

Statement of General Conformity with the London Plan 2021

The table below sets out how the [Post Submission Modified Draft Local Plan](#) (May 2021) and its associated evidence is considered to be in general conformity with the Mayor’s [London Plan 2021](#).

The GLA and TfL have also separately submitted [representations as part of the main modifications consultation](#) (July 2021) and provided a [Statement of Common Ground](#) (March 2021) (pages 4-17) confirming that the Post Submission Draft Local Plan is considered to be in general conformity with the London Plan 2021.

London Plan Requirement	OPDC response
<p>the identification of Strategic Areas for Regeneration (London Plan 2021 Policy SD10)</p>	<p>One of the supporting studies to our submission draft Local Plan was a socio-economic baseline study, which identifies the particular indices of deprivation that communities in our area are most disadvantaged against. This study has helped OPDC to identify the areas in which there should be a particular focus on addressing these disadvantages when developing OPDC’s Local Plan policies. This includes:</p> <ul style="list-style-type: none"> • Overcrowding – Further evidence on overcrowding and housing need is also contained within our Strategic Housing Market Assessment. Our Local Plan policies (particularly policies SP4 (Thriving communities), H1 (Housing supply) and H2 (Affordable housing)) seek to address this by providing new housing to a range of income levels. • Employment and income – Our Local Plan policies seek to create new employment opportunities across a range of skill levels and sectors (Policies SP5 (Resilient economy) and policies in the employment chapter) and expressly requires developments to support local people in accessing training and employment opportunities (Policy E5). • Education – Policy TCC4 (Social Infrastructure) in the draft Local Plan require contributions from developments towards enhancing and providing new education facilities to meet the needs of the new population. Educational infrastructure needs are identified in OPDC’s Social Infrastructure Needs Study and Infrastructure Delivery Plan. • Health – the draft Local Plan has a series of policies targeting improvements in health and a reduction in health inequalities. This includes but is not limited to Policies SP3 (Improving Health and Reducing Health Inequalities), SP8 (Green infrastructure and Open Space), D6 (Amenity), EU1 (Open Space), EU2 (Urban greening and biodiversity), EU4 (air quality), EU5 (Noise and Vibration), EU9 (Minimising carbon emissions and overheating), T1 (roads and streets), T2 (Walking), T3 (Cycling) and T8 (Construction).

	<p>In addition, the Integrated Impact Assessment (IIA) integrates equalities considerations in its indicators in the assessment of the policies. The IIA identifies that the draft Local Plan's policies will result in mainly positive outcomes.</p>
<p>A requirement to undertake area assessments of different places (London Plan 2021 policies SD6, SD7 and SD8)</p>	<p>Post Submission Modified Draft Local Plan (May 2021) policy SP4 (Thriving Communities) supports and encourages a range of housing tenure, types and sizes outside of Strategic Industrial Locations. This includes within town centres. Policy SP6 (Places and Destinations) set out the locations for town centres. Place and Cluster policies within the Places chapter support the mix of housing and town centres within the proposed town centre hierarchy and cluster locations. These policies provide guidance for the location of town centre and housing uses.</p> <p>OPDC's Retail and Leisure Needs Study and Addendum (2018) has assessed the need for town centre uses, taking into account capacity and forecast future needs. The recommendations of these reports have informed Post Submission Modified Draft Local Plan (May 2021) policies SP6 (Places and Destinations) and TCC1 (Locations for and Impacts of Town Centre Uses) in defining the town centre hierarchy, informing site allocation non-residential floorspace targets and defining town centre boundaries. The Retail and Leisure Needs Study (2018) and policy SP6 identify the designation of the new Old Oak major town centre. This was supported by the Mayor of London in his consultation response to the first Regulation 19 consultation (reference SP6/5). This is set out in Appendix F of the Statement of Consultation (2018).</p> <p>The Retail and Leisure Needs Study and Addendum (2018) alongside other supporting studies have informed the development capacity of commercial uses and higher density housing within new town centres and the intensification of the existing Park Royal Centre. These other supporting studies include:</p> <ul style="list-style-type: none"> - Development Capacity Study Update (2021) - The Channel Gate Development Framework Principles (2021). - The Park Royal Development Framework Principles (2018) - The Scrubs Lane Development Framework Principles Update (2021) - The Victoria Road and Old Oak Lane Development Framework Principles (2018)
<p>Plan to meet growth requirements (London Plan 2021 policy D1 B)</p>	<p>OPDC's Development Capacity Study Update (2021) identifies the location and capacity of OPDC's key development sites required to meet London Plan targets for OPDC and the Old Oak and Park Royal Opportunity Area and ensure general conformity with the London Plan. The Development Capacity Study, in turn, is informed by area-specific studies which have looked at the character, form and infrastructure to derive an appropriate development capacity for these sites. This includes:</p> <ul style="list-style-type: none"> - The Old Oak North Intensification Study (2021)

	<ul style="list-style-type: none"> - The Park Royal Intensification Study (2018) - The Scrubs Lane Development Framework Principles Update (2021) - The Victoria Road and Old Oak Lane Development Framework Principles (2018) - The Park Royal Development Framework Principles (2018) - The Channel Gate Development Framework Principles (2021) - The Grand Union Canal Massing and Enclosure Statement Update (2021) <p>The outputs from the Development Capacity Study have been used to set site allocation floorspace targets. This is included in the Post Submission Modified Draft Local Plan (May 2021), Table 3.1 on pages 32-34.</p> <p>Where relevant, the outputs from the place based supporting studies listed above have been used to set planning policy on indicative building heights and indicative layouts for positive and active frontages.</p>
<p>Support the creation of inclusive neighbourhoods (London Plan 2021 policy D5 A)</p>	<p>OPDC's requirements for inclusive design are included within Policies SP9a)vii. (Built Environment), Policy D2 (Accessible and Inclusive Design) of the Post Submission Modified Draft Local Plan (May 2021).</p> <p>Local Communities were actively engaged and collaborated with in the development of planning policies that affect them. Details of engagement with communities is set out within OPDC's Statement of Consultation</p>
<p>Encourage and explore opportunities to create new public realm with defined qualities (London Plan 2021 Policy D8)</p>	<p>The Post Submission Modified Draft Local Plan (May 2021) provides a range of policies to deliver high quality public realm that meets the requirements of London Plan policy D8 and delivers the Mayor's Healthy Streets approach. These comprise:</p> <ul style="list-style-type: none"> - Policy SP2 (Good Growth) which sets out requirements to deliver inclusive, resilient, sustainable, well-designed development that includes new public realm. - Policy SP3 (Improving Health and Reducing Health Inequalities) which requires the design and operation of external spaces to improve health and well-being. - Policy SP7 (Connecting People and Places) which supports the movement function of the public realm by encouraging active travel, supports public transport, discourages use of private motorised vehicles and limits car parking. - Policy SP8 (Green Infrastructure and Open Space) which requires the delivery of 30% of developable areas outside of Strategic Industrial Locations to be delivered as publicly accessible open space that forms part of the public realm and delivering new and enhanced green infrastructure. - Policy SP9 (Built Environment) which requires the delivery of new public realm to be of the highest design quality that positively responds to context and enhances local character and identity;

responds to heritage assets; ensures appropriate standards of amenity; delivers a safe and secure environment; delivers active and positive frontages for the public realm; delivers a high standard of accessibility and inclusive design and comprises attractive; resilient and sustainable materials.

