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27/11/2023

Dear Sir/Madam,

Consultation on the Old Oak Common West SPD- TfL comments

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response may be prepared by Places for London to reflect TfL's interests as a landowner and potential developer.

Thank you for giving Transport for London (TfL) the opportunity to comment on the Old Oak West SPD. The London Plan was published in March 2021. Local authority policy documents should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). It is important that local policy documents support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

Whilst overall we are satisfied that the document is consistent with London Plan transport policies, there are some points where further clarity would be welcomed, as detailed below. We have also highlighted some areas which might need to be reconsidered as part of a future policy review, largely as a result of circumstances changing in some areas e.g. Old Oak Common becoming the temporary terminus, as further detailed below. This means that the previous assumptions made with regards the transport network may in some instances no longer be valid.

As you are aware, we are currently undertaking a strategic modelling exercise for the area, and this should be used to inform the future transport policy for the area and the associated infrastructure requirements. As such the below comments relate to the document as currently drafted. However, we believe this may need to be updated in the future once we have had time to review the modelling results and have a better understanding of what this means for

the transport requirements for the area, as it may impact on what transport infrastructure and services we think are needed to serve the site and where.

It is acknowledged that this is an SPD and therefore isn't intended to set new policy, however OOC becoming the temporary (and potentially permanent) terminus for HS2, plus other changes mean there might now be a need for additional transport infrastructure e.g. bus standing facilities, to be provided outside of the surface transport interchange located by the HS2 station. This is to ensure that sufficient space is available across Old Oak West to support a future bus network, car lite development and other policy aspirations. This is something to be mindful of for future policy development, as without having adequate supporting bus infrastructure in place it will be difficult to deliver a comprehensive bus network.

If you have any questions in relation to these comments, please contact Rachel McElhone.

Yours faithfully,

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Appendix A: Specific suggested edits and comments from TfL on the draft Old Oak West SPD

Document Reference	Track change/comment
Para 1.3 p6	States that Old Oak West will potentially deliver more homes and space for jobs than OPDC Development Capacity Study Update (2021). It is unclear how much additional development exactly is being considered in comparison to the Local Plan and how the impacts of this have been assessed. This should therefore be clarified.
Para 2.8 (p15)	Safeguarding for Old Oak Common Lane (OOCL) station and WLO services are mentioned, with Chiltern Line services also mentioned in the same bullet point as being “associated” with the station. We think the intention for a potential Chiltern station would be to locate at/near Old Oak Common (HS2/Elizabeth line) station, although didn’t realise this was still being considered. Either way, this would not require any safeguarding related to OOCL station, so should be noted separately to avoid confusion.
Policy TP6 (p15)	References the ‘retention or potential relocation/ reincorporation of the Willesden Freight Terminal and Park Royal Bus Depot’. It should be assumed the Park Royal Bus Depot would need to remain in its current location unless a suitable viable alternative can be found and agreed with TfL and the bus operator. The bus garage is an important piece of transport infrastructure that needs to be retained in the area to support the development of the current and future bus network. Were the bus garage to be relocated it would need to i) be re-provided within the local vicinity of the existing facility; ii) have the capacity to accommodate current demands, plus future growth given the aspirations for the bus network in this area; iii) be capable of accommodating zero-emission buses, iv) involve engagement with TfL and the bus operator at a very early stage.

Fig 3.2 (p20)	Shows the spatial vision for the area. This includes the new 'Channel Gate Local Park' which seems to potentially partially conflict with the Park Royal Bus Depot, which is a change from the Local Plan where only an 'area of search was identified'. It should be assumed that the bus depot will need to remain in current location and any proposed park should not conflict with this. It should also be noted that due to space restrictions at the Old Oak interchange, there may be a need for additional bus infrastructure (e.g. standing space and bus driver facilities) to be provided in Old Oak West in order for us to deliver a bus network that can adequately serve the future development aspirations. This would require land and is something to be mindful of as part of any future policy review.
Para 5.4 (p20)	TfL may have additional comments to make with regards to Old Oak West once we have been able to review the Public Realm SPD referenced in this document as having an appropriate street network will be important to deliver the transport aspirations of the site. The impact of proposals on highway capacity could potentially be a limiting factor in delivering some of the identified improvements e.g. new cycle lanes, and we would suggest that impact assessments may be needed at the appropriate time to better understand this.
Principle TP1 (p29)	Suggest this section could also potentially include a reference to the need to safeguard land to support the future bus network

