

**OPDC**  
OLD OAK AND  
PARK ROYAL  
DEVELOPMENT  
CORPORATION

# **Integrated Impact Assessment (including Habitats Regulation Assessment Screening) Appendices**

## **LOCAL PLAN SUPPORTING STUDY**

Draft for Regulation 18 Consultation  
4 February 2016



**MAYOR OF LONDON**

## Role of this study

This study has been produced to inform the draft Local Plan and should be read alongside other relevant studies, the draft Local Plan and the London Plan.

## Study overview

<b>Document title</b>	<b>Integrated Impact Assessment (including Habitats Regulation Assessment Screening)</b>
<b>Lead author</b>	Arcadis (incorporating Hyder Consulting)
<b>Purpose of the study</b>	Integrates the following impact assessments of the Local Plan to meet European and national requirements and best practise approaches : <ul style="list-style-type: none"> <li>■ Sustainability Appraisal and Strategic Environmental Assessment;</li> <li>■ Health Impact Assessment;</li> <li>■ Equalities Impact Assessment; and</li> <li>■ Habitats Regulations Assessment</li> </ul>
<b>Stage of production</b>	<b>Draft completed to assess Regulation 18 version of the Local Plan following Scoping Report Consultation.</b>
<b>Key outputs</b>	<ul style="list-style-type: none"> <li>■ Sustainability Appraisal and Strategic Environmental Assessment: Process for assessing the social, economic, and environmental impacts of the Local Plan and aims to ensure that sustainable development is at the heart of the plan-making process.</li> <li>■ Health Impact Assessment: high-level assessment of the possible health impacts of the Local Plan.</li> <li>■ Equalities Impact Assessment: high-level assessment of the possible equalities impacts of the Local Plan.</li> <li>■ Habitats Regulations Assessment: A HRA screening exercise will be undertaken to determine if the Local Plan would generate an adverse impact upon the integrity of a Natura 2000 site (for the OPDC area, these are Richmond Park and Wimbledon Common).</li> </ul>
<b>Key recommendations</b>	<ul style="list-style-type: none"> <li>■ Ensure the contents of the draft Local Plan consider, support and enhance: <ul style="list-style-type: none"> <li>o the component environmental, social and economic elements of sustainability</li> <li>o equality for all</li> <li>o physical, mental and emotional health and well being</li> </ul> </li> <li>■ Ensure the contents of the draft Local Plan are screened for any impact on Natura 2000 sites.</li> </ul>
<b>Relations to other studies</b>	Interfaces with all other evidence base studies through their input into the draft Local Plan.
<b>Next steps</b>	The Assessment is in draft and is available for comment. Necessary revisions will be made following public consultation before the document is finalised to sit alongside the Regulation 19 consultation on the Local Plan.

## Consultation questions

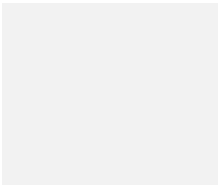
1. Do you agree with the recommendations of this supporting study? If not, please explain why.
2. Do you agree with the methods used in delivering the recommendations? If not, please set out alternative approaches and why these should be used.
3. Are there any other elements which the supporting study should address? If yes, please define these.

# OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION LOCAL PLAN

Integrated Impact Assessment  
Appendices

DECEMBER 2015

## CONTACTS



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**APPENDIX A**

**Scoping Workshop Attendees and Findings**

**Table A-1 Workshop Attendees**

<b>Name</b>	<b>Role</b>	<b>Organisation</b>
Peter Farnham	Planner	OPDC
Rachel Flowers	Health Advisor	OPDC
Andrew Jones	Environment team	GLA
David English	Historic Places Advisor	Historic England
Claire Jones	Planner	LB Brent
Samuel Cuthbert	Planner	LB Ealing
Stuart Lines	Associate Director of Public Health	LB Hammersmith and Fulham
Lucy Saunders	Public Health Director	TfL/GLA
Gillian Kavanagh	Planner	RB Kensington & Chelsea
Steve Walker	Principal Planner - London	Environment Agency
Katherine Fletcher	Heritage and Conservation Officer	Historic England

**Table A-2 Key Sustainability Issues and Opportunities from Scoping Workshop: Consultee responses**

Topic	Summary of issues raised by Scoping Workshop attendees	Implications for the Local Plan
<b>Economy, employment and training</b>	<p><b>Issues</b></p> <ul style="list-style-type: none"> <li>• Infrastructure/Utilities – a key issue for the area is how infrastructure/utilities will be improved to accommodate the new development. In particular, broadband capacity is very poor at present within Park Royal. Also transport links need significant improvement.</li> <li>• Town centres – there is a potential issue that the development of offices and retail facilities within the OPDC area would destroy neighbouring town centres, including Ealing town centre.</li> <li>• Affordable workspace – much of the available workspace is affordable at present, due to its poor quality. There is also an issue relating to density in this area – warehousing uses are low employment generators.</li> <li>• Displacement of existing businesses – especially hostile in Old Oak</li> <li>• How do we create jobs for local people if the business make-up of area changes? (i.e. Proposals for R&amp;D into climate change, circular economies but current use is more low-skilled and manufacturing)</li> <li>• Microbusiness disruption during construction (they exist hand to mouth sometimes)</li> </ul>	<ul style="list-style-type: none"> <li>• Incoming retail could be developed in small clusters. This could help to reduce the impact on other town centres. A fine balance between place-making, providing enough facilities, and not destroying external town centres, needs to be sought. Improved connectivity from the OPDC area to the town centres could be beneficial in this respect. Harlesden town centre would be walkable from the OPDC area.</li> <li>• The effect of the construction phase of development could be significantly negative for existing business, through the potential impact on the transport network. A large transitory construction workforce could also have negative effects on the community.</li> <li>• Potential for the withdrawal of PD Rights for the conversion of offices to residential use, to prevent the reduction in community cohesion and access to facilities.</li> </ul>
	<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>• Healthy New Towns – The OPDC is looking to submit a bid to become a Healthy New Town to NHS England. This is based on health-led employment in the centre, for clean, green and healthy technology businesses. This may include research companies etc.</li> <li>• North Acton could expand on its existing student accommodation to attract further university facilities in the OPDC area, which would buffer the industrial area further north, with an area of student housing further south. Anecdotal evidence suggests that the campus may be associated with Imperial College.</li> <li>• Affordable workspace – there is potential to create flexible/shared office environments, whereby users can rent desk-space without the need for a formal lease agreement for an entire office.</li> <li>• The land uses in the OPDC area are likely to experience a wholesale change from the existing</li> </ul>	<ul style="list-style-type: none"> <li>• Managing affordability</li> <li>• Managing and creating robust S106 and CIL agreements</li> <li>• Management of robust conditions that are deliverable and enforceable.</li> <li>•</li> </ul>

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Topic	Summary of issues raised by Scoping Workshop attendees	Implications for the Local Plan
	<p>situation. This could provide an opportunity to reduce disparities across the area, although may push out existing businesses.</p> <ul style="list-style-type: none"> <li>• Employment and training - There is an opportunity for the Local Plan to specify that incoming employment opportunities are to be directed towards local people in the existing and surrounding communities. This combines with an opportunity to upskill the local workforce, the majority of whom may currently be in lower-skilled jobs in the local area.</li> </ul>	
<b>Social</b>	<p><b>Issues</b></p> <ul style="list-style-type: none"> <li>• Accessibility – there is currently poor public transport access to the OPDC area – to get in to the area, would have to get a train to a tube station and then walk into the area from there. Further, there is poor wayfaring within the site.</li> <li>• Lack of primary healthcare</li> <li>• Hard edges – there are a number of 'hard edges' within the site, which create poor legibility.</li> <li>• There is a Traveller site next to Old Oak on Backley Road, which is linear against the railway line and a metal refinery.</li> <li>• Lack of affordable housing</li> <li>• Unknown future population that needs to be modelled – draw on lessons learnt from Kings Cross</li> <li>• How will site link to other areas outside OA boundaries?</li> <li>• Canal towpath plans need to be aware of how constrained the space is – can we accommodate all uses and users?</li> </ul> <p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>• Incoming population – there is an opportunity for the health of the local community to be built in to the Local Plan principles from the very beginning. This may include building in street networks, designed so that children can play independently; or building in creativity, art, intrigue,</li> </ul>	<ul style="list-style-type: none"> <li>• HIA scope should consider the surrounding area, incoming residents and people coming in for work/visiting/travelling through.</li> <li>• Construction phase impacts should be considered within the Local Plan- including both psychological and physical effects.</li> <li>• Ensure Local Plan robust enough to deal with minimum %ages of affordable housing</li> </ul> <ul style="list-style-type: none"> <li>• The Local Plan should consider minimising the use of on-street parking and servicing at the fronts of buildings, as these can have a negative effect on the 'street atmosphere'.</li> </ul>

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Topic	Summary of issues raised by Scoping Workshop attendees	Implications for the Local Plan
	<p>surprise – to create a sense of place and a high quality environment.</p> <ul style="list-style-type: none"> <li>There is an opportunity to significantly improve accessibility to and throughout the site, including the creation of legible routes and reducing 'hard edges'.</li> </ul>	
Environment	<p><b>Issues</b></p> <ul style="list-style-type: none"> <li>There is currently poor accessibility to open space/green infrastructure/play space.</li> <li>River Brent and the Grand Union Canal – the water quality in these areas is currently very poor – biological and chemical.</li> <li>Remediation – Land contamination is a key issue in the area, particularly in certain areas, depending on the presence of London Clay.</li> <li>There are currently 2 large waste sites, which serve London. Concerns were raised regarding their potential displacement. This may lead to a waste apportionment issue/create problems of pollution outside of the plan area as a result of development in the OPDC area.</li> <li>Heritage at Risk – there are areas within the scope of the Local Plan which are considered to be negatively managed from a townscape and heritage perspective. Twyford Abbey and Hereford St Mary are included in the local list of heritage assets at risk. In addition to assets themselves, wider views should also be take into account. Although archaeology is not considered to be a priority in this area, this will also need to be assessed.</li> <li>Surface Water assessments to be more than site-wide but dealt with on strategic level – TW keen to ensure that new developments do not assume that capacity is available (due to provision of new TW assets).</li> </ul> <p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>Green Infrastructure – there is an opportunity to create green infrastructure which facilitates live/work/play/travel through as well as fast and meandering routes.</li> <li>Improvement to AQMA likely due to redevelopment of area but needs to ensure that population</li> </ul>	<ul style="list-style-type: none"> <li>The Local Plan could minimise the use of on-street parking and servicing at the fronts of buildings, as these can have a negative effect on the 'street atmosphere'.</li> <li>Adoption and maintenance of new assets – London Legacy Development Corporation lessons learnt?</li> <li>Cross-boundary issues with respect to heritage assets and views need to be addressed.</li> <li>Thames Water and Counters Creek combined sewer discussion/CIL/S106 payments to deal with a system already at capacity</li> <li></li> <li>The Local Plan should facilitate the use of green infrastructure, but also manage the spread of routes across the OPDC area, so that certain routes do not become congested.</li> <li>The Local Plan should seek to ensure that improvements in the area do not lead to increase</li> </ul>

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Topic	Summary of issues raised by Scoping Workshop attendees	Implications for the Local Plan
	<p>increase doesn't counteract that.</p> <ul style="list-style-type: none"> <li>• There is an opportunity to create SUDS across the area and reduce potentially polluting discharges to watercourses – also need to address differences in catchments between east and west.</li> <li>• London Waste and Recycling Board – there is an opportunity for the OPDC area to become an example centre for the creation of an 'integrated circular economy'. This could include the creation, use and recycling of products locally, including the potential for the growing of local food through the use of vertical farms.</li> <li>• Urban Heat Island Effect – opportunity to create a decentralised energy hub and create a closed loop system.</li> <li>• An increase in population and new industries may create an opportunity to reduce pollution locally and increase efficiency/cleanliness.</li> </ul>	<p>pollution/traffic etc, elsewhere across London.</p>

**APPENDIX B**

**Review of Plans, Programmes and Environmental Protection Objectives**

**Table B-1 Sustainability Themes derived from the review of Policies, Plans and Programmes**

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
<b>Environment</b>			
<b>Promote sustainable design and mitigate and adapt to climate change</b>	<ul style="list-style-type: none"> <li>Climate change Act 2008</li> <li>UK Climate Change Programme 2006</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> <li>National Planning Policy for Waste 2014</li> <li>Written Ministerial Statement: Sustainable Drainage Systems 2014</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> <li>Social Infrastructure SPG 2015</li> <li>London Infrastructure Plan 2050 update 2015</li> <li>Sustainable Design and Construction SPG 2014</li> <li>The Mayor's Food Strategy 2008</li> <li>The Mayor's Climate Change Mitigation and Energy Strategy 2011</li> <li>The Mayor's Climate Change Adaption Strategy 2011</li> <li>London Plan Town Centres SPG 2014</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> </ul>
<b>Promote and protect the water environment including issues such as quality and resource use as well as reducing flood risk</b>	<ul style="list-style-type: none"> <li>Water Framework Directive 2000/60/EC</li> <li>Urban Waste Water Treatment Directive 91/271/EEC</li> <li>Flood and Water Management Act 2010</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> <li>Future Water 2011</li> <li>National Planning Policy for Waste 2014</li> <li>Written Ministerial Statement: Sustainable Drainage Systems 2014</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> <li>Social Infrastructure SPG 2015</li> <li>London Infrastructure Plan 2050 update 2015</li> <li>Sustainable Design and Construction SPG 2014</li> <li>Securing London's Water Future 2011</li> <li>Thames River Basin District RBMP 2009</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Hammersmith and Fulham Updated Surface Water Management Plan 2015</li> <li>Kensington and Chelsea Surface Water Management Plan 2014</li> <li>Kensington and Chelsea Local Flood Risk Management Strategy 2015</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> </ul>
<b>Reduce greenhouse gas emissions, increase energy efficiency and promote the use of renewable energy and renewable technologies in</b>	<ul style="list-style-type: none"> <li>Directive on the Promotion of the Use of Energy from Renewable Sources 2209/28/EC</li> <li>Energy Act 2013</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> <li>The UK Low Carbon Transition Plan</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Sustainable Design and Construction SPG 2014</li> <li>The Mayor's Climate Change Mitigation and Energy Strategy 2011</li> <li>The Mayor's Climate Change Adaption Strategy 2011</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> </ul>



Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
<b>appropriate locations</b>	<ul style="list-style-type: none"> <li>2009</li> <li>The Carbon Plan 2011</li> <li>UK Renewable Energy Strategy 2009</li> <li>National Planning Policy for Waste 2014</li> </ul>	<ul style="list-style-type: none"> <li>London Infrastructure Plan 2050 update 2015</li> <li></li> <li></li> <li></li> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> <li></li> <li></li> <li></li> </ul>
<b>Promote sensitive waste management</b>	<ul style="list-style-type: none"> <li>Waste Framework Directive 2008/98/EC</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> <li>National Planning Policy for Waste 2014</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Sustainable Design and Construction SPG 2014</li> <li>The Control of Dust and Emissions during Construction and Demolition SPG 2014</li> <li>London Waste and Recycling Board Waste Management Planning Advice for New Flatted Properties, 2014</li> <li>The Mayor's Municipal Waste Management Strategy, 2011</li> <li>London Infrastructure Plan 2050 update 2015</li> </ul>	<ul style="list-style-type: none"> <li>West London Joint Waste Plan 2015</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> <li></li> </ul>
<b>Protect and enhance the historic environment and recognise and appreciate landmarks, townscapes and their setting</b>	<ul style="list-style-type: none"> <li>European Convention on the Protection of the Archaeological Heritage (revised) (1992)</li> <li>European Landscape Charter 2000</li> <li>Planning (Listed Building and Conservation Areas) Act 1990</li> <li>Ancient Monuments and Archaeological Areas Act 1979</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>London View Management Framework SPG 2012</li> <li>London Plan Town Centres SPG 2014</li> <li></li> <li></li> <li></li> <li></li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Ealing Green Space Strategy 2012-2017</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> <li></li> <li></li> </ul>
<b>Conserve and enhance biodiversity as an integral part of economic, social and environmental development</b>	<ul style="list-style-type: none"> <li>European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats</li> <li>Wildlife and Countryside Act 1981</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> <li>UK Post-2010 Biodiversity Framework 2012</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> <li>Social Infrastructure SPG 2015</li> <li>Mayor's Biodiversity Strategy 2002</li> <li>London Biodiversity Action Plan 2001</li> <li>London Infrastructure Plan 2050 update 2015</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> </ul>

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
<b>Achieve more effective geoconservation and improve soil quality</b>	<ul style="list-style-type: none"> <li>National Planning Policy for Waste 2014</li> </ul>	<ul style="list-style-type: none"> <li>London's Foundations Protecting the Geodiversity of the Capital 2012</li> <li>The Mayor's Food Strategy 2008</li> </ul>	<ul style="list-style-type: none"> <li>Food Growing and Allotments Strategy for Brent 2014/16</li> <li>Hammersmith and Fulham Contaminated Land Strategy 2001</li> </ul>
<b>Optimise the use of land through increasing the density of development</b>		<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> </ul>	
<b>Improve air quality</b>	<ul style="list-style-type: none"> <li>EU Directive on Ambient Air Quality and Management 96/62/EC</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> <li>UK Air Quality Strategy 2011</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> <li>Social Infrastructure SPG 2015</li> <li>Mayors Air Quality Strategy 2010</li> <li>The Control of Dust and Emissions during Construction and Demolition SPG 2014</li> <li>London Plan Town Centres SPG 2014</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> </ul>
<b>Minimise the adverse impacts of noise on people living and working in, and visiting the area</b>	<ul style="list-style-type: none"> <li>European Directive: Environmental Noise Directive 2002/49/EC</li> <li>National Planning Policy Framework 2012</li> <li>Noise Policy Statement for England 2010</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> <li>Social Infrastructure SPG 2015</li> <li>The Mayor's Ambient Noise Strategy 2004</li> <li>London Plan Town Centres SPG 2014</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>St Quintin and Woodlands Draft Neighbourhood Plan 2015</li> </ul>
<b>Social</b>			
<b>Improve health and well-being and promote greater</b>	<ul style="list-style-type: none"> <li>Health for Growth 2014-2020</li> <li>National Planning Policy Framework 2012</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> </ul>

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
<b>levels of physical activity</b>	<ul style="list-style-type: none"> <li>• Sustainable Development Strategy 2005</li> <li>• Health Lives, Healthy People 2011</li> <li>• National Planning Policy for Waste 2014</li> </ul>	<ul style="list-style-type: none"> <li>• Social Infrastructure SPG 2015</li> <li>• The Control of Dust and Emissions during Construction and Demolition SPG 2014</li> <li>• Draft Housing SPG 2015</li> <li>• Sustainable Design and Construction SPG 2014</li> <li>• Play and Informal Recreation SPG 2012</li> <li>• The Mayor's Food Strategy 2008</li> <li>• The London Health Inequalities Strategy 2010</li> <li>• Improving Londoners Access to Nature 2008</li> <li>• London Infrastructure Plan 2050 update 2015</li> <li>• London Plan Town Centres SPG 2014</li> </ul>	<ul style="list-style-type: none"> <li>• Brent Parks Strategy 2010-2015</li> <li>• Food Growing and Allotments Strategy for Brent 2014/16</li> <li>• Brent Draft Community Safety Strategy 2014-17</li> <li>• Brent Health and Wellbeing Strategy 2014-17</li> <li>• A Plan for Children and Families in Brent 2012-2015</li> <li>• Ealing Quality of Life for Older People 2006-2016</li> <li>• Ealing Green Space Strategy 2012-2017</li> <li>• Hammersmith and Fulham Health and Wellbeing Strategy 2013-15</li> <li>• Hammersmith and Fulham Parks and Open Spaces Strategy 2008-2018</li> <li>• Hammersmith and Fulham CSPAN Physical Activity Strategy 2011</li> <li>• Ealing Sustainable Community Strategy 2006-2016</li> <li>• Kensington and Chelsea Consolidated Local Plan 2015</li> </ul>
<b>To create an equal society which recognises people's different needs, situations and goals, and removes the barriers that limit what people can do and be</b>	<ul style="list-style-type: none"> <li>• Equality Act 2010</li> <li>• National Planning Policy Framework 2012</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• The London Plan 2011, 2013, 2015</li> <li>• Sustainable Design and Construction SPG 2014</li> <li>• Social Infrastructure SPG 2015</li> <li>• Play and Informal Recreation SPG 2012</li> <li>• The Mayor's Food Strategy 2008</li> <li>• The London Health Inequalities Strategy 2010</li> <li>• Planning for Equality and Diversity in London SPG 2007</li> <li>• Improving Londoners Access to Nature 2008</li> <li>• The Mayor's Equality Framework 2009</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Brent Core Strategy 2010</li> <li>• Ealing Core Strategy 2012</li> <li>• Hammersmith and Fulham Core Strategy 2011</li> <li>• Brent Equality Strategy 2015-19</li> <li>• A Regeneration Strategy for Brent 2010-2030</li> <li>• A Plan for Children and Families in Brent 2012-2015</li> <li>• Ealing Quality of Life for Older People 2006-2016</li> <li>• Old Oak and Park Royal draft Opportunity Area Planning Framework 2015</li> <li>• Ealing Sustainable Community Strategy 2006-2016</li> <li>• St Quintin and Woodlands Draft Neighbourhood Plan 2015</li> </ul>
<b>Maximise the contribution that the arts, culture and</b>		<ul style="list-style-type: none"> <li>• The London Plan 2011, 2013, 2015</li> <li>• Play and Informal Recreation SPG 2012</li> </ul>	<ul style="list-style-type: none"> <li>• Food Growing and Allotments Strategy for Brent 2014/16</li> <li>• Cultural Strategy for Brent 2010-15</li> </ul>

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
<b>heritage can make to the community</b>		<ul style="list-style-type: none"> <li>• Social Infrastructure SPG 2015</li> <li>• The Mayor's Food Strategy 2008</li> <li>• The Mayor's Culture Strategy 2014</li> <li>• Shaping Neighbourhoods: Character and Context 2014</li> <li>• London Plan Town Centres SPG 2014</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Ealing Arts and Cultural Strategy 2013-2018</li> <li>• Old Oak and Park Royal draft Opportunity Area Planning Framework 2015</li> <li>• Ealing Sustainable Community Strategy 2006-2016</li> <li>• Kensington and Chelsea Consolidated Local Plan 2015</li> <li>• Kensington and Chelsea Issues and Options Paper for Kensal Gasworks 2012</li> <li>• St Quintin and Woodlands Draft Neighbourhood Plan 2015</li> </ul>
<b>The need to ensure that new housing development meets local needs (for all sections of society)</b>	<ul style="list-style-type: none"> <li>• National Planning Policy Framework 2012</li> <li>• Planning Policy for Traveller Sites 2015</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• The London Plan 2011, 2013, 2015</li> <li>• Draft Housing SPG 2015</li> <li>• Sustainable Design and Construction SPG 2014</li> <li>• London Infrastructure Plan 2050 update 2015</li> <li>• London Plan Town Centres SPG 2014</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Brent Core Strategy 2010</li> <li>• Ealing Core Strategy 2012</li> <li>• Hammersmith and Fulham Core Strategy 2011</li> <li>• Ealing Quality of Life for Older People 2006-2016</li> <li>• Hammersmith and Fulham Housing Strategy 2015</li> <li>• Old Oak and Park Royal draft Opportunity Area Planning Framework 2015</li> <li>• Ealing Sustainable Community Strategy 2006-2016</li> <li>• Kensington and Chelsea Consolidated Local Plan 2015</li> <li>• Kensington and Chelsea Issues and Options Paper for Kensal Gasworks 2012</li> <li>• St Quintin and Woodlands Draft Neighbourhood Plan 2015</li> </ul>
<b>Promote more sustainable transport choices and to improve accessibility</b>	<ul style="list-style-type: none"> <li>• National Planning Policy Framework 2012</li> <li>• Sustainable Development Strategy 2005</li> <li>•</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• The London Plan 2011, 2013, 2015</li> <li>• Land for Industry and Transport SPG 2012</li> <li>• Mayor's Transport Strategy 2010</li> <li>• London Infrastructure Plan 2050 update 2015</li> <li>• London Plan Town Centres SPG 2014</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• West London Sub Regional Transport Plan 2010</li> <li>• Brent Core Strategy 2010</li> <li>• Ealing Core Strategy 2012</li> <li>• Hammersmith and Fulham Core Strategy 2011</li> <li>• Old Oak and Park Royal draft Opportunity Area Planning Framework 2015</li> <li>• Park Royal Southern Gateway Position Statement 2008</li> <li>• Kensington and Chelsea Consolidated Local Plan 2015</li> <li>• Kensington and Chelsea Issues and Options</li> </ul>

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
			Paper for Kensal Gasworks 2012 <ul style="list-style-type: none"> <li>St Quintin and Woodlands Draft Neighbourhood Plan 2015</li> </ul>
<b>Recognise the importance of open spaces, sport and recreation and the contribution that they make to enhancing quality of life</b>	<ul style="list-style-type: none"> <li>National Planning Policy Framework 2012</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> <li>Social Infrastructure SPG 2015</li> <li>Play and Informal Recreation SPG 2012</li> <li>The Mayor's Food Strategy 2008</li> <li>Improving Londoners Access to Nature 2008</li> <li>London Infrastructure Plan 2050 update 2015</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Brent Parks Strategy 2010-2015</li> <li>Food Growing and Allotments Strategy for Brent 2014/16</li> <li>Ealing Green Space Strategy 2012-2017</li> <li>Hammersmith and Fulham Parks and Open Spaces Strategy 2008-2018</li> <li>Old Oak and Park Royal draft Opportunity Area Planning Framework 2015</li> <li>St Quintin and Woodlands Draft Neighbourhood Plan 2015</li> </ul>
<b>Improve educational attainment and training opportunities</b>	<ul style="list-style-type: none"> <li>Policy statement: Planning for schools development 2011</li> <li>National Planning Policy Framework 2012</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Social Infrastructure SPG 2015</li> <li>London Infrastructure Plan 2050 update 2015</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> </ul>
<b>Reduce crime and fear of crime</b>	<ul style="list-style-type: none"> <li>National Planning Policy Framework 2012</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Sustainable Design and Construction SPG 2014</li> <li>Social Infrastructure SPG 2015</li> <li>Play and Informal Recreation SPG 2012</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Brent Draft Community Safety Strategy 2014-17</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> </ul>
<b>Economic</b>			

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
<b>Promote sustainable economic development and a range of employment opportunities</b>	<ul style="list-style-type: none"> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Land for Industry and Transport SPG 2012</li> <li>The Mayor's Economic Development Strategy 2010</li> <li>London Infrastructure Plan 2050 update 2015</li> <li>London Infrastructure Plan 2050 update 2015</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>A Regeneration Strategy for Brent 2010-2030</li> <li>Old Oak and Park Royal draft Opportunity Area Planning Framework 2015</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> <li>Park Royal Southern Gateway Position Statement 2008</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> <li>Kensington and Chelsea Issues and Options Paper for Kensal Gasworks 2012</li> </ul>

Figure B-1 – Hammersmith and Fulham Core Strategy 2011: Key Diagram



Figure B-2 – Ealing Core Strategy 2012: Key Diagram

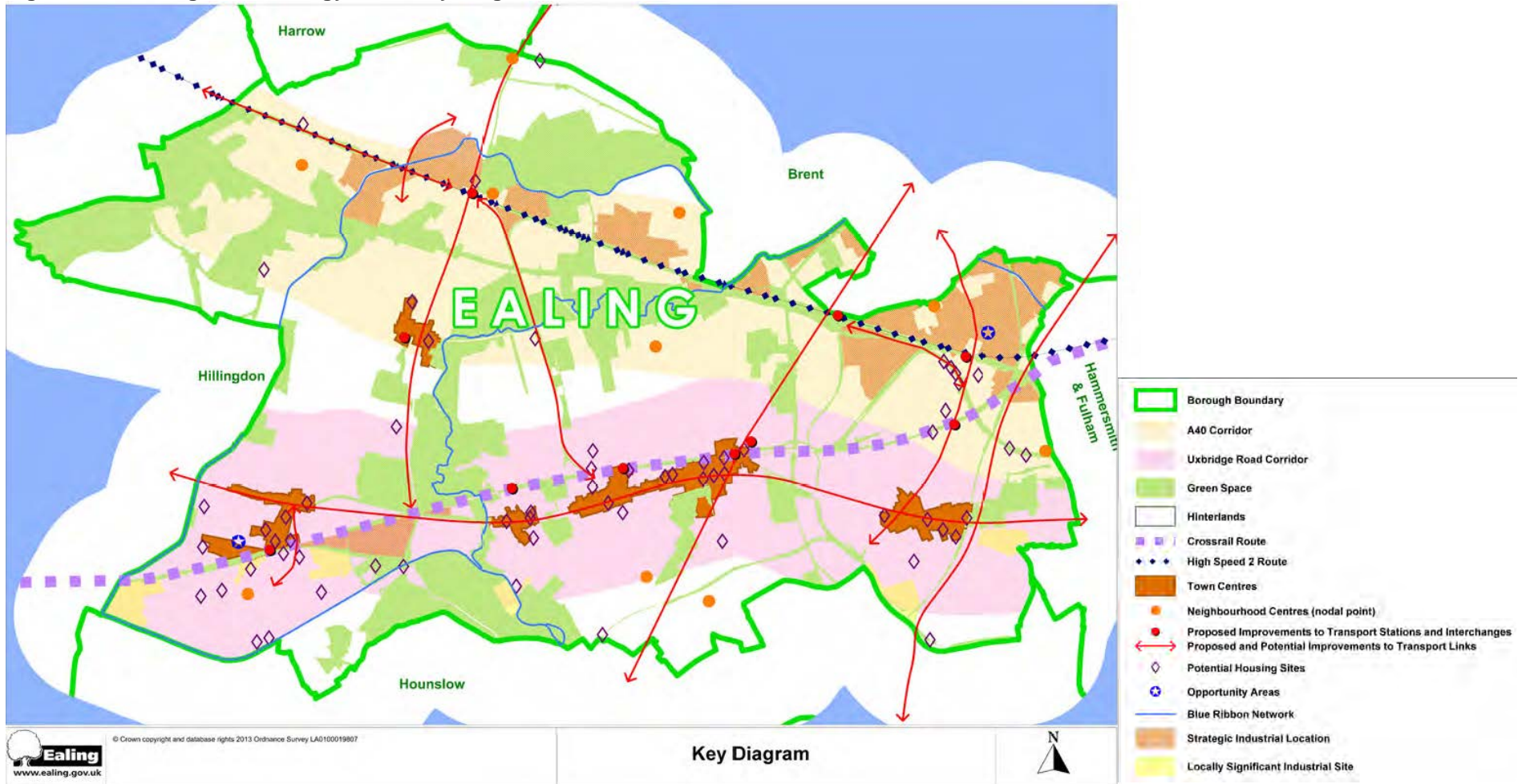
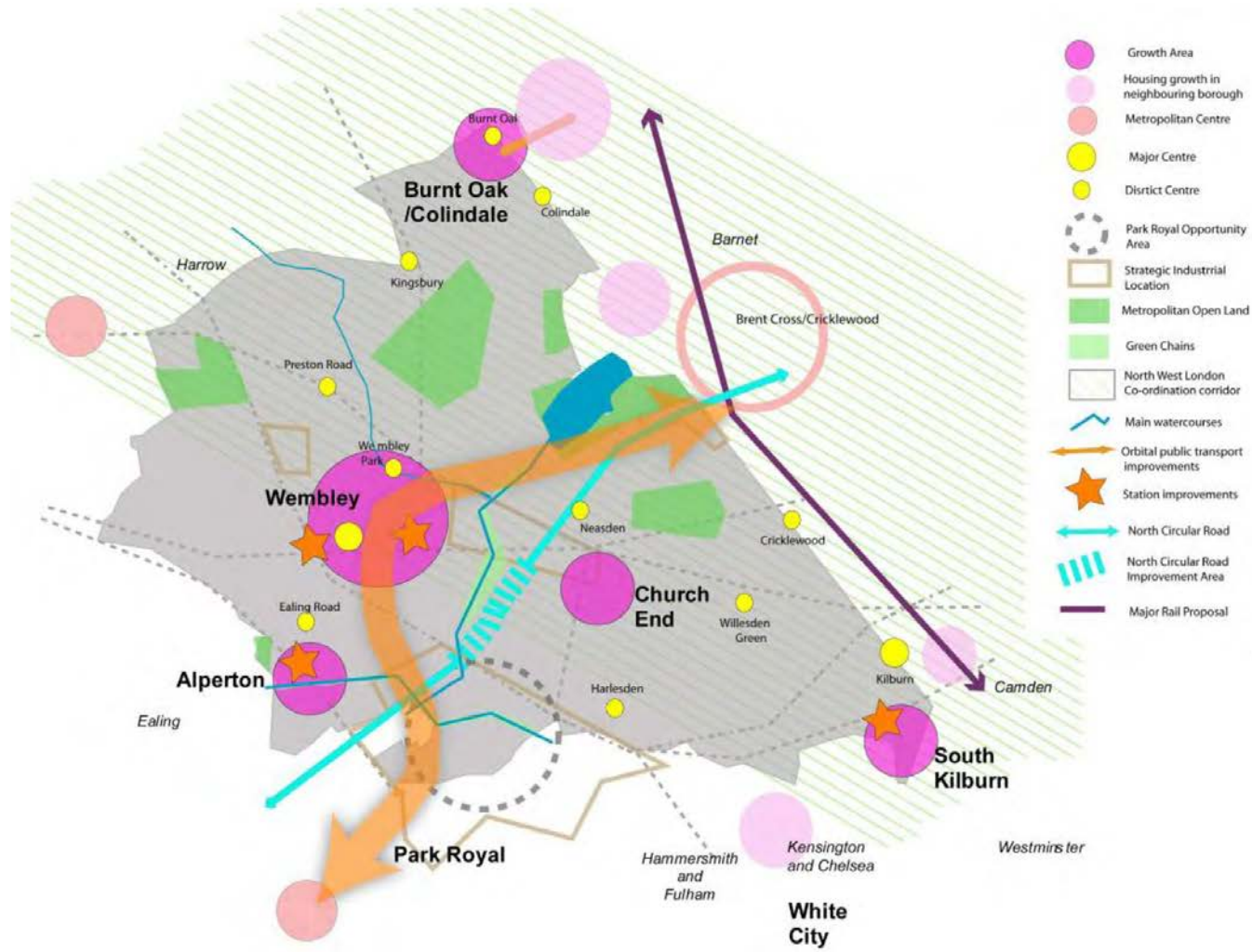
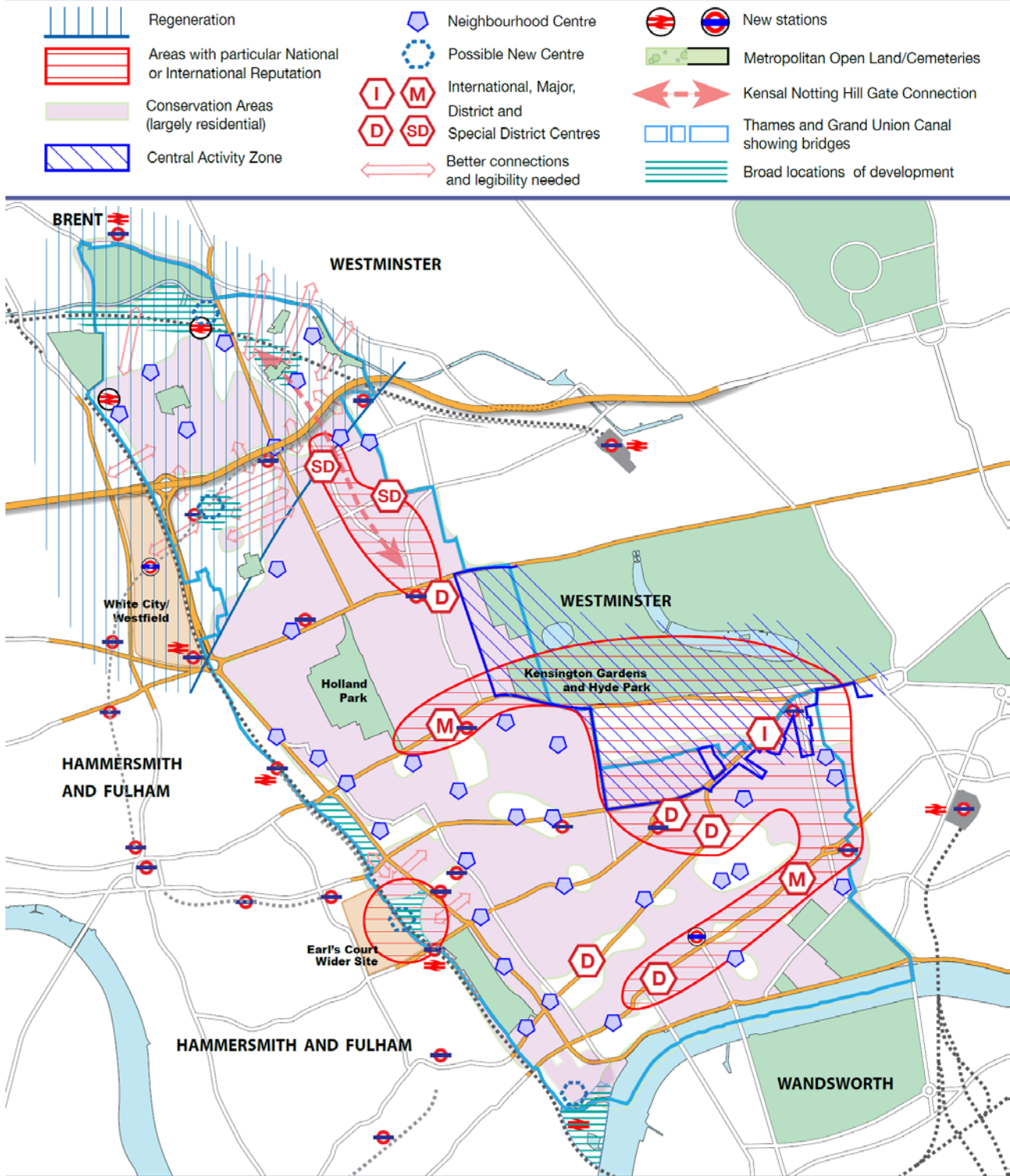




Figure B-3 – Brent Core Strategy 2010: Key Diagram



**Figure B-4 – Kensington and Chelsea Consolidated Local Plan 2015: Key Diagram**



# APPENDIX C

## Baseline Data

# C. The Sustainability Baseline and Key Sustainability Issues

## C.1 Population

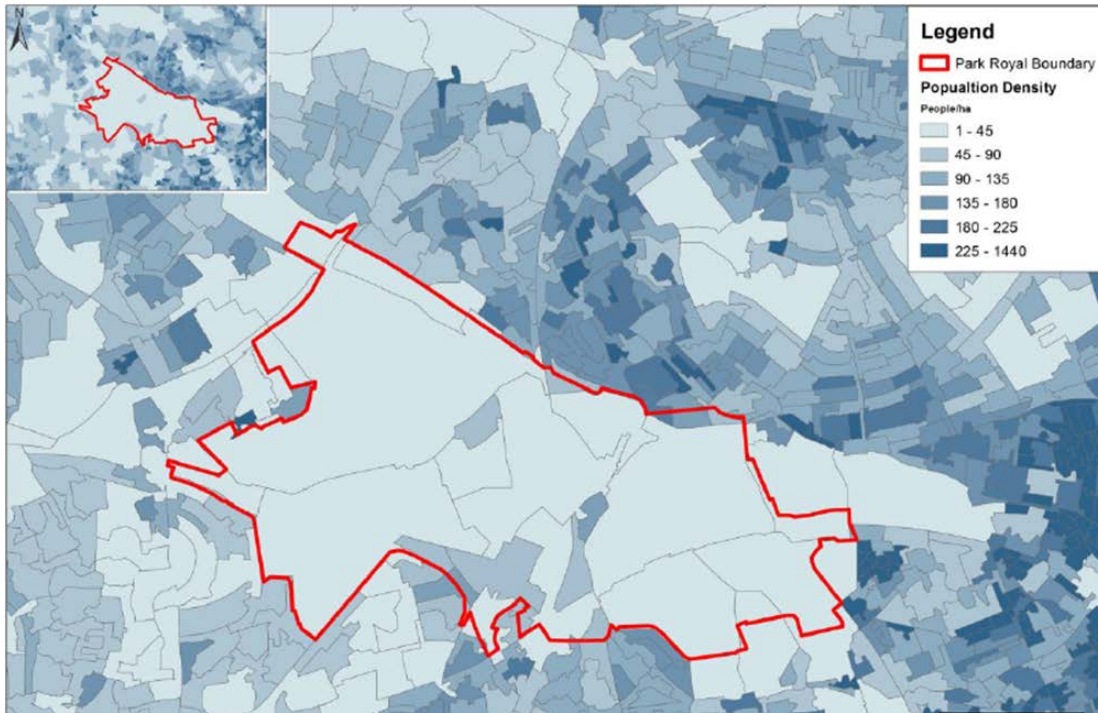
The following baseline indicators have been used to identify key population trends and characteristics:

- Total population (2011 Census and Neighbourhood Statistics<sup>1</sup>).
- Area of Ealing, Brent and Hammersmith & Fulham (Office for National Statistics Local Profiles).
- Population density (Office for National Statistics Local Profiles).
- Age structure of the population (Office for National Statistics Local Profiles and 2011 Census).
- Mean household size (Office for National Statistics Local Profiles).
- Ethnic groups represented in the population (Office for National Statistics Local Profiles).
- Faith communities represented in the population (OAPF Draft IIA Report, GLA, February 2015)
- Gender balance and pay gap (OAPF Draft IIA Report, GLA, February 2015)

### C.1.1 OPDC Area

The population of OPDC is just under 5,000 people contained in 1,898 households. **Figure C1-1** indicates the population density of the area.

**Figure C1-1 Comparative Population Density**



Source: OAPF Draft IIA Report, GLA, February 2015

The OPDC area covers some 650 hectares and due to its predominantly industrial nature has a much lower population density than its adjoining boroughs. Given the proposed minimum new homes of 25,500 this density is set to change. This influx of future population needs careful management to ensure inequalities don't worsen throughout the area and adjoining boroughs.