- Place and cluster policies which require and identify the delivery of new public realm e.g. policy P1C1 which requires the delivery of new station public realm and policy P8C1 Atlas Junction Cluster which requires the delivery of Union Way as a new route.
- Policy D1 (Public Realm) which requires the delivery of Healthy Streets and a high quality, inclusive, accessible and coordinated multi-functional public realm that supports social interaction by ensuring public realm design and integral to a scheme's design; a coordinated approach between sites to improve existing and provide new public realm; ensuring the public realm and its components respond to and enhance positive aspects of character; using durable, adaptable and sustainable materials, finishes and details; maximising the use of active and positive frontages; supporting the design, delivery operation and management of infrastructure; providing a balanced approach between security and design of the public realm in delivering security measures; delivering clear, coordinated and robust management and maintenance strategies and managing publicly accessible private realm in accordance with the Mayor's Public London Charter ensuring unrestricted continuous public use and access; and requiring advertisements to have a positive impact on their surroundings including in relation to lighting. Paragraph 5.14 refers to the need for public realm components such as furniture to deliver an uncluttered environment.
- Policy D2 (Accessible and inclusive design) which requires development to meet the latest guidance and integrate access and inclusive elements which in their design meet the requirements of all users at all stages of their lives and remove existing barriers.
- Policy D3 (Well-designed buildings) which requirements buildings to make a positive contribution to townscape.
- Policy D5 (Amenity) which requires development to maximise the quality and availability of daylight and direct sunlight to the public realm and minimise the effects of the Urban Heat Island effect, overheating and minimising excessive windspeeds on the public realm through the use of green infrastructure.
- Policy D8 (Play space) which requirements development to maximise opportunities for high quality multifunctional play and informal recreation for all ages to support social interaction.
- Policies T1 (Roads and Streets), T2 (Walking) and T3 (Cycling) which support active travel.
- Policy T4 (Parking) which require car parking in the public realm to not take precedence over other street users or the design and quality of the public realm.
- Policy TCC8 (Meanwhile Uses) which supports the delivery of appropriate meanwhile uses.

	<p>OPDC is also developing a Public Realm SPD to supplement the above policies demonstrating our commitment to developing a high quality and equitable public realm.</p>
<p>Define what is considered a tall building for specific localities and determine if there are locations where tall buildings may be an appropriate form of development (London Plan 2021 policies D8 and D9 A and D9 B)</p>	<p>OPDC's Tall Building Statement Update (May 2021) section 2 sets out what is considered to be a tall building for the OPDC area and how this has been defined based on local context as set out in OPDC's supporting studies. The definition is a minimum of 15 storeys or a minimum of 48 metres above ground level.</p> <p>The definition is stated OPDC's Post Submission Modified Draft Local Plan (May 2021) in paragraph 3.79, supporting policy SP9 (Built Environment); paragraph 5.40, supporting policy D4 (Tall buildings); and the glossary.</p> <p>The Tall Building Statement Update (May 2021) section 3 identifies locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the development plan in figure 2 and paragraph 3.14. Figure 2 should be viewed alongside the Table of Further Minor Modifications (September 2021) which clarifies the tall building location relating to policy P4C1 (Brewery Cluster).</p> <p>Section 3 of the Tall Building Statement Update sets out how these locations have been determined in accordance with London Plan (2021) paragraphs 3.9.2 and 3.9.10. In summary, these are evidenced by OPDC Local Plan supporting studies that consider the components set out in London Plan (2021) policy D1, and in considering relevant impacts.</p> <p>The locations where tall buildings may be an appropriate form of development are identified in OPDC's Post Submission Modified Draft Local Plan (May 2021) figure 3.15 that supports Policy SP9. Figure 3.15 is a map of sensitive locations and tall building locations.</p> <p>The identification of tall buildings locations has been informed by engagement with our host and neighbouring boroughs through regular meetings including OPDC's Duty to Cooperate meetings. This is demonstrated in OPDC's Schedule of Post Submission Engagement (September 2021).</p> <p>The Tall Building Statement Update (May 2021) confirms that identifying general heights of tall buildings is not considered to be appropriate at this time. This is due to the evolving context of the OPDC area as an Opportunity Area and recognising the area-specific complex circumstances in planning and delivering priorities for affordable housing, commercial uses, local and nationally significant infrastructure, new street networks, high standards of sustainability, securing deliverability of development and addressing</p>

	<p>multifaceted challenges. However, where appropriate within the Local Plan place policies, general shoulder and/or podium heights are defined based on recommendations by supporting studies.</p> <p>The Mayor of London has considered the general conformity of OPDC's Post Submission Draft Local Plan and Tall Building Statement in relation to London Plan Policy D9 in his response to the draft Local Plan Main Modifications consultation and his response states that "<i>OPDC's approach to tall buildings as set out in the Tall Buildings Statement Update (May 2021) and the draft Plan is consistent with the approach in the LP2021.</i>"</p>
<p>(Where identified as an issue locally) address the negative impacts of large-scale basement development (London Plan 2021 policy D10 A)</p>	<p>OPDC has not determined applications for large-scale basement development beneath existing buildings. Therefore, it is not identified to be a local issue and policies have not been included in the Local Plan.</p>
<p>Reflect the Agent of Change principle (London Plan 2021 policy D13)</p>	<p>Policy D5b of the Post Submission Modified Draft Local Plan (May 2021) seeks to implement the Agent of Change principle so that existing uses can continue to function and/or that their amenity is not unacceptably harmed. References explaining how the Agent of Change principle will be considered are also included in the supporting text as follows:</p> <ul style="list-style-type: none"> • Para 6.45 (EU4: Air Quality) – explains that the principle will be applied to the assessment and treatment of poor air quality. • Para 6.59 (EU5: Noise and Vibration) – states that OPDC will apply the principle when considering the impacts of noise and vibration. • Para 9.11 (E1: Protecting, Strengthening & Intensifying the Strategic Industrial Location) – OPDC will apply the principle when consider the impact of proposals adjacent to SIL to ensure that development will not harm the functioning of existing or future employment and industrial activities in SIL and vice versa, proposals for broad industrial type activities on the edge of SIL will need to adequately protect the amenity of adjacent mixed use developments. • Para 10.44 (Policy TCC4: Culture and Art) – sets out that a Cultural Action Plan should include details on how the developer will accord with the 'agent of change' principle if existing cultural infrastructure is affected.