<p>Fig 5.5 (p32) and fig 12.3 (p116)</p>	<p>The first map shows only one potential pedestrian/ cycle route from the station to Wormwood Scrubs whilst the latter shows three and as such it is unclear what the aspiration is here in terms of walking and cycling links?</p> <p>In addition, there are some inconsistencies between the two drawings in terms of the proposed junction improvements. The former shows an improvement south of Wells House Road and the latter appears to show this further north around Loverose Way. The latter also shows proposed junction improvements to the west of North Acton station, which aren't present on the other map, so we would recommend this is reviewed to make sure all plans are consistent.</p> <p>It should be noted that aspirations to deliver walking/cycling links to the south and east are unlikely to be feasible whilst Old Oak Common is acting as the HS2 terminus and are therefore unlikely to be deliverable before 2038, unless the HS2 consented design is significantly modified. People will therefore likely only be able to access site the from the east during the time covered by this SPD, which will put a lot of pressure on Old Oak Common Lane and the new site access being delivered by HS2. It therefore needs to be ensured that this site access can adequately accommodate the volume of people expected to use it, both my motorised and more sustainable modes.</p>
<p>Principal TP3 (p36)</p>	<p>It should be noted that the bus network as currently shown is indicative only at this stage and may change following receipt of the modelling results. Delivering a suitable future bus network will also be reliant on land being available in relevant locations for us to provide suitable supporting infrastructure as referenced elsewhere in this document.</p> <p>It is currently unknown whether proposed routes can be delivered reliably or if local congestion will require investment in bus priority or other bus standing to stabilise journey times and further work in relation to this will be needed.</p>
<p>Fig 5.7 p 37</p>	<p>It should be noted that bus route 228 is missing from the map and should be added. As above, reference should be added to the map to make it clear that these bus routes are indicative only at this stage and will be subject to change.</p>

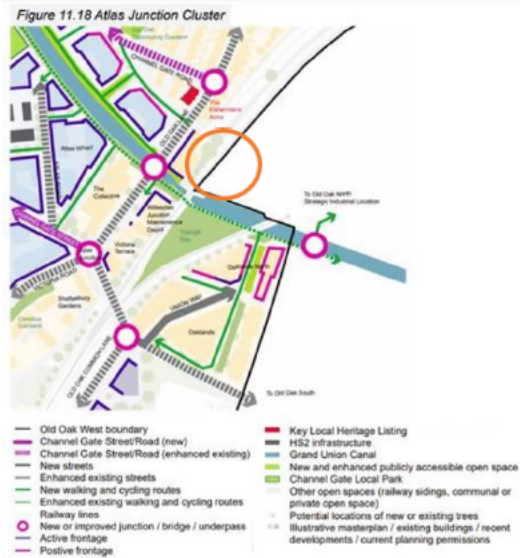
P38 (Transport)	The transport section (and the document as whole) makes limited reference to the fact that Old Oak Common will now be the HS2 terminus on a temporary basis and likely for the life of this plan, which may have implications for what onward transport infrastructure might be needed to support the onward (and inbound) dispersal of passengers. It will be important for developers and others to respond to the changing context of the site, as this might impact on the associated infrastructure requirements of the area, in particular around the transport interchange.
Policy TP5 b) 'North Acton Station' (p38)	<p>For us, the top priorities for North Acton station are delivering i) step-free access and ii) capacity enhancements and think these could potentially be higher up the list given this policy relates to the station itself rather than the surrounding public realm.</p> <p>We are unsure why the document references '<i>enhancing the existing North Acton Station Square</i>', when we thought the aspiration was to bring the square up to Victoria Road level, and the station is being redesigned in a way that supports this? If this is the case, the wording should be revised to reflect this</p>
Section 5 b) vii) (p39) Para 5.23 General	<p>The desire for an upgraded North Acton station to enable '<i>the delivery of development over and around the station and railway</i>' is noted as an aspiration, but the station cannot be designed properly until the scale and extent of any development above the site is known. We would recommend that work is undertaken to better understand what the aspiration is so that this can be taken into consideration as part of the plans to upgrade the station.</p> <p>'Stations' should be deleted from end of the paragraph.</p> <p>Clarification needs to be provided as to how the station improvements are intended to be funded i.e. through developer contributions</p>