**Figure C1-2 Age profile**

Area	Total	Male	Female	Age 0-4	Age 5-17	Age 18-24	Age 25-64	Age 65-84	Age 85 +
England & Wales	56,075,912	49.2%	50.8%	6.2%	15.1%	9.4%	52.8%	14.2%	2.2%
England	53,012,456	49.2%	50.8%	6.3%	15.1%	9.4%	52.9%	14.1%	2.2%
London	8,173,941	49.3%	50.7%	7.2%	14.9%	10.0%	56.7%	9.6%	1.5%
Inner London	3,231,901	49.8%	50.2%	7.0%	13.3%	11.4%	59.7%	7.5%	1.1%
Outer London	4,942,040	49.1%	50.9%	7.4%	16.0%	9.2%	54.7%	10.9%	1.8%
Ealing	338,449	50.0%	50.0%	7.5%	15.1%	9.3%	57.4%	9.3%	1.4%
Brent	311,215	50.3%	49.7%	7.2%	15.4%	10.1%	56.8%	9.3%	1.2%
Hammersmith and Fulham	182,493	48.7%	51.3%	6.5%	11.3%	11.4%	61.8%	7.9%	1.1%
Park Royal & Old Oak	4,941	51.2%	48.8%	8.0%	14.2%	12.5%	59.3%	5.6%	0.5%

Source: Census 2011

As shown in **Figure C1-2**, the OPDC area contains a large proportion of working age adults and a smaller population of ages 65+ than the surrounding boroughs. Careful consideration should be given to the wider

population trend of an ageing population as well ensuring an attractive area for young adults and those who may be looking to raise a family.

**Figure C1-3 Components of population change**

**Components of population change**

mid-2011 to mid-2012

	Live births Thousands	Deaths Thousands	Natural change Thousands	Net migration & other changes	Total change Thousands
				Thousands	
<b>Brent</b>	5.3	1.6	3.8	-1.3	2.4
<b>Hammersmith and Fulham</b>	2.7	0.9	1.8	-4.4	-2.6
<b>Ealing</b>	5.7	1.9	3.8	-2.5	1.4
<b>London</b>	134.0	47.6	86.5	17.5	104.0

Source:

ONS Local Profiles

Although there is a net loss of population from Brent, Ealing and Hammersmith & Fulham, there is a continued influx of people into London and this needs to be addressed as part of the area's redevelopment proposals.

The population of OPDC is ethnically diverse. Data indicates that 21.6% of the population were White British, with 18.6% identifying themselves as White Other (**Table C1-4**). Black African or Black Others are the main ethnic minority within OPDC, representing 24% of the population

**Table C1-4 Percentage of population by ethnic group**

Area	England & Wales	England	London	Inner London	Outer London	Ealing	Brent	Hammersmith and Fulham	Park Royal & Old Oak
White British	80.5%	79.8%	44.9%	38.4%	49.2%	30.4%	18.0%	44.9%	21.6%
White Irish	0.9%	1.0%	2.2%	2.3%	2.0%	3.1%	4.0%	3.5%	2.5%
White Gypsy Irish Traveller	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.6%
White Other White	4.4%	4.6%	12.6%	16.5%	10.1%	15.4%	14.3%	19.6%	18.6%
Mixed White and Black Caribbean	0.8%	0.8%	1.5%	1.8%	1.3%	1.2%	1.4%	1.5%	1.6%
Mixed White Black African	0.3%	0.3%	0.8%	1.0%	0.7%	0.6%	0.9%	0.8%	2.0%
Mixed White Asian	0.6%	0.6%	1.2%	1.3%	1.2%	1.4%	1.2%	1.5%	1.4%
Mixed Other Mixed	0.5%	0.5%	1.5%	1.8%	1.2%	1.3%	1.6%	1.7%	2.1%
Asian Indian	2.5%	2.6%	6.6%	3.4%	8.8%	14.3%	18.6%	1.9%	5.3%
Asian Pakistani	2.0%	2.1%	2.7%	1.9%	3.3%	4.3%	4.6%	0.9%	2.0%
Asian Bangladeshi	0.8%	0.8%	2.7%	5.1%	1.2%	0.5%	0.6%	0.6%	0.6%
Asian Chinese	0.7%	0.7%	1.5%	2.0%	1.2%	1.2%	1.0%	1.7%	3.0%
Asian Other Asian	1.5%	1.5%	4.9%	3.6%	5.7%	9.3%	9.2%	4.0%	5.6%
Black African	1.8%	1.8%	7.0%	8.6%	6.0%	5.1%	7.8%	5.8%	12.3%
Black Caribbean	1.1%	1.1%	4.2%	5.4%	3.5%	3.9%	7.6%	3.9%	8.2%
Black Other Black	0.5%	0.5%	2.1%	2.8%	1.6%	1.9%	3.4%	2.1%	3.5%
Other Arab	0.4%	0.4%	1.3%	1.6%	1.1%	2.9%	3.7%	2.9%	5.8%
Other Other	0.6%	0.6%	2.1%	2.6%	1.9%	3.1%	2.1%	2.7%	3.2%
<b>Total</b>	<b>56,075,912</b>	<b>53,012,456</b>	<b>8,173,941</b>	<b>3,231,901</b>	<b>4,942,040</b>	<b>338,449</b>	<b>311,215</b>	<b>182,493</b>	<b>4,941</b>

Source: Census 2011

The largest religious community in the OPDC area is Christian at 48.7%, which is higher than the London average of 48.4%, but lower than the English average of 59.4%. This is followed by Muslim at 21.7%, compared to a London average of 12.4% and an English average of 5%. Within the plan area, 14.6% stated no religion, which is lower than the London average of 20.7% and English average of 24.7%. Other minorities include Hindu (3.9%), Buddhist (1.4%), Sikh (1.2%), other religion (0.8%) and Jewish (0.3%).

**Table C1-5 Percentage of population by religion**

Area	Total	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	No religion	Religion not stated
England & Wales	56,075,912	59.3%	0.4%	1.5%	0.5%	4.8%	0.8%	0.4%	25.1%	7.2%
England	53,012,456	59.4%	0.5%	1.5%	0.5%	5.0%	0.8%	0.4%	24.7%	7.2%
London	8,173,941	48.4%	1.0%	5.0%	1.8%	12.4%	1.5%	0.6%	20.7%	8.5%
Inner London	3,231,901	45.4%	1.1%	2.2%	1.6%	14.4%	0.5%	0.5%	23.9%	10.4%
Outer London	4,942,040	50.4%	0.9%	6.9%	1.9%	11.1%	2.3%	0.7%	18.6%	7.2%
Ealing	338,449	43.7%	1.2%	8.5%	0.3%	15.7%	7.9%	0.6%	15.0%	6.9%
Brent	311,215	41.5%	1.4%	17.8%	1.4%	18.6%	0.5%	1.2%	10.6%	6.9%
Hammersmith and Fulham	182,493	54.1%	1.1%	1.1%	0.6%	10.0%	0.2%	0.5%	23.8%	8.4%
Park Royal Total	4,941	48.7%	1.4%	3.9%	0.3%	21.7%	1.2%	0.8%	14.6%	7.3%

Source: Census 2011

A study on the gender pay gap by the Government Equalities Office showed that 10% of the overall pay gap can be attributed to occupational sex segregation. A 10% greater share of men in an occupation is associated with 2 per cent higher average hourly wages. 12% of the gap is due to the industries in which men and women work, 21% is due to difference in years of experience of full-time work, 16% is due to negative effect on wages of having previously worked part-time or having taken time out of the labour market to look after family. 36% of the pay gap cannot be explained by any of the characteristics that have been controlled for in the study.

**Table C1-6 Percentage of population by gender**

Area	Total	Male	Female
England & Wales	56,075,912	49.2%	50.8%
England	53,012,456	49.2%	50.8%
London	8,173,941	49.3%	50.7%
Inner London	3,231,901	49.8%	50.2%
Outer London	4,942,040	49.1%	50.9%
Ealing	338,449	50.0%	50.0%
Brent	311,215	50.3%	49.7%
Hammersmith and Fulham	182,493	48.7%	51.3%
Park Royal & Old Oak	4,941	51.2%	48.8%

Source: Census 2011

**Table C1-7 Marital Status**

Area	All Categories	Single	Married	Same Sex Civil Partnership	Separated	Divorced	Widowed
England & Wales	45,496,780	34.6%	46.6%	0.2%	2.6%	9.0%	7.0%
England	42,989,620	34.6%	46.6%	0.2%	2.7%	9.0%	6.9%
London	6,549,173	44.1%	39.8%	0.4%	3.2%	7.4%	5.0%
Inner London	2,636,853	53.5%	31.2%	0.7%	3.5%	7.3%	3.9%
Outer London	3,912,320	37.8%	45.7%	0.3%	3.0%	7.4%	5.8%
Ealing	269,572	40.6%	44.1%	0.4%	3.0%	6.8%	5.1%
Brent	248,458	42.1%	43.2%	0.3%	3.4%	6.2%	4.7%
Hammersmith and Fulham	152,863	55.9%	29.6%	0.5%	2.9%	7.4%	3.7%
Park Royal & Old Oak	3931.3	50.7%	34.2%	0.5%	4.1%	7.5%	3.0%

Source: Census 2011

### C.1.3 Data Gaps and Uncertainties

- Future population makeup for OPDC area
- Proportion of the population that is transgender/has undergone gender reassignment
- Sexual Orientation of the population
- Data on pregnancy and maternity in relation to the local population and employment

## C.2 Education and Qualifications

The following baseline indicators have been used to characterise levels of education and attainment:

- Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles).
- Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles).
- Education, Skills and Training Deprivation (Indices of Deprivation for England 2010).



## C.2.1 OPDC Area

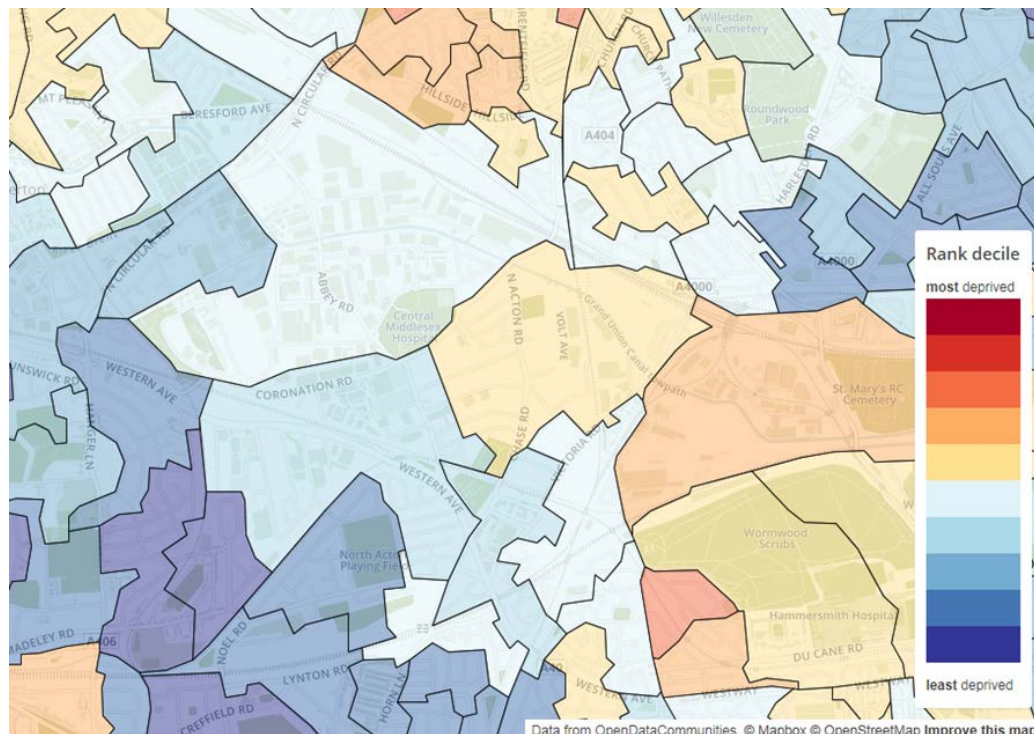
The area's level of skills and educational deprivation is average though there is great disparity between the adjoining boroughs. The low population density also creates uncertainty in the identification of trends. The percentage of people with no qualifications in 2011 was 16%. The percentage of people with NVQ Level 4 qualification or above was 36.5% compared with 44.7% for Inner London and 27.4% for England.

**Table C2-1 Percentage of the population and level of qualification achieved**

Area	All Student Age	No Qualifications	Level 1	Level 2	Apprenticeship	Level 3	Level 4 Above	Other
England & Wales	45,496,780	23%	13.3%	15.3%	3.6%	12.3%	27.2%	5.7%
England	42,989,620	22%	13.3%	15.2%	3.6%	12.4%	27.4%	5.7%
London	6,549,173	18%	10.7%	11.8%	1.6%	10.5%	37.7%	10.0%
Inner London	2,636,853	16%	8.5%	9.4%	1.0%	10.1%	44.7%	10.5%
Outer London	3,912,320	19%	12.3%	13.5%	2.1%	10.7%	33.0%	9.7%
Ealing	269,572	16%	9.9%	10.5%	1.4%	9.6%	37.0%	15.1%
Brent	248,458	19%	10.4%	10.9%	1.2%	9.7%	33.3%	15.4%
Hammersmith and Fulham	152,863	13%	7.0%	8.3%	1.2%	10.7%	49.6%	10.5%
Park Royal Total	3,931	16%	9.0%	9.9%	1.9%	9.0%	36.5%	17.4%

Source: Census 2011

**Figure C2-1 Education, Skills and Training Deprivation in OPDC**



Source: Indices of Deprivation 2010 for England

Brent in particular has a higher percentage of at least one member of staff who isn't fully proficient at their job when compared to London and therefore the Local Plan should seek to include job skills training opportunities and further education facilities.

**Figure C2-2 Education facilities adjoining OPDC Area**

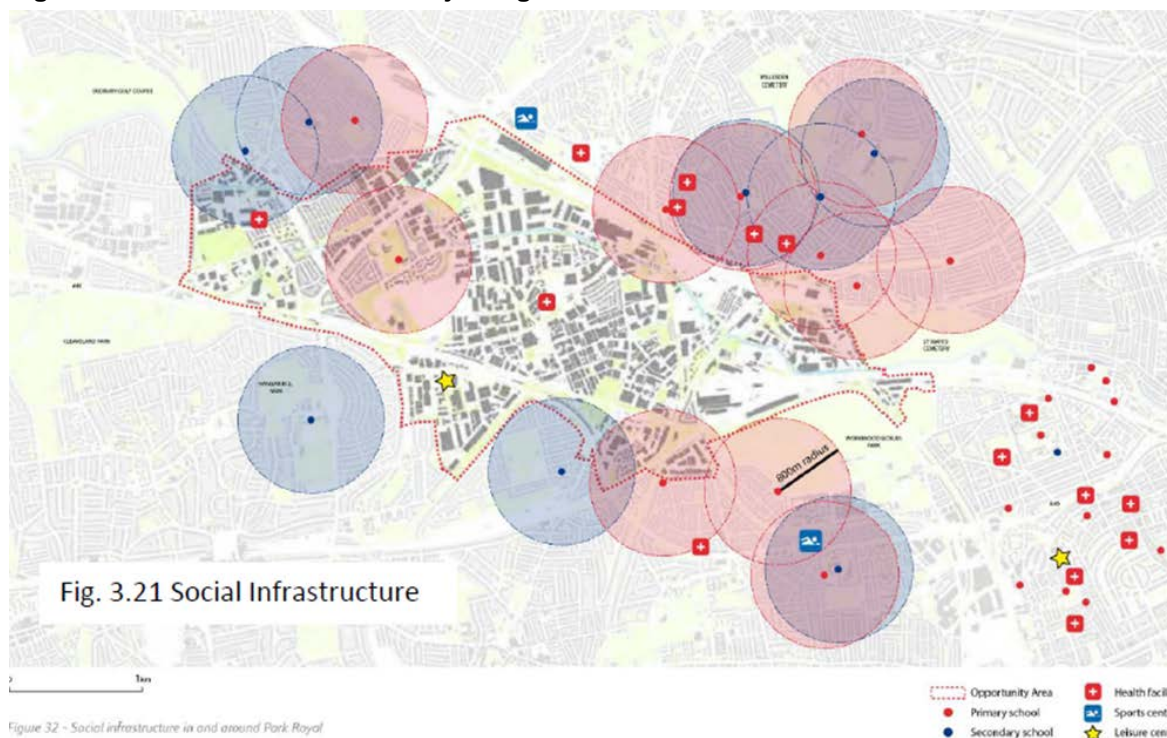


Figure 32 - Social infrastructure in and around Park Royal

Source: OAPF Draft IIA Report, GLA, February 2015

As can be seen from **Figure C2-2** there is a gap in education facilities within the area. The Local Plan and future development needs to ensure adequate provision for the new residents and existing alike.

## C.2.2 Data Gaps and Uncertainties

- Accessibility to secondary school education.
- Number and location of establishments offering life-long learning opportunities.

## C.3 Health

The following baseline data has been used to identify key trends:

- Census 2011 health status data
- Census 2011 life expectancy
- Children living in poverty
- Childhood obesity rates
- Health Deprivation and Disability (Indices of Deprivation for England 2010)
- Provision of GPs and Healthcare

It is noted that a number of the other topics within this baseline will also have an influence on health levels, including data on: population, education, air quality, noise, crime, employment, deprivation and living environment, housing, biodiversity and open space (landscape and townscape).

### C.3.1 OPDC Area

The health of people in the OPDC area is relatively good – 51.6% state they are in Very Good Health (see **Figure C3-1**). Deprivation is higher than average and 37.5% of children were living in poverty in 2010. Life expectancy for males in is 76.2% years, which was lower than the average for London. The average life expectancy for females was 83.6 years which is higher than the London average (82.8%). 8.6% of births between 2008 and 2012 were low birth weight births, which compares with a 7.4% nationally.

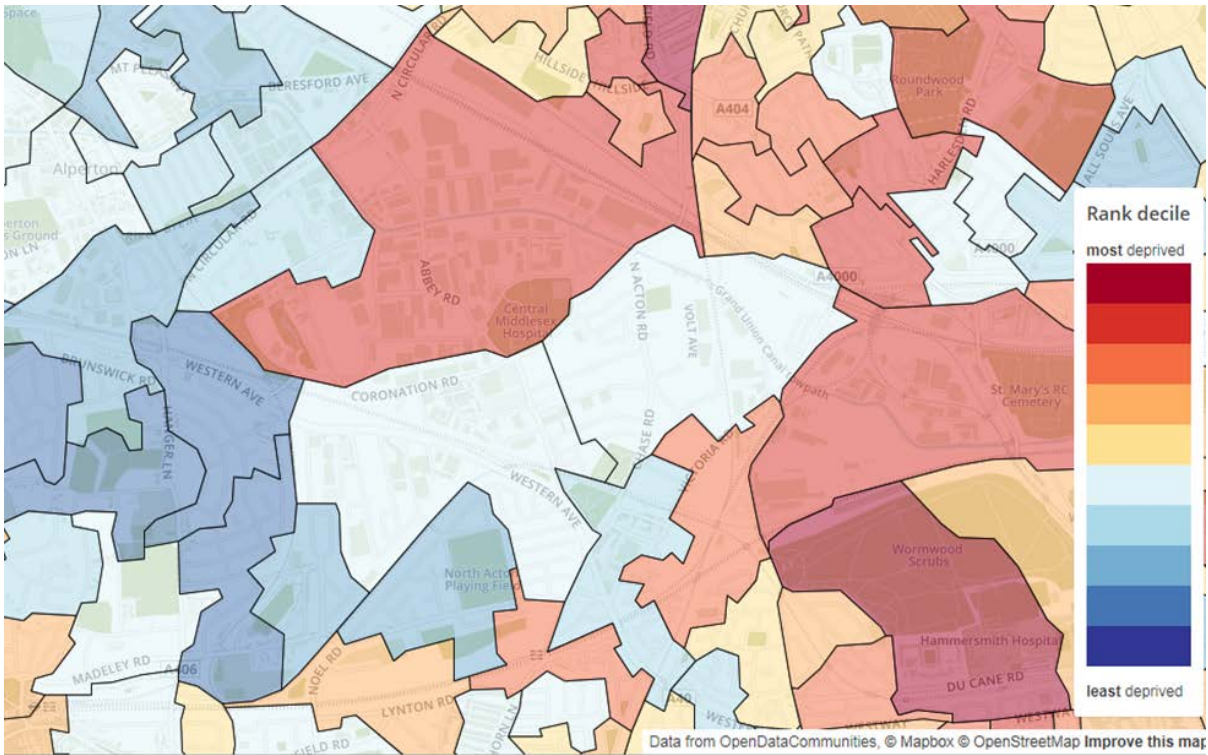
During the period 2010/11 and 2012/13, 11.8% of children at reception year were considered obese, with an additional 23.6% carrying excess weight. A further 23.6% of children in year 6 were identified as obese, with the same figure for London recorded at 22.5%.

**Table C3-1 Census 2011 Health**

Area	Total	Very Good Health	Good Health	Fair Health	Bad Health	Very Bad Health
England and Wales	56,075,912	47.1%	34.1%	13.2%	4.3%	1.3%
England	53,012,456	47.2%	34.2%	13.1%	4.2%	1.2%
London	8,173,941	50.5%	33.3%	11.2%	3.7%	1.2%
Inner London	3,231,901	52.6%	31.6%	10.5%	3.9%	1.4%
Outer London	4,942,040	49.1%	34.5%	11.7%	3.6%	1.1%
Ealing	338,449	49.2%	34.5%	11.4%	3.8%	1.2%
Brent	311,215	48.1%	34.8%	11.8%	4.0%	1.4%
Hammersmith and Fulham	182,493	56.5%	29.2%	9.4%	3.6%	1.3%
Park Royal & Old Oak	4,941	51.6%	33.9%	9.6%	3.9%	0.9%

The OPDC area includes at least one LSOA in the bottom 20% for health deprivation and disability; see **Figure C3-1** below.

**Figure C3-1 Health Deprivation and Disability in OPDC**



Source: Indices of Deprivation 2010 for England

Due to its industrial nature and history, there is a lack of primary care facilities within the OPDC boundaries, with the exception of Central Middlesex Hospital, as seen from **Figure C3-2**.

**Figure C3-2 Provision of GPs and Healthcare in OPDC**

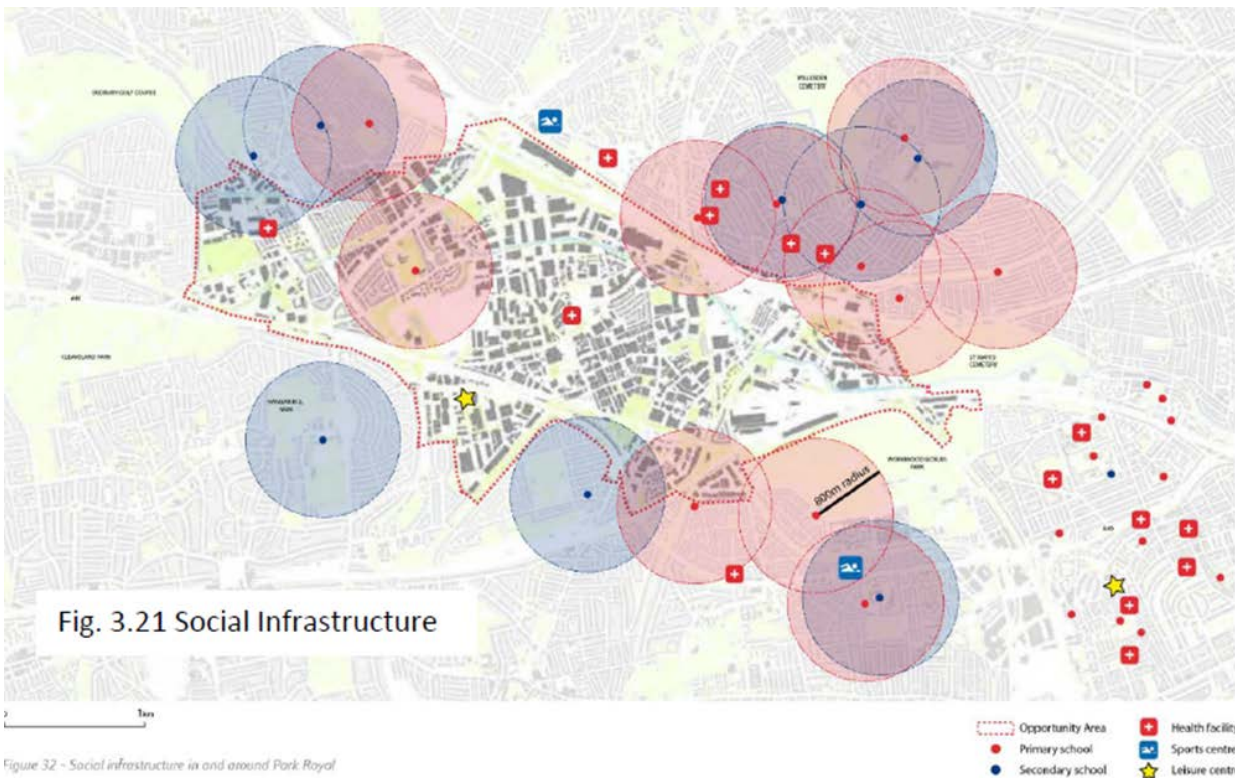


Figure 32 - Social infrastructure in and around Park Royal

Source: OAPF Draft IIA Report, GLA, February 2015

### C.3.5 Data Gaps and Uncertainties

- Proportion of population in area with access to hospital / GP / Dentist
- How children travel to school
- Play and open space quality, quantity and accessibility
- Further detailed information on disability and accessibility throughout the OPDC area and its buildings

## C.4 Crime

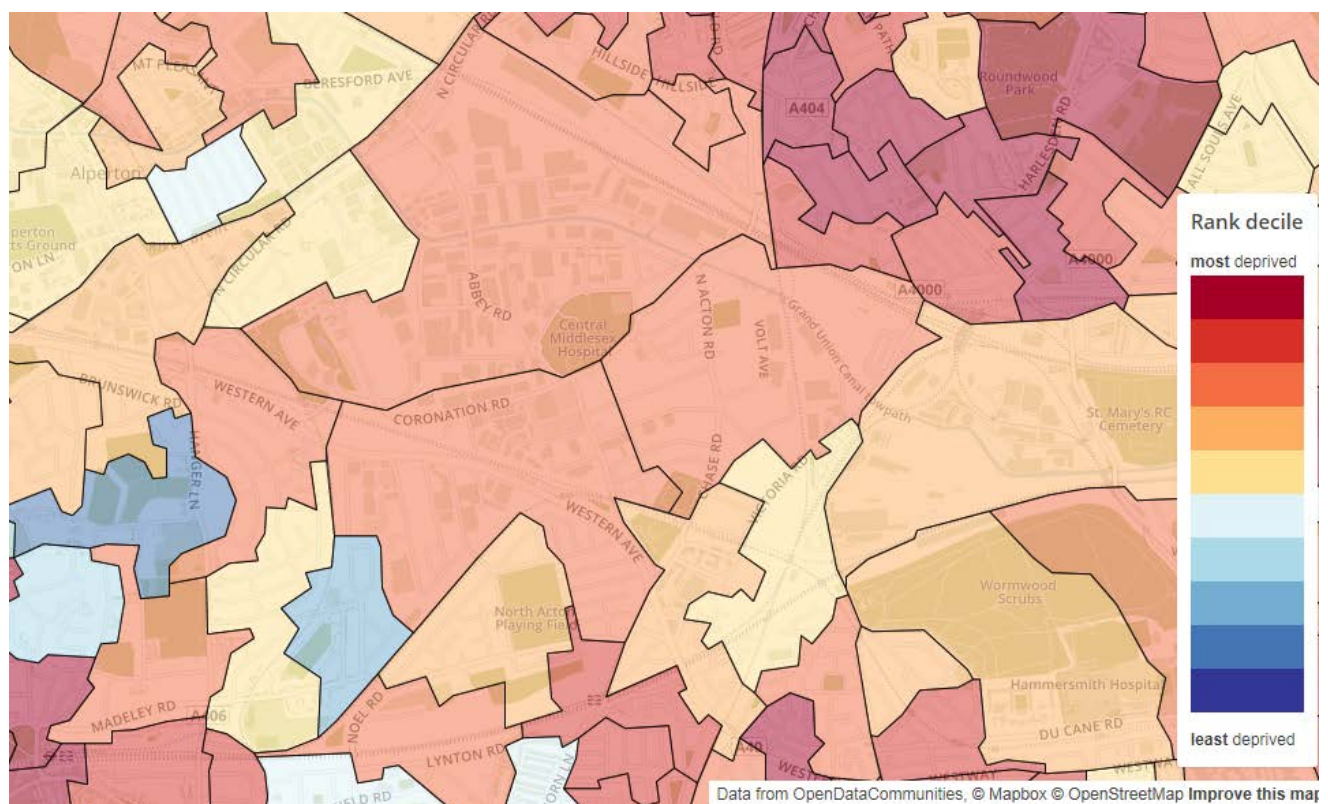
The following baseline data has been identified:

- Crime rates (Indices of Deprivation).
- Car theft
- Violence against persons (rank)
- Total Crime (rank)

### C.4.1 OPDC Area

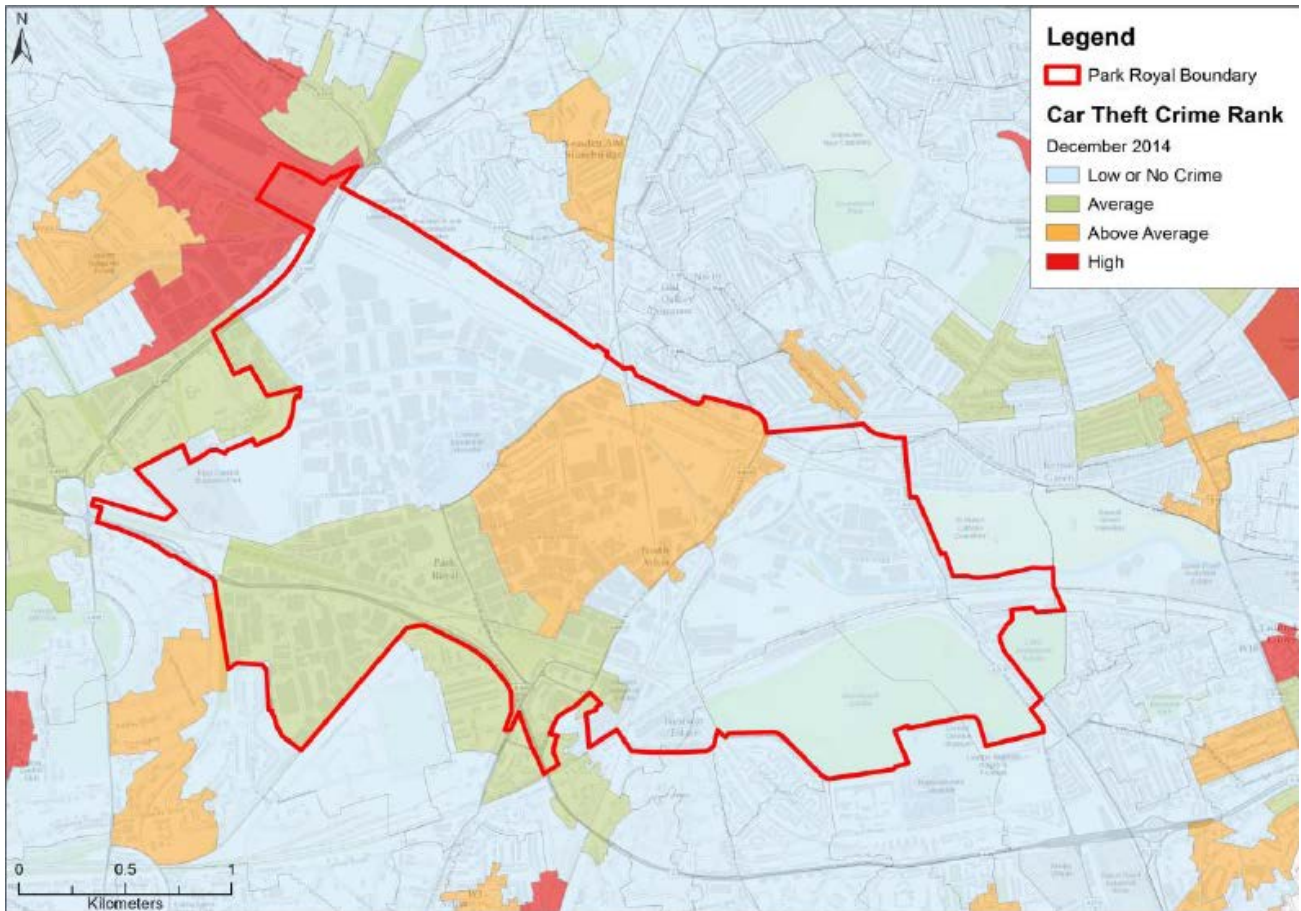
Crime in and around the OPDC area is predominantly violent crime or anti-social behaviour offences. The area is one of the more deprived areas of the country in terms of crime.

**Figure C4-1 Crime Deprivation in OPDC**



Source: Indices of Deprivation 2014

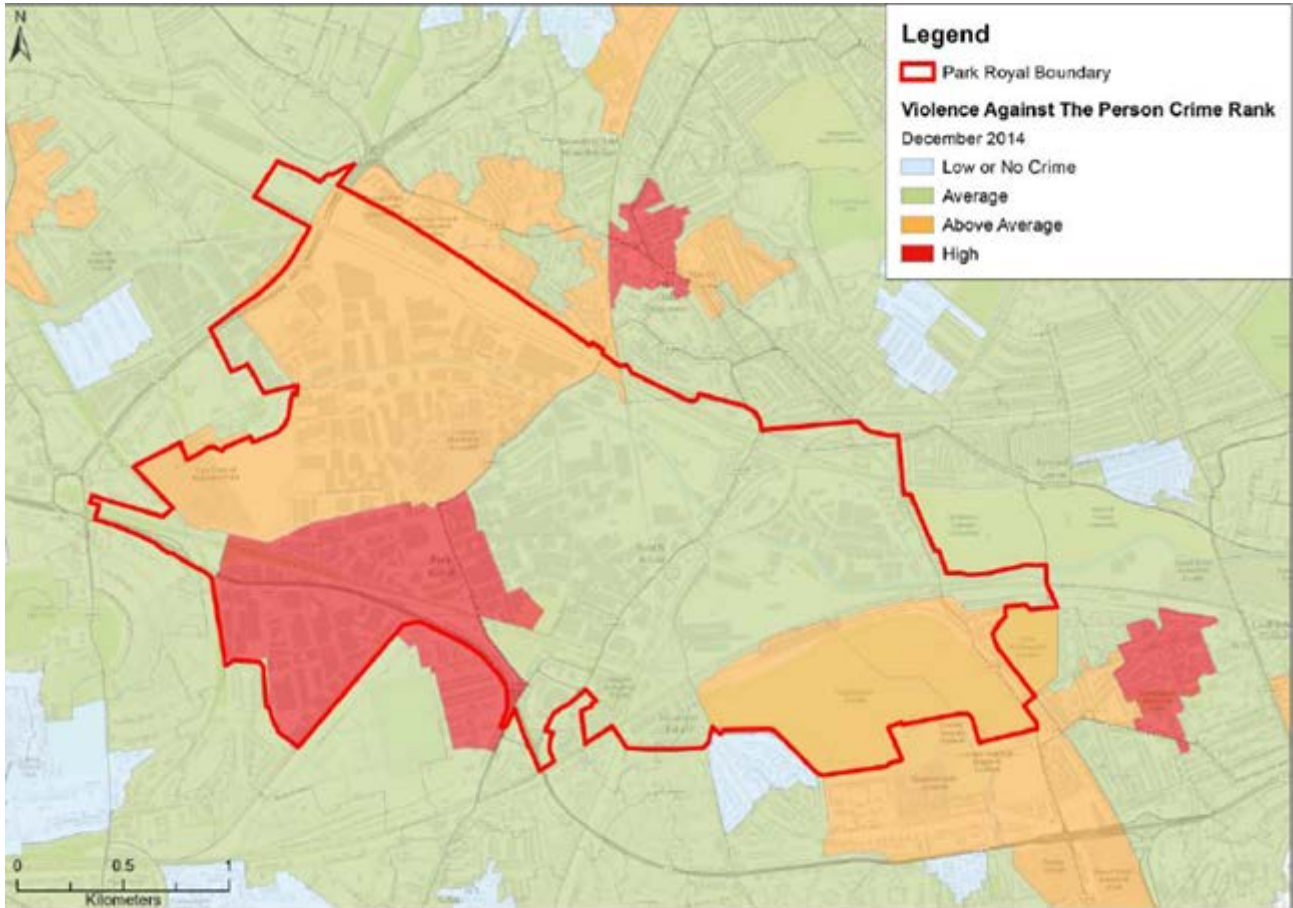
Figure C4-2 Car Theft



Source: OAPF Draft IIA Report, GLA, February 2015

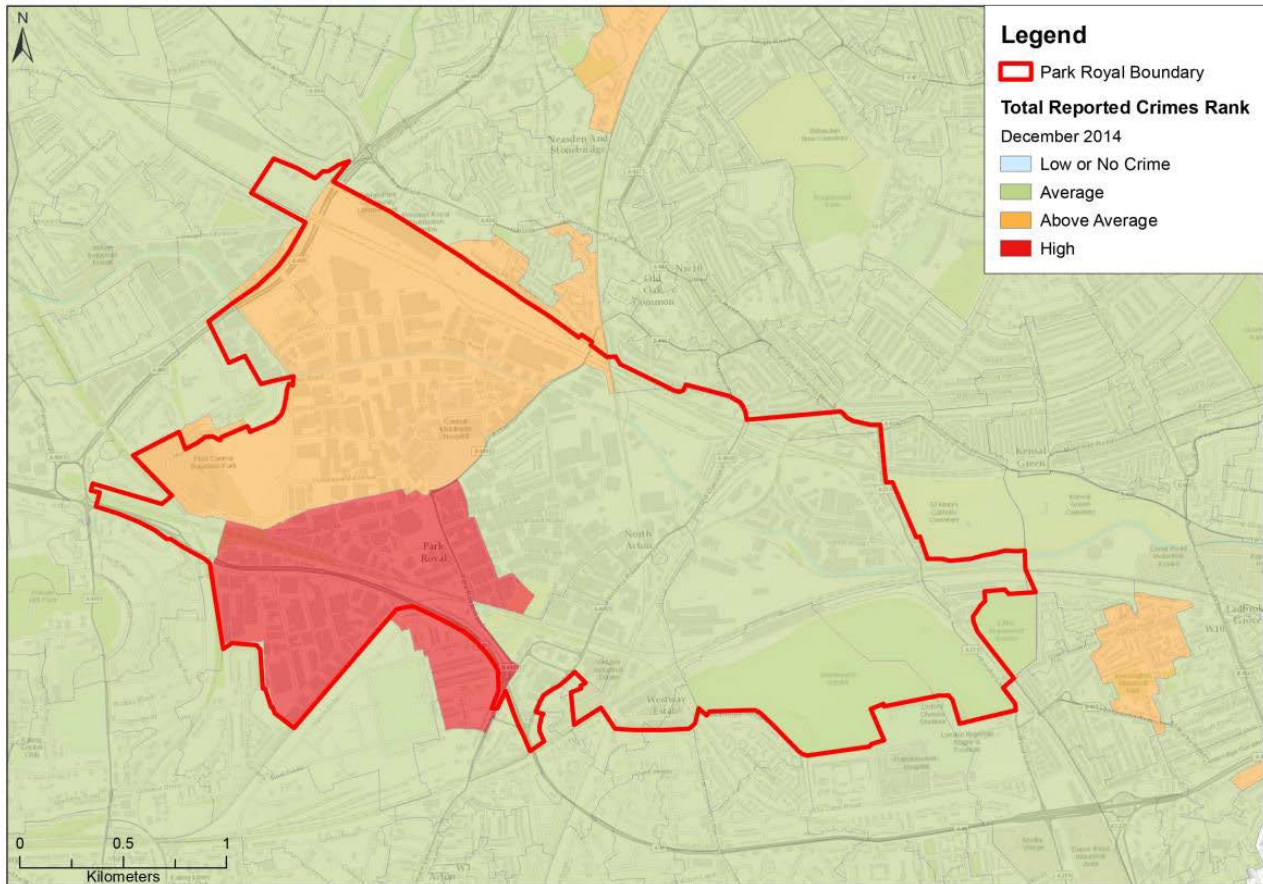
Car theft is average or above average in the centre of the OPDC (see **Figure C4-2**). Violence against persons is also high or above average in the majority of the OPDC area. Given the industrial nature of the site, the Local Plan should seek to ensure that the design new development improves the safety and perceived safety of the community and their property.