	<ul style="list-style-type: none"> Paras 10.74-10.76 (Policy TCC10: Night Time Economy Uses): OPDC will look to apply the principle to manage the impacts of night time uses, including late night premises. <p>The above Local Plan policies and the supporting text, in conjunction with the London Plan policies and national planning guidance, will ensure that existing noise and other nuisance generating uses are taken into account when new development is proposed nearby.</p>
<p>Include ten-year targets for net housing completions, ensure that the targets are achieved and optimise the potential for housing delivery</p>	<p>Policy H1b of the Post Submission Modified Draft Local Plan (May 2021) supports the delivery of 13,670 homes between 2019 and 2029 in accordance with the 2021 London Plan housing targets. This is evidenced through OPDC's Development Capacity Study Update (2021) and the Statement of Common Ground (March 2021) with the GLA (page 4).</p> <p>Paragraph 8.10 of the Post Submission Modified Draft Local Plan (May 2021) sets out how OPDC will ensure that the targets will be achieved and housing delivery optimised, specifically:</p> <ul style="list-style-type: none"> working positively with developers and other key stakeholders to support the timely delivery of development, in accordance with Policy DI3; supporting advanced construction methods such as precision-manufacturing, in accordance with Policy SP2; bringing forward development in accordance with, and where possible in advance of, the phasing identified in Figure 3.16, in accordance with Policy SP10 and Policy DI2.
<p>Recognise that local character evolves over time (London Plan 2021 policies H1 and H2 B)</p>	<p>In developing OPDC's Post Submission Modified Draft Local Plan (May 2021), OPDC has considered how the local character will change to enable the delivery of a new high density part of London, ensuring that development is optimised in response to the improved local, regional and national public transport accessibility provided by Old Oak Common Station and other station and bus service enhancements.</p> <p>OPDC has re-evaluated the appropriateness of the land use designations and potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels that was previously set out in the development plans of our host boroughs.</p> <p>The Local Plan's Spatial Vision sets out OPDC's intentions following this re-evaluation, notably that <i>"It will comprise a network of places including an innovative industrial area in Park Royal and a high-density new vibrant part of London"</i>, <i>"The OPDC area will become a major new London centre providing high-density</i></p>

	<p><i>mixed use development, that will shape west London and support London's continued growth." and "Old Oak will be the major transport hub for London, providing a gateway to London, the UK and beyond."</i></p> <p>Policy SP1 (Catalyst for Growth) recognises the delivery of new sustainable transport infrastructure in the form of the new strategic transport hub and interchange at Old Oak Common Station. Paragraph 3.1 supporting policy SP1 confirms that <i>"This new station provides the opportunity to set new standards for optimising sustainable transit orientated development that can strengthen London's position as a global city and help to deliver much needed new homes and jobs."</i> Paragraph 3.2 goes on to confirm that <i>"The development potential across Old Oak and Park Royal offers significant potential to deliver new homes, jobs and supporting ancillary uses. The Mayor's London Plan identifies that the OPDC area can deliver a minimum 25,500 homes and 65,000 jobs, making it one of London and the UK's largest regeneration projects. 19,850 of these homes and 36,350 of these jobs can be delivered within the next 20 years of this Local Plan by 2038"</i>.</p> <p>Policy SP10 (Integrated Delivery) sets out guidance to support the delivery of this re-evaluated capacity ensuring development is delivered in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</p> <p>In considering how the local character will change, this has enabled OPDC to work with the GLA in demonstrating that the majority of sites capable of accommodating development have been identified within OPDC's Development Capacity Study Update (2021). The majority of the sites are strategic sites and designated as site allocations. Therefore, the capacity for finding additional small sites is limited. Given this, and the relatively small geographic size of OPDC's area, London Plan (2021) table 4.2 sets out a low 10 year target for net housing completions on small sites for OPDC. The target for OPDC is 60 homes which equates to 6 homes per year. OPDC is confident that the change in character demonstrated in OPDC's Local Plan will be able to support the delivery of our small sites target.</p>
<p>Plan to meet identified need for gypsy and traveller pitches (London Plan 2021 policy H14)</p>	<p>OPDC's Gypsy and Traveller Needs Assessment (2018) identified that there is no need to plan for additional Gypsy and Traveller pitches during the Local Plan period, in accordance with guidance on completing GTANAs and the Planning Policy for Traveller Sites (PPTS).</p> <p>OPDC's Post Submission Modified Draft Local Plan (May 2021) policy H8b sets out that OPDC will work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham to identify sites to meet needs identified in the future.</p>

<p>Ensure the social infrastructure needs of London's diverse communities are met (London Plan 2021 policy S1)</p>	<p>OPDC's Social Infrastructure Needs Study Update (SINS) (2021) assessed the social infrastructure needs of the population within the OPDC area and identifies the social infrastructure requirements for education, health, community and emergency services to meet these needs. In developing the SINS, OPDC worked with boroughs and service providers to identify the amount, phasing and typology of social infrastructure facilities for the plan period.</p> <p>This results in Local Plan policy TCC3, paragraphs 10.27, 10.29, 10.30 and place policies identifying the need to deliver:</p> <ul style="list-style-type: none"> - Four super-nurseries - One 3FE primary school - One large health hub - Two community hubs - Expansions of ambulance facilities and three neighbourhood police facilities
<p>Identify and address local health and social care needs (London Plan 2021 policy S2)</p>	<p>OPDC's Social Infrastructure Needs Study Update (SINS) (2021) assessed the health and social care infrastructure needs of the population within the OPDC area and identifies the social infrastructure requirements for health and social care services to meet these needs. Policies to deliver these requirements comprise policy TCC3 and relevant place policies.</p> <p>The SINS was produced in collaboration with the North West London Clinical Commission Group and informed by OPDC's Health Advisor and NHS England's Acting Head of Primary Care Commissioning for the London Region and the Head of Health Partnerships at London Borough of Hammersmith & Fulham regarding the provision of space for social care in the health hub.</p>
<p>Prepare development plans that are informed by an assessment of education and childcare facility needs (London Plan 2021 policy S3)</p>	<p>OPDC's Social Infrastructure Needs Study Update (SINS) (2021) assessed the education and early-years infrastructure needs of the population within the OPDC area and identifies the social infrastructure requirements for education facilities to meet these needs. Policies to deliver these requirements comprise policy TCC3 and relevant place policies.</p> <p>This was undertaken in collaboration with our host boroughs' Education Authorities having consideration of their School Organisation Strategies and coordination with the Borough Education Officers.</p>
<p>Prepare development plans that are informed by an assessment of children and</p>	<p>The Environmental Standards Study (2018) evidences OPDC's policy requirements with regards to provision of play place, including how and where different forms of play space should be delivered to support development. This study identifies that a total of 121,400 sqm of play space will be required to</p>

