jones, mark.jones@lbhf.gov.uk , 020 8753 6700

13 April 2015

Boris Johnson
Mayor of London
(Draft Old Oak & Park Royal Opportunity Area Planning Framework)
Greater London Authority
Post Point 18
City Hall
Queens Walk
London SE1 2AA

Dear Mr Johnson,

Wormwood Scrubs Charitable Trust Comments in response to Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) – Draft for Public Consultation

Please find below the comments from the Wormwood Scrubs Charitable Trust on the draft Old Oak and Park Royal Opportunity Area Planning Framework.

The Wormwood Scrubs Charitable Trust is responsible for the Wormwood Scrubs Common in west London, having been created by the Wormwood Scrubs Act 1879. The London Borough of Hammersmith and Fulham is the sole corporate trustee of the Trust and when acting in that capacity must act in the interests of the Trust. The Act and Trust's objectives are to protect the Scrubs for 'perpetual use for exercise and recreation of the inhabitants of the metropolis'.

The Trust consider that this OAPF has been rushed and it would have been better to develop the Local Plan for the OPDC area with a detailed evidence base first. We have serious concern regarding the impact on the Scrubs of the proposed 24,000 new homes and 55,000 jobs and that a proper analysis has not been undertaken to consider this impact or to consider the need for an adequate amount of new open space within the regeneration area.

The Trust is responsible for the management of the Scrubs and would therefore need to ensure any proposals in this OAPF would not have unacceptable revenue implications to the Trust or an adverse impact on the nature of the Scrubs.

Comments on the OAPF

- Page 16 Objectives 4. Consolidate – Wording regarding Wormwood Scrubs should be strengthened from safeguarding the nearby amenity asset to protecting existing natural heritage value.
- Page 17 Figure 6 – Access to Wormwood Scrubs is presented as part of the green grid however the Trust do not support the southern access from the HS2 station onto the Scrubs in this location.
- Page 22 L3 Wormwood Scrubs – The Trust welcomes the statement “agreed with Wormwood Scrubs Charitable Trust”.
- Page 27 Figure 14 – Access to Wormwood Scrubs is presented as part of the green grid however the Trust do not support the southern access from the HS2 station onto the Scrubs in this location.
- Page 28 D3 b – The Trust are very concerned regarding taller buildings and higher densities proposed at stations and the negative impact this would have on views from the Scrubs. This is contradicted by London Plan policy in 4.2 which seeks to “reduce densities to respond to the sensitivities of existing residential communities, heritage assets and public open spaces.
- Page 33 Figure 18 – The large blob representing “Focus on town centre uses” comes far too close to the Scrubs and should be pulled further away to the north.
- Page 36 5.19 - The Trust do not support a southern access from the HS2 station onto the Scrubs in this location.
- Page 37 Figure 20 – The Trust do not support a southern access from the HS2 station onto the Scrubs in this location depicted in the Illustrative master plan.
- Page 38 002 Public amenity Space – It is important to include minimum sizes for the proposed public amenity spaces. This is really important to avoid developers through negotiations reducing the size of proposed amenity areas which could place unwelcome additional usage and stress on the Scrubs.
- Page 39 Figure 23 - The Trust do not support a southern access from the HS2 station onto the Scrubs in this location.
- Page 42 Table – Wormwood Scrubs is described in the table as a sensitive area so buildings adjacent should deliver “Lower” heights. In terms of building height what does “lower” represent? Old Oak Common Station and local vicinity however proposes the “Highest” buildings. In terms of building height what does “higher” represent? The Trust are very concerned regarding the negative view from the Scrubs of the

highest buildings proposed. Also how can this transition from “Lower” to” Highest” be effectively delivered?

Page 44 Question 6 – There should be an additional view from the Scrubs near the northern edge looking north at the station site.

Page 50 5.36 – A minimum size for the new green amenity space north of the canal should be inserted here.

Page 52 Key objectives 9 – “Development should provide an edge and new access points onto Wormwood Scrubs whilst respecting its character and ecological value”. The Trust would want to be consulted on the proposals for the IEP Depot site and its interface with the Scrubs as well as any new access points to the Scrubs.

Page 53 Figure 34 – Wormwood Scrubs should be identified on the plan as it needs to make it clear that the proposed road along the northern edge of the Scrub is not actually on the Scrubs.

The proposed east/west road north of the Scrubs is identified on the plan as a secondary street which should be reiterated. We would not want this road to become a busy road as this would impact negatively on the Scrubs. Also the road would need to be shielded from the Scrubs to prevent any adverse impact from traffic using the road and to protect views from the Scrubs.

Page 54 5.39 - The Trust do not support a southern access from the HS2 station onto the Scrubs in this location.

Page 56 Key Objective 1 - The Trust do not support a southern access from the HS2 station onto the Scrubs in this location.

Page 58 Key Objective 1 - The Trust do not support a southern access from the HS2 station onto the Scrubs in this location.

Page 80 7.2 – More emphasis should be given to nature conservation. LBHF has designated the Scrubs as a nature conservation area of Borough-wide Grade 1 importance and the Trust would encourage the OPDC to replicate this designation in the emerging local plan for the OPDC Area.

Page 80 7.3 – The Trust is concerned regarding the scale of development planned at Old Oak and the negative impact this increase in users could have on the Scrubs. This is further impacted by the current lack of new public open spaces proposed in the OPDC area to serve the additional 24,000 homes and 55,000 jobs. Heavy reliance on the Scrubs to provide recreational space for intensified development would adversely affect the character and amenity of the Scrubs. The OAPF should therefore set out minimum standards for new open space north of the Grand Union Canal.

- Page 81 Figure 53 - It should be made clear in the plan that the proposed road along the northern edge of the Scrub is not actually on the Scrubs.
- Figure 53 - The plan identifies a number of existing paths on the Scrubs but the majority of these are not formalised routes and should be removed.
- Page 109 9.25 – The Trust support the statement here that “Wormwood Scrubs has considerable existing ecological value which will need to be maintained, and enhanced where possible. Consequently the green infrastructure within the core development site itself should be designed to accommodate as much as the day to day recreational demand as possible.”
- Page 118 10.18 - The Trust do not support a southern access from the HS2 station onto the Scrubs in this location.
- Page 119 Figure 70 – There are three connections shown on the plan onto the Scrubs that require further detailed discussion with the Trust.
- Page 122 10.39 – This section mentions that “affordable sports provision will be secured through CIL or Section 106 agreements.” The Linford Christie Stadium although outside the OPDC area could accommodate new sports facilities subject to discussions with the Trust and agreement around ongoing revenue.
- Page 122 10.41- This section mentions that play space for older children formal and informal play will be secured within public open spaces. The Trust has concern that as new areas of open space within this OPDC area are limited that the Scrubs would be expected to full this shortfall which would need place undue pressure on the Scrubs.
- Page 123 Figure 72 – The “All through school” is located on the IEP Depot site close to the Scrubs. The Trust would be concerned if the Scrubs was expected to provide playing field requirements for the school as well as other requirement which could lead to over usage.

Yours sincerely,



Cllr. Wesley Harcourt
Chair Wormwood Scrubs Charitable Trust Committee
The London Borough of Hammersmith and Fulham