**Figure C4-3 Violence against Persons**



Source: OAPF Draft IIA Report, GLA, February 2015

Figure C4-4 Total Crime Rank



Source: OAPF Draft IIA Report, GLA, February 2015

## C.4.2 Data Gaps and Uncertainties

- Percentage of people who feel safe in the place where they live
- Percentage of people who feel safe travelling on public transport at night
- How to best incorporate influx of population

## C.5 Water

The following baseline indicators have been used to characterise the water environment within in the OPDC area:

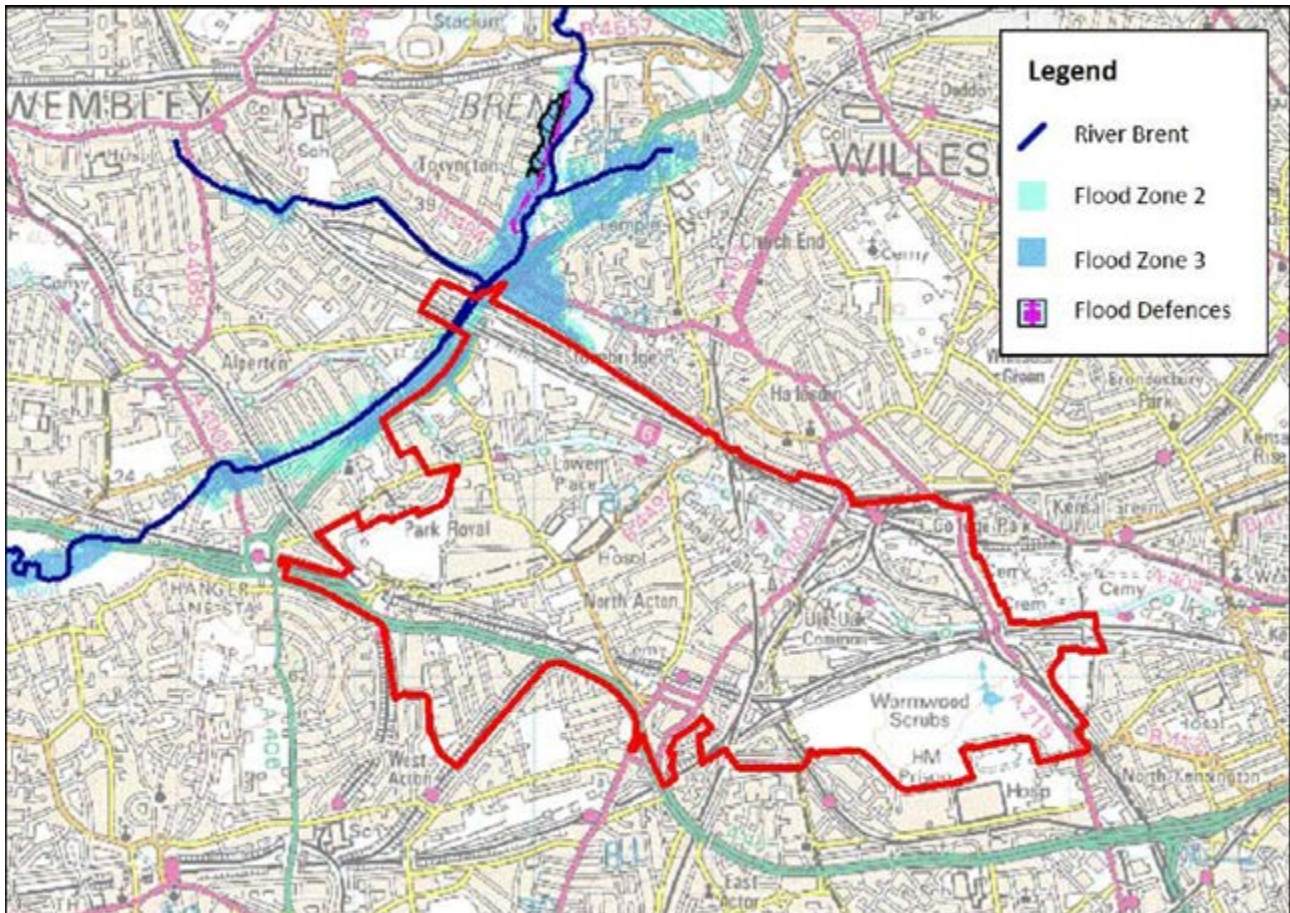
- River catchment areas (Environment Agency Thames Catchment Flood Management Plan, 2009)
- Distribution of areas at risk of fluvial flooding (Environment Agency Fluvial Flood Map)
- Areas susceptible to surface water flooding (Environment Agency Surface Water Flood Map)
- Water and groundwater quality (Environment Agency).



## C.5.1 OPDC Area

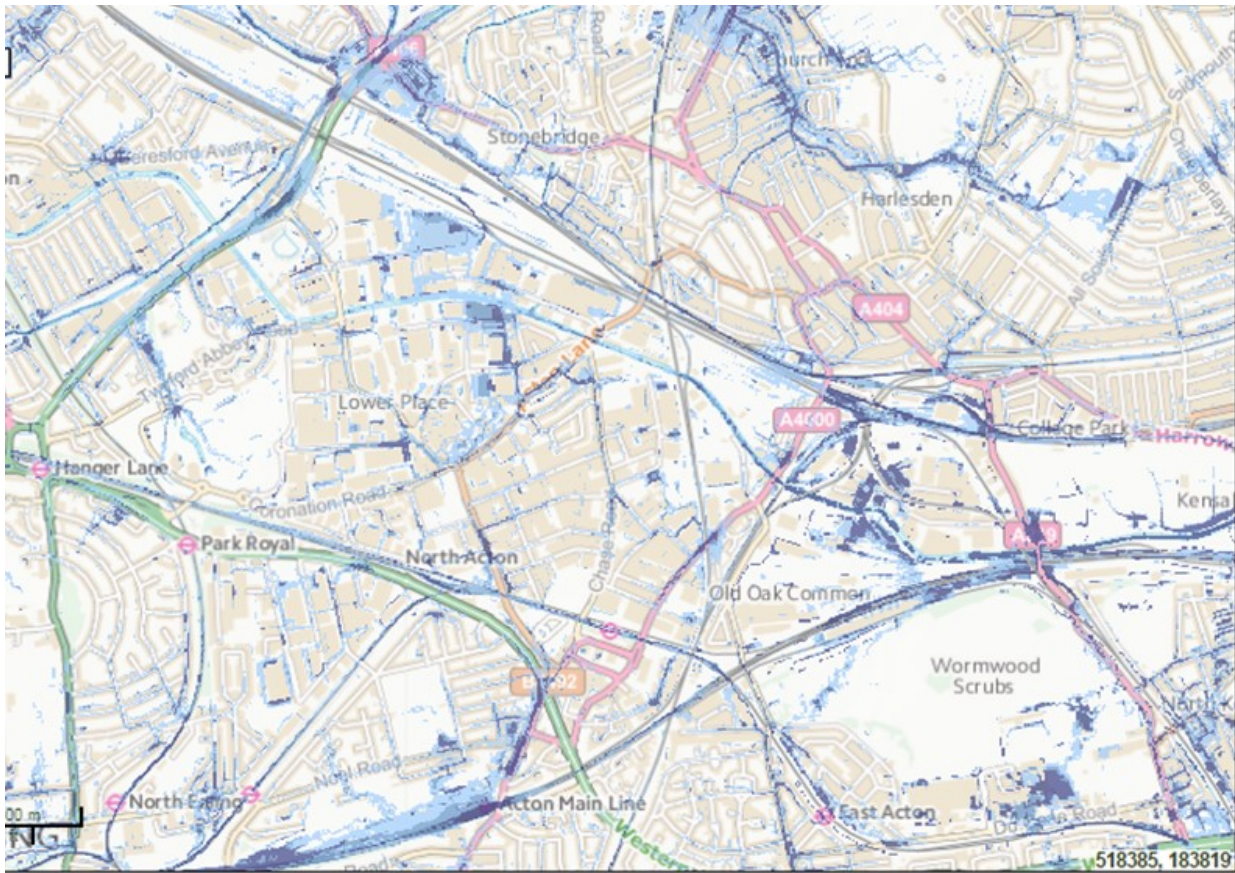
Water is an essential resource required for both domestic and industrial use. The study area's western boundary follows the lie of the River Brent and the Grand Union Canal runs from west to east of the area. The main source of flood risk to the area lies fluvial flood risk at its western edge and from surface water puddling along the road network of area (Figures C5-1 and C5-2). There is particular risk around Old Oak Common station and the area immediately to the north of Central Middlesex Hospital in Park Royal. Fluvial flooding is associated with the River Brent. There are small areas of Flood Zone 2 and 3 in the north-western corner of the area.

**Figure C5-1 Fluvial Flood Risk**



Source: Environment Agency Flood Map

Figure C5-2 Surface Water Flood Risk in OPDC



Source: Environment Agency Flood Map

Each Londoner on average consumed 161 litres of water per day compared to the England and Wales average of 149 litres per day. In the past 20 years, Thames Water has seen a 15% increase in water usage throughout London. This is equivalent to an increase of 10 litres per person per decade.

Both River Brent and Grand Union Canal are currently characterised as having poor water quality for their chemical and biological makeup. The Thames RBMP Actions for the Lower Brent indicate a desire to provide fish easement for three weirs between Brent Junction and Queensbury Road. Development within the OPDC area could contribute to an improvement in the watercourses' water quality overall.

## C.5.2 Data Gaps and Uncertainties

- Further objectives could be identified from adjoining Borough's Surface Water Management Plan
- Thames Water have indicated that Counters Creek is at capacity for any new influx into the combined sewer system – but formal assessment has not been identified.

## C.6 Soil and Land Quality

The following baseline indicators have been used to characterise the soil and land quality conditions across the borough and within the four London boroughs:

- Amount (hectares) of previously developed land available (Office for National Statistics Local Profiles).
- Number of active / historic landfills on the site (Environment Agency)

### C.6.1 OPDC Area

The 2010 ONS Local Profile in **Table C6-1** highlights the amount of previously developed land available in the three boroughs that make up the Old Oak and Park Royal Development Corporation. This reflects the high density urban environment of the borough.

**Table C6-1 Previously Developed Land**

	Vacant land Hectares	Vacant buildings Hectares	Derelict land and redevelope buildings Hectares	Land currently in use with known potential Hectares	Land that is unused or may be available for redevelopme nt Hectares
<b>Ealing</b>	0	0	0	0	140
<b>Hammersmith and Fulham</b>	0	10	0	0	100
<b>Brent</b>	0	20	30	10	150
<b>London</b>	640	330	270	340	3,660

Source: ONS Local Profiles

According to the Environment Agency website there is one historic landfill within the area boundary (Twyford Service Station). The last waste received at this site was in 1968. However there are other sites, particularly within Old Oak which will need to be relocated and the waste apportionment dealt with due the proposed change in land use of the area.

### C.6.2 Data Gaps and Uncertainties

- Area of contaminated land returned to beneficial use
- Type of contaminants within the OPDC area
- Extent of current and historic waste sites and waste transfer sites

## C.7 Air Quality

The following baseline indicators have been used to identify environmental conditions and key trends:

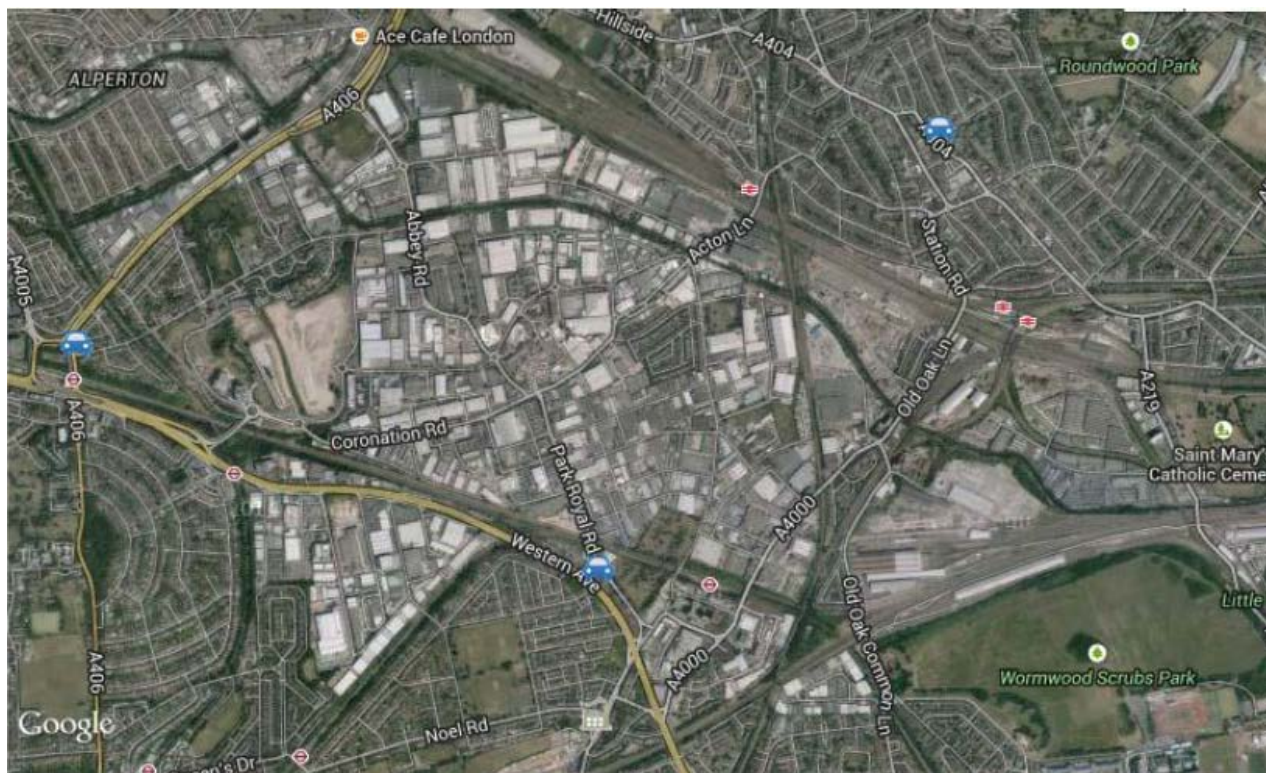
- Number and distribution of Air Quality Management Areas (AQMA) (Air Quality Archive<sup>2</sup>)
- Monitoring data for NO<sub>2</sub> and PM<sub>10</sub>

### C.7.1 OPDC Area

The principal threat to clean air in London comes from road traffic. Poor air quality can damage people's health and quality of life. It can pose particular problems for vulnerable groups such as the elderly, young children and people suffering from respiratory diseases.

AQMAs are designated when local authorities have identified locations where national air quality objectives are unlikely to be achieved. The whole of the OPDC area is considered to be within an AQMA for levels of NO<sub>2</sub> and PM<sub>10</sub>. Each of the three boroughs have identified the same exceedances and types of pollutants. There are three monitoring sites though only two are within the OPDC boundary itself as shown in **Figure C7-1**. Hanger Lane Gyratory (Ealing) Air Quality monitoring Station in operation since 2003 and Western Avenue Air Quality Monitoring Station in operation since 2010 are roadside stations located at the southern boundary of the OA and are operated to LAQN standards. The highest recorded annual mean (see **Figure C7-3**) (1st January 2014 – 1st January 2015) of Nitrogen Dioxide (NO<sub>2</sub>) concentration was measured at Hanger Lane Gyratory (67.6 $\mu$ g/m<sup>3</sup>) followed by Western Avenue at 64.367.6 $\mu$ g/m<sup>3</sup> both exceeding the objective mean of 40 $\mu$ g/m<sup>3</sup>. There are areas of high NO<sub>2</sub> concentrations in the OPDC area, particularly along the strategic highway network.

**Figure C7-1 AQMA in the OPDC**



Source: Defra

<sup>2</sup> <http://uk-air.defra.gov.uk/aqma/maps>

**Figure C7-2 AQMA Objectives**

National air quality objectives and European Directive limit and target values for the protection of human health								
Pollutant	Applies	Objective	Concentration measured as <sup>10</sup>	Date to be achieved by and maintained thereafter	European obligations	Date to be achieved by and maintained thereafter	New or existing	
Particulates (PM <sub>10</sub> )	UK	50µg.m <sup>-3</sup> not to be exceeded more than 35 times a year	24 hour mean	31 December 2004	50µg.m <sup>-3</sup> not to be exceeded more than 35 times a year	1 January 2005	Retain existing	
	UK	40µg.m <sup>-3</sup>	annual mean	31 December 2004	40µg.m <sup>-3</sup>	1 January 2005		
	Indicative 2010 objectives for PM <sub>10</sub> (from the 2000 Strategy and 2003 Addendum) have been replaced by an exposure reduction approach for PM <sub>2.5</sub> (except in Scotland – see below)							
	Scotland	50µg.m <sup>-3</sup> not to be exceeded more than 7 times a year	24 hour mean	31 December 2010				Retain existing
	Scotland	18µg.m <sup>-3</sup>	annual mean	31 December 2010				
Particulates (PM <sub>2.5</sub> ) Exposure Reduction	UK (except Scotland)	25µg.m <sup>-3</sup>	annual mean	2020	Target value 25µg.m <sup>-3</sup> <sup>12</sup>	2010	New (European obligations still under negotiation)	
	Scotland	12µg.m <sup>-3</sup>		2020	Limit value 25µg.m <sup>-3</sup>	2015		
	UK urban areas	Target of 15% reduction in concentrations at urban background <sup>11</sup>		Between 2010 and 2020	Target of 20% reduction in concentrations at urban background	Between 2010 and 2020		
Nitrogen dioxide	UK	200µg.m <sup>-3</sup> not to be exceeded more than 18 times a year	1 hour mean	31 December 2005	200µg.m <sup>-3</sup> not to be exceeded more than 18 times a year	1 January 2010	Retain existing	
	UK	40µg.m <sup>-3</sup>	annual mean	31 December 2005	40µg.m <sup>-3</sup>	1 January 2010		
Ozone	UK	100µg.m <sup>-3</sup> not to be exceeded more than 10 times a year	8 hour mean	31 December 2005	Target of 120µg.m <sup>-3</sup> not to be exceeded more than 25 times a year averaged over 3 years	31 December 2010	Retain existing	

Source: Defra

**Figure C7-3 Air Quality Monitoring data 1st January 2014-1st January 2015**

	Nitrogen Dioxide NO <sub>2</sub>	Particles PM <sub>10</sub>
Ealing - Western Avenue	64.3	29.3
Ealing - Hanger Lane Gyrotary	67.6	25.4
Brent - John Keble Primary School	N/A	21.9

Source: OAPF Draft IIA Report, GLA, February 2015

## C.7.2 Data Gaps and Uncertainties

- Extent to which new development should adhere to the Mayor’s Air Quality Neutral benchmark.
- How existing business can reduce reliance on road freight traffic with introduction of rail improvements

## C.8 Energy and Climate Change

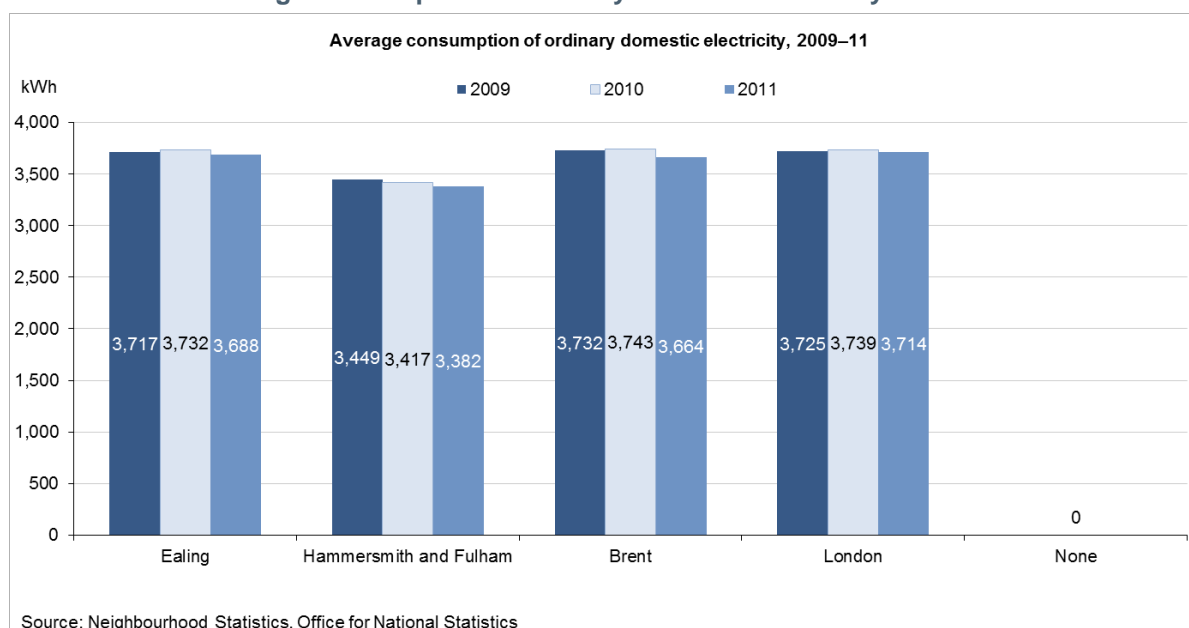
The following baseline indicators have been used:

- Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles).
- All energy consumption by sector (Office for National Statistics Local Profiles and DECC).

### C.8.1 OPDC Area

Although climate change is a global phenomenon, action to avoid its most serious effects and to minimise the emission of greenhouse gases needs to occur at a local level. The area will not be immune to the impacts of climate change, either directly or as a result of policy responses at the national and international levels.

**Table C8-1 Average consumption of ordinary domestic electricity**



Source: ONS Local Profiles

The three boroughs perform similarly when compared to London and each other for average consumption domestic electricity. The scale of development should seek to encourage as energy efficient development as possible, as well as consider the positive benefit of a site-wide decentralised energy network.

**Table C8-2 Energy Consumption by Sector**

## Energy consumption by sector

2011

	<b>Total</b>	<b>Industry and commercial</b>	<b>Domestic</b>	<b>Transport</b>
	<b>gWh</b>	<b>gWh</b>	<b>gWh</b>	<b>gWh</b>
<b>Ealing</b>	5,127	1,746	2,249	1,132
<b>Hammersmith and Fulham</b>	3,198	1,386	1,227	586
<b>Brent</b>	4,037	1,199	2,044	794
<b>London</b>	134,347	50,341	55,547	28,178

Source: ONS Local Profiles

The Planning and Energy Act 2008 allows local authorities to include policies in their local plan's setting out reasonable requirements for:

- A proportion of energy used in development in their area to be energy from renewable sources
- A proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development

The above policies should be carefully considered and balanced in the Local Plan with the need to ensure that the environment of the borough is not adversely affected.

### C.8.2 Data Gaps and Uncertainties

- Area specific energy data
- Greenhouse gas emissions data
- Levels of energy efficiency in homes and commercial buildings
- Energy consumption in industrial units within Park Royal and Old Oak

## C.9 Biodiversity, Flora and Fauna

The following baseline indicators have been used to characterise conditions across the four boroughs and within the LLDC area boundary:

- Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Local Wildlife Sites (LWS) (MAGIC, [www.magic.gov.uk](http://www.magic.gov.uk) and Local Authority websites).
- Key Biodiversity Action Plan (BAP) species and habitats present (London BAP).

### C.9.1 OPDC Area

London is a surprisingly green city and approximately 48% is surfaced in vegetation, rivers and still waters. London supports thousands of species, from algae and fungi to molluscs and mammals

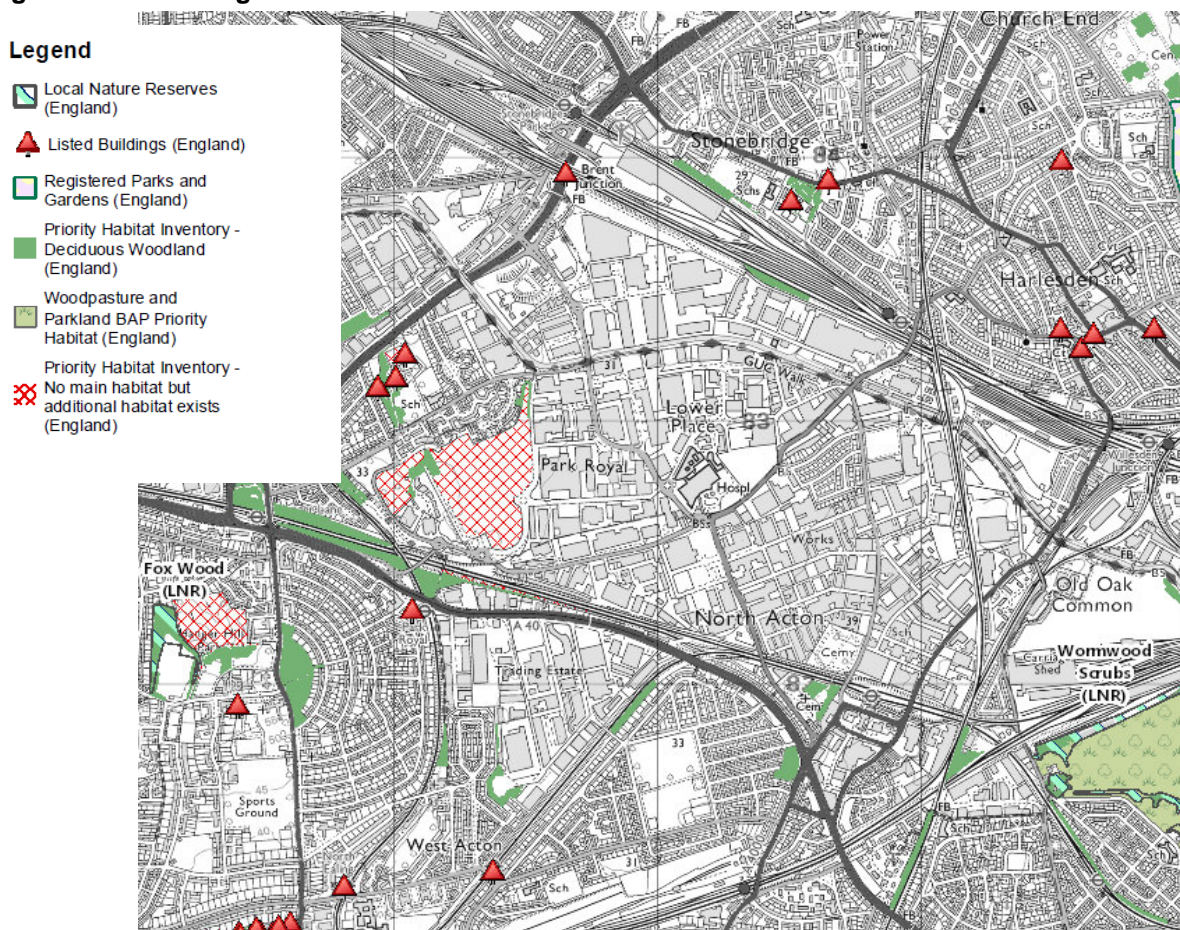
Within the OPDC area there are no SACs, SPAs, Ramsar sites, SSSIs or NNRs. There is one LNR: Wormwood Scrubs. The Grand Union Canal and adjacent area in Old Oak South is a nature conservation area of Metropolitan Importance. Other designated sites in proximity to the plan area are listed in **Table C9-1**.

**Table C9-1 Closest statutory sites of international, national and local nature importance**

Site Name	Designation	Approximate direction and distance from the OPDC area
Wormwood Scrubs	LNR	Within OPDC boundary
Fox Wood	LNR	675 metres, southwest
Westbere Copse	LNR	3.4km, northeast
Barn Elms Wetland Centre	SSSI	4.4km, south
Richmond Park	SAC	6.9km, south
Wimbledon Common	SAC	8km, south

Wormwood Scrubs Local Nature Reserve's habitat and species should be protected and enhanced.

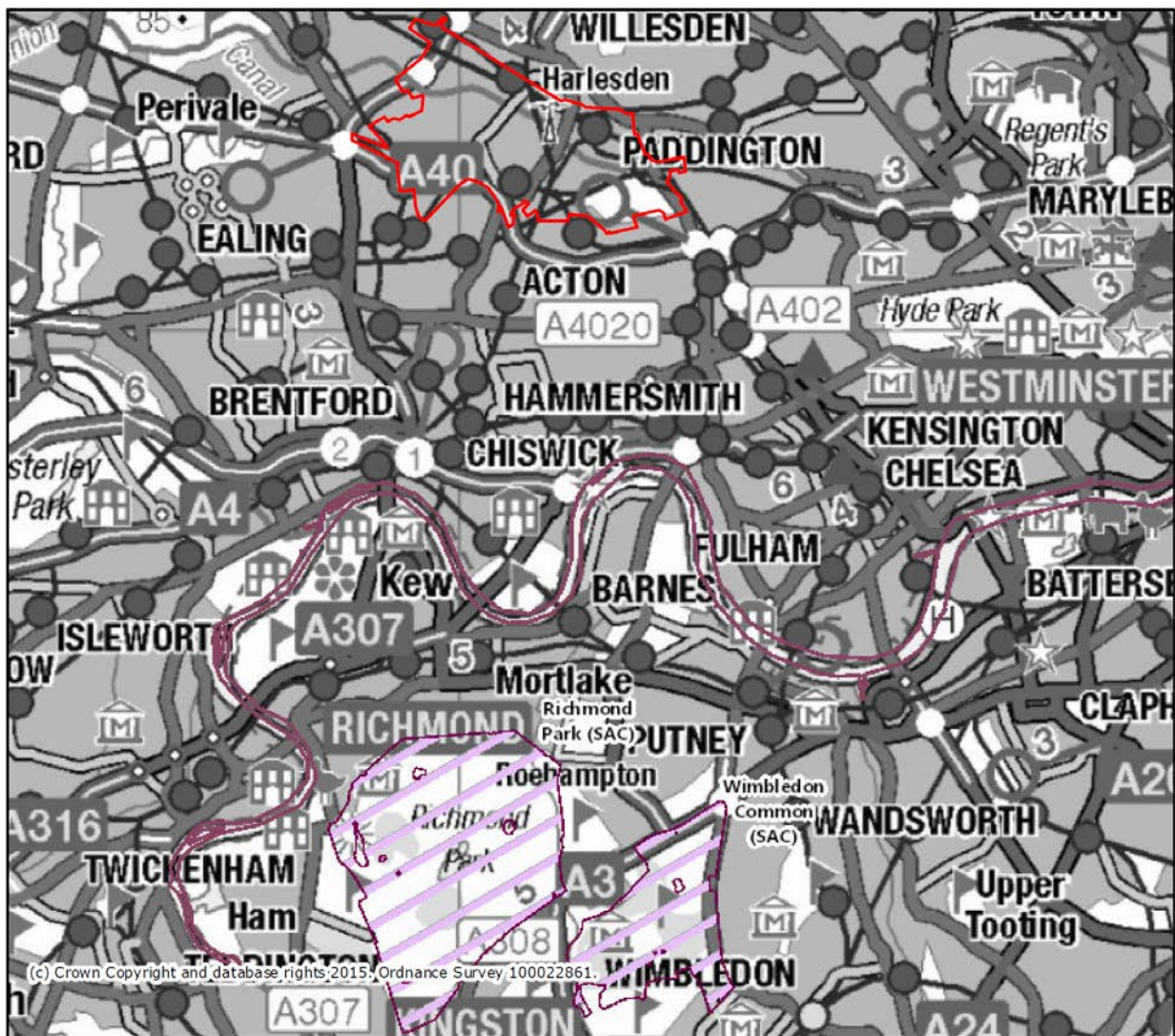
**Figure C9-1 Designated Sites**



Source: Magic.gov.uk, 4 August 2015



Figure C9-2 International Designations



Source: Magic.gov.uk, 4 August 2015

The area presents an opportunity to create and protect other sites within the boundary as well as promote green habitat connectivity to areas outside the boundary.

The UK government published 'Biodiversity: The UK Action Plan' in 1994. This plan combined new and existing conservation initiatives with an emphasis on a partnership approach. It contains 59 objectives for conserving and enhancing species and habitats as well as promoting public awareness and contributing to international conservation efforts. Following on from the initial strategy publication, 391 Species Action Plans (SAPs) and 45 Habitat Action Plans (HAPs) were published for the UK's most threatened (i.e. "priority") species and habitats. In addition there are approximately 150 Local Biodiversity Action Plans, normally at county level. These plans usually include actions to address the needs of the UK priority habitats and species in the local area, together with a range of other plans for habitats and species that are of local importance or interest (Biodiversity Action Reporting System<sup>3</sup>).

The London BAP is made up of many individual species and habitat plans. Each plan gives information on the status and threats to the species or habitat. London BAP species and habitats include the following:

#### Habitat Action Plans

- Acid grassland

<sup>3</sup> <http://www.ukbap-reporting.org.uk/>

- Chalk grassland
- Heathland
- Parks and urban greenspaces
- Private gardens
- Reedbeds
- Rivers and streams
- Standing water
- Tidal Thames
- Wasteland
- Woodland

#### **Species Action Plans**

- Bats
- Black poplar
- House sparrow
- Mistletoe
- Reptiles
- Sand martin
- Stag beetle
- Water vole

Source: London BAP<sup>4</sup>

### **C.9.2 Data Gaps and Uncertainties**

- No records of other priority habitats and species within the boundary area
- Data relating to biodiversity on brownfield land/railway sidings in particular
- Data relating to the connectivity of greenspaces and the mapping of any greenspaces (non-designated) across the area

## **C.10 Cultural Heritage**

The following baseline indicators have been used to characterise the heritage baseline:

- Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens<sup>5</sup>.
- Historic England Heritage Assessment of Old Oak<sup>6</sup>

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<sup>4</sup> <http://www.lbp.org.uk/londonpriority.html>

<sup>5</sup> [www.magic.gov.uk](http://www.magic.gov.uk)

<sup>6</sup> <http://research.historicengland.org.uk/redirect.aspx?id=6294>

## C.10.1 OPDC Area

There is one listed asset within the OPDC area – Brent Viaduct.

There are no SAMs within the area.

Within the boundary there are 2 Conservation Areas, these include:

- Old Oak Lane; and
- along Grand Union Canal.

Adjacent to the study area are the St. Mary's Conservation Area in Hammersmith and Fulham, which includes the St Mary's Cemetery and parts of the Kensal Green Cemetery. The Kensal Green Cemetery Conservation Area in The Royal Borough of Kensington and Chelsea includes the majority of the listed buildings and monuments and the majority of the Registered Park and Garden (Grade I registered Park and Garden of special historic interest which contains the Grade I listed Anglican Chapel, twelve Grade II\* listed buildings or monuments and 147 Grade II listed buildings or monuments).

Within the surrounding area, the following conservation areas may also be affected by development within the OPDC area:

- Harlseden;
- Old Oak and Wormholt;
- Hangerhill Garden Estate; and
- Hagerhill (Hay Mills) Estate.

Prior to the mid-nineteenth century, Old Oak Common area was common-ground and farmland sitting beside the Grand Junction Canal (now the Grand Union Canal) from its development in 1794. With the arrival of the railways in 1838 and their expansion into the twentieth century, industry shortly followed along the railways and the canal making use of these connections. By the late nineteenth century, Old Oak Common had been transformed into an industrial area home to heavy industries and works supporting the railways.

Following the First World War, the increase in motorised transport saw the arrival of motor car production with Park Ward manufacturing Rolls Royce vehicles at its site on Hythe Road. In the latter half of the twentieth century, redevelopment of some of the Victorian industrial buildings for lighter industry and office floorspace was carried out reflecting the restructuring of the national economy.

To the west in Park Royal, the area generally known as Twyford was farmland until the Royal Agricultural Show took place from 1903 to 1905 (which provides the area's name). Following 1905, the industrial character began to emerge with the area used as a munitions factory during the First World War alongside manufacturing and food production. By 1932 there were 73 factories employing 13,500 workers which grew to over 45,000 in the 1960s following relatively light bomb damage in the Second World War and the post-war boom period. Through the latter part of the twentieth century, industrial restructuring saw the relocation of large multinational firms, such as Heinz, away from Park Royal.

Other notable listed buildings whose setting could be affected by development in the Opportunity Area include the Grade II\* listed gatehouse and chapel at Wormwood Scrubs Prison, the Church of All Souls Harlesden (also Grade II\*), and thirteen Grade II listed buildings within 250m of the boundary. Further afield are Statutory Listed buildings, the closest being Kenmont Primary School and Park Royal Underground Station.

The Old Oak Common and Park Royal areas have a disparate assortment of railway and industrial heritage that play a valuable role in informing the evolving character of the area. Specific collections of non-designated heritage assets are located along the east of Scrubs Lane, the interwar Rolls Royce works and Acava Studios on Hythe Road. The OPDC would be seeking to designate and manage new Conservation Areas and a Local List.

A significant number of the heritage assets listed above are on English Heritage's Heritage at Risk Register. These include Kensal Green Cemetery, as well as 35 monuments within it, including the Anglican Chapel. Twyford Abbey to the west of the opportunity area is also a long standing Heritage at Risk case.

Whilst there are at present no archaeological priority areas within the proposed local plan area, the Greater London Historic Environment Record holds information on several archaeological investigations, sites and finds. Notably the site of Acton Wells 18th century spa is located within the Opportunity Area. The open ground of Wormwood Scrubs was the site of a rifle range and anti-aircraft battery and may preserve as yet undiscovered earlier remains. The Grand Junction Canal and Old Oak Common area include aspects of railway and industrial archaeological interest. The 19th century Park Royal cemetery would also be of interest if subject to redevelopment.

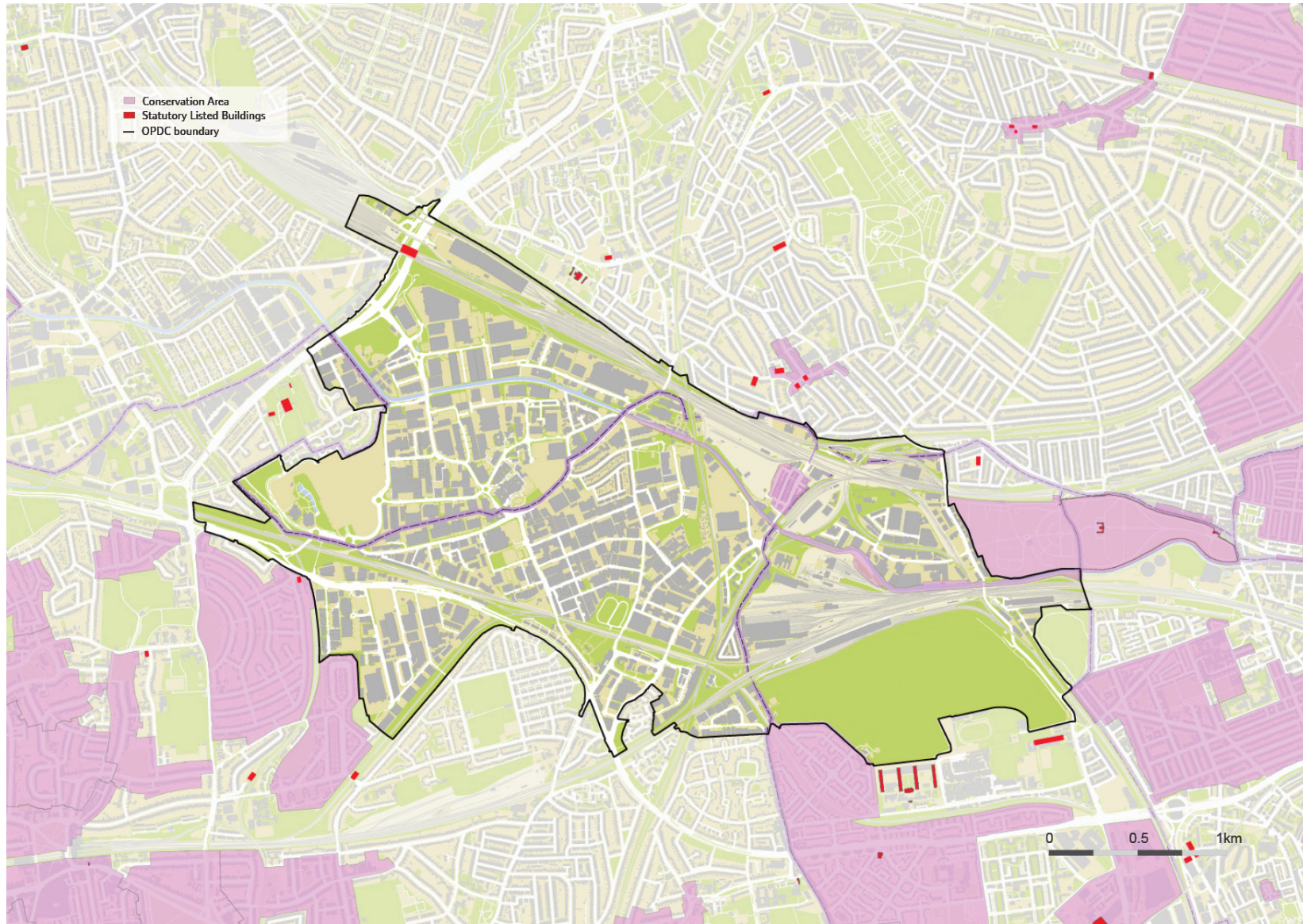
## C.10.2 Data Gaps and Uncertainties

- Planning permissions adversely affecting known or potential designated assets (historic buildings, archaeological sites etc.)
- Boroughs' Local Lists of Heritage Assets

The following baseline indicators have been used to characterise the landscape and townscape baseline:

- Designated sites
- Land uses on the study area
- Conservation Areas
- Open Space

Figure C10-1 Sites of Cultural and Archaeological Importance



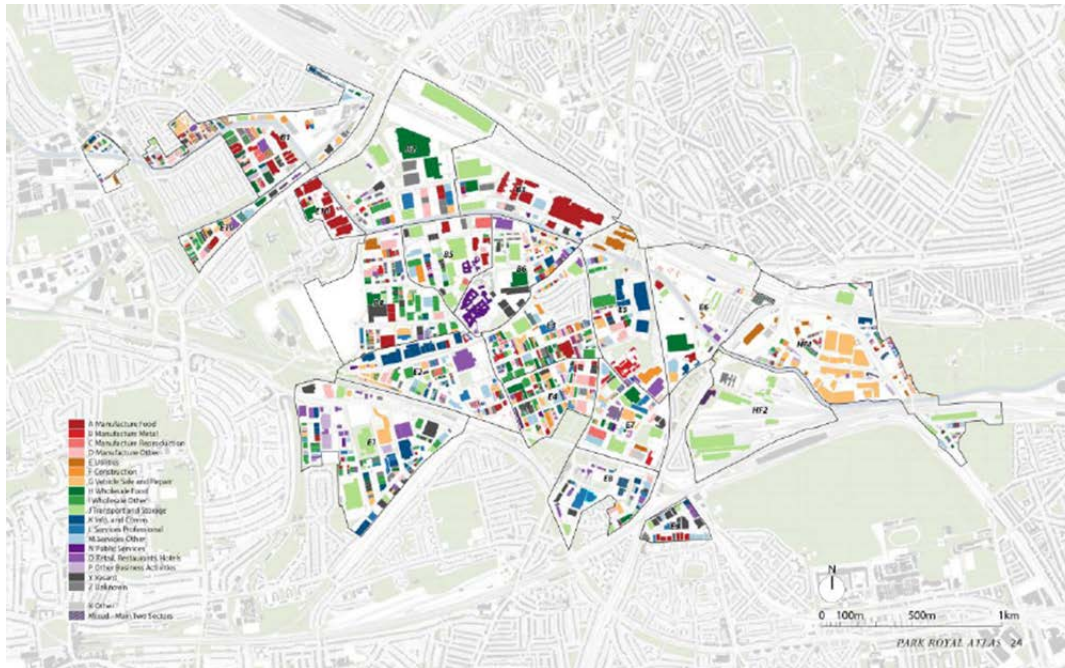
Source: Old Oak & Park Royal Opportunity Area Planning Framework (2015)

## C.11.1 OPDC Area

There are no Areas of Outstanding Natural Beauty (AONBs) within OPDC.