<p>young person's play and informal recreation facilities (London Plan 2021 policy S4)</p>	<p>satisfy requirements of the Mayor's Play and Informal Recreation SPG. The study finds that play space for 0-9 years can be satisfied through small door space play spaces, while play space for 10-18 year olds should be delivered within the proposed new Local Parks.</p> <p>These requirements have been carried through to Policy D8 (Play space) of the Post Submission Modified Draft Local Plan (May 2021) and into the policies for local parks provision - policies SP8 (Green Infrastructure and Open Space) and EU1 (Open Space)</p>
<p>Prepare development plans that are informed by a needs assessment of sports and recreation facilities (London Plan 2021 policy S5)</p>	<p>OPDC's Local Plan is supported by a Sports Courts and Swimming Pools Study (2018), which identifies current capacity and need for sports courts and swimming pools. The outputs of this study have been used to inform OPDC Local Plan Policy TCC5 (Sports and Leisure) in the Post Submission Modified Draft Local Plan (May 2021) (page 214).</p>
<p>Ensure provision is made for the burial needs of London's communities (London Plan 2021 policy S7)</p>	<p>The OPDC area contains one cemetery, North Acton Cemetery, which is protected as publicly accessible open space under Policies SP8 and Policy EU1 (b) of the Post Submission Modified Draft Local Plan (May 2021). North Acton Cemetery has available plots to support burial needs of London's communities.</p>
<p>Support the provision and protection of B Use Class business space (London Plan 2021 policy E2)</p>	<p>The Post Submission Modified Draft Local Plan (May 2021) continues to designate areas of land as Strategic Industrial Location (SIL). This means that land is being specifically protected for industrial uses, which will include Use Class B uses and is protected from redevelopment for alternative uses.</p> <p>Policy E1a and b in the Post Submission Modified Draft Local Plan (May 2021) also require proposals within the SIL to be comprised of uses suitable for broad industrial type activities in line with the London Plan policy and/or guidance and to deliver a range of mix of sizes. This approach would support compliant B use classes and a range of unit sizes being delivered within SIL in line with the London Plan policy E2, E4 and E5.</p> <p>Outside of SIL, policy E2 in the Post Submission Modified Draft Local Plan (May 2021) seeks the on site re-provision of existing industrial floorspace suitable for broad industrial type activities where the existing use is compatible with the land use policy relevant to the application site. Where a site has existing B use class business space, then the re-provision under policy E2 could consider this and deliver the co-location of industrial and other uses as part of the new development.</p> <p>The Place policies, by encouraging opportunities for industrial intensification within SIL and industrial co-location outside of SIL, are also supporting the delivery of new/additional B use classes that could be being delivered as part of this in accordance with OPDC Local Plan policy E1 and E2.</p>

	<p>Policies SP5 (Economic Resilience) and E3 (Supporting small and start up businesses) in the Post Submission Modified Draft Local Plan (May 2021) support proposals that provide employment space across a range of sizes, types, tenures, forms and affordabilities including: affordable workspace offered at below market rate; shared workspaces; and small business units. These policies would apply generally and with the expectation that different types of B use business space would be delivered as part of this broad mix of employment space.</p>
<p>Consider detailed affordable workspace policies (London Plan 2021 policies E3 B (2) and E3 C)</p>	<p>Policy E3 in OPDC's Post Submission Modified Draft Local Plan (May 2021) sets out broad requirements to support small and start up businesses; it includes provisions for affordable workspace offered at below market rent levels. A number of OPDC supporting studies have informed policy E3 including:</p> <ul style="list-style-type: none"> • Circular and Sharing Economy Study (2018) • Cultural Principles (2018) • Future Employment Growth Sectors Study (2018) • Industrial Estates Study (2018) • Socio-Economic Baseline Study (2018) • Whole Plan Viability Study (summary) (2018) <p>OPDC is also developing research into the specific needs for affordable workspace (types, sizes, % rent levels etc) within the OPDC area. This research will inform an updated draft Planning Obligations Supplementary Planning Document (SPD) which will include more detailed guidance on what OPDC will seek to secure in relation to policy E3. OPDC considers that this approach towards setting guidance for affordable workspace in an SPD is the most appropriate. An SPD will allow flexibility for more regular updates to adapt to any short term and/or ongoing changes to the affordable workspace market.</p>
<p>Define the detailed boundaries of SIL and protect and intensify their function (London Plan 2021 policy E5 B)</p>	<p>A detailed boundary for the Strategic Industrial Location (SIL) has been defined and is shown in the Table of figure modifications (including Policies Map) (May 2021). OPDC's Industrial Land Review Addendum (2021) provides a justification for the modified SIL boundary and applies a sequential approach and criteria based assessment to minimise any further release of SIL and to avoid unacceptable impacts. The report also demonstrates how the OPDC can help meet industrial demand and deliver intensification.</p> <p>OPDC's Post Submission Modified Draft Local Plan (May 2021) supports the protection and intensification of SIL as follows:</p>

- The Spatial Vision and policy SP5b (Economic Resilience) support proposals that will protect, strengthen and intensify SIL in Park Royal and Old Oak North.
- Key intensification opportunities have been identified as site allocations in Table 3.1 in the draft Local Plan and include: Cargiant, The Triangle Business Centre, EMR, Bashley Road Metal Refinery and 32-36 & 38-42 Minerva Road. A significant quantum of intensified industrial floorspace is being planned for through these allocations.
- Place policies that include land designated as SIL – P2 (Old Oak North), P4 (Park Royal West) and P5 (Old Park Royal) – all support opportunities to deliver industrial intensification and relevant site allocations. They also set out opportunities to improve the attractiveness and competitiveness of the SIL through improvements to the function and quality of the public realm, movement network, green infrastructure, environment; and by conserving and enhancing heritage assets and their settings.
- Policy E1 (Protecting, Strengthening & Intensifying the Strategic Industrial Location) support proposals that deliver industrial uses. It also requires sites to achieve a no net loss or the intensification of industrial floorspace capacity, deliver a mix of unit sizes, provide adequate servicing and delivery space and appropriately designed for industrial uses and growth sectors.
- Policy D5 (Amenity) seeks to implement the Agent of Change principle. This will ensure that existing industrial uses within SIL can continue to function and/or that their amenity is not unacceptably harmed.

The following supporting studies have looked at opportunities to protect, intensify and improve SIL in the OPDC area and informed the policies set out above:

- [Development Capacity Study Update \(2021\)](#)
- [The Old Oak North Intensification Study \(2021\)](#)
- [The Park Royal Intensification Study \(2018\)](#)
- [Future Employment Growth Sectors Study \(2018\)](#)
- [Industrial Estates Study \(2018\)](#)
- [Industrial Land Review \(2018\)](#) and [Industrial Land Review Addendum \(2021\)](#)
- [Infrastructure Delivery Plan \(2021\)](#) – provides a list of the infrastructure that is necessary to deliver development and intensification in SIL, based on information provided in other supporting studies.