Policy EUP2 and Table – 6.1	Refers to delivering two new parks of a minimum of 2ha in size. Whilst it is acknowledged this is as per the adopted Local Plan, we have previously highlighted that more space is needed within the transport interchange zone to support a suitably sized bus station. Without it, additional bus facilities may also be needed in the Channel Gate area. Having insufficient space available within the interchange (and/ or elsewhere) to meet our bus requirements may mean we need to review the bus network, and that fewer buses than anticipated can serve the site which could have wider implications in terms of the ability of the bus network to support the proposed scale of development.
General	It would be useful to get clarity on the housing numbers and how they compare to the Local Plan, to make sure we are clear on the scale of development being proposed and where. Table 11.1 of the Local Plan states North Acton and Acton Wells alone has capacity for 8,000 new homers, whereas the SPD says Old Oak West should support the delivery of a minimum of 6,905 units, so it would be good to understand why there is a difference.
General -OOCL station	The labelling of OOCL station on figures is not necessarily clear, with one icon placed on the North London Line (NLL). The West London Orbital (WLO) service would serve platforms along the Dudding Hill line. We think it has generally just been shown as one station in past documents and if there were platforms on both lines, it would be operated as a single station. However, it could just have NLL platforms, just WLO platforms or both and this should be reflected in the plans if possible.
Fig 8.4 (p66)	We assume it's just an issue with the key, but the map reads as though the North Acton neighbourhood town centre is located around Old Oak Common station rather than North Acton. In fig 9.4 this area is referred to as the 'Old Oak commercial centre' instead, so we would recommend this is clarified.
Figure 11.2	OOCL station not located within the station cluster, as with the other station clusters. We assume this is a design issue and the roundel just needs moving into the cluster boundary
P1C1 Old Oak South (p102)	Whilst this policy is supported in principle, it could potentially be worth specifically mentioning buses here given their importance in facilitating onward journeys from the station. As above, 'Old Oak South' park should be designed in such a way that enables a suitably sized/ designed transport interchange to be delivered.

<p>Fig 11.8 (p104) and fig 11.20 (p110)</p>	<p>The map does not appear to show the existing bus depot. As stated above, it should be assumed this needs to be retained in its current location unless a suitable alternative can be found and agreed with TfL. In addition, the proposed new 'Channel Gate Street/ Road' appears like it could conflict with the bus depot and this should also be avoided.</p>
<p>Fig 11.14 (p107)</p>	<p>There is a new 'key route' called Old Oak Street, running E-W from Old Oak Common Station to North Acton. It seems to partially use the new bridge alignment over the NLL and Dudding Hill Line. Clarification is needed that this street is not intended for any motorized vehicles, at least in the central bridge section around the Overground station. Principle TP1g) i) states that it will be "a through-route for walking and cycling including a new bridge over the railway corridor, and where feasible, buses, providing access only for private vehicles". Figures 11.14 and 12.3 do seem to confirm it's a walking/cycling route only through the OOCL station area – but wording elsewhere in the document is somewhat vague on what modes are allowed, so clarity on this is needed.</p>

Fig 11.18 (p109)-

Some illustrative development is shown north of the canal/ east of Old Oak Lane for mixed use development, 6-12 storeys in height within the next 6-20 years. This appears to be on part of the Willesden Southwest siding lands that we are investigating for WLO train stabling and a new facility building (see image below). These sidings are very likely to be needed for this future rail use and so cannot be assumed to be available for development at this time. With further design work there may be options to develop over the sidings if this can be shown to be viable, but there would need to be sufficient space for train storage and potential ancillary infrastructure such as the facility building and a rebuilt bridge over the canal.



General

No reference has been made in the document to the maintenance, servicing, and freight strategy for the intensified land use. Clarity is therefore requested on how these issues are proposed to be dealt with within Old Oak West.

General	No reference has been made to how the cumulative impact of construction traffic on Old Oak Common Lane will be mitigated whilst both the ASD and HS2 are being delivered? The SPD states that Old Oak Common Lane will be widened to include generous footpaths and segregated cycle lanes but does not illustrate where this will occur. The current designs do not include walkways of both sides of the highway.
General	<p>No reference has been made on how surface run off from the adjacent site development located close to the HS2 site will be managed. The adjacent highway will be lowered on Old Oak Common Lane and recent experiences on the parallel highway (Victoria Road) indicate there is flood risk (see photo from 13/11/2023). Flooding along this route would have a significant impact so it would be useful to understand how/ if the potential for this this has been assessed, and how the potential impacts would be mitigated.</p> 