The OPDC area comprises a largely industrial townscape with its edges influenced by more residential spaces. Railway infrastructure is a dominant feature across the site.

**Figure C11-1 Land Uses in the Study Area**



Source: OAPF Draft IIA Report, GLA, February 2015

The study area lies between two catchment areas – River Brent and the lost river of Counters Creek (now a combined sewer). Park Royal is predominantly warehousing and industrial units with Central Middlesex Hospital in the centre of it.

Old Oak is industrial units with the Cargiant site a dominant feature. At present a Crossrail depot is also being built there.

There is a Conservation Area along Old Oak Lane and along Grand Union Canal. The old Rolls Royce factory forms part of Old Oak.

Along the south-eastern boundary lies Wormwood Scrubs Park which is grassland and some woodland. The eastern boundary is Kensal Green Cemetery. While there are substantial areas of green space on the periphery of the plan area, the industrial nature of the area means that most parts have a severe open space deficiency. Integration with the All London Green Grid Area Frameworks is an important consideration.

## C.11.2 Data Gaps and Uncertainties

- Number of noise and light pollution complaints
- Percentage of new housing completions in area achieving design standards such as Building for Life and Lifetime Homes

## C.12 Waste

The following baseline indicators have been used to characterise the existing conditions:

- Percentage of household waste sent for reuse, recycling or composting (ONS Local Profiles).

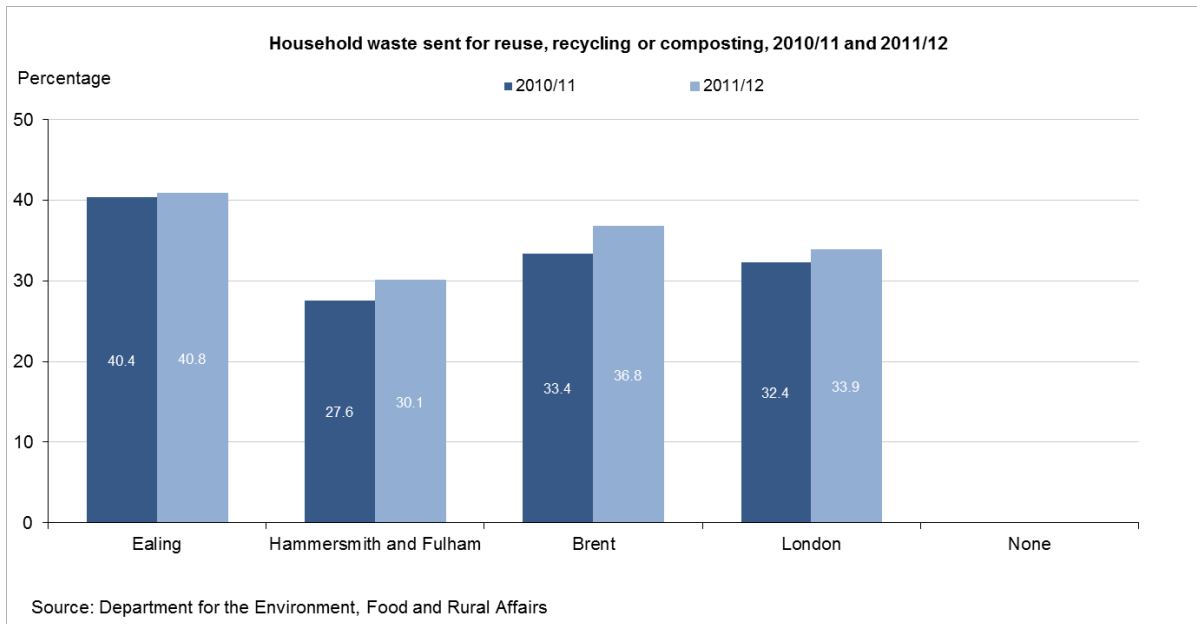
- Amount of residual waste per household (ONS).
- Amount of commercial and industrial waste produced (Defra).

## C.12.1 OPDC Area

There are no area-specific statistics for the study area.

Recycling rates are higher for Ealing compared to Brent, Hammersmith & Fulham and London as a whole though they have increased between 2010 and 2012 (**Table C12-1**).

**Table C12-1 Household Waste Sent for Reuse, Recycling or Composting**



There is currently no data available on the municipal waste sent to landfill in the area.

There are several waste sites within the area:

- European Metal Recycling
- Powerday
- Capital Waste Ltd
- UK Tyre Exporters
- O'Donovan's Waste Disposal Ltd.

## C.12.2 Data Gaps and Uncertainties

- Percentage of municipal waste sent to landfill in study area.
- Waste facilities available in each borough and how to deal with apportionment

## C.13 Transportation

The following baseline indicators have been used to characterise the existing conditions across the borough:

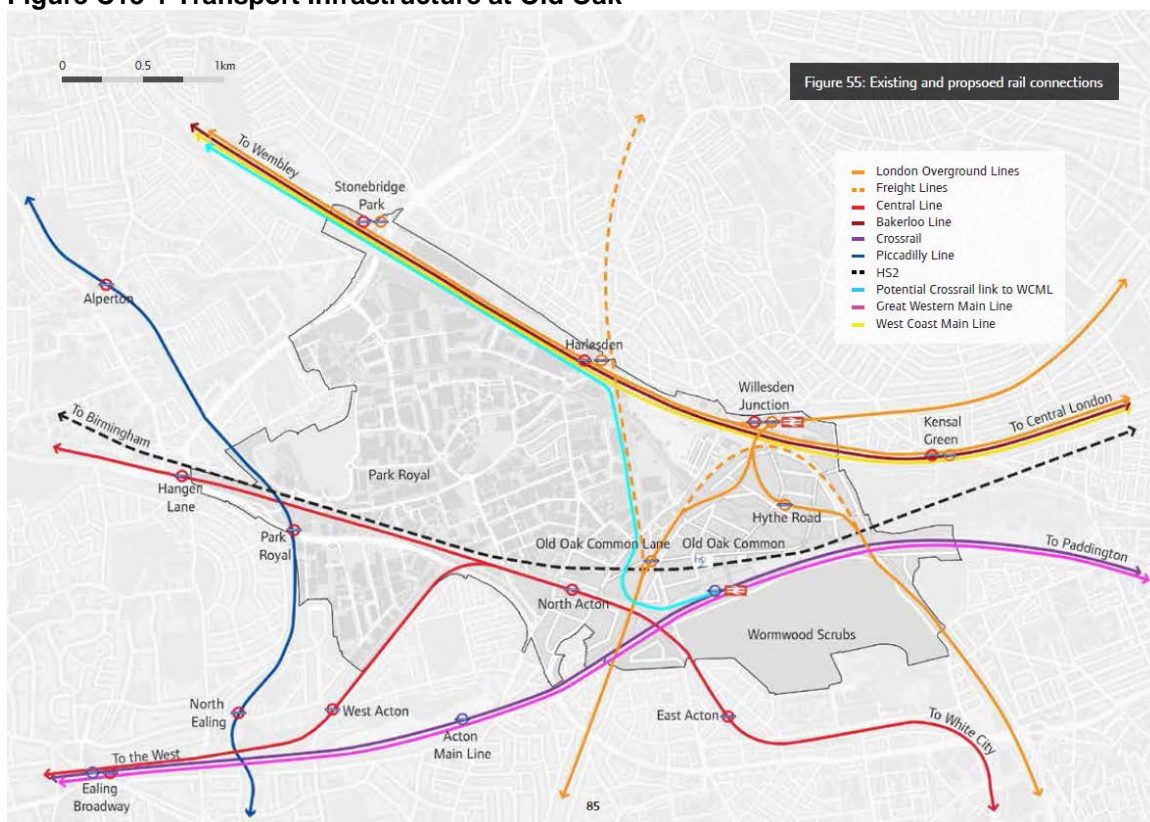
- Distribution of major transport systems – roads, rail links
- Draft Old Oak and Park Royal Opportunity Area Planning Framework, Transport Strategy, February 2015

## C.13.1 OPDC Area

The Transport Strategy made a number of high level assumptions and modelled the impacts of area's proposals. It didn't take into account the transport impacts resulting from the relocation of existing activities. Further work is being explored to consider these elements. There is also a number of transport proposals identified which are contingent on land coming available which is likely to be beyond the 2031 timescales.

The new Old Oak Common station and surrounding interchange will be the key driver for development in the area and will be the focus of future transport connections. HS2 will provide 18 trains per hour between Old Oak and the North, with Birmingham Airport just 31 minutes from Old Oak. The new Crossrail station at Old Oak will provide up to 24 trains per hour into central London, as well as services towards Heathrow and Reading. The presence of a Crossrail station will be one of the most important transport connections to the site, providing a significant increase in rail capacity to the West End, City and Canary Wharf. Crossrail will provide excellent regional and sub-regional connectivity to Old Oak.

**Figure C13-1 Transport Infrastructure at Old Oak**



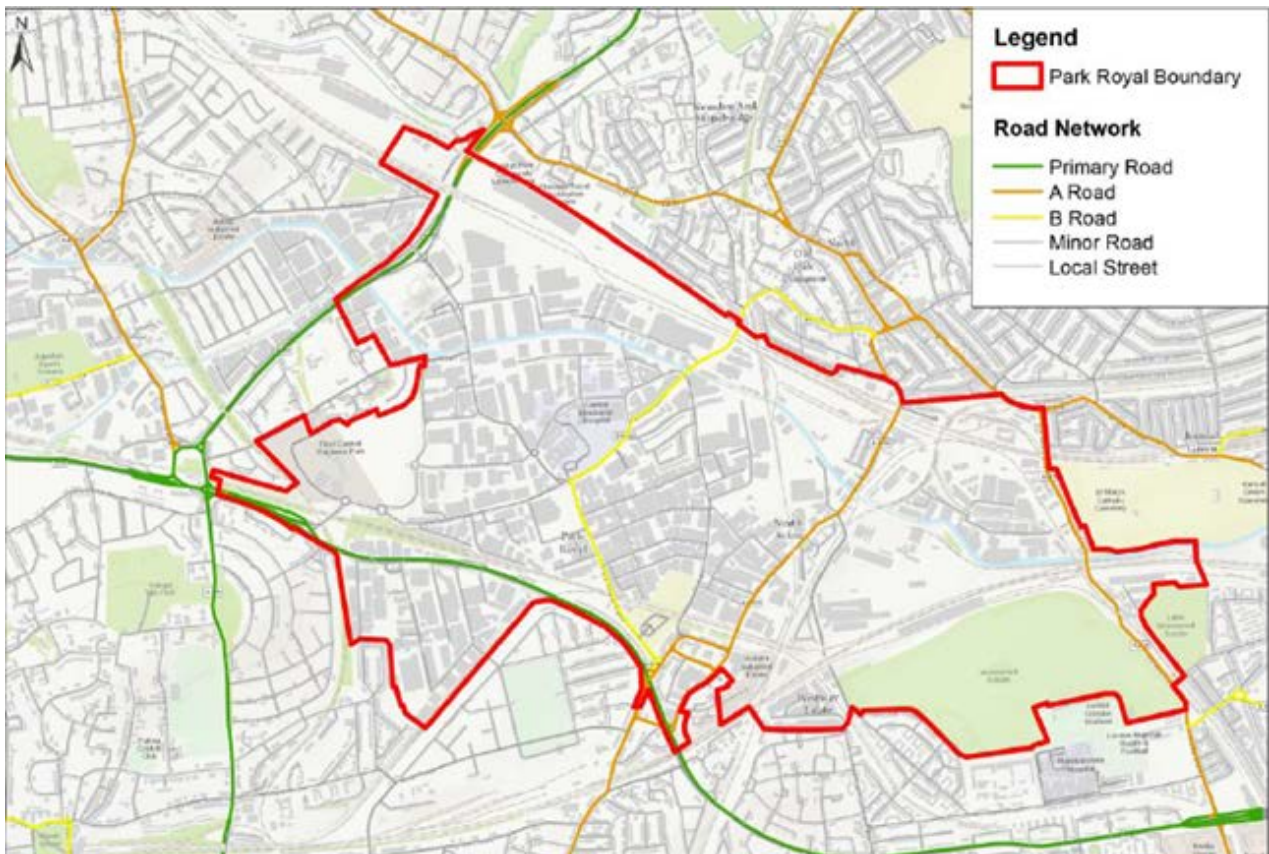
Source: OAPF Transport Strategy, GLA, February 2015

The study didn't consider the impacts of the number of homes being proposed nor the number of jobs. As such this needs careful consideration in the Local Plan.

Old Oak and Park Royal generate a significant number of road freight movements. The current road network is shown in **Figure C13-2**. Park Royal is home to London's largest industrial area and has significant wholesale, transport and warehouse activity. Any new proposals must consider the existing road users and capacity requirements, along with ensuring improvements in non-road transport, such as rail and by foot or cycle.

**Figure C13-2 Road Network**





Source: OAPF Draft IIA Report, GLA, February 2015

The Grand Union Canal presents a great opportunity for both water travel and freight movements as well as footpaths and should be considered a strategic transport link within the area.

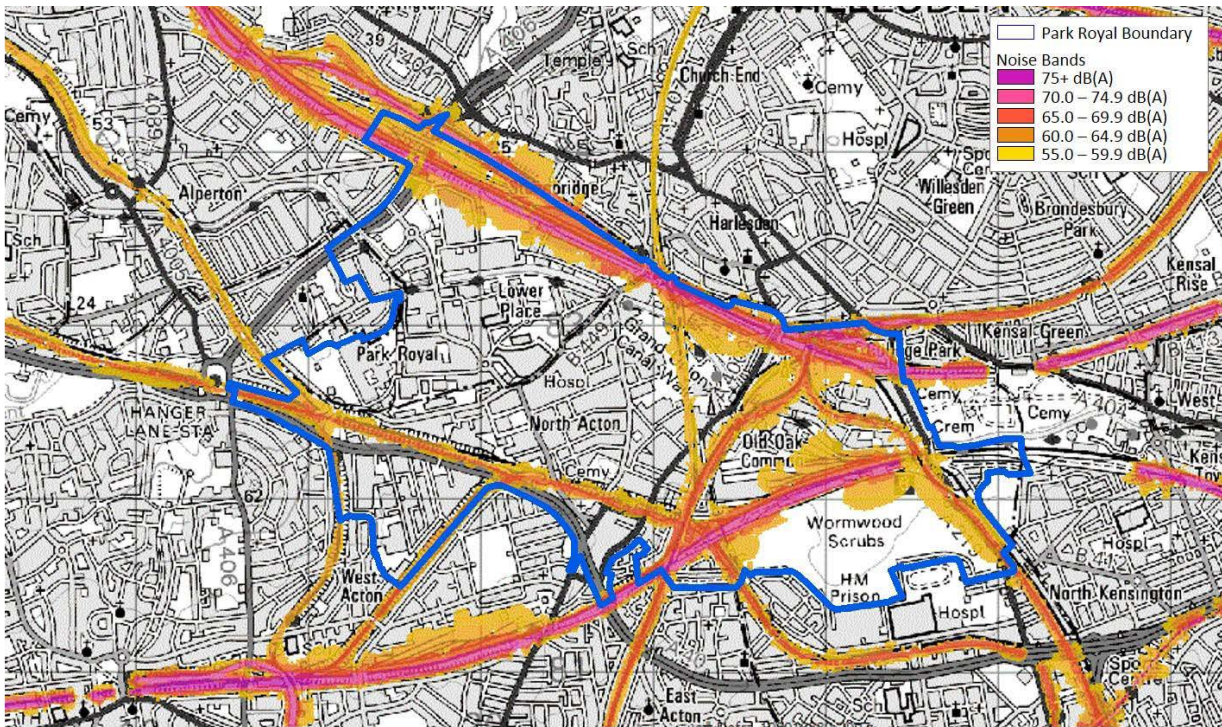
Noise is defined as unwanted sound. Sensitive receptors to noise include residential areas, educational facilities, health care facilities and places of worship. Road and rail noise are significant contributors to the ambient noise environment, particularly around the town centre and main distributor roads. Department for Environment, Food and Rural Affairs (Defra) Online road, rail and industrial noise mapping shows the extent to which these noise sources may affect sensitive receptors. Built up areas shield unwanted sound and cause the effect to decrease over a short distance. Open areas such as parks allow the noise to travel over a longer distance and disturb users of such spaces.

Figure C13-3 Road Traffic Noise – average daytime



Source: [www.services.defra.gov.uk/wps/portal/noise](http://www.services.defra.gov.uk/wps/portal/noise) in OAPF Draft IIA Report, GLA, February 2015

Figure C13-4 Rail Noise – average daytime



Source: [www.services.defra.gov.uk/wps/portal/noise](http://www.services.defra.gov.uk/wps/portal/noise)

Source: [www.services.defra.gov.uk/wps/portal/noise](http://www.services.defra.gov.uk/wps/portal/noise) in OAPF Draft IIA Report, GLA, February 2015

## C.13.2 Data Gaps and Uncertainties

- Impacts on proposed quantum of development on existing businesses and residents in terms of access by road and rail

## C.14 Economy

The following baseline indicators have been used to characterise economic conditions across the borough:

- Economy Local Profiles (ONS)
- Employment by industry (ONS- NOMIS).

### C.14.1 OPDC Area

Smaller businesses, independent traders and entrepreneurs tend to dominate the study area. The image of Park Royal and Old Oak developments range from larger freight and wholesale businesses through to microbusinesses that survive because the area offers a place for their industry not available elsewhere in London coupled with inexpensive rents. On one hand while this can contribute to an entrepreneurial spirit, on the other it can translate into a weakness from an economic standpoint.

This is contributing towards pressure for redevelopment and regeneration. Redevelopment would help alleviate housing shortages in London but careful consideration needs to be given to how any new provision of retail will impact on other neighbouring town centres such as Ealing. Similarly, redevelopment of the area is likely to give rise to local pressures from existing businesses who are likely to be unwilling to relocate.

In 2010, 18.6% of the adult population were long-term unemployed (claiming job seekers allowance for over 1 year). This figure is above the national average of 10.1% and the London-wide figure of 11.5%.

A higher than average proportion of the area's population are classified in sales and customer service occupations, process plant occupations, elementary occupations and skilled trades compared to London as a whole. Professional occupations and associate professional and technical occupations however are lower than London's average but higher than regional and national averages. This data is presented in **Table C14-1**.

**Table C14-1 Employment by Occupation Jul 2011-Jun 2012**

Area	Total employed 16 -74	Managers Directors Senior Officials	Professional Occupations	Associate_ Professional/Technical Occupations	Administrative Secretarial Occupations	Skilled Trades_ Occupations	Caring Leisure Other Service Occupations	Sales Customer Service Occupations	Process Plant and Machine Operatives	Elementary Occupations
England & Wales	26,526,336	10.8%	17.4%	12.7%	11.4%	11.5%	9.4%	8.4%	7.2%	11.1%
England	25,162,721	10.9%	17.5%	12.8%	11.5%	11.4%	9.3%	8.4%	7.2%	11.1%
London	3,998,897	11.6%	22.5%	16.3%	11.7%	8.3%	7.9%	7.5%	4.7%	9.6%
Inner London	1,637,362	12.4%	25.6%	19.7%	9.7%	6.3%	7.1%	6.6%	3.3%	9.4%
Outer London	2,361,535	11.0%	20.3%	13.9%	13.0%	9.7%	8.4%	8.1%	5.7%	9.8%
Ealing	164,820	10.9%	21.0%	14.2%	10.7%	9.9%	7.5%	7.9%	6.1%	11.8%
Brent	147,461	9.6%	18.2%	12.6%	10.9%	10.6%	8.2%	9.5%	6.9%	13.5%
Hammersmith and Fulham	99,618	14.6%	27.0%	22.1%	9.6%	5.4%	6.5%	5.5%	2.5%	6.7%
Park Royal & Old Oak	2,461	8.6%	19.1%	15.7%	11.5%	11.0%	7.4%	7.8%	6.2%	12.6%

Source: OAPF Draft IIA Report, GLA, February 2015

**Table C14-2 Local Industry Units by Broad Industry Group**

Area	England & Wales	England	London	Inner London	Outer London	Ealing	Brent	Hammersmith and Fulham	Park Royal & Old Oak
Employed Age 16-74	26,526,336	25,162,721	3,998,897	1,637,362	2,361,535	164,820	147,461	99,618	24,611
Agriculture/Forestry/Fishing	0.9%	0.8%	0.1%	0.1%	0.1%	0.0%	0.0%	0.1%	0.1%
Mining/Quarrying	0.2%	0.2%	0.1%	0.2%	0.1%	0.2%	0.1%	0.3%	0.2%
Manufacturing	8.9%	8.8%	3.2%	2.2%	3.9%	4.7%	4.6%	2.3%	3.9%
Electricity/Gas/Steam/Airconditioning Supply	0.6%	0.6%	0.3%	0.2%	0.3%	0.2%	0.2%	0.2%	0.1%
Water Supply/Sewerage/Waste Remediation Activities	0.7%	0.7%	0.4%	0.2%	0.4%	0.4%	0.3%	0.2%	0.3%
Construction	7.7%	7.7%	6.6%	4.4%	8.1%	7.9%	8.9%	4.0%	8.0%
Wholesale/Retail/Trade/Repair Motor Vehicles	15.9%	15.9%	13.1%	11.0%	14.5%	14.4%	17.0%	10.6%	15.5%
Transport Storage	5.0%	5.0%	5.0%	3.5%	6.1%	7.3%	5.7%	3.2%	6.8%
Accommodation & Food Service	5.6%	5.6%	6.3%	7.4%	5.5%	6.7%	7.9%	6.8%	9.2%
Info & Communication	4.0%	4.1%	6.9%	8.2%	6.0%	8.4%	6.3%	9.6%	7.3%
Financial/Insurance	4.3%	4.4%	7.7%	9.5%	6.4%	4.1%	4.4%	9.9%	3.5%
Real Estate	1.4%	1.5%	2.0%	2.1%	1.9%	1.8%	1.8%	2.9%	2.5%
Professional Scientific Technology	6.6%	6.7%	10.9%	14.1%	8.6%	8.8%	8.4%	16.1%	7.8%
Administrative Support Service	4.9%	4.9%	5.9%	5.9%	5.8%	6.8%	6.6%	5.4%	6.4%
Public Administration/ Defence	6.0%	5.9%	5.0%	4.3%	5.5%	3.8%	3.6%	3.0%	3.3%
Education	9.9%	9.9%	9.6%	9.2%	9.9%	9.0%	8.1%	8.2%	8.7%
Health	12.5%	12.4%	10.7%	10.1%	11.2%	9.8%	10.3%	9.4%	10.1%
Other: Other	5.0%	5.0%	6.4%	7.4%	5.7%	5.7%	6.0%	7.6%	6.5%

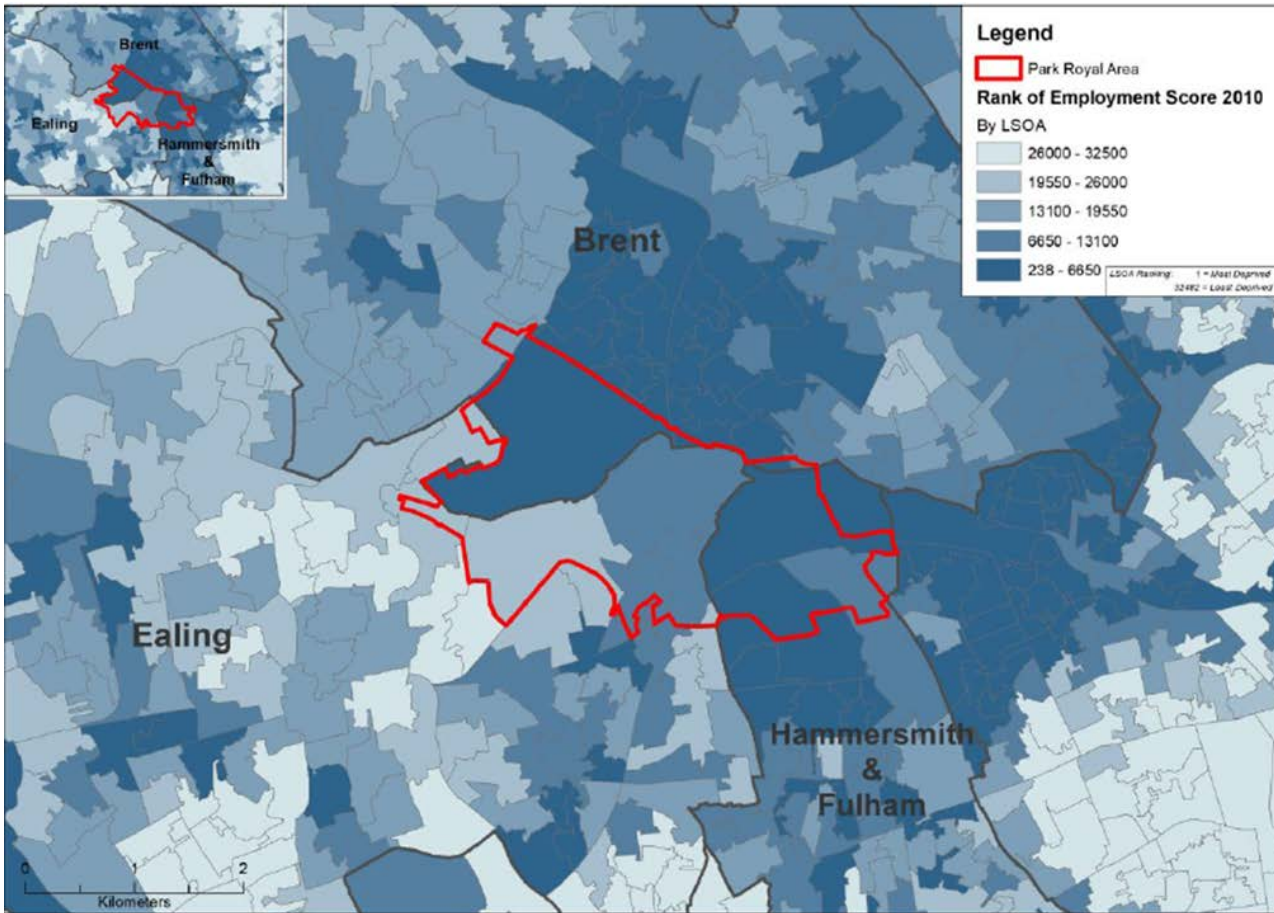
Source: OAPF Draft IIA Report, GLA, February 2015

**Table C14-2** shows the employment by industry in the study area and surrounding boroughs. There's a higher than the London average of manufacturing, construction, wholesale and accommodation & food services within the Park Royal and Old Oak study area.

These more intensive industries need to be accommodated in terms of the proposed redevelopment whilst also allowing new industries to flourish – especially by providing space for green technologies.

The area ranks among the most deprived in terms of its employment deprivation as can be seen from **Figure C14-1**.

**Figure C14-1 Local Industry Units by Broad Industry Group**



Source: OAPF Draft IIA Report, GLA, February 2015

As such, consideration needs to be made to as how this can be addressed within the Local Plan whilst also considering how this redevelopment, its economic potential and new population increase will sit within the wider borough and London context.

## B.14.2 Data Gaps and Uncertainties

- Planning consents for employment uses and take up of employment floorspace
- Noise impacts from commercial uses
- Commercial / retail rental data
- No. / % of people working from home

## B.15 Deprivation and Living Environment

The following baseline data has been identified:

- Number of wards with LSOAs in the bottom 20% most deprived (Indices of Deprivation for England 2010).

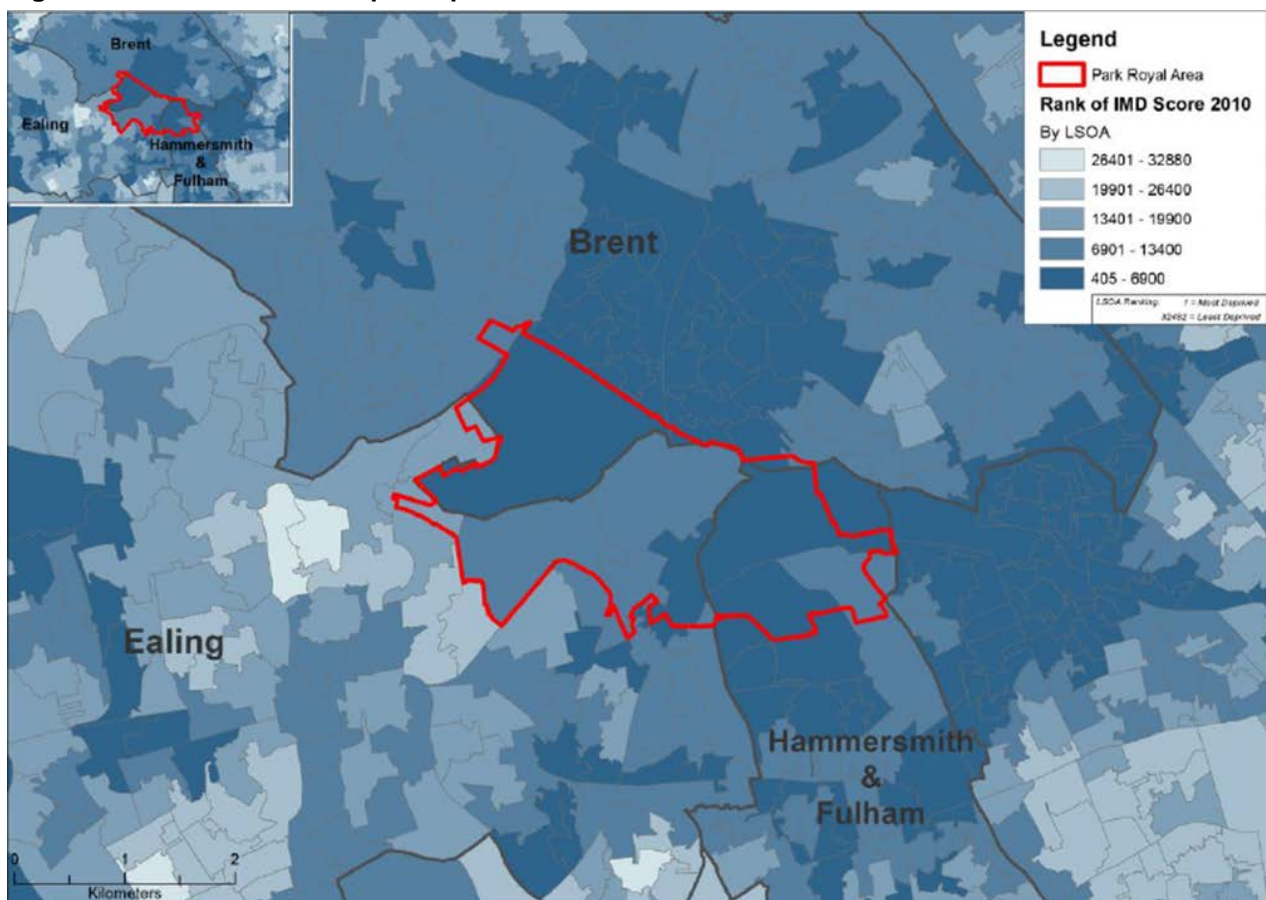
## B.15.1 OPDC Area

The Indices of Deprivation 2010 were published by Communities and Local Government in March 2011. The purpose of the Indices is to identify small areas of England which are experiencing multiple aspects of deprivation. It replaces the Indices of Deprivation 2007 as the official measure of deprivation in England. Deprivation is a multi-faceted and complex problem which influences and is influenced by a wide range of factors. The ID2010 contains seven domains which relate to income deprivation, employment deprivation, health deprivation and disability, education skills and training deprivation, barriers to housing and services, living environment deprivation, and crime.

The average Indices of Multiple Deprivation (IMD) score measure reflects the average level of deprivation across LSOAs in the borough. In 2010, the study area's average IMD score ranks it as being in the most deprived LSOAs within London.

However, it's difficult to look at any trends for the study area due to the OPDC's recent formation and is made up of parts of a number of LSOAs.

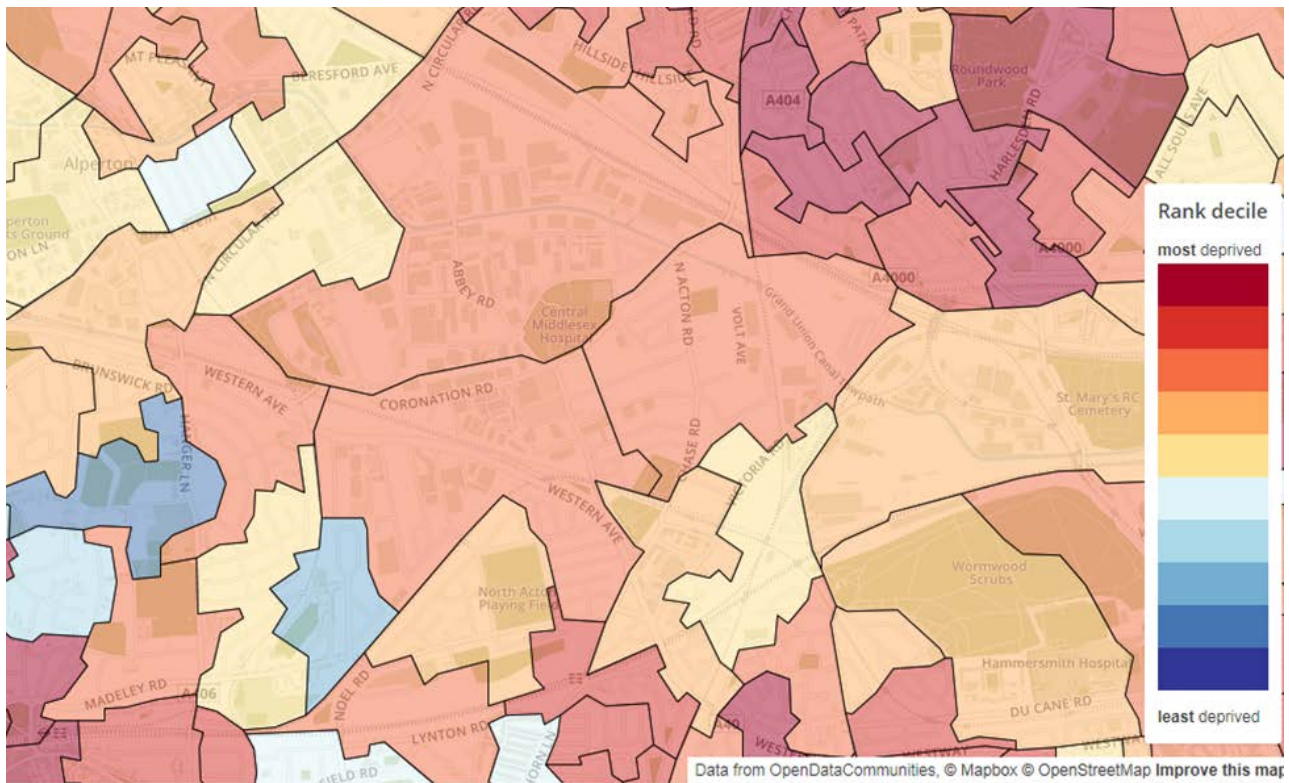
**Figure C15-1 Indices of Multiple Deprivation in OPDC**



Source: OAPF Draft IIA Report, GLA, February 2015

Given its largely industrial nature, it's also reasonable to assume that the small residential population coupled with its industrial make-up means that the levels of deprivation within the area may be skewed.

**Figure C15-2 Overall living environment deprivation levels in OPDC**



Source: Indices of Deprivation

As seen from **Figure C15-2**, what is clear irrespective of the set-up of the OPDC area is that it suffers from high levels of living environment deprivation probably due much to the fact that it is largely industrial rather mixed use or residential and this needs to be a significant consideration in the Local Plan.

## B.15.2 Data Gaps and Uncertainties

- Provision of childcare
- Deprivation statistics for the area

## B.16 Housing

The following baseline indicators have been used to characterise the status of housing across the borough:

- Dwelling Stock (Office for National Statistics Local Profiles)
- Household density (Office for National Statistics Local Profiles)
- Household composition (OAPF Draft IIA Report, GLA, February 2015)

The area only contains some 1,898 households, with the rest being industrial and warehouse units. Given the remit of the OPDC the housing numbers within the area is set to rise sharply in Old Oak. Currently dwelling stock suggests that compared to adjoining boroughs owner-occupiers is a lower percentage than that of Ealing and a large percentage are in private landlord's hands.

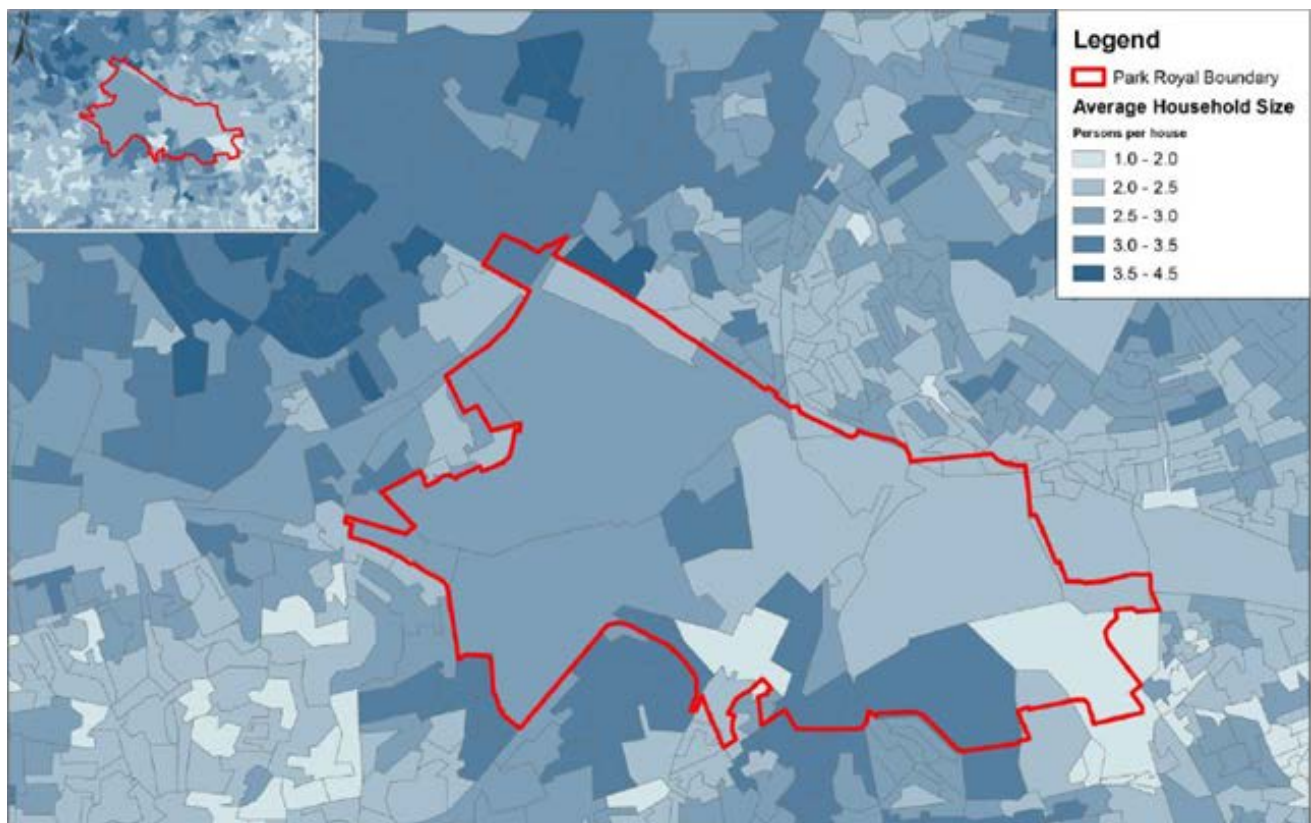
**Table C16-1 Dwelling Stock by Tenure and Condition**

Area	All households	Owned: Owned outright	Owned: Owned with a mortgage or loan	Shared ownership (part owned and part	Social rented: Rented from council (local	Social rented: Other	Private rented: Private landlord or	Private rented: Other	Living rent free
England and Wales	23,366,044	30.8%	32.7%	0.8%	9.4%	8.2%	15.3%	1.4%	1.4%
England	22,063,368	30.6%	32.8%	0.8%	9.4%	8.3%	15.4%	1.4%	1.3%
London	3,266,173	21.1%	27.1%	1.3%	13.5%	10.6%	23.7%	1.3%	1.3%
Inner London	1,363,817	14.1%	19.4%	1.5%	18.8%	14.0%	29.2%	1.6%	1.5%
Outer London	1,902,356	26.2%	32.7%	1.1%	9.7%	8.2%	19.9%	1.2%	1.2%
Ealing	124,082	22.9%	28.2%	1.8%	10.5%	7.6%	26.4%	1.2%	1.5%
Brent	110,286	20.3%	22.6%	1.5%	9.7%	14.4%	28.8%	1.3%	1.4%
Hammersmith and Fulham	80,590	15.9%	18.1%	1.6%	15.7%	15.4%	30.0%	1.7%	1.5%
Park Royal & old Oak	1,898	12.9%	16.6%	7.5%	7.3%	17.1%	37.1%	1.2%	0.9%

Source: OAPF Draft IIA Report, GLA, February 2015

Household density at its most dense in the south-eastern part of the area due to the predominantly industrial use of the area itself as can be seen from **Figure C16-1**.

**Figure C16-1 Household Density**



Source: OAPF Draft IIA Report, GLA, February 2015

Affordable housing considerations as well as housing unit proportions (types and tenures) need to be considered in the Local Plan.



9% of households in the plan area are lone parent families and over 90% of these parents are women. The proportion of such households in the population doubles since the 1991 census. Single parents make up a high proportion of households living in social housing (23% of council tenants and 32% of housing associated tenants).