<p>Designate and Define detailed boundaries and policies for Locally significant Industrial Sites (London Plan 2021 policy E6)</p>	<p>There are no proposed Locally Significant Industrial Sites identified within the OPDC area.</p>
<p>Encourage business, logistics and industrial intensification or relocation (London Plan 2021 policies E7 A, B and E)</p>	<p>OPDC has taken a plan led approach to industrial intensification and colocation and seeks to intensify SIL so that industrial floorspace is reprovided in the OPDC area rather than being relocating elsewhere.</p> <p>OPDC's Post Submission Modified Draft Local Plan (May 2021) de-designates or releases areas of SIL, but to mitigate for this loss, the draft Local Plan is also consolidating and proactively encouraging the intensification of industrial uses within the remaining SIL area and industrial co-location outside of SIL. OPDC's Industrial Land Review Addendum (2021) provides evidence to demonstrate that industrial intensification and co-location could deliver a no net loss of industrial floorspace capacity, and the potential to deliver an overall net gain of 250,428sqm of industrial floorspace.</p> <p>Key policies supporting the intensification of SIL include:</p> <ul style="list-style-type: none"> • The Spatial Vision and policy SP5b (Economic Resilience) support proposals that will intensify SIL in Park Royal and Old Oak North. • Key intensification opportunities have been identified as site allocations in Table 3.1 in the Local Plan and include: Cargiant, The Triangle Business Centre, EMR, Bashley Road Metal Refinery and 32-36 & 38-42 Minerva Road. A significant quantum of intensified industrial floorspace is being planned for through these allocations. • Place policies that include land designated as SIL – P2 (Old Oak North), P4 (Park Royal West) and P5 (Old Park Royal) – all encourage the delivery of industrial intensification and relevant site allocations. In conjunction with the transport policies, they also ensure that potential impacts on the transport network will be addressed, through improved provision for walking, cycling, public transport, and the wider movement network. P2 and P4 also support increased building heights where this will deliver industrial intensification and SIL compliant broad industrial type activities, in anticipation of the potential for multistorey industrial development. • Policy E1 (Protecting, Strengthening & Intensifying the Strategic Industrial Location) seeks to ensure proposals deliver a range of industrial uses. It also requires sites to achieve a no net loss or the intensification of industrial floorspace capacity, deliver a mix of unit sizes that includes small units, provide adequate servicing and delivery space and can provide flexibility to support appropriate

	<p>identified growth sectors. Supporting paragraph 9.9 references the need to deliver high plot ratios through industrial intensification.</p> <p>The following supporting studies have proactively looked at opportunities to support businesses, deliver intensification, deliver high plot ratios and different forms of development (including multi storey schemes) in the OPDC area.</p> <ul style="list-style-type: none"> • Development Capacity Study Update (2021) • The Old Oak North Intensification Study (2021) • The Park Royal Intensification Study (2018) • Future Employment Growth Sectors Study (2018) • Industrial Estates Study (2018) • Industrial Land Review (2018) and Industrial Land Review Addendum (2021) • Infrastructure Delivery Plan (2021) <p>These studies have informed the policies set out in the Local Plan.</p>
<p>Identify future requirements and locations for new retail development, areas for consolidation and policies for various retail classes (London Plan 2021 policies E9 B and C)</p>	<p>The future Town Centre network is identified in Strategic Policy SP6 (Places and Destinations) and TCC1 (Locations for and Impacts of Town Centre Uses) the Post Submission Modified Draft Local Plan (May 2021) including the new Old Oak major town centre. Further details on how this new town centre networks should be delivered are set out in the relevant place policies of the Chapter 4 and are also reflected in the economic floorspace figures for the Plan’s site allocations as set out in Policy SP10.</p> <p>Policy TCC1 (Location for and Impacts of Town Centre Uses) sets out how OPDC will ensure that proposals deliver town centre uses in the appropriate locations to support existing town centres and deliver new town centre locations.</p> <p>Policy TCC2 (Vibrancy) sets out protections for existing town centre uses and sets out how proposals should deliver new town centres uses. This includes requirements which will ensure delivery of smaller town centre units.</p>
<p>Demonstrate a clear understanding of the historic environment (London Plan 2021 policy HC1 B)</p>	<p>OPDC’s Post Submission Modified Draft Local Plan (May 2021) Spatial Vision identifies the need to conserve and enhance heritage assets with policies SP9 (Built Environment) and D7 (Heritage) providing guidance to conserve and enhance the historic environment that supports the creation of a new part of London positive shaped by local context, character and heritage. Further detailed guidance for specific heritage elements are set out in the Place and Cluster policies.</p>

	<p>These policies are informed by OPDC's Heritage Strategy (2018) which sets out a comprehensive understanding of the historical development significance of the OPDC area. This sets out recommendations for designated and undesignated heritage assets. These recommendations have been reflected in the Local Plan and in other heritage workstreams such as Conservation Area designations and the production of OPDC's Local Heritage Listings (2020).</p>
Identify local views (policies HC3 G (There are no designated views within the OPDC area))	<p>OPDC's Post Submission Modified Draft Local Plan (May 2021) policy D6 (Key Views) identifies and provides guidance for key views that are local to the OPDC area. These are depicted in figure 5.8 and informed by OPDC's Views Study (2018).</p>
Protect existing cultural venues and promote new (²⁷ London Plan 2021 policy HC5 A)	<p>Strategic Policy SP6 (Places and Destinations: a-iii) the Post Submission Modified Draft Local Plan (May 2021) supports the creation of a new cultural quarter in the OPDC area.</p> <p>Policy TCC4 (Culture and Art) sets out how proposals will be expected to protect existing cultural spaces and supports the delivery of new cultural spaces.</p>
Promote and manage the night-time economy (London Plan 2021 policy HC6 B)	<p>The supporting text to Strategic Policy SP6 (Places and Destinations) of the Post Submission Modified Draft Local Plan (May 2021) highlights the role of the night time economy when delivering a new network of Town Centres in the OPDC area.</p> <p>Policy TCC10 (Night Time Economy Uses) sets how night time economy uses will be managed, and where appropriate, mitigated.</p>
Protect Public Houses (London Plan 2021 policy HC7 A)	<p>Policy TCC6 (Public Houses) of the Post Submission Modified Draft Local Plan (May 2021) sets out how the existing public houses are protected in the OPDC area. This includes requirements for proposals resulting in the loss of an existing public house to competitively market the premises for no less than 24 months.</p>
Identify green infrastructure assets and opportunities for addressing challenges (London Plan 2021 policy G1 C)	<p>OPDC's Environmental Standards Study (SD20) evidences OPDC's policies with regards to green infrastructure as set out in Policy SP8, and the Environmental and Utilities Policies of Chapter 6 of the Post Submission Modified Draft Local Plan (May 2021).</p> <p>The Study assesses existing green infrastructure assets in the OPDC and identifies the key opportunities to maximise green infrastructure through the future regeneration of the area.</p>

