

Matter 7 – A40 Corridor and Park Royal,

The A40 corridor as illustrated in Key diagram Map 4 forms a broad sweep through 5 Conservation Areas, listed buildings (both national and local), protected frontages in Greenford and a large amount of natural environment. This includes Green Belt of the Northolt and Greenford Countryside Park, Horsenden Hill, with its importance for nature conservation and geological deposits, and the Brent River Park as well as more limited areas of parks and Green Corridors in Acton. These green spaces are protected by the London Plan and PPS/PPGs and would be to a lesser extent by the DNPPF. Their conservation should be paramount and it is misleading to show them as part of a development corridor. These green areas will contribute to sustainable regeneration through their amenity, climate amelioration, nature conservation value and recreational value.

Built environment with heritage value should be identified and its scope for regeneration appreciated through reflecting its character in the redevelopment of its setting. It is important to identify where the heritage assets will be recorded so that residents and developers have easy access to avoid unnecessary destruction in the balance of regeneration (see policy 3.1 b).

We think this corridor is very misleading and propose as an alternative strategy that specific areas for regeneration are identified so that transport and infrastructure policies can be focused on the areas of greatest need.

The A40 is an important HGV access from Heathrow, the West and the M25 to two of the three of the strategic industrial sites in the Borough identified in the London Plan. It is also a major access into central London and to the Strategic Industrial locations within the borough for the economic development encouraged by the DNPPF. We support Policy 3.2 and are concerned that transfer of land shown for employment use on the UDP Proposals Map to housing will result in rises in land prices that would prevent the modernisation of premises or redevelopment of land for business, services, logistics or industrial use taking place. Advertising outdated premises with inadequate space for movement of large lorries might show that there is little demand for industrial floorspace but the result may be very different for well designed sustainable buildings with space for landscaping. Evidence of lack of demand needs to be considered carefully.

The requirement for 3000 additional residential units will put pressure on these industrial estates and supporting infrastructure will also have land demands.

We consider that the number of units should be carefully revised with more realistic assumptions about constraints on the areas concerned and the impact on the viability of Strategic Industrial Locations. Land released for housing must include community and new schools sites that do not reduce the quality of life for existing school children.

Policy 3.1b) does not take into account London Policy 7.9 on heritage-led regeneration. The most sustainable form of regeneration is renovation not redevelopment. The policy should take this into account.

We suggest the following revision: Policy 3.1b) to promote regeneration within the Corridor by balancing localities for sustainable redevelopment with conservation of heritage assets and the natural environment.

Issues and questions

1. Is it realistic to place reliance on HS2 when it is identified in The London Plan for anticipated

completion post 2020 and is as yet is unfunded?

It is important to safeguard any land needed for unfunded projects but the CS should not base policies for the next 5 years that depend on its completion.

2. How would the cancellation of HS2 affect the implementation of policies in Chapter 3?

It would affect the rate at which regeneration of Park Royal takes place because of the proximity of the proposed Crossrail/HS2 interchange stations at Old Oak Common. Alternative transport improvements to vehicular access and exploitation of the underused overground railway (former GWR New North Main Line) would still be a considerable stimulus to Park Royal's economic development. Sir Terry Farrell has produced a report *A Vision for Park Royal City International* for LB Hammersmith and Fulham (promoters of the new station) which aims to explore the wider potential of the proposed Crossrail and HS2 stations at Old Oak Common, and to look at the economic benefits that could ensue from their co-location. His proposals cover adjoining boroughs including Ealing.

HS 2 would have little influence on the development of the remainder of the corridor but its cancellation would be welcomed by many local residents in the area who are concerned about noise and vibration from the proposed railway.

3. Policy 3.3 supporting text indicates that traffic movement through Park Royal is a key challenge and it is vital that public transport serving the area is improved.

Nevertheless, there is only a commitment to 'further investigate options' for two rail interchange facilities. Are the relevant infrastructure providers supportive of such ideas and if not what are the contingency plans?

The Park Royal Southern Gateway Position Statement 2008 explores options for the focus around North Acton Station. The Park Royal Opportunity Framework (PROF) adopted by the Mayor in 2011 identifies that 11% of the people who work in the whole of Park Royal go to work by bus, 15% by underground, 6% by train and 50% by car. Roads in Park Royal are congested and narrow and given the number of cars and HGVs it will be difficult to accommodate more bus services. Para 4.2 in the PROF put forward some proposals for bus and bus & rail interchange improvements but alternative transport routes are needed and use should be made of rail and road space that is available to provide dedicated public transport routes.

Transport improvements should be identified to reduce journey to work by car. In order to relieve congestion on the A40 rail freight should be promoted in association with adjoining local authorities.

4. The Grand Union Canal runs through the area: should its use be promoted and increased use effectively managed to assist in the delivery of the CS vision and strategy?

The Paddington Arm of the canal is underused in its industrial sections. This will continue unless links can be established for the movement of bulky loads and wharves retained or developed. Para 7.77 of the London Plan provides criteria for the assessment of wharves but the presence of locks on the canals make it a less attractive form of moving bulk goods than the Thames. Otherwise the use is likely to be confined to recreation and the amenity that it provides. Designing landscape for any space available adjacent to the canal would improve the process of regeneration and on redevelopment the interface of the canal with the factories and warehouses needs improvement.

We suggest the following wording should be added to policy 3.2 b): "with space made available on redevelopment including landscaping, appropriate design of buildings and fencing."

5. Has the role of the canal been adequately recognised in the supporting text to Policy 4.2?

Regenerating Greenford Green mentions Butlers Wharf but we do not think this has been a wharf for a long time. However, its reuse could possibly feature in the Waste Plan. The canal has proved to be an important amenity in previous mixed use redevelopments.