Lone parents experience some of the greatest levels of economic and housing need, their household incomes are only about a third of the average income. They are more than three times more likely to be dependent on benefits than the average household, and twice as likely to be in unsuitable housing.

## C.16.2 Data Gaps and Uncertainties

- Future population composition

## C.17 Crossboundary Issues

For many authorities, the geographical scale of particular baseline issues means that they relate closely to neighbouring authorities. For example, housing provision and prices, employment migration and commuting, service provision and education can all result in flows of people across boundaries. In order to help to characterise the baseline further, some of these key 'crossboundary' issues have been identified below.

- There is not enough affordable housing being constructed in London to meet current demand; and as the number of households in London grows, demand for affordable housing will increase. These issues may be exacerbated in future years if trends remain the same. There are therefore opportunities for the OPDC Local Plan to contribute to reducing this trend.
- Surface water flood risk and the measures to manage this may also be a crossboundary issue e.g. surface water runoff from one borough having an impact on a neighbouring borough. OPDC need to work in partnership with the neighbouring boroughs to ensure flood risk is reduced for future generations.
- Employment and economic activity rates within OPDC area is particularly important especially when consideration needs to be made with adjoining town centres as well as existing business that may not have anywhere else to go.
- There is a severe lack of open space currently in the area and in the adjacent boroughs overall - it is important that the OPDC Local Plan incorporates open space.
- Although Wormwood Scrubs and the Grand Union Canal are important biodiversity assets, other space within the area and the adjoining boroughs need to be developed. The benefits of this could be at least two-fold. The Local Plan should support the existing biodiversity but also encourage more biodiversity into other sections of the study and promote green connectivity. Green spaces need to be multi-functional and evenly located so as to avoid over-reliance on one particular space.
- Impact of significant quantum of development on the surrounding heritage assets and settings needs to be carefully managed.
- Cumulative impacts regarding major roads and the impact on the new rail infrastructure should be considered.

## **APPENDIX D**

### **Initial Analysis of other relevant SA Frameworks**

## Development of SA Framework Objectives

**Note:** although some of the objectives may be comparable to more than one objective, a 'best fit' approach has been taken. It is noted that relevant assessment criteria/sub-objectives from each of the frameworks will be drawn upon where relevant. It is also noted that although the HUDU Matrix assessment criteria relate to project-level assessments, these have been interpreted to become more relevant at the policy assessment level.

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
<b>1. Biodiversity.</b> To conserve and enhance natural habitats and wildlife and bring nature closer to people.	<b>Biodiversity EN4.</b> To conserve and enhance biodiversity.	9. Protect and enhance the natural environment and biodiversity.		<ul style="list-style-type: none"> <li>Maintain or enhance biodiversity</li> </ul>	<p>1. Conserve and enhance biodiversity and promote the use of green infrastructure</p> <p>The HRA findings will be integrated into the SA through assessment under this objective.</p>
<b>2. Water Quality &amp; Water Resources.</b> To improve the quality of groundwater and to achieve the wise management and sustainable use of water resources. Minimise the risk of surface flooding and promote sustainable urban drainage.	<b>Water Quality &amp; Resources EN2.</b> To improve water quality; conserve water resources and provide for sustainable sources of water supply.	12. Improve water quality, conserve water resources and minimise the impact of flooding.		<ul style="list-style-type: none"> <li>Incorporation of sustainability drainage techniques</li> </ul>	<p>2. Improve the quality of water resources and achieve their sustainable use</p> <p>3. Minimise the risk of and from flooding</p>

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
<p><b>3. Natural resources.</b> To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured products. Recycle demolition materials in construction and minimise the consumption of water and energy in developments</p>			<p><b>Careful consumption 10.</b> Responsible consumption of resources in the borough.</p>		<p>The aspects of this objective will be covered under proposed objectives relating to: water resources; energy; regeneration and waste.</p>
<p><b>4. Climate Change.</b> To address the causes of climate change through minimising the emissions of greenhouse gases. Encourage energy generation from renewable and low carbon sources, and promote energy efficiency.</p>	<p><b>Climate Change EN7.</b> To reduce contributions to climate change and reduce vulnerability to climate change.</p>	<p>11. Reduce contributions to and vulnerability to climate change.</p>	<p><b>Climate Change 11.</b> Reduce climate change and its impact on the borough.</p>	<ul style="list-style-type: none"> <li>• Incorporation of low and zero carbon energy source planning</li> <li>• Layout of development and schemes to maximise passive energy use, and respond to winter and summer temperatures including ventilation, shading and landscaping.</li> <li>• Proposals which incorporate sustainable</li> </ul>	<p>4. To minimise contributions to climate change through greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.</p> <p>Reducing vulnerability</p>

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
				design and construction techniques	to climate change will be targeted through other objectives including those related to reducing flood risk, sustainable water use, minimising other resource use, sustainable design and green infrastructure.
5. <b>Air Quality.</b> To improve air quality.	<b>Air Quality EN3.</b> To improve air quality.	5. Minimise detrimental noise impacts. 10. Improve air quality.	<b>Reduce pollution</b> 8. Reduce the level of pollution.	<ul style="list-style-type: none"> <li>• Minimisation of construction impacts</li> <li>• Minimisation of noise pollution caused by traffic and commercial uses</li> <li>• Minimisation of air pollution cause by traffic and commercial uses</li> </ul>	5. To minimise air, noise and light pollution, particularly for vulnerable groups
6. <b>Energy.</b> To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy					The aspects of this objective will be merged under the climate change objective

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
and electricity.					above.
<p><b>7. Waste.</b> To minimise production of waste across all sectors in the OA and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste.</p>	<p><b>Waste Management EN8.</b> To minimise the production of waste and use of non-renewable materials.</p>	<p>14. Reduce waste generation and increase waste recycling.</p>		<ul style="list-style-type: none"> <li>Proposals which encourage recycling (including building materials)</li> </ul>	<p>6. To minimise production of waste across all sectors in the OA and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste.</p>
<p><b>8. Soil conditions and contamination.</b></p> <p>Ensure all contaminated sites are remediated prior to development with the option of in-situ treatment investigated.</p>	<p><b>Land and Soil EN9.</b> To conserve and enhance land quality and soil resources.</p>				<p>The aspects of this objective will be included under the regeneration objective below.</p>
<p><b>9. Accessibility / Availability (Transport).</b> To ensure that all residents and visitors have</p>	<p><b>Traffic EN1.</b> To reduce the effect of traffic on the</p>	<p>15. Reduce vehicular dependency and</p>	<p><b>Reduce transport impacts 9.</b> Reduce the effect of</p>	<ul style="list-style-type: none"> <li>Prioritisation and encouragement of walking and cycling including through the use of shared spaces and cycle</li> </ul>	<p>7. Minimise the need to travel through improving accessibility by walking,</p>

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
<p>access to key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot (relative to those taken by car).</p>	<p>environment</p> <p><b>Accessibility S7.</b> To improve accessibility to key services especially for those most in need.</p> <p><b>Efficient Movement EC5.</b> To encourage efficient patterns of movement in support of economic growth.</p>	<p>promote the use of sustainable modes of transport.</p>	<p>transport on the environment.</p>	<p>lanes/parking, including inclusive accessible routes.</p> <ul style="list-style-type: none"> <li>• Connectivity of public realm and internal routes to local and strategic cycle and walking networks</li> <li>• Traffic calming measures and minimisation of road injuries</li> <li>• Connectivity of new development to public transport, local services and facilities, reducing the need to travel by car</li> </ul>	<p>cycling and public transport</p>
<p><b>10. Built and Historic Environment.</b> To enhance and protect the existing built environment (including the architectural distinctiveness, townscape /landscape and archaeological heritage), and ensure new buildings are</p>	<p><b>Landscape &amp; Townscape EN5.</b> To maintain and enhance the quality of landscapes and townscapes.</p> <p><b>Historic</b></p>	<p>3. Preserve and enhance the local historic environment and cultural heritage.</p>	<p><b>Heritage 7.</b> Improve the local environment and heritage</p>		<p>8. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape /landscape and archaeological heritage), and ensure</p>

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
appropriately designed and constructed	<b>Environment &amp; Cultural Assets EN6.</b> To conserve and, where appropriate, enhance the historic environment and cultural assets.				new buildings are appropriately designed and constructed
<b>11. Regeneration and Land Use.</b> To stimulate regeneration that maximises benefit to the most deprived areas and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings.	<b>Regeneration EC3.</b> To reduce disparities in economic performance and promote sustainable regeneration.	13. Enhance existing buildings and facilities, and encourage the reuse/remediation of vacant land and under-utilised buildings.		<ul style="list-style-type: none"> <li>• Proposals which make the best use of existing land</li> <li>•</li> </ul>	9. To stimulate regeneration that maximises benefit to the most deprived areas and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings, including the remediation of contaminated land.
<b>12. Housing.</b> To ensure that	<b>Housing S.4</b> to	6. Improve access to well designed,	<b>Affordable homes</b>	<ul style="list-style-type: none"> <li>• Health and wellbeing credits of the Code</li> </ul>	10. Improve access to



Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
all Londoners have access to good quality, well-located, affordable housing that promotes liveability.	provide everybody with the opportunity to live in a decent home.	affordable, inclusive and appropriately located housing.	<b>4.</b> Provide decent and affordable homes	<p>for Sustainable Homes</p> <ul style="list-style-type: none"> <li>• Housing needs of older people including extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes</li> <li>• Adaptable homes for independent living for older and disabled people</li> <li>• Good design through layout and orientation</li> <li>• Range of housing types and sizes, including affordable housing, in response to local housing needs</li> <li>• Energy efficient housing (high SAP rating)</li> </ul>	well designed, well-located, affordable and inclusive housing of a range of types and tenures, to meet identified local needs.
<b>13. Employment.</b> To offer everyone the opportunity for rewarding, well-located and satisfying employment.	<b>Growth EC1.</b> To encourage sustainable economic growth.  <b>Employment EC2.</b>	16. Promote local employment opportunities, training and skills attainment. 17. Support	<b>Satisfying work 6.</b> Increase the opportunities for satisfying and well paid work.	<ul style="list-style-type: none"> <li>• Provision of access to local employment and training opportunities including temporary construction and permanent 'end-use' jobs</li> <li>• Provision of childcare facilities</li> </ul>	11. To offer everyone the opportunity for rewarding, well-located and satisfying employment locally

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
	<p>To offer everybody the opportunity for rewarding and satisfying employment.</p> <p><b>Investment EC4.</b> To encourage and accommodate both indigenous and inward investment.</p>	sustainable economic growth.	<b>Sustainable Economy 12.</b> Improve the sustainability of the local economy.	<ul style="list-style-type: none"> <li>Provision of managed and affordable workspace for local businesses, including live/work units</li> <li>Opportunities for work for local people via local procurement arrangements</li> </ul>	12. To encourage indigenous and inward investment to create sustainable economic growth
<p><b>14. Liveability and Place.</b> To create and sustain liveable, mixed use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.</p>	<p><b>Community Identity S6.</b> To encourage a sense of community, identity and welfare</p>				Aspects of this objective will be addressed under equality and diversity as well as accessibility and health and wellbeing objectives.
<p><b>15. Open space.</b> Improve the quality of the public realm and increase the number of public</p>		8. Protect and enhance public open space.		<ul style="list-style-type: none"> <li>Retention and enhancement of existing open and natural spaces including improved accessibility</li> </ul>	13. Improve the quality of the public realm and increase the provision, accessibility and quality

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
open spaces.				<ul style="list-style-type: none"> <li>• Provision of new open or natural space</li> <li>• Provision of play spaces for children and young people</li> <li>• Provision of allotments and community farms to facilitate the supply of local food</li> </ul>	of public open spaces.
<b>16. Education and Skills.</b> To improve the education and skills levels of the population.	<b>Education and skills S3.</b> To improve the education and skills of the population	18. Improve opportunities for education and training.	<b>Education and skills 3.</b> Improve the education and skills of young people and adults.	<ul style="list-style-type: none"> <li>• Contribution to meeting primary, secondary and post 19 educational needs</li> </ul>	14. To improve the education and skills levels of the population
<b>17. Safety and security.</b> Reduce the amount of crime and reduce the fear of crime through building and public realm design principles.	<b>Crime Prevention and Community Safety S5.</b> To reduce crime and anti-social activity	4. Reduce crime, fear of crime and antisocial behaviour.		<ul style="list-style-type: none"> <li>• Proposals and policies seeking to design out crime including increasing natural surveillance</li> <li>• Creation of attractive, multi-use public spaces and buildings</li> <li>• Community engagement</li> </ul>	15. To reduce crime and the fear of crime through building and public realm design principles
<b>18. Health and Well-being.</b>	<b>Health and</b>	1. Actively support inclusive access to	<b>Health 2.</b> Improve health of population	<ul style="list-style-type: none"> <li>• Retention and provision of additional</li> </ul>	16. To maximise the

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
To maximise the health and well-being of the population, reduce inequalities in health and promote healthy living.	<b>Wellbeing S2.</b> To improve the health and wellbeing of the population.	essential health, community and local services. 7. Reduce health inequalities and promote healthy living.	overall	social infrastructure <ul style="list-style-type: none"> <li>Meeting identified needs for healthcare services</li> <li>Meeting identified needs for other social infrastructure eg schools, social care and community facilities (including capacity, location and accessibility)</li> <li>Opportunities for shared community use and co-location of services</li> <li>Provision of a range of retail uses, including for affordable shops, a range of food stores and avoidance of an over-concentration of hot food takeaways.</li> </ul>	health and well-being of the population, reduce inequalities in health and promote healthy living.
<b>19. Equality and Diversity.</b> To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	<b>Prosperity and Social Inclusion S1.</b> To reduce poverty and social exclusion.	2. Promote community involvement, voluntary and partnership working. 19. Promote cultural and community	<b>Social Justice 1.</b> Increase equality and social justice. <b>Social cohesion 5.</b> Increase local residents' sense of community and	<ul style="list-style-type: none"> <li>Connectivity of existing communities through layout and movement, avoiding physical barriers and severance and land uses and spaces which encourage social interaction</li> <li>Provision of a mix of uses and a range of</li> </ul>	<b>17.</b> To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
		identity.	social cohesion.	community facilities <ul style="list-style-type: none"> <li>• Opportunities for the voluntary and community sectors</li> <li>• Adherence to the principles of Lifetime Neighbourhoods</li> </ul>	and social exclusion.

## **APPENDIX E**

### **Consultation Responses to IIA Scoping Report**

Consultation Responses to Scoping Report, September 2015

Respondent	Relevant comment extract	Response
Brent Friends of the Earth	<p><b>(a) Do you have any further suggestions regarding the scope of the IIA and its proposed appraisal of the Local Plan?</b>            Answer: The issue of sustainability should be emphasized from the beginning of the description of the scope of the IIA. The size of this development means that it will have a profound effect on the environment both of the OPDC area and the surroundings.</p> <p>The SEA Directive refers to the promotion of accepted measures that promote sustainability including reasonable alternatives.            We are concerned that such “accepted measures” – notably potential energy saving systems such as district heating and the possible provision of heat pumps should be considered at an early stage since they would affect the design and construction of the buildings themselves and need to be considered at a very early stage in the Plan..</p>	<p>Agree. Text amended to reflect this.</p> <p>Agree. Additional indicator included.</p>
Brent Friends of the Earth	<p><b>(b) Are there any additional PPPs that should be considered for review?</b>            Answer: No local Authority Air Quality Action Plans have been included. Most of the existing area is categorized as an AQMA, Air Quality Management Area. This has implications for the future transport policy and is most important I relation to the Health Impact Assessment.</p>	<p>Noted.</p>
Brent Friends of the Earth	<p><b>(c) Are there any additional themes that could be drawn out of the review of PPPs?</b>            Answer. The issues of sustainability, health impact, transport, climate change are all intertwined with the provision of affordable energy, air quality, the actual construction of buildings, the quality of the means of transport and the levels of carbon dioxide reduction, so, although they may be classified as separate themes in relation to the various impact assessments they will have common issues which need to be included wherever relevant.</p>	<p>Noted. The role of the IIA Report is to coordinate the assessment of these elements to provide holistic recommendations.</p>

Respondent	Relevant comment extract	Response
Brent Friends of the Earth	<p><b>(d) Do you agree with the sustainability issues and opportunities that we have identified? Are there additional issues that both the IIA and the Local Plan should consider?</b></p> <p>Answer: We are concerned that the standards of construction of all buildings, houses and flats, public buildings and commercial and industrial development, should all reach the best standards of energy efficiency and not simply satisfy the latest regulatory standards.</p> <p>Also that every effort should be made to promote the use of renewable energy through incorporating solar energy panels where practicable, considering too the use of heat pumps and the provision of district heating.</p> <p>In relation to transport we hope that the use of the canal will be promoted and that consideration should be given to establishing a low emission zone which would require that all vehicles entering the area are low emission vehicles that have to pass the necessary tests at regular intervals.</p>	<p>Agree. Objective 7 seeks to help to ensure this.</p> <p>Noted. Objective 7 seeks to help to ensure this alongside enabling other renewable energy generation sources.</p> <p>Agree. New indicator for Objective 4 included:</p> <p>Proportion of waste and freight arriving and leaving the area by canal.</p> <p>Noted. The OPDC area is within the Greater London Low Emission Zone.</p>
Brent Friends of the Earth	<p><b>(e) Is there any additional baseline information that you feel it would be important to include?</b></p> <p>Answer: The changes in the area will be so great that existing baseline information would not provide an adequate comparison. It would be better to make comparisons with the highest possible recommended values so that the IIA measures show how effectively the OPDC is likely to achieve the best possible standards.</p>	<p>Disagree. The existing baseline provides an initial starting point to monitor the delivery of the Local Plan.</p>
Brent Friends of the Earth	<p><b>(f) Are there any particular topics or geographical areas of specific concern to your organisation?</b></p> <p>Answer: We have already said that our main concerns are that energy efficiency, use of renewable energy and prevention of air pollution are incorporated into all policies and buildings.</p> <p>We also believe that a sufficient number of affordable dwellings should be included in the housing plans.</p>	<p>Noted.</p>



Respondent	Relevant comment extract	Response
Building Products Index Ltd	<p>Yes there should be changes to IIA Framework, IIA Objectives/Sub Objectives Box 18 first bullet point" increase in the net number of businesses registered in the area" This is a bad objective and should be removed. The quantity of businesses is not a suitable objective, the quality of businesses is a better objective, or the ratio between the square metre a business occupies and the number of people employed might be better if you are seeking to attract employment to the area.</p>	<p>Disagree. A net increase in businesses is considered to be a sound objective to be considered by the IIA.</p> <p>Noted. The quality of workspace is considered to be addressed through the delivery of workspaces for new and emerging businesses alongside the encouragement of development of employment growth sectors.</p> <p>Noted. The workspace densities are considered in the final bullet point of Objective 18.</p> <p>Noted. Objective 17 considers the number of people being employed in the area.</p>
Car Giant	<p>2. Section 4.2 outlines a series of environmental, social and economic objectives that have been used to generate some common themes. We recognise the importance of the need "to ensure that new housing development meets local needs" however we do think that there should also be recognition that Old Oak Common is also a Strategic regional housing site and that the objective should be to meet the need to ensure that new housing development addresses 'local and London needs.'</p>	<p>Agree. Text amended to state "to ensure that new housing development meets local and regional needs"</p>
Car Giant	<p>A common theme has also been included within 4.2 to "reduce crime and fear of crime." Whilst we agree with this objective, it is inevitable that there is potential for crime to increase when comparing the number of residents now to the number residents in the future. However, we believe that there is an opportunity to make the area safer and the objective should be to 'promote safer communities and reducing fear of crime.'</p>	<p>Disagree. The wording is considered appropriate for the relevant objective.</p>

Respondent	Relevant comment extract	Response
Car Giant	<p>3. Section 5 identifies the key Sustainability Issues and Opportunities for the OPDC. Within the Local Economy topic section the table outlines that the Local Plan should seek to “provide business opportunities that meet the current and future needs of the local economy, within the context of the neighbouring communities” and that “there is an opportunity for the Local Plan to specify that incoming employment opportunities are to be directed towards local people in the existing and surrounding.” Whilst we don’t disagree with the overall objectives of providing business opportunities and employment opportunities, we do think that these points contradict the GLAs vision that this opportunity area will be a major employment centre of London-wide significance and we suggest that the wording should be revised to illustrate maximising opportunities for local people to access jobs.</p>	<p>Agree. Text amended to state: "The Local Plan should seek to provide employment and business opportunities that meet the current and future needs of the local and regional economy, within the context of the neighbouring communities."</p> <p>Noted. Text amended to state: "there is an opportunity for the Local Plan to specify that a proportion of incoming employment opportunities are to be directed towards local people in the existing and surrounding"</p>
Car Giant	<p>In addition to this, the table states (page33) that “retail should be in small clusters” and “the Local Plan should manage the affordability of newly generated economic activities.” We support the principle of retail development but we want to highlight that fragmentation of retail in clusters has the potential to not be compatible with commercially sustainable retail which should be considered going forward.</p>	<p>Agree. The following sentences have been removed: "§ Incoming retail should be developed in small clusters. This could help to reduce the impact on other town centres."</p>
Car Giant	<p>In addition, we agree with the principle of affordable new generated economic opportunities, but we do think that this provides risk to the potential investment of offices and therefore suggest that the Local Plan should promote the commercial viability of employment space instead.</p>	<p>Disagree. This implication is not considered to be a significant risk.</p>
Car Giant	<p>4. Section 6 illustrates the draft IIA objective and sub- objectives and starts to introduce indicators and approach to target setting. We believe that some of the potential targets outlined throughout need further consideration and evaluation and we would like to engage further and have more focused discussions with the OPDC on these targets once the Local Plan has further developed. Some examples to note is firstly the indicator/objective for a proportion of family housing. We feel that the objective would be improved if it was not so prescriptive and instead stated ‘provision of accommodation suitable for a range of different household types.’</p>	<p>Noted. Further engagement will be carried out through the plan making process.</p> <p>Disagree. The sub-objectives are considered to be appropriate in supporting the overarching objective.</p>

Respondent	Relevant comment extract	Response
Car Giant	<p>Further to this, there are a number of objectives relating to employment and economy. On page 48, it has been proposed to offer a proportion of new employment and training opportunities to “local people” and “local women” via procurement arrangements. For Old Oak to succeed as a business destination it needs to be more than a local employment destination. We believe that the real objective is not the proportion of jobs offered to local people, but making the most of opportunities for local people to access employment here.</p>	<p>Noted. The reference provided relates to an indicator for monitoring the delivery of the objective. The proportion of jobs offered to local people is considered to be a representation of the opportunities for local people to access employment.</p>
Diocese of London	<p><b>2a) Do you have any further suggestions regarding the scope of the IIA and its proposed appraisal of the Local Plan?</b></p> <p>The long term management and funding of the public spaces such as open spaces, highways, pedestrian and cycle routes along with community facilities and social infrastructure will be crucial to the success of the development as a community through its life.</p> <p>Further consultation is supported concerning the desire and viability of locally managed spaces and places that allow for genuine community engagement and involvement. This could help determine what is required from the community’s perspective as plans evolve and if the capacity exists to support such local initiatives.</p>	<p>Noted. Objective 1, sub-objective 3 will be amended to reference management of open spaces.</p>
Diocese of London	<p>Health Impact assessments should look at provision of interventions that improve health and are complementary to local health services. The prospect of the OPDC area taking a fresh look at health provision is exciting and such improvements in local health and related services that promote and support well-being would be welcomed and potentially have a beneficial impact in adjoining areas if spaces, places, and services are more widely accessed.</p>	<p>Noted.</p>
Diocese of London	<p>Concerning the Equalities Impact Assessment, the future make-up of the local population(s) cannot be predicted with any accuracy. The principles for the assessment are provided by statute and we would welcome the OPDC involving members of the area’s diverse community to help test out approaches and complete such assessments that will support key decisions ahead. We would be keen to help the OPDC with the EIA’s that will allow us all to gain further understanding of the issues faced day to day and to work closely with those with most to lose when services</p>	<p>Noted. This suggestion will be used to inform OPDC engagement processes and updates to the Local Plan.</p>

Respondent	Relevant comment extract	Response
	<p>and developments fail to meet their needs within the plans for development ahead. To guard against this risk, the community's involvement and influence on key aspects of design and accessibility will greatly enhance what takes shape within the OPDC area.</p>	
<p>Diocese of London</p>	<p><b>2(b) Are there any additional PPPs that should be considered for review?</b></p> <p>The Mayor of London's Supplementary Planning Guidance on Social Infrastructure 2015.</p> <p>The Mayor of London's Cultural Strategy to help guide introducing facilities, destinations and activities across the OPDC area.</p>	<p>Noted. Mayor's Culture Strategy is already included within the list of PPPs and subsequent assessment.</p>
<p>Diocese of London</p>	<p><b>2(e) Is there any additional baseline information that you feel it would be important to include?</b></p> <p>The plans showing social infrastructure include 'as the crow flies distances' from facilities. Ideally baseline data should show actual travel times from new development (particularly residential) to those facilities as new facilities may not be available from the outset, given that the area has little connectivity currently.</p> <p>N.B. Burlington Danes Academy and primary school, Wood Lane are not shown on the plans.</p>	<p>Noted. Consideration will be given to provided actual travel times in the IIA.</p>
<p>Diocese of London</p>	<p>Re: The list of issues the authority wants to solve - we would welcome increased community engagement that builds on their knowledge and experience to help shape the Local Plan. These assessments and their review should identify and tackle areas of concern to community stakeholders.</p>	<p>Noted.</p>
<p>Diocese of London</p>	<p>The base line data concerning the current and small resident population in and around Old Oak Common Lane are valuable pointers but need to be recognised in the context of significant population growth and change. The make-up of the large population increase within new developments cannot be accurately predicted nor can its various needs and priorities be established with certainty at this stage.</p>	<p>Noted.</p>

Respondent	Relevant comment extract	Response
Diocese of London	<p>2(f) Are there any particular topics or geographical areas of specific concern to your organisation?</p> <p>The Diocese of London oversees all the parishes which fall within the OPDC area. Our particular concern is to ensure the Diocese is able to meet the spiritual needs of both the present and the new community although ministering to the whole person means the church has a long track-record in supporting those both in terms of need and celebration.</p> <p>Through the London Diocesan Board for Schools we also sponsor schools which are inclusive, have an open admissions policy and a balanced Christian ethos.</p> <p>The Diocese is part of a joint venture that provides modern health facilities to meet contemporary needs.</p> <p>Local parish facilities are in use across the Diocese to deliver community services involving local groups and volunteers.</p> <p>The Diocese works with other faith communities, locally, and regionally.</p>	Noted
Diocese of London	<p><b>Objective 1 To enhance the built environment and encourage ‘place-making’</b></p> <p>The Diocese strongly supports this objective and the sub-objectives. We aim to ensure that our own places of worship, schools and ancillary facilities achieve these aims and of course churches are often the most distinctive and beautiful buildings in an area and help to provide a sense of place and legibility. We would welcome an additional sub-objective that emphasises the creation of safe and welcoming spaces for all</p> <p>We support the principle of Lifetime Neighbourhoods</p>	Agree. Objective 1 amended to reflect this aspiration

Respondent	Relevant comment extract	Response
Diocese of London	<p><b>Objective 2 To optimise the efficient use of land through increased development densities and building heights, where appropriate</b></p> <p>We have concerns about these objectives and sub-objectives. The pressures to make efficient use of land and to create development value that can fund essential infrastructure are understood but if Old Oak is to be a real neighbourhood it must become a community and attract those who want to invest long-term in the area such as families for whom high density is not necessarily appropriate. The optimisation of future developments should not risk creating an area with housing and services that serves its community poorly. Lessons can be learned from other recent developments across London. We would draw your attention to the Olympic Park SPG which states: [This] SPG emphasises the importance of family housing, supported by new and improved open spaces and social infrastructure such as schools and health facilities. This will be in contrast to much recent apartment dominated development and help establish lifetime neighbourhoods where people will choose to live, settle and raise families.</p> <p>Assessments associated with family and other specific housing needs should help develop standards and policies safeguarding the community for a lifetime whilst meeting current demand for homes.</p>	Noted. Objective 5 considers the delivery of a range of housing types and tenures including family housing.
Diocese of London	<p><b>Objective 4 Minimise the need to travel and improve accessibility for all users</b></p> <p>We understand that Old Oak Common transport interchange will be amongst the most connected in the UK. There needs to be a distinction between the importance of the interchange and its promotion nationally and the local movement of visitors, residents and local traffic within the OPDC area once studies have been conducted. OOC needs to be a destination in its own right as well as an efficient interchange.</p>	Noted. Objective 1 considers the role of creating a destination through land uses and wider placemaking.

Respondent	Relevant comment extract	Response
Diocese of London	<p><b>Objective 5 Improve access to well designed, well located, market, affordable and inclusive housing of a range of types</b></p> <p>As noted above, we believe that new homes should be 'liveable' and a proper allocation of internal space specified to better support the needs of different family sizes and other households.</p>	<p>Noted. Objective 5 considers the delivery of Lifetime Homes standards.</p>
Diocese of London	<p><b>Objective 13 Increase community cohesion and reduce social exclusion</b></p> <p>The Diocese strongly supports this objective and the sub-objectives noted above. Some of the indicators used for Objective 15 relating to walking distance could usefully be used for the second sub-objective here.</p> <p>We note that the Brent Local Plan SA has the following objective: 'Community Identity S6. To encourage a sense of community, identity and welfare'.</p> <p>Although difficult to measure, the Diocese strongly believes this will be critical to assessing the success of the new community. Amending the proposed objective to incorporate this would be welcomed and demonstrate that the OPDC is putting the community at the heart of its planning process.</p> <p>The provision of appropriate places and spaces that support such aspects of community life should be encouraged.</p>	<p>Noted. As the IIA Framework should be considered as a whole, it is not considered necessary to repeat the sub-objectives of Objective 15. Objective 1 considers developing and enhancing local distinctiveness.</p> <p>Agree. Wording of Objective 13 modified.</p>

Respondent	Relevant comment extract	Response
Diocese of London	<p><b>Objective 15 Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</b></p> <p>The Diocese strongly supports this objective and particularly the sub-objectives noted above.</p> <p>With regard to the indicator 'Increase in the capacity of local social infrastructure', we would be interested to know how this will be measured</p> <p>We note that there is no indicator for access to retail facilities which should be included and the impact there could be on neighbouring high street areas that could suffer as a result of developments.</p> <p>We would welcome assessment of the potential offered by an engaged and active community in running their open spaces, community gardens and shared facilities. The OPDC might want to consider this approach with developers.</p>	<p>Noted. The GLA Social Infrastructure SPG suggests how social infrastructure capacity can be measured.</p> <p>Agree. Wording of Objective 17 amended to reflect access to retail facilities.</p>
Environment Agency	<p><b>Consultation Question (b)</b>  <b>Are there any additional PPPs that should be considered for review?</b>  Environment Agency comments We feel the following PPPs should also be considered for review:  <b>International/European</b>  The revised Waste Framework Directive which can be found at the following websites:  <a href="http://ec.europa.eu/environment/waste/framework/">http://ec.europa.eu/environment/waste/framework/</a>  and  <a href="https://www.gov.uk/guidance/waste-legislation-and-regulations">https://www.gov.uk/guidance/waste-legislation-and-regulations</a>  <b>National</b>  Separate collection of waste paper, plastic, metal and glass:  <a href="https://www.gov.uk/guidance/separate-collection-of-waste-paper-plastic-metal-and-glass">https://www.gov.uk/guidance/separate-collection-of-waste-paper-plastic-metal-and-glass</a>  Flood Risk Regulations 2009 and Flood and Water Management Act 2010:  <a href="http://www.legislation.gov.uk/ukxi/2009/3042/pdfs/uksi_20093042_en.pdf">www.legislation.gov.uk/ukxi/2009/3042/pdfs/uksi_20093042_en.pdf</a>  <a href="http://www.legislation.gov.uk/ukpga/2010/29/contents">http://www.legislation.gov.uk/ukpga/2010/29/contents</a></p>	<p>Noted. Flood and Water Management Act 2010 is already included in the review. It is considered that it is not necessary to include the Flood Risk Regulations in addition, as these interpret the Act. It is considered that guidance relating to the separation of waste, as referenced, is relevant to public and private waste collectors (as stated on the link quoted) and is not directly relevant to land use planning, although the sustainable management of waste will be addressed using other guidance.</p>



Respondent	Relevant comment extract	Response
Environment Agency	<p>Regional/London The control of dust and emissions during construction and demolition Supplementary Planning Guidance: <a href="https://www.london.gov.uk/sites/default/files/Dust%20and%20Emissions%20SPG%208%20July%202014_0.pdf">https://www.london.gov.uk/sites/default/files/Dust%20and%20Emissions%20SPG%208%20July%202014_0.pdf</a> Environment Agency Waste and Air Quality Evidence Gathering Project Summary Report December 2013 London's Wasted Resource: The Mayor's Municipal Waste Management Strategy Making Business Sense of Waste: The Mayor's Business Waste Management Strategy: <a href="https://www.london.gov.uk/priorities/environment/publications/the-mayors-waste-management-strategies">https://www.london.gov.uk/priorities/environment/publications/the-mayors-waste-management-strategies</a> London Waste and Recycling Board Waste Management Planning Advice for New Flatted Properties: <a href="http://www.lwarb.gov.uk/wp-content/uploads/2015/05/Final-report-Waste-Management-Planning-Advice-for-Flatted-Properties.pdf">http://www.lwarb.gov.uk/wp-content/uploads/2015/05/Final-report-Waste-Management-Planning-Advice-for-Flatted-Properties.pdf</a> Securing London's Water Future-The Mayors Water Strategy: <a href="https://www.london.gov.uk/priorities/environment/publications/securing-london-s-water-future-the-mayor-s-water-strategy">https://www.london.gov.uk/priorities/environment/publications/securing-london-s-water-future-the-mayor-s-water-strategy</a> The table includes the 2009 River Basin Management Plan (RBMP) but the 2015 RBMP is due to published imminently and therefore should inform the forthcoming Local Plan. Local We understand that the OPDC are in the process of preparing a suite of detailed evidence to support the Local Plan. We recommend that the following documents are included in the evidence suite:</p> <ul style="list-style-type: none"> <li>- 'Integrated Water Management Strategy'</li> </ul>	<p>Noted. Although not a PPP, OPDC will liaise with EA to acquire the Waste and Air Quality Evidence Gathering Report to be used for baseline evidence. A London specific air quality strategy is included in the review. It is considered that the business-specific waste management strategy is not directly relevant. The Mayor's water strategy is included in the review. The 2015 Thames River Basin Management Plan will be added once published, as part of the iterative process of IIA.</p> <p>Noted. OPDC is developing an Integrated Water Management Plan.</p>

Respondent	Relevant comment extract	Response
Environment Agency	<p><b>Brent, Ealing &amp; Hammersmith and Fulham</b></p> <p>We note that you have referenced LB Hammersmith and Fulham's Surface Water Management Plan (SWMP) as relevant evidence to the SEA. The OPDC Local Plan should also reference and be informed by LB's Ealing and Brent Surface Water Management Plan. The SWMPs have designated Critical Drainage Areas (CDA'S) within the OPDC boundary so it is important that the recommendations of the Local Plan and policies ensure a joined up approach is taken in addressing surface water flood risk issues in the CDA's.</p> <p>The Local Plan should also be informed by the 3 boroughs separate Strategic Flood Risk Assessments. However, it is a possibility that these documents are have been superceded by more relevant information which is why we also recommend that the OPDC carries out a new Strategic Flood Risk Assessment.</p>	Noted.
Environment Agency	<p><b>Consultation Question (c)</b></p> <p><b>Are there any additional themes that could be drawn out of the review of PPPs?</b></p> <p>Environment Agency comments We support the inclusion of 'Water' as a theme providing this considers flood risk, water quality and water resources.</p> <p>We recommend that the flood risk theme includes an assessment of all local sources of flooding such as surface water and ground water, river flooding and as the site is downstream from the Welsh Harp reservoir it is important that the potential risk of flooding from reservoirs is assessed.</p> <p>We recommend that the 'Water' theme also includes an objective to achieve sustainable drainage throughout the site.</p> <p>We recommend that a theme is included to 'promote, protect and enhance Green Infrastructure'. The provision of well planned and good quality Green Infrastructure (GI) will provide multiple benefits. These include reducing flood risk, improving ecological value and enhancing biodiversity, improving air quality, reducing the urban heat island effect and improving amenity value. Good quality GI can help to achieve the objectives of the SEA and the HIA.</p>	<p>Agree. It is considered that the water 'theme' includes the key issues identified. The more detailed information will included in the IIA Framework for use in the assessments. Objective 6 considers the use of sustainable drainage. It is considered that this could include GI. GI is also relevant to a number of other IIA Objectives, and will be considered as a multiple benefit throughout the assessment.</p>

Respondent	Relevant comment extract	Response
Environment Agency	<p><b>Consultation Question (d)</b>  <b>Do you agree with the sustainability issues and opportunities that we have identified? Are there additional issues that both the IIA and the Local Plan should consider?</b>  Environment Agency Comments  <b>Water</b>  We broadly support the key issues listed in this section but feel that opportunity should be taken to strengthen the wording of:  “The risk of flooding and the mobilisation of contaminants should be minimised through measures such as a site-wide drainage strategy and increased awareness.”  We recommend that the wording is changed to state that the mobilisation of contaminants should be prevented. It may also be appropriate to state that the risk of flooding should be minimized by the use of Sustainable Drainage Systems throughout the site wide drainage strategy.  The Local Plan should also seek to ensure that any contaminated groundwater is remediated through the redevelopment of the area.</p>	<p>Noted. Objective 9 of the IIA Framework considers the risk to the water environment from the run-off of contaminants. Flood risk and sustainable drainage is specifically addressed under Objective 6.  Noted. Objective 6 identifies the use of sustainable urban drainage.  Noted. This suggestion will be used to inform the development of the Local Plan.</p>
Environment Agency	<p><b>Soils and Geology</b>  We recommend that the Local Plan promotes the CL:AIRE Definition of Waste: Development Industry Code of Practice. This will help to ensure that materials are re-used on site in a sustainable manner.  <a href="http://www.claire.co.uk/index.php?option=com_content&amp;view=category&amp;id=977&amp;Itemid=330">http://www.claire.co.uk/index.php?option=com_content&amp;view=category&amp;id=977&amp;Itemid=330</a></p>	<p>Noted. The IIA Scoping Report includes guidance relating to waste policy. However, it is considered that guidance for contractors is not directly relevant for the IIA.  Noted. This suggestion will be used to inform the development of the Local Plan.</p>
Environment Agency	<p><b>Air Quality</b>  Air quality is a serious problem in London. We therefore recommend that the Local Plan ensures that the Sustainable Design and Construction Supplementary Planning Guidance is followed. We also recommend that the Local Plan requires all new Waste facilities to fully enclose operations and considers requiring existing facilities to enclose operations due to the increase in population and sensitive receptors as a result of the redevelopment of the OPDC area.</p>	<p>Noted. The IIA Scoping Report references the GLA Sustainable Design and Construction SPG.  Noted. This suggestion will be used to inform the development of the Local Plan.</p>

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Environment Agency	<p><b>Climate Change</b>            We recommend that flood risk management and SuDS should be included in the opportunities for climate change adaptation. Flood Risk to the OPDC may increase as a result of climate change and therefore the Local Plan presents an opportunity to promote Sustainable Drainage Systems (SuDS) which can help to reduce flood risk, reduce the urban heat island effect and increase the energy efficiency of buildings.</p>	<p>Noted. Objective 6 identifies the use of sustainable urban drainage.            Noted. This suggestion will be used to inform the development of the Local Plan.</p>
Environment Agency	<p><b>Biodiversity Flora and Fauna</b>            Invasive species such as Japanese Knotweed and Giant Hogweed are present throughout the Brent Catchment. We therefore think the Local Plan should seek to address this issue and take a strategic approach to removal of these species within the OPDC area.</p>	<p>Noted. This suggestion will be used to inform the development of the Local Plan.</p>
Environment Agency	<p><b>Waste</b>            We agree that the potential land use changes mean that the Local Plan needs to consider any impact on the ability of neighboring boroughs to meet their waste apportionment. The OPDC should also consider the potential reduction in waste processing capacity as a result of the proposed changes in land use, particularly as the redevelopment of the area may result in significant amounts of construction and demolition waste. If these waste processing facilities need replacing the OPDC should assess appropriate locations on a strategic level.            The report has identified waste sites within the OPDC boundary and we recommend that the Local Plan considers whether it is appropriate to introduce new residential development in close proximity to these sites if they are to remain and if any mitigation measures will be required.</p>	<p>Noted. This suggestion will be used to inform the development of the Local Plan.</p>
Environment Agency	<p><b>Deprivation and Living Environment</b>            The provision of good quality and well connected GI will help to provide access to nature and improve amenity of the OPDC area and provide benefits which could contribute to reducing deprivation.</p>	<p>Agree. Objective 13 sub-objectives amended to specifically reflect this.            Noted. This suggestion will be used to inform the development of the Local Plan.</p>

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Environment Agency	<p><b>Consultation Question (f)</b>  <b>Are there any particular topics or geographical areas of specific concern to your organisation?</b></p> <p>Environment Agency comments  We are aware that there are drainage capacity issues in the wider area which should be addressed through cross boundary co-operation. Possible solutions may include achieving drainage solutions within the OPDC boundary and exploring opportunities to retrofit SuDS in neighbouring boroughs.  The Alperton Housing Zone will may also add pressure to the existing infrastructure but may also present an opportunity to provide contribute to strategic water infrastructure and GI solutions. This may also result in the Grand Union Canal being used more frequently by the residents of both the OPDC area and the Housing Zone. This needs to be considered and provides more justification for maximising opportunities to increase GI along the Grand Union Canal.</p>	<p>Noted. Objective 6 identifies the use of sustainable urban drainage.  Noted. This suggestion will be used to inform the development of the Local Plan.</p>
Historic England	<p>Historic England welcomes the attention given by the IIA scoping report to Heritage at Risk, and the importance of development within the OPDC area seeking opportunities to protect and enhance these assets. However, we have some concerns that treatment of cultural heritage throughout the document is uneven and at times confused. While the IIA goes into a satisfactory level of detail in section 5.4 in relation to Kensal Green Cemetery we would expect to see this consideration flow through the document. We note that there is confusion in this part of the document about the St Mary's Conservation Area in Hammersmith and Fulham, which includes St Mary's Cemetery and parts of the Grade I registered landscape of Kensal Green Cemetery, and Kensal Green Cemetery Conservation Area in RBKC, which includes the vast majority of the listed buildings and monuments and the majority of the Registered Park and Garden. This is important in relation to the issue of the setting. This needs to be addressed in a manner that is proportionate to the significance of the heritage assets that will be affected by the development proposed at Old Oak and Park Royal, with particular consideration required regarding the potential impacts on the heritage significance of those assets.</p>	<p>Agree. Table 5-1 in Appendix C amended for clarification.</p>
Historic England	<p>We also consider that the IIA does not fully take into account the wider positive role that heritage can play environmentally, socially and economically.</p>	<p>Noted. Text added to Table 5-1. It is considered that the IIA Framework covers the wider benefits, which will be explored in the assessment through the sub-objectives included.</p>