<p>Undertake a needs assessment of open space and include appropriate policies to protect and provide (London Plan 2021 policy G4 A)</p>	<p>OPDC's Environmental Standards Study (2018) evidences OPDC's policies with regards to green infrastructure as set out in Policies SP8 and EU1 of the Post Submission Modified Draft Local Plan (May 2021).</p> <p>The Study assesses provision of, and access to, existing open spaces in and around the OPDC area, and outlines a strategy for delivery of new public open spaces to meet the needs of the future projected population. This includes the requirement to deliver 30% of developable land outside of SIL as publicly accessible open space, and the requirements for new Local Parks as part of this.</p>
<p>Identify Sites of Importance for Nature Conservation, coherent ecological networks, areas of deficiency and opportunities to address them (London Plan 2021 policy G6 B)</p>	<p>OPDC's overarching green infrastructure strategy is established through Policy SP8 of the Post Submission Modified Draft Local Plan (May 2021). This sets out how proposals will be expected to conserve and enhance existing areas of ecology and seek to deliver an overall net gain in biodiversity as part of the overall green infrastructure network for the OPDC area.</p> <p>Further requirements are set out in Policy EU2 on how OPDC will ensure that development in the OPDC area secures an overall increase in green cover and a net gain in biodiversity by supporting development. This includes the requirements to measurably conserve and enhance Sites of Importance for Nature Conservation (SINC) and other identified priority habitats or species, and requirements to optimise urban greening and opportunities for biodiversity within new developments.</p> <p>The Local Plan's approach to delivering an integrated network of green infrastructure is supported by the Environmental Standards Study (2018), while the Local Plan is also supported by a Sites of Importance for Nature Conservation Statement (2018) which identifies of all identified SINC's within the OPDC area.</p>
<p>Protect veteran trees and ancient woodland and identify tree planting opportunities (London Plan 2021 policy G7 B)</p>	<p>Policy EU2 of the Post Submission Modified Draft Local Plan (May 2021) sets out how OPDC will protect and enhance existing biodiversity and ecological assets, including trees.</p> <p>There are no areas of ancient woodland within the OPDC area. There are also no recorded veteran trees in the OPDC area. Notwithstanding this, all development proposals are required to avoid the loss of existing biodiversity, which would include any newly identified veteran trees.</p> <p>Policy EU2 d-ii states that OPDC will, where possible, require proposals to deliver planting of mature or semi mature trees along all streets.</p>

<p>Protect existing allotments and identify potential sites (London Plan 2021 policy G8 A)</p>	<p>As open spaces, existing allotments are protected under policy EU1 b) of the Post Submission Modified Draft Local Plan (May 2021) which says that existing open spaces should be protected, and that their loss will only be considered where at least an equivalent quantum, quality, access and function of open space is provided.</p> <p>Policy EU1 d-iii) also requires that all open spaces (public, communal and private) should seek to provide opportunities for food growing as part of the range of functions that open spaces could provide. This is also recognised in Policy D5, which requires that proposals for private and/or communal open space supports integrated solutions for food growing.</p> <p>The Place Policies for Park Royal West P4 h) and Old Park Royal (P5 f) both highlight the opportunities for commercial food growing to be optimised across the Park Royal industrial area.</p>
<p>Establish clear goals for the management of identified geodiversity sites and identify geological sites of conservation importance (London Plan 2021 policy G9 A)</p>	<p>The OPDC area does not contain identified geodiversity sites as shown in London Plan figure 8.3. Therefore, the Local Plan does not identify or provide guidance for the management of these sites.</p>
<p>Identify and deliver improvements to air quality (London Plan 2021 policy SI 1 A)</p>	<p>OPDC's Local Plan is supported by an Air Quality Study (2018), which identifies a series of recommendations to ensure that development in the OPDC area appropriately protects occupiers from pollution receptors and that developments are air quality positive. The recommendations in this study have been embedded within the Post Submission Modified Draft Local Plan (May 2021) within Policy EU4 (Air Quality) (Page 132) and Table 6.1 (Page 135).</p>
<p>Identify the need for and sites for energy infrastructure and heating and cooling networks (London Plan 2021 policy SI 3 C)</p>	<p>OPDC's Local Plan is supported by a Utilities Study (2018) and North Acton District Energy Network Study (2018). This identifies a series of electricity, heating and cooling requirements which have been incorporated into the Local Plan within Policy EU10 (Energy Systems).</p> <p>Requirements for energy infrastructure are included in OPDC's Infrastructure Delivery Plan (2021) at NU4-NU11.</p>
<p>Promote improvements to water supply infrastructure, protect and improve the water environment and be informed</p>	<p>OPDC's Local Plan is supported by an Integrated Water Management Strategy (2018) and Utilities Study (2018). Recommendations from these two strategies have been embedded within the Post Submission Modified Draft Local Plan (May 2021), in particular within Policy EU3 (Water). This includes policy requirements to improve water infrastructure for potable, foul and storm water, maximising the efficient use</p>

<p>by an Integrated Water Management Strategy (London Plan 2021 policies SI 5 B, D and F)</p>	<p>of water and protect and improve the water environment (such as for potential outfalls into the Grand Union Canal).</p> <p>Requirements for water infrastructure are included in OPDC's Infrastructure Delivery Plan (2021) at NU12-NU20.</p>
<p>Support the delivery of full-fibre or equivalent digital infrastructure (London Plan 2021 policy SI 6 B)</p>	<p>OPDC's Local Plan is supported by a Smart Strategy (2018) which sets out recommendations for implementing telecommunications networks in Old Oak and Park Royal.</p> <p>Recommendations from this strategy have been embedded within the Post Submission Modified Draft Local Plan (May 2021), in particular within Policy EU11 (Smart Technology).</p> <p>Requirements for telecommunications infrastructure are included in OPDC's Infrastructure Delivery Plan (2021) at NU1-2.</p>
<p>Plan for identified waste needs, allocate sufficient sites, identify locations to manage borough waste apportionments and cooperate with host boroughs to meet identified waste needs (London Plan 2021 policies SI 8 B and C)</p>	<p>The West London Waste Plan (WLWP) covers the six west London boroughs and the OPDC area. It was adopted as part of OPDC's development plan in 2015. The WLWP reflects the targets and waste apportionments specified in the 2011 London Plan, which are higher than the 2021 London plan target, and plans to meet other identified waste needs within the WLWP area. The adoption of the WLWP and the safeguarding of WLWP sites (existing and allocated) through the OPDC Local Plan both demonstrate how OPDC has been cooperating with the host boroughs of Brent and Ealing, supporting them to meet the waste apportionment targets and identifying suitable locations for waste and in accordance with S18 B & C.</p> <p>The Waste Technical Paper (2018) is part of OPDC's evidence base. It was jointly prepared by the WRWA waste planning authorities (including Hammersmith and Fulham) but there has been no collective agreement to pool capacity and apportionments across the WRWA area.</p> <p>The Waste Technical Paper considered the 2016 London Plan apportionment targets, which is higher than the targets in the 2021 London Plan. The Technical Paper also sets out capacity to manage identified Construction, Demolition and Excavation (CDE) waste needs and confirms that there is no requirement for additional waste capacity related to the other waste streams. The Technical Paper and the OPDC Waste Apportionment Study identify the potential for the Old Oak Sidings (Powerday) site to meet LBHF apportionment targets, help meet CDE waste needs and generate surplus waste capacity.</p> <p>The Post Submission Modified Draft Local Plan (May 2021) continues to safeguard the Old Oak Sidings (Powerday) site and other existing sites for waste use in line with London Plan policies. Hammersmith and Fulham adopted Local Plan (2018) makes reference to the plan to safeguard the Old Oak Sidings</p>