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Historic England	<p>Historic England welcomed the opportunity to participate in the Scoping Workshop that partially informs this document. We note that the section relating to Heritage at Risk in Appendix A is confusing due to typographical errors.</p>	<p>Noted. IIA Scoping Report amended to address errors.</p>
Historic England	<p>Unfortunately this confusion is also evident in the Baseline Data (section C.10) where the map is not only difficult to read with regard to conservation areas, some of which are not illustrated, but it does not include Registered Parks and Gardens of Special Historic Interest that could be affected, nor does it show the five APAs within a 500m radius of the OPDC area, and the spread of listed buildings and monuments in Kensal Green Cemetery appears inaccurate. The associated list of conservation areas that may be affected by development within the OPDC area on p.24 should be expanded to include Kensal Green Cemetery Conservation Area and Oxford Gardens Conservation Area, both of which are in the Royal Borough of Kensington and Chelsea. Also, we note that the Hanger Hill Garden Estate and Hanger Hill (Haymills) Estate Conservation Areas in Ealing are both mislabelled.</p> <p>In the accompanying text on p.25 the St Marys Cemetery and Kensal Green Cemetery, and their respective designations, are not clearly differentiated.</p> <p>While the OPDC does not currently have a list of locally significant buildings, the three local boroughs who previously acted as planning authorities for this area have produced local lists. As such you may also wish to make reference to undesignated heritage assets, which should also be considered as part of the planning process.</p>	<p>Agree. Heritage map has been updated. Text regarding the potential to explore the production of a Local List to protect and/or enhance heritage assets added to Table 5-1 and IIA Framework.</p>
Historic England	<p><b>Question A.</b>  <b>Do you have any further suggestion regarding the scope of the IIA and its proposed appraisal of the Local Plan?</b>  It is important that the references to heritage in the IIA inform the policies in the new Local Plan and any related plans or documents that flow from it. These themes and their interrelationships should inform the whole plan. Since the conservation of the historic environment is a strategic priority in the NPPF, the IIA should facilitate the development of a positive strategy for the historic environment as set out in paragraphs 126 and 157 (8) of the NPPF. For this reason, we would expect consideration of the historic environment to include and go beyond the relevant issues highlighted on p. 20 of the IIA (Common themes), which currently overlook the role of the historic</p>	<p>Agree. The IIA Framework is to be considered as a whole, with the interrelationships between the objectives noted in the framework for clarity. The relationship between the historic environment and sustainable design and energy generation will be noted.</p>

Respondent	Relevant comment extract	Response
	<p>environment in providing low carbon and green options for developments.</p>	
<p>Historic England</p>	<p><b>Question B.</b>  <b>Are there any additional Plans, Policies or Programmes that should be considered for review?</b>  The list of international documents omits the European Landscape Charter (2000), also known as the Florence Charter. We would encourage you to add this.</p> <p>We would query the inclusion of the Government Office for London Circular 1/2000: Strategic Planning in London in your list of national plans policies and programmes. This document has been superseded. We would encourage you to include Historic England's Historic Environment Good Practice Advice in Planning Notes on:</p> <ol style="list-style-type: none"> <li>1. The Historic Environment in Local Plans (2015);</li> <li>2. Managing Significance in Decision-Taking in the Historic Environment (2015); and</li> <li>3. The Setting of Heritage Assets (2015).</li> </ol> <p>We would also encourage you to make reference to the English Heritage publication Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment (2013). These documents are all available on our website: <a href="https://historicengland.org.uk/images-books/publications/">https://historicengland.org.uk/images-books/publications/</a>.</p> <p>At a local level you may wish to make reference to the lists of locally significant buildings that have been produced by the London boroughs of Brent, Ealing and Hammersmith and Fulham.</p>	<p>Noted. Agree with comment with regards to the European Landscape Charter and the London Circular 1/2000. However, it is considered that the other documents referenced are guidance as opposed to PPPs. These will be used as reference document, but not included in the PPP review itself.</p>

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Historic England	<p><b>Question C.</b>  <b>Are there any additional themes that could be drawn out of the review of PPPs?</b>  As per our response to question A, the environmental theme of protecting and enhancing the historic environment is also relevant to draft IIA objectives 6, 7 and 8. This is particularly relevant when considering adapting and reusing existing buildings and infrastructure such as the Grand Union Canal. Furthermore, we consider that the wording of theme should be amended to read "... and recognise and appreciate landmarks, townscapes and their setting". This is important as there are numerous very highly graded heritage assets whose setting could be dramatically changed by development within the OPDC area.</p> <p>Historic England welcomes the social theme that specifically seeks to maximise the contribution that the arts, culture and heritage can make to the community. Given the heritage significance of the canal passing through the opportunity area, and the proximity of various highly significant heritage assets such as Kensal Green and Twyford Abbey, we would also suggest that heritage has the potential to contribute strongly to the economic development of the area through the reuse of buildings and tourism. As such you could, in our opinion, add objective 12 to the list of relevant objectives for the economic theme.</p>	<p>Agree. Theme modified in Table 4-2 and Appendix B. Cross-references added to Table 4-2 and Objective 12 in the IIA Framework.</p>



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Historic England	<p><b>Question D.</b>  <b>Do you agree with the sustainability issues and opportunities that we have identified? Are there additional issues that both the IIA and the Local Plan should consider?</b></p> <p>In line with our guidance Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment (2013), we would encourage the Cultural Heritage Objective (12) to be reworded to say “To conserve and enhance the historic environment, heritage assets and their settings”. This would reflect the fact that the most significant impacts of the planned development at Old Oak and Park Royal for the historic environment, will be on the setting of heritage assets in the surrounding area. We would also encourage you to make the following alterations to the sub-objectives in objective 12 (Heritage):</p> <ul style="list-style-type: none"> <li>• Reword the second sub-objective to say “Avoid the loss of heritage assets to new development”</li> <li>• Add to the wording of the third sub-objective to say “Avoid adverse impacts on the setting of heritage assets, including those outside OPDC area”</li> <li>• An additional indicator for objective 12 could be the development of a heritage strategy, potentially including works to enhance or better reveal heritage significance in and around the OPDC area, celebrating local character/features including as part of a public engagement strategy. Such a heritage strategy could be linked to objectives 13, 15, 16 and 17 to enhance the social benefits to the new and existing communities derived from the heritage of Old Oak Park Royal. This work could also highlight economic opportunities which would link it to objective 18.</li> </ul>	<p>Agree. Wording for Objective 12 amended.</p> <p>Disagree. Wording considered to be appropriate for minimising loss of heritage assets.</p> <p>Agree. Text amended to reflect this.</p> <p>Disagree. Although the suggestion would be beneficial, it is not appropriate for the role of an IIA objective.</p>
Historic England	<p>In addition to these comments about objective 12 (heritage), we would recommend that further consideration be given to the following IIA objectives and sub-objectives:</p> <ul style="list-style-type: none"> <li>• Objective 1 (p.38) could be developed to state “Optimise development opportunities to develop and enhance local distinctiveness and character” and “Maximise the contribution ... intrigue, character and surprise into the built environment.”</li> <li>• Objective 3 (p. 39) could be linked to objective 12 with specific regard to reusing existing buildings.</li> <li>• Objectives 6 and 7 (p. 42) could be linked to objective 12 in terms of the sustainable adaption and reuse of existing buildings, and embodied energy that historic buildings contain.</li> <li>• Objectives 9 and 10 (pp. 43-44) could be linked to objective 12 in terms of better revealing heritage significance and helping people enjoy the Grand Union Canal</li> </ul>	<p>Agree. Wording for Objectives 1, 3, 6, 7, 9 and 10 amended.</p>

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Historic England	<p><b>Question E.</b>  <b>Is there any additional baseline information that you feel it would be important to include?</b></p> <p>In addition to the general points raised above that relate to the baseline information, we are pleased to note that the English Heritage Old Oak Area Assessment is mentioned on p. 23 of the Baseline Data review. We would encourage the OPDC to complete a similar piece of characterisation work for the Park Royal area. Further work considering particular areas or building types may also help inform later stages of the plan making process. These are likely to be particularly useful if the OPDC choose to designate any conservation areas or create a local list of buildings and structures of heritage significance.</p>	Noted.
Historic England	<p><b>Question F.</b>  <b>Are there any particular topics or geographical areas of specific concern to your organisation?</b></p> <p>As our comments on the IIA highlight, the most sensitive and significant heritage assets that will be affected by development in the opportunity area, are those located outside of its boundaries. The most notable of these is Kensal Green Cemetery. The consequence of this is that the setting of heritage assets should be an important consideration in the development of the Local Plan to ensure that it will result in sustainable development as defined by the NPPF. We look forward to working with the OPDC in developing the local plan to achieve this aim, as well as to develop characterful places that will add to London's rich built legacy.</p>	Noted.

Respondent	Relevant comment extract	Response
Historic England Archaeology	<p>We welcome the references to archaeology in the scoping report. Whilst there are at present no archaeological priority areas within the proposed local plan area, the Greater London Historic Environment Record holds information on several archaeological investigations, sites and finds. Notably the site of Acton Wells 18th century spa is located within the Opportunity Area. The open ground of Wormwood Scrubs was the site of a rifle range and anti-aircraft battery and may preserve as yet undiscovered earlier remains. The Grand Junction Canal and Old Oak Common area include aspects of railway and industrial archaeological interest. The 19th century Park Royal cemetery would also be of interest if subject to redevelopment.</p> <p>Thus although the Opportunity Area is not generally of high archaeological potential, major redevelopment could affect a range of undesignated heritage assets of archaeological interest. With the Mayor’s support Historic England has recently consulted upon and is now finalising guidance for the comprehensive review programme for London’s Archaeological Priority Areas so we recommend that this document is referred to as a relevant Regional Policy &amp; Programme. A desk-based appraisal should then be undertaken to identify areas of known or potential archaeological interest meriting identification as new priority areas to inform implementation of NPPF historic environment policy.</p>	Noted. Text added to baseline and key issues. The guidance itself is not considered to be a PPP, although subsequent strategies or baseline data will be added at a later stage of the IIA as part of the iterative process.
Natural England	Under the section looking at the “Review of plans and programmes” in Table 4.1 where West London is considered, the entry for the West London Waste Plan can be updated to say that the plan has now been adopted and is no longer the “Proposed Submission Plan”.	Agree. Text amended to reflect this.

Respondent	Relevant comment extract	Response
Resident	<p>1. Additional Consultation, (paragraph 1.9.3, page 6) of the Scoping Report says “An important element of the IIA, HIA and EqIA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.”</p> <p>We note that we have not been approached by OPDC officers regarding the scoping report and know no others that have been. (NB this was discussed at the GUA meeting on 7th October). We would very much like to know - who have been identified as key representatives, what was the process for their identification and have any of those identified been advised of this.</p>	<p>OPDC’s Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC’s website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>
Resident	<p>2. Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC’s Issues &amp; Options Local Plan has not been proactively provided.</p>	<p>The SEA Directive requires OPDC to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The Consultation Bodies are Historic England, Natural England and the Environment Agency.</p> <p>To enable a wider range of stakeholders to input into the Local Plan development process from an early stage, OPDC</p>

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		<p>considered it appropriate to exceed legislative requirement and invite interested parties to submit comments.</p> <p>All stakeholders on OPDC's consultation database were contacted via email on 4 September 2015 and a copy was placed on OPDC's website.</p> <p>OPDC is in week 30 of a 25-30 year project. The statutory function as a local planning authority means that staffing has focused on a team that will progress evidence base for policies and ensure robust processes are in place to manage planning applications. The Strategy and Programmes team, including Communications and Engagement, is still embryonic; therefore, your patience is appreciated while the Corporation continues to staff up to serve local residents and businesses, meet groups to forge relationships and works to set-up a community group.</p> <p>On 12 October, OPDC Communications and Planning officers presented to a small group of GUA members to start these meetings and to explain how local communities can get involved in the planning process. OPDC convened a second meeting with GUA members on 3 November to discuss the Scoping Report and wider Local Plan process with a public workshop on the vision and objectives held on 30 November prior to the Local Plan consultation in early 2016.</p>

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Resident	<p>The European Assessment Directive or the European Union requires that realistic alternatives are assessed. Recent legal judgements have also asserted the importance of public authorities consulting upon arguable yet discarded options.</p> <p>We ask that community-based alternatives – set out in the following Vision and Objectives are assessed, with positive and negative effects identified, and included in the OPDC's Issues &amp; Options Local Plan.</p>	<p>The provided community-based vision and objectives provide a comprehensive and detailed range of suggestions which are being used to directly inform the draft Local Plan proposed vision and objectives. Where the suggestions are more relevant for policy options, these have also been used to inform the development of these options.</p> <p>As the provided community-based vision and objectives have directly and positively informed the development of the draft OPDC Local Plan, that will be subject to the IIA, a separate IIA on these is not considered necessary.</p> <p>Following a public workshop on the vision and objectives on 30 November, further community input has been provided into the development of the vision and objectives.</p> <p>As agreed at the workshop, feedback on this work and how the provided community-based vision and objectives have informed the Local Plan will be provided in January 2016. There will also be subsequent opportunity to comment on the vision and objectives during the first Local Plan consultation from February 2016.</p>

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Resident	<p>3. A key issue for all section of the community in and around the OPDC is the impact of a 30 year construction period – including issues of dust, noise, vibration and pollution, and ability of the boroughs to meet the potential accommodation, facilities and amenity needs of construction workers. This has not been fully considered in the report. It must be fully identified and planned for as quite separate IIA and Local Plan objectives.</p>	<p>Agree. Amendments made:  Key Sustainability issues and opportunities  Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.”  Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.”  Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives  “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods.  § Consider the impact of construction on local infrastructure on local businesses and communities.  § Mitigate the impact of construction traffic  11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups  § Minimise noise pollution caused by</p>

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		<p>traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise light pollution</p> <p>13. Increase community cohesion and reduce social exclusion</p> <p>§ Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision.</p> <p>15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</p> <p>§ Minimise construction phase impacts on communities, in relation to both physical and psychological health”</p>



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Resident	<p>1. Additional Consultation, (paragraph 1.9.3, page 6) of the Scoping Report says “An important element of the IIA, HIA and EqIA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.”</p> <p>We note that we have not been approached by OPDC officers regarding the scoping report and know no others that have been. (NB this was discussed at the GUA meeting on 7th October). We would very much like to know - who have been identified as key representatives, what was the process for their identification and have any of those identified been advised of this.</p>	<p>OPDC’s Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC’s website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>
Resident	<p>2. Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC’s Issues &amp; Options Local Plan has not been proactively provided.</p>	<p>The SEA Directive requires OPDC to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The Consultation Bodies are Historic England, Natural England and the Environment Agency.</p> <p>To enable a wider range of stakeholders to input into the Local Plan development process from an early stage, OPDC</p>

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Resident	<p>3. A key issue for all section of the community in and around the OPDC is the impact of a 30 year construction period – including issues of dust, noise, vibration and pollution, and ability of the boroughs to meet the potential accommodation, facilities and amenity needs of construction workers. This has not been fully considered in the report. It must be fully identified and planned for as quite separate IIA and Local Plan objectives.</p>	<p>Agree. Amendments made:</p> <p>Key Sustainability issues and opportunities  Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.”  Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.”  Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives  “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods.  § Consider the impact of construction on local infrastructure on local businesses and communities.  § Mitigate the impact of construction traffic  11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p>

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		<p>§ Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise light pollution</p> <p>13. Increase community cohesion and reduce social exclusion</p> <p>§ Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision.</p> <p>15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</p> <p>§ Minimise construction phase impacts on communities, in relation to both physical and psychological health”</p>

Respondent	Relevant comment extract	Response
Resident	Design Strategy & Density: all new design should be in keeping with the original architecture of the area, which is Victorian and Edwardian. Constructions should only be 5 storeys high near the main station or commercial hubs, but residential dwellings should be lower and be surrounded by sufficient green areas (currently under-represented on the Old Oak Green Grid on page 39) for a village feel. No tall buildings should be visible from the TITRA conservation area or Park Royal Bridge. Any plan to repeat the bland, gloomy, soulless design of North Acton should be immediately discarded - that recent development is an eyesore. Only appealing and thoughtful development please.	Noted. The following objectives consider the design, massing and height of buildings: Objective 1 considers enhancement of the built environment and encouragement of place-making. Objective 2 considers the optimisation of the efficient use of land through increased development densities and building heights, where appropriate.
Resident	Old Oak Lane should become a secondary road and be freed from lorries and HGVs, many of which are a danger to pedestrians due to the high speed at which they drive. Trucks and large commercial vehicles should be redirected to Atlas Road and the new highways connecting Hythe Road and Old Oak Common, for example. Channel Gate Road, which was created by bulldozing our Victorian cottages must be closed down, landscaped, and given back to the TITRA community for future generations.	Noted. Objective 4 considers the transport network and Objective 14 considers the use of traffic calming measures.
Resident	Regarding the need to liaise with the local communities that will not be a problem. We have always welcomed the opportunity and pro-actively asked to engage if necessary.	Noted.
Resident	Can I also say that I was surprised to read in your literature that 'the wider area around Old Oak and Park Royal contains some of the most deprived communities in England'. Did a resident pen this, or someone who has never lived here? Please explain.	Noted. This statement is based on the Indices of Multiple Deprivation.
Resident	You should change all references to "Middlesex Hospital" to "Central Middlesex Hospital".	Agree. Text amended to reflect this.
RBKC	<b>(a) Do you have any further suggestions regarding the scope of the IIA and its proposed appraisal of the Local Plan?</b> In terms of the spatial scope which is set out at section 2.2, RBKC notes that "Studies in relation to the effects on local populations in the neighbouring areas to the OPDC boundary are currently ongoing." However, we would further welcome specific mention of local populations in the neighbouring area of RBKC. We would also anticipate that these additional studies will account for the Kensal Canalside Opportunity Area which is proximate to the OPDC.	Disagree. Reference to local populations in neighbouring areas is considered sufficient for the purposes of the draft IIA Scoping Report

Respondent	Relevant comment extract	Response
RBKC	<p><b>(b) Are there any additional PPPs that should be considered for review?</b>  RBKC considers that the following documents are absent from Table 4-1 and should be included because their implications go beyond authority boundaries:</p> <p><b>Kensington &amp; Chelsea</b></p> <ul style="list-style-type: none"> <li>• Consolidated Local Plan (July 2015) – particularly with regard to Chapter 3 ‘Our Vision and Strategic Objectives’ (including the Key Diagram) and Chapter 5 ‘Kensal’, Chapter 20 ‘Kensal Gas Works’</li> <li>• Surface Water Management Plan (SWMP, February 2014)</li> <li>• Local Flood Risk Management Strategy (LFRMS, July 2015)</li> <li>• Issues and Options Paper for Kensal Gasworks (June 2012)</li> <li>• St Quintin and Woodlands Draft Neighbourhood Plan (May 2015)</li> </ul> <p><b>Regional / London</b></p> <ul style="list-style-type: none"> <li>• Social Infrastructure SPG (May 2015)</li> <li>• The Control of Dust and Emissions During Construction and Demolition SPG (July 2014)</li> <li>• Town Centres SPG (July 2014)</li> <li>• London Planning Statement SPG (May 2014)</li> <li>• London Infrastructure Plan 2050 Update (March 2015)</li> </ul> <p><b>National</b></p> <ul style="list-style-type: none"> <li>• National Planning Policy for Waste (October 2014)</li> <li>• Planning Policy for Traveller Sites has since been updated in August 2015</li> <li>• Written Ministerial Statement: Sustainable Drainage Systems (December 2014) (equivalent to national planning policy)</li> </ul>	<p>Agree. Text amended. It is considered that the London Planning Statement SPG is more relevant to the Local Plan preparation than the IIA.</p>
RBKC	<p><b>(c) Are there any additional themes that could be drawn out of the review of PPPs?</b>  RBKC considers the themes which have been identified are comprehensive for the purposes of the Impact Assessment.</p>	<p>Noted</p>
RBKC	<p><b>(d) Do you agree with the sustainability issues and opportunities that we have identified? Are there additional issues that both the IIA and the Local Plan should consider?</b>  RBKC welcomes the section 5.4 which addresses cross boundary considerations and references St Mary’s and Kensal Green Cemetery. However, we would encourage the OPDC to expand on a commitment to ‘stitching the edge’, a principle mentioned at the scoping meeting (21 July 2015). There is no reference to consideration of how boundaries will be developed in this IIA document, or how potential issues could be</p>	<p>Agree. Objective 2, bullet point 2 amended to state: Optimise development density in a way that makes the most efficient use of land whilst meeting commercial needs and responding to sensitive areas.</p> <p>Agree. Objective 4, bullet point 2, will be amended to state: Increase the</p>

Respondent	Relevant comment extract	Response
	mitigated. This is of particular importance for Kensal Canalside.	connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks including via green infrastructure networks and the canal
RBKC	<p><b>(f) Are there any particular topics or geographical areas of specific concern to your organisation?</b></p> <p>Yes, as discussed above RBKC is mainly concerned about the cross boundary considerations, including Kensal Canalside, St Mary's and Kensal Green Cemetery, and also the economic impact particularly on retail centres and transport linkages. RBKC is also concerned about the impact on surface water drainage and flooding in the Counters Creek catchment area, which includes a large proportion of RBKC's area. Please see RBKC's response to the Old Oak and Park Royal Planning Opportunity Area Framework document (14 April 2015).</p>	Noted. Objective 4 considers surface water drainage and flooding.
RBKC	<p>(g) Are there any changes you consider should be made to the IIA Framework, IIA Objectives / sub-objectives or indicators?</p> <p>The Council reiterates its request that direct reference is made to improving links to other opportunity areas via rail. Both Crossrail (Kensal Canalside) and the Overground (White City) stand to benefit from direct access to the Opportunity Areas and embracing connectivity between the Mayor's key growth areas should be included within the objectives and indicators.</p>	Agree. Objective 4, bullet point 2, amended to state: Increase the connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks including via green infrastructure networks and the canal
RBKC	The Council welcomes the indicator for objective 12 which includes "Decrease in the number of Heritage Assets at Risk in and around the area". However, we would request that St Mary's and Kensal Green Cemetery is mentioned as it borders the OPDC area, and so the need to protect this heritage asset's context is critical.	Disagree. Reference to heritage assets at risk in and around the area is considered sufficient for the purposes of the draft IIA Scoping Report



Respondent	Relevant comment extract	Response
<p>St Quintin and Woodlands Neighbourhood Forum</p>	<p><b>General</b>  The document has been published for consultation with no covering statement from the OPDC. It is a lengthy and technical document, which contains no summary of conclusions as to its implications for the development of the OPDC Local Plan. As a document on which the general public and local residents associations can become meaningfully 'engaged', it is challenging to say the least. Nevertheless, the document states at paragraph 1.9.3 that An important element of the IIA, HIA and EqIA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.  As far as we can ascertain through contact with many local residents associations and community organisations, there has been no such attempt to draw the attention to this document to 'key representatives from the community'. It has been published on the OPDC consultation webpage, but we are not aware of any further efforts to draw it to the attention of those living in and around the OPDC area. We wish this to be noted as a matter of record.</p>	<p>OPDC's Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC's website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>

Respondent	Relevant comment extract	Response
<p>St Quintin and Woodlands Neighbourhood Forum</p>	<p>Page 8 on Assessment of Alternatives for SEA screening states It is a requirement of the SEA Directive that 'reasonable alternatives' are assessed and, therefore, alternative options will be assessed using the IIA Framework. In accordance with NPPG:</p> <p>The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative.'</p> <p>We have struggled to find any part of the Hyder report which sets out any 'reasonable alternatives' ...</p>	<p>Noted. Information has been added to section2.2.1 . The draft IIA Scoping Report represents the initial stage in the SA process for the emerging Local Plan and sets the scope for the remainder of the process. Its purpose is to:</p> <p>Set the scope and level of detail of the SA;  Identify relevant plans, policies, programmes and initiatives that will inform the SA process and the Local Plan;  Identify relevant baseline information;  Identify key sustainability issues and problems; and  Present an SA Framework, consisting of sustainability objectives and indicators, against which the Local Plan can be assessed.</p> <p>Assessment of Alternatives relates to the options suggested in the Regulation 18 version of the draft Local Plan.</p>

Respondent	Relevant comment extract	Response
<p>St Quintin and Woodlands Neighbourhood Forum</p>	<p>... or explains why it is assumed that the OPDC area should be planned on the basis of an incoming 24,000 homes and 55,000 jobs. These figures are now included in the 2015 London Plan, as a result of the additions made through the FALP exercise. But we can find little or no rationale or detailed justification for these targets in the FALP documentation.</p> <p>In the IIA there is a statement at Appendix C Baseline Data Page 2 which reads ‘Given the proposed minimum new homes of 25,500 this density is set to change’. No explanation of the rationale or planning justification for this proposed new density for the OPDC area is provided.</p> <p>Hammersmith and Fulham Council consulted on a revised Draft Local Plan from 9th January to 20th February 2015. We appreciate that planning powers for this northern part of the borough are now in the hands of the OPDC, but this does not negate the work that the Borough Council has previously undertaken in respect of the Old Oak area.</p> <p>This LBHF Draft Local Plan stated in relation to the Old Oak Opportunity Area at paragraph 6.8 The Mayor of London’s Further Alterations to the London Plan (FALP) 2014 identifies Old Oak as an Opportunity Area. It includes land in the OORA in LBHF and land within the London Boroughs of Ealing and Brent and covers 155 hectares in total. The Opportunity Area is identified as having the potential to provide up to 24,000 homes and 55,000 jobs, making it London’s largest Opportunity Area in terms of its potential contribution to growth. The Council considers that approximately 18,000 homes and 50,000 jobs could be accommodated within LBHF and that approximately 6,000 homes and 20,000 jobs could be delivered within the next 20 years covered by this Local Plan, thereby helping to accommodate a substantial quantum of London’s homes and jobs needs. It is important that the new homes are available to Londoners rather than to international investors.</p>	<p>The current version of the London Plan (consolidated with amendments with from the FALP) was adopted in March 2015 following an Examination in Public.</p> <p>As such the London Plan’s minimum housing targets and indicative employment figures for Old Oak and Park Royal are form part of the Development Plan for the OPDC area.</p> <p>The Old Oak and Park Royal OAPF supplements the London Plan, establishing the principles for the range of densities across Old Oak.</p> <p>This strategic planning policy and guidance provides the baseline for the draft IIA Scoping Report.</p>

Respondent	Relevant comment extract	Response
<p>St Quintin and Woodlands Neighbourhood Forum</p>	<p>We support the view of LBHF that planning for 24,000 homes, rather than approximately 18,000, is potentially excessive development of the OPDC area and needs a fuller justification than has as yet been provided. The risk remains that such development will lead to densities and building heights which fail to integrate with existing communities in the area, and which will overload the road network and other infrastructure such a drainage and water supply.</p> <p>The LBHF Draft Local Plan suggests a series of options for the Old Oak Regeneration Area Alternative Options - Policy OORA (Strategic Policy – Old Oak Regeneration Area)  Maintain the current policy where existing strategic industrial land and waste uses are safeguarded.  Defer the regeneration of parts of the site until suitable transport nodes are operational  Optimise the quantum of development as far as possible but prohibit tall buildings in the regeneration area.  Rather than a mix of employment and residential, land use could be weighted towards the provision of employment.  Rather than a mix of employment and residential, land use could be weighted towards the provision of more residential use.</p> <p>The St Quintin and Woodlands Forum supports the use of the Old Oak regeneration area for a combination of new jobs and new homes. But we have serious concerns that the London Plan targets severely under-estimate the capacity of the existing and planned road network to cope with the scale of development envisaged, and as reflected in Hyder’s IIA scoping study. We understand that EU and UK SEA legislation requires that ‘reasonable alternatives’ are consulted on, and we do not see that this has happened in this case?</p>	<p>The current version of the London Plan (consolidated with amendments with from the FALP) was adopted in March 2015 following an Examination in Public.</p> <p>As such the London Plan's minimum housing targets and indicative employment figures for Old Oak and Park Royal are form part of the Development Plan for the OPDC area.</p> <p>The Old Oak and Park Royal OAPF supplements the London Plan, establishing the principles for the range of densities across Old Oak.</p> <p>This strategic planning policy and guidance provides the baseline for the draft IIA Scoping Report.</p> <p>Assessment of Alternatives relates to the options suggested in the Regulation 18 version of the draft Local Plan.</p>

Respondent	Relevant comment extract	Response
St Quintin and Woodlands Neighbourhood Forum	<p>Paragraph 4.2 of the Hyder document is headed Key Results from the Review and reads:</p> <p>Environmental, social and economic objectives and issues identified in the review of plans, programmes and environmental protection objectives (PPPs) of relevance to the IIA were used to generate a series of common themes. Appendix B presents a summary of how the identification of common themes relates to each of the PPPs reviewed. How these themes relate to the relevant assessment processes is presented in Table 4-2. The results of this assessment have been used to inform the development of the draft IIA Framework. How the resulting draft Objectives relate to the identified themes is also shown in Table 4-2.</p> <p>It is very hard for the lay reader or member of the public can understand how the subsequent table can be labelled as 'Key Results'. There are no 'results' stated. The document states 'the results of this assessment have been used to inform the development of the draft IIA framework', without explaining in what manner? There is no sense of which findings or 'results' from the assessment have proved more influential than any other.</p>	Noted. Table 4-2 renamed 'Results of review of Plans, Policies and Programmes.'
St Quintin and Woodlands Neighbourhood Forum	On question a) the scope of the IIA seems inadequate in failing to provide any explanation or justification for the main London Plan policies for the OPDC Local Plan (55 jobs and 24,000 homes) and failing to identify or explore any 'reasonable alternatives'.	<p>The current version of the London Plan (consolidated with amendments with from the FALP) was adopted in March 2015 following an Examination in Public.</p> <p>As such the London Plan's minimum housing targets and indicative employment figures for Old Oak and Park Royal are form part of the Development Plan for the OPDC area.</p> <p>The Old Oak and Park Royal OAPF supplements the London Plan, establishing the principles for the range of densities across Old Oak.</p> <p>This strategic planning policy and guidance provides the baseline for the</p>

Respondent	Relevant comment extract	Response
		draft IIA Scoping Report.
St Quintin and Woodlands Neighbourhood Forum	On question d) sustainability issues which are not explored include the scale of proposed development on local infrastructure (road network, sewers and drainage, water supply) all of which are already vulnerable to the cumulative impact of approved developments in White City East (Imperial West, Westfield 2, Stanhope/BBC, St James).	Noted. Title of Objective 4 amended to state Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network.  Objective 9 considers the capacity of water infrastructure to meet future demand.
The island triangle residents' association	The document is very encouraging. TITRA strongly supports the emerging themes such as: <ul style="list-style-type: none"> <li>- Increasing economic development and encouraging upskilling, employment and inward investment</li> <li>- Renewal of existing business sites (including brownfield) to enable future development / business growth</li> <li>- Different types of residential housing, especially affordable</li> <li>- Improving transport, particularly rail, cycling and pedestrian access</li> <li>- Social infrastructure, whether shops, schools, health care units and other amenities</li> </ul>	Noted.

Respondent	Relevant comment extract	Response
<p>The island triangle residents' association</p>	<p>2.1. No commitment to existing communities We, as local residents, believe that the IIA must have explicit PPPs for safeguarding and enhancing existing residential communities.</p> <p>There are 5,000 people living in large and small housing estates and cottages and they seem to be absent from the document or the workshops that preceded it. These residential areas have a range of construction, waste-related and other pollution and transport issues (from development being pushed to the edges of London boroughs) which require direct consideration (and suitable mitigation) by the Local Plan assessment:</p> <p>Area Major issues North Acton conservation area • Heavy traffic &amp; pollution from HGVs on Old Oak Lane / same issues from HGVs using Channel Gate Road access to Willesden Euroterminal • Powerday waste plant – pollution and odours since its opening • Clean Power energy recovery plant - in partnership with Network Rail – which threatens pollution in Kensal Rise and Harlesden as well as the North Acton conservation area • Years of disruption from HS2 construction works &amp; traffic access to Euroterminal site • Parking and rubbish dumping issues Wells House Road • Encirclement and land take from HS2 construction • Years of serious disruption from HS2 construction / TfL Old Oak Common station construction</p> <p>Midland Terrace • Years of serious disruption from HS2 construction / TfL Old Oak Common station construction. Wesley Road • Lack of amenities such as shops • Parking issues</p> <p>The advent of HS2 in summary will lead to land-take, disruption from 24/7 construction and road closures which will, to say the least, degrade the quality of life in these different communities. This association believes that these issues must be properly assessed by proper monitoring / data, taking on board residents' views and adopting preventative measures where possible.</p>	<p>Agree. Amendments made:</p> <p>Key Sustainability issues and opportunities Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.” Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.” Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods. § Consider the impact of construction on local infrastructure on local businesses and communities. § Mitigate the impact of construction traffic 11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p>

Respondent	Relevant comment extract	Response
		<p>§ Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise light pollution</p> <p>13. Increase community cohesion and reduce social exclusion</p> <p>§ Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision.</p> <p>15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</p> <p>§ Minimise construction phase impacts on communities, in relation to both physical and psychological health”</p>



Respondent	Relevant comment extract	Response
<p>The island triangle residents' association</p>	<p>In addition, the North Acton road infrastructure as a whole is already overworked and beset by traffic jams through the day – often because of very minor roadworks – which leads to increased levels of pollution.</p> <p>Our association believes that the authorities together with local residents will have to set up local air quality monitoring capabilities locally to align with the Local Plan with Theme 5's aspiration of improving air quality. Whatever the planned level of development, residents (in existing and new communities) need proof that nearby activities - waste sites, major construction work like HS2 aren't causing problems.</p> <p>TITRA has recently taken part in a small academic study by Mapping for Change, a whollyowned subsidiary of UCL, which has confirmed that properties on Old Oak Lane experience NO2 levels above EU limits (BBC London report on the project is here: <a href="http://www.bbc.co.uk/news/uk-england-london-34439468">http://www.bbc.co.uk/news/uk-england-london-34439468</a>).</p> <p>However, the TITRA community has no localised monitoring of risks such as particulates (PMs) which present an even more alarming pollution risk, given multiple local waste sites, waste haulage, cement batching, excavation and construction material stockpiling and rail transport activities in North Acton alone. Since TITRA has been able to do air quality NO2 monitoring at very modest cost, and the association is aware that the OPDC is starting to collaborate with smart city technology providers, we believe that localised air quality monitoring would be a realistic and an invaluable application for such technologies.</p> <p>TITRA asks that these different environmental pollution and construction blight issues are explicitly acknowledged in the IIA and commitments to remedial measures brought into its core themes.</p>	<p>Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting. An additional indicator has been added in IIA Objective 11.</p>

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>2.2 No waste treatment plants near residents' homes</p> <p>TITRA notes that under IIA Theme 8: waste management, that the OPDC wants to reduce waste displacement (exporting domestic waste out of London area) and promote a 'circular economy for waste', there should be a counterbalancing principle of no waste treatment sites being located adjacent to resident areas in line with London Plan 2015's commitment to ensuring quality of life and a clean environment for the capital's residents.</p>	<p>Noted. Objective 11 amended to recognise the need for waste management facilities to not negatively impact on sensitives uses including existing and future homes and building occupants. A sub objective has been added in IIA Objective 11.</p>
The island triangle residents' association	<p>If the corporation is to realise its target of 24,000 new homes, then our association believes that it should be clarifying that:</p> <ol style="list-style-type: none"> <li>1) energy recovery sites that will adversely affect residential areas / entertainment /cultural hubs</li> <li>2) any waste facilities need a major buffer between sites and residential areas – TITRA suggests at least 1000 metres. Sadly, the authorities and borough planners never seem to accept the misery and degradation to people's quality of life that arises from such plants and inadequately-enforced environmental controls. The Old Oak Lane conservation area (and Harlesden) is proof that a mere 50-100m is nowhere near sufficient distance between waste processing sites and residential areas, even with the supposed latest 'best available technology' waste management technology in place.</li> </ol>	<p>Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting. A sub objective has been added in IIA Objective 11.</p>
The island triangle residents' association	<p>Also with regard to the waste issue, TITRA is very concerned by the implications of IIA Theme 3 sub-theme's intention to: "increase accessibility to household and commercial sustainable waste management facilities". This statement looks to our association to be a covert statement of support for the location of waste handling sites along the canal in Old Oak as envisaged in the 2015 London Plan and the OPDC's OAPF. Our association cannot accept that intention without clear safeguards and an entirely new approach by London planning authorities establishing buffer zones between people's homes and waste sites.</p>	<p>Noted. It is the intention of the sub-objective to minimise travel to such facilities as household waste recycling centres, to encourage people to recycle and minimise travel distances. A sub objective has been added in IIA Objective 11.</p>
The island triangle residents' association	<p>TITRA emphasises that without evidence of new, more sympathetic thinking to existing and new residents' needs and risks to their health, the likely result of the IIA's potentially ambiguous industrial development and waste treatment themes is that waste / industrial uses will be pushed to the edge of the development zone – replicating the disastrous development in recent decades whereby the three boroughs of Ealing, Brent &amp; Hammersmith &amp; Fulham simply pushed development to the margins – i.e. North Acton – of their respective areas. This would jeopardise new housing developments in Old Oak as well as old ones.</p>	<p>Noted. Objective 11 amended to recognise the need for waste management facilities to not negatively impact on sensitives uses including existing and future homes and building occupants.</p> <p>OPDC Board adopted the West London Waste Plan to safeguard:</p>

Respondent	Relevant comment extract	Response
		<ul style="list-style-type: none"> <li>• Twyford Waste Transfer Station;</li> <li>• Quattro, Victoria Road.</li> </ul> <p>In addition OPDC will continue to work with stakeholders regarding the long-term aspirations of Powerday.</p>
The island triangle residents' association	TITRA requires a clear statement for no waste treatment sites near to residential areas.	Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting.
The island triangle residents' association	<p>2.3. Innovation in housing</p> <p>TITRA welcomes IIA theme 5's commitment to "affordable and inclusive housing of a range of types and tenures, to meet identified local needs" but asks whether greater emphasis can be given to innovative forms of housing for the development area. While a number of the capital's universities have provided student / graduate accommodation blocks, these buildings are largely unattractive high rise blocks with only limited retail space or community resources on the ground floor – in the example of the North Acton gyratory, this is already giving a ghost town feel to the area. The association believes that the OPDC, with its co-ordinated planning powers for the development zone, has a unique opportunity to create the conditions for innovative small-scale housing and rented accommodation types that gets away from the current trend for "ghost towns" of high rise blocks.</p>	Agree. Objective 5 to make reference to the delivery of innovative housing typologies to meet needs

Respondent	Relevant comment extract	Response
<p>The island triangle residents' association</p>	<p>3.0 Additional PPPs  3.1 Sustainable communities  TITRA acknowledges that the OPDC has carried out a thorough assessment ahead of the local plan but there is no sense in the document that the PPPs have really examined how it is going to deliver sustainable communities.  Looking at the North Acton area alone, apart from The Collective's building on Old Oak Lane (whose developer has given thought to community needs with a planned canalside space and multiple building uses), there is little doubt that Old Oak will see further high rise residential build but the general experience of North Acton (and future developers' plans for Portal Way central area / piazza surrounded by 30-storey plus buildings) is that there is:</p> <ul style="list-style-type: none"> <li>· Hardly any use of ground floor retail / community facilities</li> <li>· Very limited attempts to animate or liven up public spaces</li> <li>· Mainly high rise units leading to under-used, wind-blown public areas</li> <li>· Existing residential areas are being / will be overwhelmed by high rise units or isolated by the impacts of construction work being carried over years and decades</li> </ul> <p>The association asks that since the lifeless public space and construction-driven isolation of existing communities are already issues in North Acton, that it should be acknowledged and addressed with a core PPP to create the conditions for sustainable communities in the assessment whether from community events, Wi-Fi in public spaces and so on.</p>	<p>Noted. It is considered that Objective 1 of the IIA Framework will address these potential issues.</p>

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>4.0. Additional themes</p> <p>4.1 Greater clarity required on industrial and residential development</p> <p>TITRA notes that while the Local Plan will boost economic growth and employment, the IIA has commitments to activities such as waste handling in the zone, which can potentially be read as encouraging 'dirty' sites in proximity to residential areas.</p> <p>The result of the less-than-clear industrial development and waste treatment themes in the IIA document is that waste and industrial uses will potentially be pushed to the edge of the development zone – which could replicate the disastrous and polluting development in recent decades whereby the three boroughs of Ealing, Brent &amp; Hammersmith &amp; Fulham simply pushed development to the edge of their boroughs. These previous, flawed policies have left residential communities like the Old Oak conservation area with 1) a legacy of pollution and 2) needing to constantly press local polluters and the authorities to enforce pollution controls. For sites such as Euroterminal and Powerday, these tasks have been going on for more than a decade. TITRA asks for explicit commitments by the completed assessment for:</p> <ul style="list-style-type: none"> <li>· A clear separation of industrial/waste and residential development</li> <li>· Acknowledgment that communities may need information and resources if they are having deal with such issues</li> <li>· Smart monitoring of polluting sites leading to more effective enforcement of pollution prevention and controls</li> </ul>	<p>Noted. Objective 11 amended to recognise the need for waste management facilities to not negatively impact on sensitives uses including existing and future homes and building occupants.</p> <p>Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting.</p>

Respondent	Relevant comment extract	Response
<p>The island triangle residents' association</p>	<p>5.0 Do you agree with the sustainability issues identified?            5.1. Mitigation of pollution during Old Oak's redevelopment &amp; beyond            TITRA agrees with the broad idea of making Old Oak's renewal sustainable but it requires that specific pollution issues as well as the impact of area construction/transport/logistics on existing communities should be assessed. This omission has to be resolved with a direct commitment in the IIA to:</p> <ul style="list-style-type: none"> <li>· Effective monitoring of vehicles and traffic movements on existing as well as new roads in the development zone (ideally using smart technologies and sensors as mentioned above)</li> <li>· More effective enforcement of HGV and car pollution controls (including more effective environmental controls and better supervision of tenant companies' working hours on the Willesden Euroterminal Yard)</li> <li>· Where necessary restriction of HGVs and other polluting vehicles' numbers.</li> </ul>	<p>Noted. Amendments to be made:</p> <p>Key Sustainability issues and opportunities            Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.”            Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.”            Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives            “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods.            § Consider the impact of construction on local infrastructure on local businesses and communities.            § Mitigate the impact of construction traffic            11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p>

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		<p>§ Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise light pollution</p> <p>13. Increase community cohesion and reduce social exclusion</p> <p>§ Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision.</p> <p>15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</p> <p>§ Minimise construction phase impacts on communities, in relation to both physical and psychological health”</p> <p>This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting.</p>

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The island triangle residents' association	<p>6.1 Waste sites in Old Oak</p> <p>Aside of the issue of waste sites discussed in section 2.2. above, TITRA is very concerned by the lack of clarity over the permitted uses of the Willesden Euroterminal site, including:</p> <ol style="list-style-type: none"> <li>1) Pollution from HGV traffic accessing the Euroterminal site</li> <li>2) The likely use of the site by HS2 for tunnel waste / construction spoil removal</li> <li>3) Network Rail and its partner Clean Power's plans for developing an energy recovery site at the Willesden Euroterminal – whether HS2 is built or not – and whether the partners have asked the OPDC whether it will support this development.</li> </ol>	Noted. This information will be used to inform discussions with relevant stakeholders.
The island triangle residents' association	<p>The document is very encouraging. TITRA strongly supports the emerging themes such as:</p> <ul style="list-style-type: none"> <li>- Increasing economic development and encouraging upskilling, employment and inward investment</li> <li>- Renewal of existing business sites (including brownfield) to enable future development / business growth</li> <li>- Different types of residential housing, especially affordable</li> <li>- Improving transport, particularly rail, cycling and pedestrian access</li> <li>- Social infrastructure, whether shops, schools, health care units and other amenities</li> </ul>	Noted.



Respondent	Relevant comment extract	Response
<p>The island triangle residents' association</p>	<p>2.1. No commitment to existing communities We, as local residents, believe that the IIA must have explicit PPPs for safeguarding and enhancing existing residential communities.</p> <p>There are 5,000 people living in large and small housing estates and cottages and they seem to be absent from the document or the workshops that preceded it. These residential areas have a range of construction, waste-related and other pollution and transport issues (from development being pushed to the edges of London boroughs) which require direct consideration (and suitable mitigation) by the Local Plan assessment:</p> <p>Area Major issues North Acton conservation area • Heavy traffic &amp; pollution from HGVs on Old Oak Lane / same issues from HGVs using Channel Gate Road access to Willesden Euroterminal • Powerday waste plant – pollution and odours since its opening • Clean Power energy recovery plant - in partnership with Network Rail – which threatens pollution in Kensal Rise and Harlesden as well as the North Acton conservation area • Years of disruption from HS2 construction works &amp; traffic access to Euroterminal site • Parking and rubbish dumping issues Wells House Road • Encirclement and land take from HS2 construction • Years of serious disruption from HS2 construction / TfL Old Oak Common station construction</p> <p>Midland Terrace • At least 6 Years of serious disruption from HS2 construction / TfL Old Oak Common station construction. The compound behind the houses will only be released after 2032! Wesley Road • Lack of amenities such as shops • Parking issues</p> <p>Lack of amenities is true for all the local areas and during construction even the existing once are likely to disappear.</p> <p>The advent of HS2 will lead to land-take, disruption from 24/7 construction and road closures which will to say the least, degrade the quality of life in these communities. The association feels that these issues some be acknowledged, even if action on them may necessarily be years away.</p>	<p>Agree. Amendments made:</p> <p>Key Sustainability issues and opportunities Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.” Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.” Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods. § Consider the impact of construction on local infrastructure on local businesses and communities. § Mitigate the impact of construction traffic 11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p>

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Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>In addition, the North Acton road infrastructure is overworked and beset by traffic jams through the day which leads to pollution. TITRA has recently carried out its own air pollution monitoring of NO2 to recognised government standards through Mapping for Change, a wholly-owned subsidiary of UCL. This small-scale study has confirmed that properties on Old Oak Lane experience NO2 levels above EU limits.</p> <p>We ask that these different issues are explicitly acknowledged and scope for future remedial measures brought into the assessment's core themes.</p>	Noted. This information used to inform proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting. An indicator has been added in IIA Objective 11.
The island triangle residents' association	<p>2.2 No waste treatment plants near residents' homes</p> <p>TITRA notes that under IIA Theme 8: waste management, that the OPDC wants to reduce waste displacement (exporting domestic waste out of London area) and promote a 'circular economy for waste', there should be a counterbalancing principle of no waste treatment sites being located adjacent to resident areas in line with London Plan 2015's commitment to ensuring quality of life and a clean environment for the capital's residents.</p>	Noted. Objective 11 amended to recognise the need for waste management facilities to not negatively impact on sensitives uses including existing and future homes and building occupants. A sub objective has been added in IIA Objective 11.
The island triangle residents' association	<p>If the corporation is to realise its target of 24,000 new homes, then our association believes that it should be clarifying that:</p> <ol style="list-style-type: none"> <li>1) energy recovery sites that will adversely affect residential areas / entertainment /cultural hubs</li> <li>2) any waste facilities need a major buffer between sites and residential areas – TITRA suggests at least 1000 metres. Sadly, the authorities and borough planners never seem to accept the misery and degradation to people's quality of life that arises from such plants and inadequately-enforced environmental controls. The Old Oak Lane conservation area (and Harlesden) is proof that a mere 50-100m is nowhere near sufficient distance between waste processing sites and residential areas, even with the supposed latest 'best available technology' waste management technology in place.</li> </ol>	Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting. An indicator has been added in IIA Objective 11.

Respondent	Relevant comment extract	Response
The island triangle residents' association	Also with regard to the waste issue, TITRA is very concerned by the implications of IIA Theme 3 sub-theme's intention to: "increase accessibility to household and commercial sustainable waste management facilities". This statement looks to our association to be a covert statement of support for the location of waste handling sites along the canal in Old Oak as envisaged in the 2015 London Plan and the OPDC's OAPF. Our association cannot accept that intention without clear safeguards and an entirely new approach by London planning authorities establishing buffer zones between people's homes and waste sites.	Noted. It is the intention of the sub-objective to minimise travel to such facilities as household waste recycling centres, to encourage people to recycle and minimise travel distances. A sub objective has been added in IIA Objective 11.
The island triangle residents' association	TITRA emphasises that without evidence of new, more sympathetic thinking to existing and new residents' needs and risks to their health, the likely result of the IIA's potentially ambiguous industrial development and waste treatment themes is that waste / industrial uses will be pushed to the edge of the development zone – replicating the disastrous development in recent decades whereby the three boroughs of Ealing, Brent & Hammersmith & Fulham simply pushed development to the margins – i.e. North Acton – of their respective areas. This would jeopardise new housing developments in Old Oak as well as old ones.	<p>Noted. Objective 11 amended to recognise the need for waste management facilities to not negatively impact on sensitives uses including existing and future homes and building occupants.</p> <p>OPDC Board adopted the West London Waste Plan to safeguard:</p> <ul style="list-style-type: none"> <li>• Twyford Waste Transfer Station;</li> <li>• Quattro, Victoria Road.</li> </ul> <p>In addition OPDC will continue to work with stakeholders regarding the long-term aspirations of Powerday.</p>
The island triangle residents' association	TITRA requires a clear statement for no waste treatment sites near to residential areas.	Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting.

Respondent	Relevant comment extract	Response
<p>The island triangle residents' association</p>	<p>2.3. Innovation in housing  TITRA welcomes IIA theme 5's commitment to "affordable and inclusive housing of a range of types and tenures, to meet identified local needs" but asks whether greater emphasis can be given to innovative forms of housing for the development area. While a number of the capital's universities have provided student / graduate accommodation blocks, these buildings are largely unattractive high rise blocks with only limited retail space or community resources on the ground floor – in the example of the North Acton gyratory, this is already giving a ghost town feel to the area. The association believes that the OPDC, with its co-ordinated planning powers for the development zone, has a unique opportunity to create the conditions for innovative small-scale housing and rented accommodation types that gets away from the current trend for "ghost towns" of high rise blocks.</p> <p>In addition, everything that is being created around North Acton stations seems to be for the benefit of the students and does not seem to take into account local residents, who if nothing else, were here first.</p>	<p>Agree. Objective 5 amended to make reference to the delivery of innovative housing typologies to meet needs</p>

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>3.0 Additional PPPs 3.1 Sustainable communities</p> <p>TITRA acknowledges that the OPDC has carried out a thorough assessment ahead of the local plan but there is no sense in the document that the PPPs have really examined how it is going to deliver sustainable communities.</p> <p>Looking at the North Acton area alone, apart from The Collective's building on Old Oak Lane (whose developer has given thought to community needs with a planned canalside space and multiple building uses), there is little doubt that Old Oak will see further high rise residential build but the general experience of North Acton (and future developers' plans for Portal Way central area / piazza surrounded by 30-storey plus buildings) is that there is:</p> <ul style="list-style-type: none"> <li>• Limited use of ground floor retail / community facilities</li> <li>• Very limited attempt to animate or liven up public spaces</li> <li>• Mainly high rise units leading to under-used, wind-blown public areas</li> <li>• Existing residential areas are being/will be overwhelmed by high rise building or isolated by the impacts of construction work being carried over years, even decades</li> </ul> <p>The association asks that since the lifeless public space and construction-driven isolation of existing communities are already issues in North Acton, that it should be acknowledged and addressed with a core PPP to create the conditions for sustainable communities in the assessment whether from community events, Wi-Fi in public spaces and so on.</p>	Noted. It is considered that Objective 1 of the IIA Framework will address these potential issues.
The island triangle residents' association	<p>In addition, the density of development seems to be completely overwhelming and giving nothing back to the existing communities. As per the London Plan, the maximum allowed in an urban area is 650 habitable rooms per hectare. Surely, around North Acton that has been severely exceeded with all the planning applications coming to the fore.</p>	<p>Noted. OPDC has a scheme of delegation with LB Ealing. As such the borough will continue to determination planning applications within North Acton.</p> <p>The London Plan density matrix is supplemented by the GLA Housing SPG which provides guidance for delivering higher housing densities.</p>

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The island triangle residents' association	<p>4.0. Additional themes  4.1 Greater clarity required on industrial and residential development  TITRA notes that while the Local Plan will boost economic growth and employment, the IIA has commitments to activities such as waste handling in the zone, which can potentially be read as encouraging 'dirty' sites in proximity to residential areas.  The result of the less-than-clear industrial development and waste treatment themes in the IIA document is that waste and industrial uses will potentially be pushed to the edge of the development zone – which could replicate the disastrous and polluting development in recent decades whereby the three boroughs of Ealing, Brent &amp; Hammersmith &amp; Fulham simply pushed development to the edge of their boroughs. These previous, flawed policies have left residential communities like the Old Oak conservation area with 1) a legacy of pollution and 2) needing to constantly press local polluters and the authorities to enforce pollution controls. For sites such as Euroterminal and Powerday, these tasks have been going on for more than a decade. TITRA asks for explicit commitments by the completed assessment for:</p> <ul style="list-style-type: none"> <li>· A clear separation of industrial/waste and residential development</li> <li>· Acknowledgment that communities may need information and resources if they are having deal with such issues</li> <li>· Smart monitoring of polluting sites leading to more effective enforcement of pollution prevention and controls</li> </ul>	<p>Noted. Objective 11 amended to recognise the need for waste management facilities to not negatively impact on sensitives uses including existing and future homes and building occupants.</p> <p>Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting.</p>

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<p>The island triangle residents' association</p>	<p>5.0 Do you agree with the sustainability issues identified?            5.1. Mitigation of pollution during Old Oak's redevelopment &amp; beyond            TITRA agrees with the broad idea of making Old Oak's renewal sustainable but it requires that specific pollution issues as well as the impact of area construction/transport/logistics on existing communities should be assessed. This omission has to be resolved with a direct commitment in the IIA to:</p> <ul style="list-style-type: none"> <li>· Effective monitoring of vehicles and traffic movements on existing as well as new roads in the development zone (ideally using smart technologies and sensors as mentioned above)</li> <li>· More effective enforcement of HGV and car pollution controls (including more effective environmental controls and better supervision of tenant companies' working hours on the Willesden Euroterminal Yard)</li> <li>· Where necessary restriction of HGVs and other polluting vehicles' numbers.</li> </ul>	<p>Noted. Amendments made:</p> <p>Key Sustainability issues and opportunities            Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.”            Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.”            Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives            “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods.            § Consider the impact of construction on local infrastructure on local businesses and communities.            § Mitigate the impact of construction traffic            11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p>



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The island triangle residents' association	<p>6.1 Waste sites in Old Oak</p> <p>Aside of the issue of waste sites discussed in section 2.2. above, TITRA is very concerned by the lack of clarity over the permitted uses of the Willesden Euroterminal site, including:</p> <ol style="list-style-type: none"> <li>1) Pollution from HGV traffic accessing the Euroterminal site</li> <li>2) The likely use of the site by HS2 for tunnel waste / construction spoil removal</li> <li>3) Network Rail and its partner Clean Power's plans for developing an energy recovery site at the Willesden Euroterminal – whether HS2 is built or not – and whether the partners have asked the OPDC whether it will support this development.</li> </ol>	Noted. This information will be used to inform discussions with relevant stakeholders.
The island triangle residents' association	<p>We are also concerned over the destruction of all the small sites of green spaces around this already isolated and largely industrial area and would like to respectfully request that this issue is given priority in replacing any cut down vegetation as quickly as possible and with semi mature trees. The area already suffers with severe pollution and planting at the end of construction would create a desert during the long years. Also, mature trees protect the environment in many ways and young saplings actually produce CO2 before they become mature. This issue is important to the local residents for many reasons, some of which are visual, some which are noise reduction. We have watched these trees grow and mature over 30 years and would like them protected rather than cut down for convenience. We would like the green spaces to be increased in number and size rather than reduced. At the moment, the only additional planting on the plans is forecast in the newly created areas.</p>	<p>Noted. OPDC will work with relevant stakeholders in relation to the re-provision of trees and street greening.</p> <p>The emerging draft Local Plan will be supported by a Green Infrastructure Strategy and Public Realm Strategy which will provide guidance in relation to the location and amount of street greening and new open spaces within Old Oak and Park Royal</p>
West London Line Group	<p>Allow for growth for all types of transportation by safeguarding enough space at key locations for sufficient vehicles to serve each of these. This implies being cautious as to the amount of land to be used for building development, as well as generous with the space needed for passenger circulation in and around stations. Stratford station (East London) could well offer lessons here since, despite its size and recent development, it can feel dangerously crowded at times of peak usage.</p>	Noted. Development proposals will need to demonstrate through relevant submission material that access and circulation is safe and supports wider placemaking.
West London Line Group	<p>Allow for growth in all rail services in and around Old Oak Common at all four stations (main HS2/GWML/Crossrail complex, Hythe Road and Old Oak Common Land Overground stations, and Willesden Junction), with passive provision for platform and turnback extensions. For example, the Overground platforms and turnbacks should at a future time be able to accommodate 10 or preferably 12-car trains.</p>	Noted. Transport modelling for future capacity requirements will be undertaken by the relevant transport authorities including HS2, Transport for London and Network Rail.

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West London Line Group	<p>Most importantly, for the benefit of the country, the sub-region and the local area, make provision for a five 12-car platform station on top of the HS2 station box to allow direct and proximate connections between HS2/Crossrail/GWML services and West London Line/West Coast Main Line/Midland Main Line services. These additional links should be provided (i) to underpin the economic success of the MDC area, (ii) to allow good connections here to Heathrow, and (iii) to reduce the stress on Crossrail at Old Oak Common and tube and other services at Euston upon the opening of both Phases 1 and 2 of HS2. Any architectural 'statements' presently destined for the roof of the HS2 atrium should be raised one 'floor' to surmount these WLL platforms instead.</p> <p>No other building should be placed on top of the HS2 station box</p>	<p>Noted. Transport modelling for future capacity requirements will be undertaken by the relevant transport authorities including HS2, Transport for London and Network Rail.</p> <p>This will be used to inform the design of the station and any potential over station development.</p>
West London Line Group	<p>1. Additional Consultation, (paragraph 1.9.3, page 6) of the Scoping Report says "An important element of the IIA, HIA and EqIA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer."</p> <p>We note that we have not been approached by OPDC officers regarding the scoping report and know no others that have been. (NB this was discussed at the GUA meeting on 7th October). We would very much like to know - who have been identified as key representatives, what was the process for their identification and have any of those identified been advised of this.</p>	<p>OPDC's Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC's website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>

Respondent	Relevant comment extract	Response
West London Line Group	<p>2. Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC's Issues &amp; Options Local Plan has not been proactively provided.</p>	<p>The SEA Directive requires OPDC to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The Consultation Bodies are Historic England, Natural England and the Environment Agency.</p> <p>To enable a wider range of stakeholders to input into the Local Plan development process from an early stage, OPDC considered it appropriate to exceed legislative requirement and invite interested parties to submit comments.</p> <p>All stakeholders on OPDC's consultation database were contacted via email on 4 September 2015 and a copy was placed on OPDC's website.</p> <p>OPDC is in week 30 of a 25-30 year project. The statutory function as a local planning authority means that staffing has focused on a team that will progress evidence base for policies and ensure robust processes are in place to manage planning applications. The Strategy and Programmes team, including Communications and Engagement, is still embryonic; therefore, your patience is appreciated while the Corporation continues to staff up to serve local residents and businesses, meet groups to forge relationships and works to set-up a community group.</p>

Respondent	Relevant comment extract	Response
		<p>On 12 October, OPDC Communications and Planning officers presented to a small group of GUA members to start these meetings and to explain how local communities can get involved in the planning process. OPDC convened a second meeting with GUA members on 3 November to discuss the Scoping Report and wider Local Plan process with a public workshop on the vision and objectives held on 30 November prior to the Local Plan consultation in early 2016.</p>

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West London Line Group	<p>The European Assessment Directive or the European Union requires that realistic alternatives are assessed. Recent legal judgements have also asserted the importance of public authorities consulting upon arguable yet discarded options.</p> <p>We ask that community-based alternatives – set out in the following Vision and Objectives are assessed, with positive and negative effects identified, and included in the OPDC's Issues &amp; Options Local Plan.</p>	<p>The provided community-based vision and objectives provide a comprehensive and detailed range of suggestions which are being used to directly inform the draft Local Plan proposed vision and objectives. Where the suggestions are more relevant for policy options, these have also been used to inform the development of these options.</p> <p>As the provided community-based vision and objectives have directly and positively informed the development of the draft OPDC Local Plan, that will be subject to the IIA, a separate IIA on these is not considered necessary.</p> <p>Following a public workshop on the vision and objectives on 30 November, further community input has been provided into the development of the vision and objectives.</p> <p>As agreed at the workshop, feedback on this work and how the provided community-based vision and objectives have informed the Local Plan will be provided in January 2016. There will also be subsequent opportunity to comment on the vision and objectives during the first Local Plan consultation from February 2016.</p>

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West London Line Group	<p>3. A key issue for all section of the community in and around the OPDC is the impact of a 30 year construction period – including issues of dust, noise, vibration and pollution, and ability of the boroughs to meet the potential accommodation, facilities and amenity needs of construction workers. This has not been fully considered in the report. It must be fully identified and planned for as quite separate IIA and Local Plan objectives.</p>	<p>Agree. Amendments made:</p> <p>Key Sustainability issues and opportunities  Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.”  Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.”  Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives  “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods.  § Consider the impact of construction on local infrastructure on local businesses and communities.  § Mitigate the impact of construction traffic  11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p>

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		<p>§ Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise light pollution</p> <p>13. Increase community cohesion and reduce social exclusion</p> <p>§ Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision.</p> <p>15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</p> <p>§ Minimise construction phase impacts on communities, in relation to both physical and psychological health”</p>



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Resident	<p>1. Additional Consultation, (paragraph 1.9.3, page 6) of the Scoping Report says “An important element of the IIA, HIA and EqIA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.”</p> <p>We note that we have not been approached by OPDC officers regarding the scoping report and know no others that have been. (NB this was discussed at the GUA meeting on 7th October). We would very much like to know - who have been identified as key representatives, what was the process for their identification and have any of those identified been advised of this.</p>	<p>OPDC’s Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC’s website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>
Resident	<p>2. Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC’s Issues &amp; Options Local Plan has not been proactively provided.</p>	<p>The SEA Directive requires OPDC to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The Consultation Bodies are Historic England, Natural England and the Environment Agency.</p> <p>To enable a wider range of stakeholders to input into the Local Plan development process from an early stage, OPDC</p>

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		<p>considered it appropriate to exceed legislative requirement and invite interested parties to submit comments.</p> <p>All stakeholders on OPDC's consultation database were contacted via email on 4 September 2015 and a copy was placed on OPDC's website.</p> <p>OPDC is in week 30 of a 25-30 year project. The statutory function as a local planning authority means that staffing has focused on a team that will progress evidence base for policies and ensure robust processes are in place to manage planning applications. The Strategy and Programmes team, including Communications and Engagement, is still embryonic; therefore, your patience is appreciated while the Corporation continues to staff up to serve local residents and businesses, meet groups to forge relationships and works to set-up a community group.</p> <p>On 12 October, OPDC Communications and Planning officers presented to a small group of GUA members to start these meetings and to explain how local communities can get involved in the planning process. OPDC convened a second meeting with GUA members on 3 November to discuss the Scoping Report and wider Local Plan process with a public workshop on the vision and objectives held on 30 November prior to the Local Plan consultation in early 2016.</p>

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Resident	<p>The European Assessment Directive or the European Union requires that realistic alternatives are assessed. Recent legal judgements have also asserted the importance of public authorities consulting upon arguable yet discarded options.</p> <p>We ask that community-based alternatives – set out in the following Vision and Objectives are assessed, with positive and negative effects identified, and included in the OPDC's Issues &amp; Options Local Plan.</p>	<p>The provided community-based vision and objectives provide a comprehensive and detailed range of suggestions which are being used to directly inform the draft Local Plan proposed vision and objectives. Where the suggestions are more relevant for policy options, these have also been used to inform the development of these options.</p> <p>As the provided community-based vision and objectives have directly and positively informed the development of the draft OPDC Local Plan, that will be subject to the IIA, a separate IIA on these is not considered necessary.</p> <p>Following a public workshop on the vision and objectives on 30 November, further community input has been provided into the development of the vision and objectives.</p> <p>As agreed at the workshop, feedback on this work and how the provided community-based vision and objectives have informed the Local Plan will be provided in January 2016. There will also be subsequent opportunity to comment on the vision and objectives during the first Local Plan consultation from February 2016.</p>

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Resident	<p>3. A key issue for all section of the community in and around the OPDC is the impact of a 30 year construction period – including issues of dust, noise, vibration and pollution, and ability of the boroughs to meet the potential accommodation, facilities and amenity needs of construction workers. This has not been fully considered in the report. It must be fully identified and planned for as quite separate IIA and Local Plan objectives.</p>	<p>Agree. Amendments made:</p> <p>Key Sustainability issues and opportunities  Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.”  Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.”  Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives  “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods.  § Consider the impact of construction on local infrastructure on local businesses and communities.  § Mitigate the impact of construction traffic  11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p>

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Friends of Wormwood Scrubs	<p>2. Consultation Question (d) (sustainability issues and opportunities)            Table 5 -1 p 28            Topic: Biodiversity, Flora and Fauna            Key Issue: Wormwood Scrubs            The Friends would emphasise the biodiversity of the Scrubs associated with its uniquely rural nature.            Implications/Opportunities            The Friends endorse all these. With regard to the protection and enhancement of the Scrubs' habitat and species, we draw attention to the ecological enhancement proposals for the Scrubs at present being developed jointly by HS2 and LBHF.</p>	<p>Noted. The biodiversity designations for Wormwood Scrubs are referenced within table 5-1 and opportunities for the Local Plan to protect and enhance the habitat and species recognised.</p>
Friends of Wormwood Scrubs	<p>3. Consultation Question (f) (particular topics or geographic areas of specific concern)            5.4 text fourth para: "The redevelopment of the area should seek to improve open space provision all around the area in addition to improving connections to Wormwood Scrubs as well as enable green infrastructure and services that could be used by residents and non-residents of the area alike".            (a) The Scrubs is (of course) of specific concern to the Friends. We have consistently argued for creation of open space within the OPDC area without recourse to the Scrubs as a substitute for such open space. We endorse Draft IIA Objectives 1. bullet point 3 "Create new, accessible, open-spaces-public, communal, private and children's play space, public realm and spaces where children can play independently."            (b) Existing connections to the Scrubs are perfectly adequate for its existing use. Any future connection must not be at the expense of its existing character or adversely affect its biodiversity (see Question (d) above).</p>	<p>Noted.</p>
Friends of Wormwood Scrubs	<p>4. Draft IIA Objective 10: proposed indicator "Condition of Wormwood Scrubs LNR" we repeat reference to the ecological enhancement proposals in 2. above.</p>	<p>Noted</p>

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Hammersmith Society	<p>First of all, we have to be critical of the format of the document itself. It is really quite indigestible even to a group such as ours, with many professionals as members. We have already emphasised in our comments on the Draft Statement of Community Engagement, which was considerably more accessible than the IIA document, the importance of the OPDC producing consultation documents that are clearly and simply set out and in plain English. The IIA document has no preamble or introduction to explain its purpose in terms that a reasonable lay person can easily understand – nor does it provide a summary of conclusions or priorities. Only the second introductory paragraph under 1.1 is comprehensible, the rest being jargon. However the sections at 5.4 Cross boundary considerations and Section 6 – would have acted as a quite comprehensible introduction.</p>	<p>Noted. A non-technical summary for the Draft IIA of the Regulation 18 version of the Local Plan will be provided.</p>
Hammersmith Society	<p>We acknowledge that such a document is a required part of the Local Plan process, and that there is a need for speed. However, the document promotes the importance of community involvement throughout the Local Plan process. To our knowledge, and from our involvement with the Grand Union Alliance, key representatives have not been identified by OPDC as is suggested with a view to working through the document.</p>	<p>OPDC's Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC's website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>

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Hammersmith Society	Define that the Vision is really about the eastern 'Old Oak' side of the OPDC area and that the western side will remain but be enhanced as an Industrial/business area.	Disagree. Park Royal is considered valuable industrial area which should benefit from enhancements and support. The proposed Vision reflects this.
Hammersmith Society	Recognise that the OPDC is potentially about the development around a nationally important transport hub (HS2/Crossrail1 etc) and a series of neighbourhood both existing and proposed. OPDC's success will be judged largely on how well it reconciles these differing requirements.	Noted. This information will be used to inform the emerging draft Local Plan.
Hammersmith Society	Recognise that for the OPDC will be more than the sum of these parts and that there should be elements of the development which would be of wider appeal. This was identified in Key Objective 3 of the OAPF which stated : 'Potential for large scale catalyst uses such as new educational facility, football stadium, sports complex, health, arts leisure or cultural centre' : This society favours arts, leisure and/or a cultural centre which might include elements such as a lido, ice skating, concert hall.	Agree. Cultural uses are envisaged to play a key role in the regeneration of the area. This information will be used to inform the emerging draft Local Plan.
Hammersmith Society	The scale of the residential development needs to be defined and justified so that it is not just accepted that the apparently random number of 24,000 new homes is targeted without proper consideration of the type of neighbourhoods that will result.	<p>The current version of the London Plan (consolidated with amendments with from the FALP) was adopted in March 2015 following an Examination in Public.</p> <p>As such the London Plan's minimum housing targets for 24,000 new homes and indicative employment figures for Old Oak and Park Royal are form part of the Development Plan for the OPDC area.</p> <p>The Old Oak and Park Royal OAPF supplements the London Plan, establishing the principles for the range of densities across Old Oak.</p> <p>The minimum 24,000 target was developed through a development capacity exercise which has been refined to reflect local sensitives and development opportunities in the OAPF.</p>



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		<p>This strategic planning policy and guidance provides the baseline for the draft IIA Scoping Report.</p> <p>The OAPF provides principles for the delivery of densities that respond to sensitive areas in and around the OPDC area. The Local Plan will develop this guidance further.</p>
Hammersmith Society	The neighbourhoods need to be of a human scale and distinctive : The densities need to be appropriate so that a wide range of homes can be provided and if some are in towers these are limited in height to say 10 storeys.	Noted. The OPDC Local Plan will be supported by a Character Study and Development Capacity Study to inform scale of development and local character.
Hammersmith Society	Neighbourhood areas need to be completed in phases and have access to proper community facilities (e.g. Appropriate retail, schools, doctor's surgeries etc).	Agree. The delivery of development will be defined through the Development Capacity Study and required infrastructure identified
Hammersmith Society	The phasing of development (over the potential 30 year period) needs to be carefully considered so that completed neighbourhoods are protected from the potential disruption/disturbance of living in an almost continuous building site.	Noted. Managing the impact on surrounding neighbourhoods is being suggested within the emerging Local Plan.
Hammersmith Society	There is no mention of private amenity spaces nor for that matter landscaping : There needs to be proper and commensurate provision of open spaces both as parks but also play spaces for all age groups.	Noted. The GLA Housing SPG sets out requirements for private amenity spaces for development. The emerging Local Plan will be supported by a Public Realm Strategy that will provide guidance for landscaping and the wider public realm

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Hammersmith Society	The standard of architectural design throughout has got to be of exceptionally good quality : Not just the same old stuff we see being rolled out all over London : The new stations – particularly the HS2/Crossrail station – should be the subject of an international competition : It is after all potentially the second largest after Waterloo : Think Kings Cross or Birmingham New Street. To achieve this will probably require the appointment of a highly respected and able design champion.	Noted. Architectural quality is critical to the success of Old Oak. As such the Place Review Group has been established to independently assess major planning applications and emerging planning policies.
Hammersmith Society	There should be a strong emphasis in the Local Plan regarding conservation areas and the use of heritage assets	Noted. Conservation and heritage policy options will be proposed within the Local Plan
Hammersmith Society	The GUA have rightly identified that canal should be not just cleaned up and used, but also developed with boat basins and the like to provide vitality and greater use of the canal. The point could also be made of using the canal for the transport of materials during the construction works in order to reduce the burden on local roads.	Noted. This information will be used to inform the emerging draft Local Plan.
Harlesden Town Team	<p>1. Additional Consultation, (paragraph 1.9.3, page 6) of the Scoping Report says “An important element of the IIA, HIA and EqIA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.”</p> <p>We note that we have not been approached by OPDC officers regarding the scoping report and know no others that have been. (NB this was discussed at the GUA meeting on 7th October). We would very much like to know - who have been identified as key representatives, what was the process for their identification and have any of those identified been advised of this.</p>	<p>OPDC’s Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC’s website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the</p>

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		<p>OPDC Board and wider community activities.</p>
<p>Harlesden Town Team</p>	<p>2. Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC's Issues &amp; Options Local Plan has not been proactively provided.</p>	<p>The SEA Directive requires OPDC to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The Consultation Bodies are Historic England, Natural England and the Environment Agency.</p> <p>To enable a wider range of stakeholders to input into the Local Plan development process from an early stage, OPDC considered it appropriate to exceed legislative requirement and invite interested parties to submit comments.</p>

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<p>Harlesden Town Team</p>	<p>The European Assessment Directive or the European Union requires that realistic alternatives are assessed. Recent legal judgements have also asserted the importance of public authorities consulting upon arguable yet discarded options.</p> <p>We ask that community-based alternatives – set out in the following Vision and Objectives are assessed, with positive and negative effects identified, and included in the OPDC's Issues &amp; Options Local Plan.</p>	<p>The provided community-based vision and objectives provide a comprehensive and detailed range of suggestions which are being used to directly inform the draft Local Plan proposed vision and objectives. Where the suggestions are more relevant for policy options, these have also been used to inform the development of these options.</p> <p>As the provided community-based vision and objectives have directly and positively informed the development of the draft OPDC Local Plan, that will be subject to the IIA, a separate IIA on these is not considered necessary.</p> <p>Following a public workshop on the vision and objectives on 30 November, further community input has been provided into the development of the vision and objectives.</p> <p>As agreed at the workshop, feedback on this work and how the provided community-based vision and objectives have informed the Local Plan will be provided in January 2016. There will also be subsequent opportunity to comment on the vision and objectives during the first Local Plan consultation from February 2016.</p>

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<p>Harlesden Town Team</p>	<p>3. A key issue for all section of the community in and around the OPDC is the impact of a 30 year construction period – including issues of dust, noise, vibration and pollution, and ability of the boroughs to meet the potential accommodation, facilities and amenity needs of construction workers. This has not been fully considered in the report. It must be fully identified and planned for as quite separate IIA and Local Plan objectives.</p>	<p>Agree. Amendments made:</p> <p>Key Sustainability issues and opportunities Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.” Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.” Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods. § Consider the impact of construction on local infrastructure on local businesses and communities. § Mitigate the impact of construction traffic 11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p>

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Regents Canal Network	<p>A great concern is the 'future proofing' of the OPDC project with its predicted 25-30 year development. A planning mechanism needs to be employed that allows stages of updating and revision of the development plans as the project proceeds. The housing and transport requirement of 10 years ago would not be appropriate now as they have changed noticeably, so the OPDC plans made now may not suit in 10 years time, let alone the full term of the project. Having been involved with the Kings Cross Central Development for many years, I can confirm that lessons must be learned from unrevised outdated decisions that are set in stone.</p>	<p>Noted. The OPDC Local Plan is being informed by evidence base which enables it to take a flexible approach to accommodate change. The Local Plan will be reviewed annually through the Annual Monitoring Report. Should changes be required, the Local Plan will be updated in accordance with due processes.</p>
Regents Canal Network	<p>On the positive side, it seems that lessons have been learned from the disorder and inadequacies of the LLDC, and the set up and management of the OPDC is far more competent, and also includes close consideration and involvement of the community which is lacking in the Lee Valley.</p>	<p>Noted</p>
Regents Canal Network	<p>The poor quality of some of the documentation supplied by OPDC is of concern as it is so dense and inaccessible. The result can be a lack of clarity from which misjudgments and misinterpretations can result, or may have even occurred in the recent flurry of erudite and indigestible documents.</p> <p>This has been caused in part by the 'undue haste' in the planning proceedings, and as identified by the London Assembly, among others. Can the timetable be readjusted, and good order and careful thought processes prevail.</p>	<p>Noted. With regard to the IIA scoping report, the content and structure is informed by statutory requirements.</p> <p>The timetable for the Regulation 18 consultation has been amended in response to concerns raised by stakeholders to take place in late January to deliver an 8 week formal consultation period alongside supplementary processes.</p>



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Regents Canal Network	<p>One other matter that needs to be addressed is the over-ambitious density proposals for this neighbourhood that is not central London. The density of housing can be fairly high even in this location, but the predicted total of 24,000 new homes will impose an unreasonable density for West London, particularly as large numbers of mega towers will not be acceptable in this neighbourhood. Again lessons should be learned from unsuitable towering developments that have been parachuted into sensitive areas all over London with pressure from the Mayor.</p>	<p>The current version of the London Plan (consolidated with amendments with from the FALP) was adopted in March 2015 following an Examination in Public.</p> <p>As such the London Plan's minimum housing targets for 24,000 new homes and indicative employment figures for Old Oak and Park Royal are form part of the Development Plan for the OPDC area.</p> <p>The Old Oak and Park Royal OAPF supplements the London Plan, establishing the principles for the range of densities across Old Oak.</p> <p>This strategic planning policy and guidance provides the baseline for the draft IIA Scoping Report.</p> <p>The OAPF provides principles for the delivery of densities that respond to sensitive areas in and around the OPDC area. The Local Plan will develop this guidance further.</p>
Regents Canal Network	<p>The main issue for the Regents Network is for the Grand Union Canal to be given careful consideration, as mentioned in the GUA response.</p> <ul style="list-style-type: none"> <li>• The Grand Union Canal is a navigation. The use by boats travelling along the canal is being encouraged to bring London's canals back to life. This will include freight transport as well as leisure boating. It could become very busy with ten or fifteen barges passing every hour. But it will still be a wonderful environment and will remain calm and gentle.</li> <li>• There needs to be a strict limit to moored boats along the main channel. There may be opportunities for a group of boats to be moored in a wider stretch or a lay-by, where there can be a mooring facility and infrastructure, but opportunistic mooring in any</li> </ul>	<p>Noted. This information will be used to inform the development of the draft Local Plan.</p>

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	<p>available space and along to towpath should be discouraged. After all, the canal is not a housing estate, and as the London Plan says, the canal 'should not be used as an extension of the developable land in London' (BRN Policy 7.27, Para 7.84). It is added that 'nor should parts of it be a continuous line of moored craft'.</p> <ul style="list-style-type: none"> <li>• However, at any opportunity there should be provision of Visitor Moorings, with adequate infrastructure and services.</li> <li>• Everything along the canal and in the vicinity should be calm. It is perfectly ok if nothing happens along the canal, and the open water itself becomes the feature. Our canals have become to be appreciated as a quiet haven, even in the centre of London</li> <li>• That the canals should be 'animated' is a perverse notion perpetrated by British Waterways and now the Canal and River Trust, which has been solidly objected to by Regents Network and others for many years. But it was BWB talking as a property developer rather than a navigation authority, and it is unfortunate that this notion is often repeated, and more than likely coming from property developers wanting to exploit the canals. The last thing the canal needs is to be animated.</li> <li>• There have been suggestions that side basins could be constructed along the canal, but this is not favoured unless there is a sound reason for their use. The basins could be destinations for water transport passengers or freight, or for visitor moorings for instance. As a water feature let into the surrounding developments, a basin would be a weak objective unless carefully designed and as a special undertaking. In any event, if a water feature is required then it is possible to construct a pond in any location other than canalside, and could include fountains if it is further away. Canals and fountains do not go well together.</li> <li>• New buildings should be set back from the edge of the canal, to preserve and protect the waterway's character and individuality. Pressure from property developers for their buildings to be close to water in order to increase their rents and profits is not acceptable. Heritage, environment, scenery and views come before profit. Buildings in the canal vicinity should also be low level to avoid enclosing the waterway, and historically it was more typical to have an open wharf at the canalside with the warehouse set back. Dining areas in front of restaurants and cafes should also be set back rather than at the water's edge.</li> <li>• Towpaths are now for pedestrian use, although the occasional horse-drawn tourist barge would not go amiss, as we have on other parts of the canal network.</li> </ul>	

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	<p>Incidentally, it is a requirement that any canalside railings, equipment, lighting and so on should be designed so that a towing rope would not be snagged, even these days. As the towpaths are used by walkers, family groups, baby buggies, dogs on leads, the elderly and wheelchairs etc, then they are not suitable as a cycle route as they are not sufficiently wide to be considered for sharing. A genuine 'leisure' cyclist or a family cycle group could be acceptable as pedestrians could readily be given priority with perfect safety and without great disturbance. Any cyclist venturing on to a towpath should know that they are restricted to travelling more or less at walking speed, and not expect to get anywhere very quickly.</p> <ul style="list-style-type: none"> <li>• The take-over of towpaths by fast cyclists is not acceptable, and the towpaths have become unpleasant, and dangerous, for pedestrians. It should be the cyclist who use alternative routes to get to their destinations, rather than the pedestrians finding alternatives routes as is the case at the present. It is the pedestrians that have priority, but that is no longer the case along many stretches of towpath in London.</li> <li>• Cycling is strongly supported. It is an important enough activity for it to be given special attention, and there is a widespread development of cycle paths, and the funding available to continue expanding the cycle networks. OPDC should set new standards and take the opportunity with the comprehensive development of such a large area to provide dedicated cycle paths, or in the case of new shared paths they should be of sufficient generous width to share with pedestrians safely. It will also avoid frightening the horses.</li> <li>• The future use and activity on the canals in West London for freight is developing , with particular focus on the Park Royal area and other local industrial and business centres that are canalside. It is seen that this will help to alleviate the gridlock on the roads a certain amount, but more importantly will have a marked effect on the improvement of air quality as canal transport is 80% less polluting than lorries.</li> <li>• There is no doubt of the advantages of using the canals in the OPDC area during the construction phases of the development over a number of years, which will reduce lorry movements and pollution. However, although this has been mentioned, no transport plan includes details of the use of water transport. There is the opportunity for establishing a number of convenient loading and consolidation sites, and including the use of conveyors.</li> </ul>	

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Regents Canal Network	<p>2. Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC’s Issues &amp; Options Local Plan has not been proactively provided.</p>	<p>The SEA Directive requires OPDC to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The Consultation Bodies are Historic England, Natural England and the Environment Agency.</p> <p>To enable a wider range of stakeholders to input into the Local Plan development process from an early stage, OPDC</p>

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		<p>considered it appropriate to exceed legislative requirement and invite interested parties to submit comments.</p> <p>All stakeholders on OPDC's consultation database were contacted via email on 4 September 2015 and a copy was placed on OPDC's website.</p> <p>OPDC is in week 30 of a 25-30 year project. The statutory function as a local planning authority means that staffing has focused on a team that will progress evidence base for policies and ensure robust processes are in place to manage planning applications. The Strategy and Programmes team, including Communications and Engagement, is still embryonic; therefore, your patience is appreciated while the Corporation continues to staff up to serve local residents and businesses, meet groups to forge relationships and works to set-up a community group.</p> <p>On 12 October, OPDC Communications and Planning officers presented to a small group of GUA members to start these meetings and to explain how local communities can get involved in the planning process. OPDC convened a second meeting with GUA members on 3 November to discuss the Scoping Report and wider Local Plan process with a public workshop on the vision and objectives held on 30 November prior to the Local Plan consultation in early 2016.</p>

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## Changes to IIA Framework following Scoping Consultation

Changes shown in **red and bold text** (additions) or ~~strike through~~ (deleted text)