	<p>(Powerday) site in OPDC's draft Local Plan, and that the Old Oak Sidings (Powerday) site can meet LBHF's waste apportionment target set out in the London Plan (2016) and that there is surplus capacity. Joint work on the Waste Technical Paper, as well as safeguarding sites within the OPDC/LBHF area in Local Plan policy EU6, demonstrate how OPDC is cooperating with Hammersmith and Fulham, supporting them to meet the waste apportionment targets and identifying suitable locations for waste in accordance with S18 B & C.</p> <p>OPDC Post Submission Modified Draft Local Plan (May 2021) policy E1 (Protecting, Strengthening & Intensifying the Strategic Industrial Location) supports proposals that deliver industrial uses with SIL; this would include SIL compliant waste uses. Therefore, the general provisions in E1 help identify SIL as an appropriate location for waste uses.</p>
<p>Ensure sufficient capacity of aggregates wharves and depots and support the production of recycled/secondary aggregates and identify mineral safeguarding areas and sites and facilities (London Plan 2021 policies SI 10 B and C)</p>	<p>There is one aggregate rail depot located within the OPDC and Brent boundaries in Park Royal. The site is within the designated Strategic Industrial Location and no land use changes or alternative development is proposed on this site in OPDC's Local Plan. As Strategic Industrial Location, the site is protected as an industrial use.</p> <p>None of the OPDC supporting studies identify any sand or gravel resources and, therefore, development would not sterilise any future potential extraction opportunities.</p> <p>There are existing facilities in the OPDC area that produce/process recycled aggregates. Again, these are located within SIL and no land use changes or alternative development are proposed on these sites in OPDC's Local Plan. This means that they could continue to operate for these purposes.</p>
<p>Identify areas where flood risks exist and develop actions and policy to reduce them and contribute to measures set out in Thames Estuary 2100 Plan (London Plan 2021 policies SI 12 B and D)</p>	<p>OPDC's Local Plan is supported by an Integrated Water Management Strategy (2018) and Utilities Study (2018). This identifies areas of flood risk and strategies to mitigate flood risk, principally through the introduction of sustainable drainage systems.</p> <p>Recommendations from these two strategies have been embedded within the Post Submission Modified Draft Local Plan (May 2021), in particular within Policy EU3 (Water).</p> <p>Requirements for water infrastructure are included in OPDC's Infrastructure Delivery Plan (2021) at NU12-NU20.</p> <p>The Thames Estuary 2100 Plan concerns itself with sources of flooding from tidal flooding of Thames Estuary. Whilst the OPDC area is not identified as being directly at risk of tidal flooding, OPDC's policies aiming to deliver sustainable drainage systems which achieve greenfield run-off rates will reduce discharge</p>

	into the Thames and therefore help to support recommendations around reductions in outfalls into the Thames.
Address the strategic importance of London's waterways and maximise their benefits (London Plan 2021 policy SI 14 A)	<p>OPDC's Post Submission Modified Draft Local Plan (May 2021) has a dedicated policy P3 (Grand Union Canal) for the Grand Union Canal that provides guidance to maximise the multifunctional social, economic and environmental benefits of the Grand Union Canal. This provides guidance to:</p> <ul style="list-style-type: none"> - activate the canal through adjacent land uses and moorings. - support safety and security along its length. - improve accessibility to the canal and enhancement of the towpath as a walking route and part of the National Cycle Network. - support the use of the canal for waterborne passenger, leisure and freight transport. - Conserve and enhance the biodiversity value of the canal as a Site of Importance for Nature Conservation. - Enhance the water quality of the canal and integrating it with new water infrastructure. - Conserve and enhance the Grand Union Canal Conservation Area.
Protect and enhance waterway infrastructure (London Plan 2021 policy SI 16 A)	OPDC's Post Submission Modified Draft Local Plan (May 2021) has a dedicated policy P3 (Grand Union Canal) that provides guidance to conserve and enhance the Grand Union Canal. The policy was developed in collaboration with the Canal and River Trust.
Support river restoration and biodiversity improvements (London Plan 2021 policy SI 17 A)	OPDC's Post Submission Modified Draft Local Plan (May 2021) has a dedicated policy P3 (Grand Union Canal) that provides guidance to conserve and enhance the biodiversity value of the canal as a Site of Importance for Nature Conservation in accordance with policy EU2 (Urban Greening and Biodiversity) and enhance the environmental role of the canal in accordance with policy EU3 (Water)
Support delivery of 80% trips by foot, cycle or public transport (London Plan 2021 policy T1 A)	<p>OPDC's Post Submission Modified Draft Local Plan (May 2021) is supported by the studies listed below, which identifies a range of interventions that will significantly improve conditions for walking and cycling and greatly enhance the quality and capacity of public transport services, and once delivered, will be effective in promoting increased travel by sustainable modes.</p> <ul style="list-style-type: none"> - Old Oak Park Strategic Transport Study (2018) - Public Realm, Walking and Cycling Strategy (2018) - Park Royal Transport Study (2018) - Bus Strategy Update (2021) - Channel Gate Development Framework Principles (2021) - The Scrubs Lane Development Framework Principles Update (2021)

	<p>- The Victoria Road and Old Oak Lane Development Framework Principles (2018)</p> <p>Additionally, OPDC's Car Parking Study (2018) recommends limiting car parking for all land uses – up to 0.2 spaces per residential unit in the early years of the development and car free when transport investment is committed, and car free for all non-residential uses. This underpins a mode shift towards walking, cycling and public transport.</p> <p>OPDC's Infrastructure Delivery Plan (2021) demonstrates how a new and enhanced walking and cycling network, public realm, road and public transport network will be achieved.</p> <p>The recommendations from the studies and strategies cited above have been used to inform the transport policies in the Post Submission Modified Draft Local Plan (May 2021), including but not limited to Policy SP7 (Connecting People and Places), T1 (Roads and Streets), T2 (Walking), T3 (Cycling), T4 (Parking), T5 (Rail), T6 (Buses) and T9 (Transport Assessments and Travel Plans).</p> <p>Policy SP7 (Connecting People and Places) identifies that the measures in the policy and transport chapter are aimed at ensuring development achieves the 80% mode share target.</p>
<p>Deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, promote and demonstrate the application of the Mayor's Healthy Streets Approach and identify opportunities to improve the balance of space given to people (London Plan 2021 policies T2 A and B)</p>	<p>OPDC's Public Realm, Walking and Cycling Strategy (2018), Channel Gate Development Framework Principles (2021) and Park Royal Transport Study (2018) identifies specific walking and cycling connections that will deliver a more legible and permeable network of streets and enhanced public realm in the Opportunity Area, integrated with green infrastructure. These are to be designed in line with the Healthy Streets Approach.</p> <p>OPDC's Old Oak Park Strategic Transport Study (2018) recommends measures to promote walking and cycling such as new connections over Grand Union Canal and existing railway lines, publicly accessible high quality cycle parking, new formal and informal pedestrian crossing facilities, and the introduction of Legible London wayfinding signage to guide people who wish to travel on foot.</p> <p>The recommendations from these studies have informed OPDC's Infrastructure Delivery Plan (2021), and policies within the Post Submission Modified Draft Local Plan (May 2021), including policies SP7 (Connecting People and Places), T2 (Walking), T3 (Cycling) and T4 (Parking).</p>
<p>Develop transport policies and projects to support the</p>	<p>This is identified in OPDC's Infrastructure Delivery Plan (2021) and Development Capacity Study Update (2021).</p>

<p>sustainable development of London and the Wider South East as well as better national and international public transport connections, ensure the provision of sufficient, suitably located land for current and expanded public and active transport systems, safeguard the schemes outlined in London Plan table 10.1 and give particular priority to five named schemes (London Plan 2021 policies T3 A, B, C and D)</p>	<p>Post Submission Modified Draft Local Plan (May 2021) policy P7 (North Acton and Acton Wells) and P7C2 (Old Oak Common Lane Station Cluster) seeks to safeguard land and connections to deliver a future West London Orbital (WLO); policy P8 (Old Oak Common and Old Oak Common Lane) supports the retention of Willesden Junction Bus Depot; policy P9 (Channel Gate) supports the retention of Willesden Freight Terminal and Park Royal Bus Depot.</p>
<p>Reflect and be integrated with current and planned transport access, capacity and connectivity (London Plan 2021 policy T4 A)</p>	<p>OPDC's Bus Strategy Update (2021) demonstrates how a future bus network exploits the opportunities afforded by new rail stations at Old Oak Common and Old Oak Common Lane. The indicative bus network includes new links to the new stations at Old Oak Common station and Old Oak Common Lane, extensions and rerouting of existing bus routes to better serve existing local stations, including Willesden Junction station, and extra buses to improve capacity and bus journey times at peak times. Additionally, OPDC's Infrastructure Delivery Plan (2021) identifies bus infrastructure interventions including bus priority measures, such as bus lanes and bus gates, and new bus stops with bus countdown facilities.</p> <p>OPDC's Public Realm, Walking and Cycling Strategy (2018), Channel Gate Development Framework Principles (2021) and The Victoria Road and Old Oak Lane Development Framework Principles (2018) demonstrates a network of healthy streets, which responds to the opportunities afforded by Old Oak and Old Oak Common station. These studies identify new walking and cycling connections, including new routes across the Grand Union Canal, enabled by new bridges and underpasses. OPDC's Infrastructure Delivery Plan (2021) identifies walking and cycling infrastructure interventions that builds on the new opportunities afforded by the existing and future transport network.</p> <p>Post Submission Modified Draft Local Plan (May 2021) policies T1 (Roads and Streets), T2 (Walking), T3 (Cycling), T4 (Car Parking), T5 (Rail) and T6 (Buses) embed the recommendations from the studies cited above.</p>

<p>Help remove barriers to cycling and create a healthy environment for cyclists (London Plan 2021 policy T5 A)</p>	<p>OPDC's Local Plan is supported by the Public Realm, Walking and Cycling Strategy (2018), Channel Gate Development Framework Principles (2021), The Scrubs Lane Development Framework Principles Update (2021), Park Royal Transport Strategy (2018) and The Victoria Road and Old Oak Lane Development Framework Principles (2018). These studies emphasise the importance of a well-defined network of streets for pedestrians and cyclists, and recommends a package of interventions, including upgrading existing footway surfaces of poor quality, improving street lighting, introducing Legible London signage to improve wayfinding, providing more generous footway widths, new formal and informal pedestrian and cycle crossing facilities along desire lines, new walking and cycle connections, and step free access to existing and planned stations.</p> <p>These studies have been used to inform Post Submission Modified Draft Local Plan (May 2021), particularly policies T2 (Walking), T3 (Cycling) and T5 (Rail). Projects are also outlined in OPDC's Infrastructure Delivery Plan (2021).</p>
<p>Use the maximum car parking standards set out to set local standards (London Plan 2021 policies T6 D and T6.1)</p>	<p>OPDC's Old Oak Park Strategic Transport Study (2018) and Car Parking Study (2018) recommends restrictive parking standards for all land uses across the Opportunity Area. These studies recommend limiting car parking to 0.2 spaces per residential unit in the early period of development and car free development when transport investment is completed and car free for all other land uses.</p> <p>These studies have been used to inform Post Submission Modified Draft Local Plan (May 2021) Policy T4 (Car Parking).</p>
<p>Facilitate sustainable freight movement, include a freight strategy and safeguard railheads (London Plan 2021 policies T7 A, B and D)</p>	<p>OPDC's Local Plan is supported by the Old Oak Park Strategic Transport Study (2018) and a Construction and Logistics Strategy (2018), which set out potential strategic measures to mitigate the impact of freight movements on the local and strategic road network. These contain key recommendations such as promoting waterborne freight via the Grand Union Canal and requiring all developers to produce and submit a Construction Logistics Plan (CLP) which out the measures that will be deployed to mitigate construction traffic impacts, and a Delivery and Service Plan (DSP) which sets out measures to mitigate freight movement during the operation of the development.</p> <p>These recommendations are embedded within Post Submission Modified Draft Local Plan (May 2021) policies T7 (Freight, Servicing and Delivery Plans) and T8 (Construction).</p>