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
1	<p><b>To enhance the built environment and encourage ‘place-making’</b></p> <ul style="list-style-type: none"> <li>▪ Optimise development opportunities to develop and enhance local distinctiveness <b>and character</b></li> <li>▪ Ensure new buildings <b>and public spaces</b> are appropriately designed and constructed including enabling <b>the creation of safe and welcoming spaces and</b> access for all</li> <li>▪ Create new, accessible <b>and managed</b> open spaces- public, communal, private and children’s play space, public realm and spaces where children can play independently, <b>which reflect the needs of the community.</b></li> <li>▪ Maximise the contribution that the arts, culture and heritage can make to a community including building creativity, art, intrigue, <b>character</b> and surprise into the built environment</li> <li>▪ Increase in the legibility of public spaces and increase walking and cycling routes within and adjacent to Old</li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>Provision of publicly accessible open space in accordance with the London Plan Categorisation<sup>7</sup>:</i> <ul style="list-style-type: none"> <li>○ <i>Regional Parks (400ha): 3.2 to 8km from homes;</i></li> <li>○ <i>Metropolitan Parks (60ha): 3.2km from homes;</i></li> <li>○ <i>District Parks (20ha): 1.2km from homes;</i></li> <li>○ <i>Local Parks and Open Spaces (2ha): 400m from homes;</i></li> <li>○ <i>Small Open Spaces (under 2ha): less than 400m from homes;</i></li> <li>○ <i>Pocket Parks (under 0.4ha): less than 400m from homes;</i></li> <li>○ <i>Linear Open Spaces (Variable): wherever feasible.</i></li> </ul> </li> <li>▪ <b>Proportion of accessible open spaces created which have a long term management and</b></li> </ul>	<p>SEA: Population, Human Health, Material Assets, Cultural Heritage, Landscape</p> <p>HIA</p> <p>EqIA</p>

<sup>7</sup> [https://www.london.gov.uk/sites/default/files/ALGG\\_SPG\\_Mar2012.pdf](https://www.london.gov.uk/sites/default/files/ALGG_SPG_Mar2012.pdf)

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	<p>Oak and Park Royal</p> <ul style="list-style-type: none"> <li>▪ Encourage the use of contemporary technology in the public realm to support design, delivery and management</li> <li>▪ Encourage adherence to the principles of Lifetime Neighbourhoods</li> <li>▪ Maximise delivery of active frontages in appropriate locations</li> </ul> <p>Link to objectives 12 (heritage), 5 (housing); 13 (community cohesion); 14 (crime and fear of crime); 15 (health and wellbeing)</p>	<p><b><i>funding plan</i></b></p> <ul style="list-style-type: none"> <li>▪ <i>Integration with the All London Green Grid Area Frameworks</i></li> <li>▪ <i>Number of new buildings and public spaces designed to be inclusive</i></li> <li>▪ <i>Proportion of new development incorporating an appropriate level of open space for recreation</i></li> <li>▪ <i>Legibility and quality of the pedestrian and cycle environment</i></li> <li>▪ <i>Proportion of new development incorporating Lifetime Neighbourhoods principles</i></li> <li>▪ <i>Proportion of people who are happy with their local environment as a place to live</i></li> <li>▪ <i>Proportion of new development using technology to improve legibility</i></li> </ul>	
2	<p><b>To optimise the efficient use of land through increased development densities and building heights, where appropriate</b></p> <ul style="list-style-type: none"> <li>▪ Optimise housing density in a way that makes the most efficient use of land whilst meeting housing needs</li> <li>▪ Optimise development density in a way that makes the most efficient use of land whilst meeting commercial needs <b>and responding to sensitive areas</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>Housing density in comparison to neighbourhood quality</i></li> <li>▪ <i>Density of commercial development in comparison to existing (2015) levels</i></li> </ul>	<p>SEA: Population, Human Health, Biodiversity, Soil, Water, Landscape, Material Assets</p> <p>HIA</p>

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	Link to objectives 7 (natural resources use); and 8 (waste)		
3	<p><b>Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land</b></p> <ul style="list-style-type: none"> <li>▪ Increase accessibility to household and commercial sustainable waste management facilities</li> <li>▪ Improve soil quality and achieve more effective geoconservation where appropriate</li> <li>▪ Contribute to a scheme of strategic land remediation</li> </ul> <p>Link to objectives 4 (natural resources use); 6 (waste); <b>and 12 (reuse of existing buildings)</b></p>	<ul style="list-style-type: none"> <li>▪ <u>Amount (hectares) of previously developed land available (Office for National Statistics Local Profiles)</u></li> <li>▪ <i>Quality of soil resources</i></li> <li>▪ <i>Materials balance as a result of construction activities</i></li> <li>▪ <i>Development and implementation of a strategic land remediation scheme</i></li> <li>▪ <i>Amount of soil remediated on site</i></li> </ul>	<p>SEA: Population, Human Health, Biodiversity, Soil, Water, Landscape, Material Assets</p> <p>HIA</p>
4	<p><b>Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network</b></p> <ul style="list-style-type: none"> <li>▪ Increase the co-location of services and facilities, in accessible locations by walking, cycling and public transport</li> <li>▪ Increase the connection of the public realm and internal routes to <b>neighbouring areas alongside</b> local and strategic cycle and walking networks including via green infrastructure networks and the canal</li> <li>▪ Prioritise walking and cycling over other forms of transport</li> <li>▪ Increases the opportunity for the transport of goods and</li> </ul>	<ul style="list-style-type: none"> <li>▪ <u>Distribution of major transport systems – roads, rail links</u></li> <li>▪ <i>Modal shift of existing travel patterns verses future travel patterns</i></li> <li>▪ <i>Connectivity of the cycling and walking network</i></li> <li>▪ <i>Km of designated cycling and walking routes</i></li> <li>▪ <i>Proportion of goods arriving and leaving the area by rail in comparison to road</i></li> <li>▪ <b><i>Proportion of waste and freight arriving and leading the area by canal</i></b></li> <li>▪ <i>Proportion of shared spaces within the urban</i></li> </ul>	<p>SEA: Population, Human Health, Air, Climatic Factors, Material Assets, Landscape</p> <p>HIA</p> <p>EqIA</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<p>people by rail transport</p> <ul style="list-style-type: none"> <li>▪ Consider the impact of construction on local infrastructure on local businesses <b>and communities</b></li> <li>▪ Support the testing and implementation of future transport modes</li> <li>▪ Mitigate the impact of construction traffic</li> <li>▪ Maximise the accessibility of stations</li> </ul> <p>Link to objectives 7 (climate change); 11 (pollution); and 14 (safety)</p>	<p><i>environment</i></p> <ul style="list-style-type: none"> <li>▪ <i>Controlled parking zones, car clubs and travel plan measures implemented</i></li> <li>▪ <i>Number of accessible public transport interchanges and bus stops (source: Equal Life Chances for All 2009)</i></li> <li>▪ <i>Number of local businesses negatively affected by construction activities</i></li> <li>▪ <i>Increase in traffic on the highway network in and around the OPDC area</i></li> </ul>	
5	<p><b>Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local <b>and regional</b> needs</b></p> <ul style="list-style-type: none"> <li>▪ Provision of adaptable homes for independent living for older and disabled people</li> <li>▪ <b>Provision of innovative housing typologies to meet needs</b></li> <li>▪ Provision of homes to need the needs of older people including extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes</li> <li>▪ Provision of housing suitable for family accommodation including single-parent families</li> <li>▪ Increase in use of high quality design including meeting</li> </ul>	<ul style="list-style-type: none"> <li>▪ <u>Dwelling Stock (Office for National Statistics Local Profiles).</u></li> <li>▪ <u>Household density (Office for National Statistics Local Profiles)</u></li> <li>▪ <i>Proportion of LSOAs in the bottom 10% for housing deprivation</i></li> <li>▪ <i>Proportion of dwellings meeting all of the health and wellbeing credits in the Code for Sustainable Homes</i></li> <li>▪ <i>Proportion of dwellings that meet internal space standards</i></li> <li>▪ <i>Proportion of dwellings with a high SAP rating</i></li> <li>▪ <i>Proportion of the population considered to be</i></li> </ul>	<p>SEA: Population, Human Health, Climatic Factors, Material Assets</p> <p>HIA</p> <p>EqIA</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<p>energy efficiency standards</p> <ul style="list-style-type: none"> <li>▪ Provision of facilities to meet identified needs of Gypsies, Travellers and Travelling Show people</li> <li>▪ Ensure all new homes meet Lifetime Homes standards</li> </ul> <p>Link to objectives 1 and 6 (sustainable design); 13 (community cohesion and social exclusion); 14 (secured by design); 15 (health)</p>	<p><i>homeless (source: Equal Life Chances for All 2009)</i></p> <ul style="list-style-type: none"> <li>▪ <i>Amount of family size housing (source: Equal Life Chances for All 2009)</i></li> <li>▪ <i>Proportion of single parent families living in unsuitable accommodation</i></li> <li>▪ <i>Amount of affordable housing (source: Equal Life Chances for All 2009)</i></li> <li>▪ <i>Amount of Lifetime Homes (source: Equal Life Chances for All 2009)</i></li> <li>▪ <i>Proportion of market, affordable and specialist housing delivered.</i></li> </ul>	
6	<p><b>Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect</b></p> <ul style="list-style-type: none"> <li>▪ Minimise the proportion of new development at risk of flooding <b>from all sources including surface water, groundwater and reservoir flooding</b></li> <li>▪ Minimise the increase in risk of flooding elsewhere</li> <li>▪ Increase the use of sustainable design including Sustainable Urban Drainage, natural ventilation and shading for temperature adaptation</li> </ul> <p>Link to objectives 10 (habitat connectivity); 7 (energy efficiency); <b>12</b></p>	<ul style="list-style-type: none"> <li>▪ <u>River catchment areas (Environment Agency Thames Catchment Flood Management Plan, 2009).</u></li> <li>▪ <u>Distribution of areas at risk of fluvial flooding (Environment Agency Fluvial Flood Map)</u></li> <li>▪ <u>Areas susceptible to surface water flooding (Environment Agency Surface Water Flood Map)</u></li> <li>▪ <i>Proportion of energy usage in buildings using sustainable design compared with standard construction</i></li> </ul>	<p>SEA: Biodiversity, Human Health, Water, Air, Climatic Factors, Material Assets, Landscape</p> <p>HIA</p> <p>EqIA</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<b>(sustainable adaptation and reuse of existing buildings)</b>		
7	<p><b>To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy</b></p> <ul style="list-style-type: none"> <li>▪ Enable the area to be more self-sufficient in terms of energy generation and storage</li> <li>▪ Increase the proportion of energy generated from low, zero or negative carbon energy sources, <b>through consideration of measures from the outset</b></li> <li>▪ Increase the proportion of journeys made by non-motorised transport</li> <li>▪ Increase the use of sustainable design to minimise the resource requirements and outputs of new development</li> </ul> <p>Link to objectives 4 (minimise the need to travel); 7 (sustainable design); <b>and 12 (sustainable adaptation and reuse of existing buildings)</b></p>	<ul style="list-style-type: none"> <li>▪ <u>Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles)</u></li> <li>▪ <u>All energy consumption by sector (Office for National Statistics Local Profiles and DECC)</u></li> <li>▪ <i>Energy consumption per capita</i></li> <li>▪ <b><i>Proportion of properties generating energy from low or zero carbon sources, including solar.</i></b></li> <li>▪ <b><i>Proportion of new developments incorporating district heating or heat pumps</i></b></li> <li>▪ <i>Greenhouse gas emissions per capita compared with London and national averages</i></li> <li>▪ <i>Proportion of journeys made by non-motorised transport</i></li> <li>▪ <i>Proportion of energy generated from low, zero or negative carbon energy sources</i></li> </ul>	<p>SEA: Population, Human Health, Air, Climatic Factors, Material Assets</p> <p>HIA</p> <p>EqIA</p>
8	<p><b>To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste</b></p> <ul style="list-style-type: none"> <li>▪ Promote the creation of a circular economy for the</li> </ul>	<ul style="list-style-type: none"> <li>▪ <u>Number of active / historic landfills on the site (Environment Agency)</u></li> <li>▪ <u>Percentage of household waste sent for reuse, recycling or composting (ONS Local Profiles)</u></li> <li>▪ <u>Amount of residual waste per household (ONS)</u></li> </ul>	<p>SEA: Biodiversity, Population, Human Health, Soil, Water, Climatic Factors, Material Assets, Landscape</p>



	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<p>management of waste</p> <ul style="list-style-type: none"> <li>▪ Increase the use of recycled materials for the construction of buildings and infrastructure</li> <li>▪ Address the displacement of waste management to other areas</li> <li>▪ Enable the sustainable management of contaminated soils and hazardous waste</li> <li>▪ Increase accessibility to household and commercial sustainable waste management facilities</li> <li>▪ Maximise use of innovative waste collection and waste management techniques including smart technology</li> </ul> <p>Link to objectives 7 (resources use); 2 (efficient use of land); 3 (remediation)</p>	<p><u>sent to landfill or incineration</u></p> <ul style="list-style-type: none"> <li>▪ <u>Amount of commercial and industrial waste produced (Defra)</u></li> <li>▪ <i>Amount of waste recycled and re-used within the area</i></li> <li>▪ <i>Amount of waste transported within the area</i></li> </ul>	<p>HIA</p> <p>EqIA</p>
9	<p><b>Improve the quality of the water environment</b></p> <ul style="list-style-type: none"> <li>▪ Promote the improved efficiency in the use of water domestically and commercially</li> <li>▪ Promote the improved quality of local watercourses</li> <li>▪ <b>Prevent</b> Reduce the risk posed to the water environment from the run-off of contaminants</li> <li>▪ Ensure that infrastructural capacity is sufficient to accommodate new development ahead of occupation</li> </ul>	<ul style="list-style-type: none"> <li>▪ <u>Water and groundwater quality (Environment Agency)</u></li> <li>▪ <i>Development of a site wide drainage strategy</i></li> <li>▪ <i>Water consumption per capita</i></li> <li>▪ <i>Increase in infrastructural capacity as a proportion of new development</i></li> <li>▪ <i>Increased use of existing infrastructure</i></li> </ul>	<p>SEA: Water, Human Health, Soil, Landscape</p> <p>HIA</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	Link to objectives 1 (biodiversity); 3 (climate change adaptation); 4 (climate change contributions); 5 (pollution); 7 (remediation); <b>and 12 (Grand Union Canal)</b>		
10	<p><b>Create and enhance biodiversity and the diversity of habitats across the area and its surroundings</b></p> <ul style="list-style-type: none"> <li>▪ Conserve or enhance existing biodiversity across the plan area, including on brownfield sites</li> <li>▪ Increase the connectivity of habitats across the area and its surroundings</li> <li>▪ Create new areas dedicated to nature conservation</li> <li>▪ Seek to reduce the potential wide ranging impacts on international sites</li> </ul> <p>Link to objectives 3 (remediation); 6 (climate change adaptation); 9 (water environment); 11 (pollution); <b>and 12 (Grand Union Canal)</b></p>	<ul style="list-style-type: none"> <li>▪ <u>Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Sites of Importance for Nature Conservation (SINCs) and Local Wildlife Sites (MAGIC, <a href="http://www.magic.gov.uk">www.magic.gov.uk</a> and Local Authority websites).</u></li> <li>▪ <u>Key Biodiversity Action Plan (BAP) species and habitats present (London BAP)</u></li> <li>▪ <i>Protected species with favourable conservation status</i></li> <li>▪ <i>Habitat connectivity</i></li> <li>▪ <i>Condition of Wormwood Scrubs Local Nature Reserve</i></li> <li>▪ <i>Condition of Grand Union Canal area of nature conservation</i></li> <li>▪ <i>Increase in areas of greenspace for biodiversity including inaccessible areas</i></li> </ul>	SEA: Biodiversity, Flora, Fauna  HRA

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
11	<p><b>To minimise air, noise and light pollution, particularly for communities and vulnerable groups</b></p> <ul style="list-style-type: none"> <li>▪ Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development <del>through the location of</del> <b>on existing and future communities through the use of mitigation measures and the locating of future</b> sensitive users away from high noise <b>pollution</b> generators and the use of mitigation measures</li> <li>▪ Minimise air pollution caused by traffic and commercial uses <b>during the construction and operation of development on existing and future communities,</b> through the location of <b>use of mitigation measures and the locating of future</b> sensitive users away from areas of high air pollution <b>generators</b> and the use of mitigation measures</li> <li>▪ <b>Ensure that new waste management facilities do not negatively impact on sensitive uses including existing and future homes, and building occupants</b></li> <li>▪ <b>Reduce emissions from construction and demolition sites</b></li> <li>▪ Minimise light pollution</li> </ul> <p>Link to objectives 4 (sustainable transport); 7 (climate change); 15</p>	<ul style="list-style-type: none"> <li>▪ <u>Number and distribution of Air Quality Management Areas (AQMAs) (Air Quality Archive<sup>8</sup>)</u></li> <li>▪ <i>Number of new local air quality monitoring points</i></li> <li>▪ <i>Ill health attributed to air, noise or light pollution</i></li> <li>▪ <i>Proportion of the population affected by high levels of noise during construction and post construction including a breakdown by equality group</i></li> <li>▪ <i>Proportion of the population affected by light pollution from traffic or industry during construction and post construction including a breakdown by equality group</i></li> <li>▪ <i>Proportion of population living within areas with regular exceedances in NOx and particulates</i></li> </ul>	<p>SEA: Population, Human Health, Air, Material Assets</p> <p>HIA</p> <p>EqIA</p>

<sup>8</sup> <http://uk-air.defra.gov.uk/aqma/maps>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	(health)		
12	<p><b>To conserve and where appropriate enhance cultural heritage the historic environment, heritage assets and their settings</b></p> <ul style="list-style-type: none"> <li>▪ Promote the historical interpretation of heritage assets, including the canal, through the use of multifunctional green infrastructure</li> <li>▪ Minimise heritage assets lost to new development</li> <li>▪ Avoid adverse impacts on the setting of heritage assets, <b>including those outside the OPDC area</b></li> <li>▪ Maximise the reuse and adaptation of heritage assets for place-making <b>and minimising the embedded carbon in new development</b></li> <li>▪ Enhance local views and landscapes</li> <li>▪ Reduce the number of Heritage Assets at Risk in and around the area</li> <li>▪ Reduce impacts on heritage assets and their settings in areas adjacent to the plan area</li> <li>▪ Enhance areas of greenspace in connection with areas of importance for heritage protection</li> </ul> <p>Link to objectives 1 (place-making), 3 (reuse of existing buildings), <b>6 (energy efficiency), 7 (energy generation and sustainable design), 8 (use of recycled materials) and 18 (encourage inward</b></p>	<ul style="list-style-type: none"> <li>▪ <u>Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens (<a href="http://www.magic.gov.uk">www.magic.gov.uk</a>)</u></li> <li>▪ <i>Decrease in the number of Heritage Assets at Risk in and around the area</i></li> <li>▪ <i>Increase in the number of heritage assets identified and protected <b>through the development of Local List</b></i></li> <li>▪ <i>Increase in the number of heritage assets highlighted and enhanced or utilised for place-making and interpretation</i></li> <li>▪ <i>Development of a local views strategy and proportion of new developments adhering to its principles</i></li> <li>▪ <b><i>Increase in the number of heritage assets re-used for development</i></b></li> </ul>	<p>SEA: Cultural Heritage, Material Assets, Biodiversity, Climatic Factors, Landscape</p> <p>HIA</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	investment).		
13	<p><b>Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare</b></p> <ul style="list-style-type: none"> <li>▪ Improve the quality of the public realm and increase the provision, accessibility and quality of public open spaces including play spaces</li> <li>▪ To increase connectivity and avoid physical barriers and severance across the area <b>through measures including green infrastructure</b>, creating physical and social linkages with the surrounding communities</li> <li>▪ Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, <b>specifically in relation to social infrastructure and housing provision</b></li> </ul> <p>Link to objectives 1 (place-making); 4 (accessibility); 5 (housing); 14 (crime and fear of crime); 15 (health)</p>	<ul style="list-style-type: none"> <li>▪ <i>Number of offices converted to residential under permitted development rights</i></li> <li>▪ <i>Schemes to reduce the impact of construction on the local community</i></li> <li>▪ <b><i>Connectivity of pedestrian linkages across the area</i></b></li> </ul>	<p>SEA: Population, Human Health, Climatic Factors, Landscape, Material Assets</p> <p>HIA</p> <p>EqIA</p>
14	<p><b>Improve safety and reduce crime and the fear of crime</b></p> <ul style="list-style-type: none"> <li>▪ Increase natural surveillance and other measures to design out crime</li> <li>▪ Encourage increased safety through the use of traffic management and calming methods</li> </ul> <p>Link to objectives 1 (place-making); 4 (sustainable transport); 5 (housing); 13 (community cohesion); 15 (health)</p>	<ul style="list-style-type: none"> <li>▪ <u>Crime rates (Indices of Deprivation)</u></li> <li>▪ <i>Road traffic accidents and diversity profiling (source: Equal Life Chances for All 2009)</i></li> <li>▪ <i>Percentage of people who feel that there is less discrimination in their neighbourhood than 3 years ago (source: Equal Life Chances for All 2009)</i></li> <li>▪ <i>Percentage of the local population who feel</i></li> </ul>	<p>SEA: Population, Human Health, Material Assets</p> <p>HIA</p> <p>EqIA</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
		<p><i>personal safety on buses, tubes and trains (source: Equal Life Chances for All 2009)</i></p> <ul style="list-style-type: none"> <li>▪ <i>Percentage of women who feel safe using local bus, tube, trains, black cabs, and mini cabs at night, alone (source: Equal Life Chances for All 2009)</i></li> <li>▪ <i>Proportion of developments incorporating Secured by Design principles</i></li> </ul>	
15	<p><b>Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</b></p> <ul style="list-style-type: none"> <li>▪ Increase accessibility to social infrastructure including health care facilities, schools, social care and community facilities</li> <li>▪ Increase the capacity of local social infrastructure</li> <li>▪ Encouragement of opportunities for buildings with a shared community use and the co-location of services</li> <li>▪ Facilitate the supply of local food through the provision of space for uses such as allotments or farmers markets</li> <li>▪ Reduce the potential for an over-concentration of hot food takeaways in the local area</li> <li>▪ Minimise construction phase impacts <b>on communities, in relation to</b> both physical and psychological health</li> </ul> <p>Link to objectives 1 (place-making); 4 (accessibility); 5 (housing); 13</p>	<ul style="list-style-type: none"> <li>▪ <u>Health Deprivation and Disability (Indices of Deprivation for England 2010)</u></li> <li>▪ <i>Proportion of the population living within walking distance of health care facilities</i></li> <li>▪ <i>Proportion of the population living within walking distance of education facilities</i></li> <li>▪ <i>Proportion of the population living within walking distance of social care facilities</i></li> <li>▪ <i>Proportion of the population living within walking distance of community facilities</i></li> <li>▪ <i>Proportion of the population with access to space for the growing of food locally</i></li> <li>▪ <i>Increase in the capacity of local social infrastructure</i></li> <li>▪ <i>Childhood obesity rates</i></li> </ul>	<p>SEA: Population, Human Health, Material Assets, Soil, Air, Water, Landscape</p> <p>HIA</p> <p>EqIA</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	(social and economic wellbeing)	<ul style="list-style-type: none"> <li>▪ <i>Life expectancy</i></li> </ul>	
16	<p><b>To improve the education and skills levels of all members of the population, particularly vulnerable groups</b></p> <ul style="list-style-type: none"> <li>▪ Increase in the availability of formal education across all age groups, including adults from all equality groups</li> <li>▪ Increase in the availability of informal education and training for all</li> </ul> <p>Link to objectives 4 (accessibility); 13 (community cohesion); 15 (health and wellbeing); 117 (social and economic wellbeing); 18 (sustainable economic growth)</p>	<ul style="list-style-type: none"> <li>▪ <u>Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles).</u></li> <li>▪ <u>Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles).</u></li> <li>▪ <u>Education, Skills and Training Deprivation (Indices of Deprivation for England 2010).</u></li> <li>▪ <i>Proportion of the population with access to appropriate education facilities by sustainable transport modes</i></li> <li>▪ <i>Decrease in educational underachievement gap between disadvantaged groups and the wider community (source: Equal Life Chances for All 2009)</i></li> </ul>	<p>SEA: Population, Human Health, Material Assets</p> <p>HIA</p> <p>EqIA</p>
17	<p><b>Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training</b></p> <ul style="list-style-type: none"> <li>▪ Provision of access to a range of high quality local employment opportunities, <b>a proportion of which will be directed towards</b> local people, both during construction and permanent jobs, including those from disadvantaged groups</li> <li>▪ Encourage workforces to reflect local <b>and regional</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ <u>Number of wards with LSOAs in the bottom 20% most deprived (Indices of Deprivation for England 2010)</u></li> <li>▪ <i>Proportion of new employment and training opportunities being awarded to local people via local procurement arrangements</i></li> <li>▪ <i>Proportion of new employment and training opportunities being awarded to local women via local procurement arrangements</i></li> </ul>	<p>SEA: Population, Human Health, Material Assets</p> <p>HIA</p> <p>EqIA</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<p>diversity in all occupations and at all levels</p> <ul style="list-style-type: none"> <li>▪ Provision of access to a range of work-based and other training opportunities, <b>a proportion of which will be directed towards</b> local people, including those from disadvantaged groups</li> <li>▪ Provision of a range of <b>accessible</b> retail stores, including food stores and smaller affordable shops for social enterprises</li> <li>▪ Increase in the provision of facilities for childcare</li> <li>▪ Encouragement of employer's to adopt the London Living Wage</li> </ul> <p>Link to objectives 15 (health and wellbeing); 116 (education and training) and 18 (sustainable economic growth)</p>	<ul style="list-style-type: none"> <li>▪ <i>Employment rate by excluded group compared to employment rate of all Londoners (source: Equal Life Chances for All 2009)</i></li> <li>▪ <i>Workforce profile at all levels (source: Equal Life Chances for All 2009)</i></li> <li>▪ <b><i>Proportion of the community living within walking distance of a local shop (see Table 6-2)</i></b></li> <li>▪ <i>Levels of Child Poverty (source: Equal Life Chances for All 2009)</i></li> <li>▪ <i>Number of childcare places (source: Equal Life Chances for All 2009)</i></li> <li>▪ <i>Take-up of subsidised childcare places (including those for disabled children) benchmarked against the LDA Childcare Affordability Programme (source: Equal Life Chances for All 2009)</i></li> </ul>	
18	<p><b>To encourage inward investment alongside investment within existing communities, to create sustainable economic growth</b></p> <ul style="list-style-type: none"> <li>▪ Increase in the net number of businesses registered in the area</li> <li>▪ Increase infrastructure and utilities capacity, including broadband connections</li> <li>▪ Ensure workspace meets the needs of new and</li> </ul>	<ul style="list-style-type: none"> <li>▪ <u>Economy Local Profiles (ONS)</u></li> <li>▪ <u>Employment by industry (ONS- NOMIS)</u></li> <li>▪ <i>Proportionate coverage of broadband across the area</i></li> <li>▪ <i>Proportion of new employment development that includes an element of affordable workspace</i></li> <li>▪ <i>New businesses categorised as 'health-led'</i></li> </ul>	<p>SEA: Population, Human Health, Material Assets</p> <p>HIA</p> <p>EqIA</p>



	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<p>emerging businesses, including affordable, flexible and micro/SME workspace</p> <ul style="list-style-type: none"> <li>▪ Deliver retail that does not negatively impact on neighbouring town centres</li> <li>▪ Encourage the development of employment growth sectors including clean, green and healthy businesses</li> <li>▪ Support the relocation of business from Old Oak to Park Royal.</li> <li>▪ Intensify the use of workspaces within Park Royal</li> </ul> <p>Link to objectives 16 (education and training) and 17 (social and economic wellbeing).</p>	<ul style="list-style-type: none"> <li>▪ <b><i>New businesses that contribute to the growth of the low carbon goods and services sector</i></b></li> <li>▪ <i>Amount of new employment floorspace in Old Oak</i></li> <li>▪ <i>Amount of new industrial floorspace in Park Royal</i></li> </ul>	

**APPENDIX F**

**Strategic Options Assessment**

**Table F-1 – Affordable Housing Approaches**

Draft IIA Objective (see Table 6-1 of IIA Scoping Report )	Approach 1 – (Single) Fixed contribution across OPDC area		Approach 2 – Product dependent range		Approach 3 – Viability based percentage		Approach 4 – Negotiate a target on site specific basis	
	Impact	Commentary	Impact	Commentary	Impact	Commentary	Impact	Commentary
<b>1. To enhance the built environment and encourage 'place-making'</b>	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
<b>2. To optimise the efficient use of land through increased development densities and building heights, where appropriate</b>	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
<b>3. Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land</b>	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
<b>4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods</b>	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
<b>5. Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs</b>	+/-	The approach could help to create a 'level playing field' across the area, which could enable the delivery of affordable housing. This could help to ensure that all areas are 'equal' in terms of provision, which could help distribute affordable housing more evenly across the plan area. This could help to ensure that mixed communities and a sense of place is achieved.  However, should this mean that fewer sites are developed, negative effects	-	The product dependent range could lead to inequalities across the plan area, as some housing 'types', and therefore types of communities, may be seen as more 'suitable' for higher affordable housing provision than others. This could lead to negative effects against this objective.	+/-	A viability based percentage could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need. This approach, however, would include an initial target percentage, which could help negotiations, although it is unclear whether this target percentage would be an all-area percentage or based on different products or areas.	-	A site specific approach could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need. Without an initial target, negotiated levels of provision could be low.  A site specific approach could, alternatively, lead to the provision of an increase in market housing overall, which

Draft IIA Objective (see Table 6-1 of IIA Scoping Report )	Approach 1 – (Single) Fixed contribution across OPDC area		Approach 2 – Product dependent range		Approach 3 – Viability based percentage		Approach 4 – Negotiate a target on site specific basis	
	Impact	Commentary	Impact	Commentary	Impact	Commentary	Impact	Commentary
		may result.				A viability-based approach could, alternatively, help to deliver more affordable housing as, should a fixed percentage be required, developers may not develop certain sites due to viability issues. Therefore, a mix of both positive and negative effects is predicted.		could reduce the significance of negative effects against this objective.
<b>6. Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect</b>	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
<b>7. To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy</b>	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
<b>8. To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all</b>	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.

Draft IIA Objective (see Table 6-1 of IIA Scoping Report )	Approach 1 – (Single) Fixed contribution across OPDC area		Approach 2 – Product dependent range		Approach 3 – Viability based percentage		Approach 4 – Negotiate a target on site specific basis	
	Impact	Commentary	Impact	Commentary	Impact	Commentary	Impact	Commentary
green waste								
9. Improve the quality of the water environment	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
10. Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
11. To minimise air, noise and light pollution, particularly for vulnerable groups	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
12. To conserve and, where appropriate, enhance, cultural heritage	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
13. Increase community cohesion and reduce social exclusion	+/-	The approach could help to create a 'level playing field' across the area, which could enable the delivery of affordable housing. This could help to ensure that all areas are 'equal' in terms of provision, which could help distribute affordable housing more evenly across the plan area. This could help to reduce social exclusion.  However, should this mean that fewer sites are developed, negative effects may result.	-	The product dependent range could lead to inequalities across the plan area, as some housing 'types', and therefore some communities, may be seen as more 'suitable' for higher affordable housing provision than others. This could lead to negative effects against this objective as it may create inequalities and increase social exclusion across the area.	+/-	A viability based percentage could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need, increasing social exclusion. This approach, however, would include an initial target percentage, which could help negotiations, although it is unclear whether this target percentage would be an all-area percentage or based on different products or areas.  A viability-based approach could, alternatively, help to deliver more affordable housing as, should a fixed percentage be required, developers may not develop certain sites due to viability issues. Therefore, a mix of both positive	--	A site specific approach could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need. Without an initial target, negotiated levels of provision could be low. This could increase levels of social exclusion in relation to access to affordable housing.

Draft IIA Objective (see Table 6-1 of IIA Scoping Report )	Approach 1 – (Single) Fixed contribution across OPDC area		Approach 2 – Product dependent range		Approach 3 – Viability based percentage		Approach 4 – Negotiate a target on site specific basis	
	Impact	Commentary	Impact	Commentary	Impact	Commentary	Impact	Commentary
						and negative effects is predicted.		
<b>14. Improve safety and reduce crime and the fear of crime</b>	+/-	<p>The approach could help to create a 'level playing field' across the area, which could enable the delivery of affordable housing. This could help to ensure that all areas are 'equal' in terms of provision, which could help distribute affordable housing more evenly across the plan area. This could help to reduce social exclusion and subsequently reduce levels of crime and anti-social behaviour.</p> <p>However, should this mean that fewer sites are developed, negative effects may result.</p>	-	<p>The product dependent range could lead to inequalities across the plan area, as some housing 'types', and therefore types of communities, may be seen as more 'suitable' for higher affordable housing provision than others. This could lead to negative effects against this objective as it may create inequalities and increase social exclusion across the area and subsequently reduce levels of crime and anti-social behaviour.</p>	+/-	<p>A viability based percentage could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need, increasing social exclusion. This approach, however, would include an initial target percentage, which could help negotiations, although it is unclear whether this target percentage would be an all-area percentage or based on different products or areas.</p> <p>A viability-based approach could, alternatively, help to deliver more affordable housing as, should a fixed percentage be required, developers may not develop certain sites due to viability issues. Therefore, a mix of both positive and negative effects is predicted.</p>	--	<p>A site specific approach could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need, which could have knock on effects for anti-social behaviour. Without an initial target, negotiated levels of provision could be low. This could increase levels of social exclusion and subsequent levels of crime/fear of crime.</p>
<b>15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</b>	+/-	<p>The approach could help to create a 'level playing field' across the area, which could enable the delivery of affordable housing. This could help to ensure that all areas are 'equal' in terms of provision, which could help distribute affordable housing more evenly across the plan area. This could help to reduce social exclusion and subsequently improve human health.</p> <p>However, should this mean that fewer sites are developed, this could lead to negative effects.</p>	-	<p>The product dependent range could lead to inequalities across the plan area, as some housing 'types', and therefore types of communities, may be seen as more 'suitable' for higher affordable housing provision than others. This could lead to negative effects against this objective as it may create inequalities and increase social exclusion across the area. This could have negative effects for health in certain areas.</p>	+/-	<p>A viability based percentage could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need, increasing social exclusion. This approach, however, would include an initial target percentage, which could help negotiations, although it is unclear whether this target percentage would be an all-area percentage or based on different products or areas.</p> <p>A viability-based approach could, alternatively, help to deliver more affordable housing as, should a fixed percentage be required, developers may not develop certain sites due to viability issues. Therefore, a mix of both positive and negative effects is predicted.</p>	--	<p>A site specific approach could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need, which could have knock on effects for health. Without an initial target, negotiated levels of provision could be low. This could increase levels of social exclusion and subsequent knock-on effects for health.</p>

Draft IIA Objective (see Table 6-1 of IIA Scoping Report )	Approach 1 – (Single) Fixed contribution across OPDC area		Approach 2 – Product dependent range		Approach 3 – Viability based percentage		Approach 4 – Negotiate a target on site specific basis	
	Impact	Commentary	Impact	Commentary	Impact	Commentary	Impact	Commentary
<b>16. To improve the education and skills levels of all members of the population, particularly vulnerable groups</b>	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
<b>17. Maximise the social and economic wellbeing of the population and improve access to employment and training</b>	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
<b>18. To encourage inward investment alongside investment within existing communities, to create sustainable economic growth</b>	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.

## **APPENDIX G**

### **Assessment of Policy Options, Preferred Policy Options and Alternative Options**



The tables below provide an explanation of the notation used in the assessment matrices.

**Performance of Policy**

Major Positive Impact (significant)	The option strongly supports the achievement of the IIA Objectives	++
Positive Impact	This option contributions partially to the achievement of the IIA Objective	+
Neutral/No Impact	There is no clear relationship between the option and/or the achievement of the IIA Objective	0
Positive and negative outcomes	The option has a combination of both positive and negative contributions to the achievement of the IIA Objective.	+/-
Uncertain outcome	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal or the impact may depend heavily upon implementation at the local level. More information is required to assess the impacts.	?
Negative Impact	The policy partially detracts from the achievement of the SA Objective.	-
Major Negative Impact (significant)	The policy strongly detracts from the achievement of the SA Objective.	--

**Temporal Scale**

<b>L-T</b>	Effects likely to arise in 10-25 years of Local Plan implementation
<b>M-T</b>	Effects likely to arise in 5-10 years of Local Plan implementation
<b>S-T</b>	Effects likely to arise in 0-5 years of Local Plan implementation
<b>D</b>	Direct effects.

<b>I</b>	Indirect effects.
<b>R</b>	Effects are reversible
<b>IR</b>	Effects are irreversible
<b>H/M/L</b>	High, medium or low certainty of prediction

**Table G-1 Chapter 3: The Overarching Spatial Policies**

- OSP 1: Optimising growth
- OSP 2: Land use
- OSP 3: Connections and open spaces
- OSP 4: Densities and building heights
- OSP 5: Places

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	OSP1	+	L-T, I, R, L	London-wide	The policy is likely to contribute to the enhancement of the built environment through optimising the use of brownfield land and supporting the regeneration of the area as well as the wider area.
		OSP2	++	L-T, D, R, M	OPDC area and surrounding boroughs.	The policy includes the support of proposals that will deliver a thriving new centre, to accommodate a significant number of new homes and jobs, as well as protecting the Park Royal industrial estate. This could contribute to the achievement of enhancements to the built environment locally as well as encourage 'place-making' – the policy also requires the delivery of a 'full mix' of town centre uses and associated infrastructure within a new town centre hierarchy. Supporting text indicates the types of uses encouraged, which would include new shops, culture, sports and leisure infrastructure such as new schools, health centres and community space. This could lead to benefits against this objective in the long term.
		OSP3	++	L-T, D, R, M	OPDC area and surrounding boroughs.	The policy should help to deliver improvements to the existing built environment, which could lead to significant positive benefits. The creation of a well-connected and legible network of high quality and varied public, communal and private amenity spaces based on the celebration of existing features, should help to create a sense of place and local distinctiveness.
		OSP4	+	L-T, I, R, M	Town centres within OPDC area and surrounding boroughs.	Focusing the highest densities of development in the centre of the area could also help to develop a sense of place locally in the long term and ensure that the areas around the stations and town centres are well connected. However, the key issues as stated in the Local Plan text highlight that <i>'Well-designed high density and tall building development can play a positive role in creating vibrancy and a sense of place. To be successful, such buildings should be exemplar and ensure the creation of a liveable place and avoid poor quality environments.'</i> Paragraph 3.22 states that <i>"Tall buildings must achieve the highest standards of design, be mindful of their surrounding context and accord with the requirements set out in national guidance, the London Plan and the draft preferred policy options of this Local Plan"</i> The supporting text to the policy states that 'sensitive locations' are considered to be

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						areas adjacent to designated heritage assets, existing public amenity spaces and existing residential communities. Lower densities in these areas could help the design of development to integrate into the local area and create a sense of place. See <i>recommendation under objective 12</i> .
		OSP5	++	L-T, D, R, M	OPDC area and surrounding boroughs.	The policy states that OPDC will support proposals that 'create a series of attractive and locally distinctive places and lifetime neighbourhoods'. Proposals should also 'clearly demonstrate early engagement with existing residents and business to inform place-making'. Small and large-scale catalyst uses will also be supported to drive regeneration and help to generate a sense of place. These requirements should lead to significant benefits against this objective.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	OSP1	++	M, L-T, D, R, M	OPDC area	The policy seeks to deliver a significant quantum of new homes, jobs and supporting services on brownfield land, which could have direct significant benefits against this objective.
		OSP2	+	M, L-T, I, R, L	OPDC area	The policy seeks to deliver a significant amount of development on brownfield land, which could lead to benefits against this objective.
		OSP3	0			The policy is not related to the density of development specifically.
		OSP4	+	M, L-T, D, IR, M	OPDC area	The policy specifically refers to the need for high density development in appropriate locations across the plan area. This could lead to benefits against this objective.
		OSP5	0			The policy is not related to the density of development specifically.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	OSP1	++	S, M, L-T, D, R, M	OPDC area	The policy seeks to optimise the development of brownfield land, which could have direct significant benefits against this objective. <i>It is recommended that the policy specifically refers to the use and remediation of contaminated land as that which should be optimised, should there be an option within the site [NB this is now covered in Policy EU12].</i>
		OSP2	++	M, L-T, I, R, L	OPDC area	The policy seeks to deliver a significant quantum of development on brownfield land, which could lead to benefits against this objective.
		OSP3	+			The policy promotes development on brownfield land and could lead to benefits against this objective.
		OSP4	++	M, L-T, D, IR, M	OPDC area	The policy specifically refers to the need for high density development in appropriate locations across the plan area. This could lead to benefits against this objective.
		OSP5	+			The policy promotes development on brownfield land and could lead to benefits against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	OSP1	++	L-T, I, R, M	London-wide and national	As explained in the policy supporting text, optimising development in this strategic location could have London-wide benefits for accessibility by sustainable modes of transport, with the potential for benefits to reach more widely.
		OSP2	++	L-T, I, R, L	OPDC area	The policy seeks to deliver a range of land uses within the area, including homes, jobs and associated town centre infrastructure. This could help to reduce the need to travel for both existing and incoming communities, which could have long term benefits against this objective.
		OSP3	++	L-T, D, R, M	OPDC area	The development of an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that is well-connected and legible, is likely to encourage walking and cycling as modes of transport, which could have benefits against this objective. <i>The policy could specify that improvements will seek to prioritise non-motorised uses within the street-scene, and encourage lower vehicle speeds through design [NB this is now covered in Policy T1].</i>
		OSP4	++	L-T, I, R, M	London-wide and national	As set out in the supporting text, part of the rationale behind encouraging high density development in this location is to optimise the area's excellent public transport accessibility. This is reflected in the policy wording, which seeks that the highest density development is focussed around Old Oak Common Station, with high density development also focussed around other stations, with a mix of densities at key destinations. These policy requirements could help to improve accessibility and encourage a modal shift to more sustainable transport use in this area as well as more widely.
		OSP5	+			The policy promotes the potential for large-scale catalyst uses to be located in the OPDC area. These uses are likely to generate significant trip numbers and it is appropriate that these sorts of uses are located in areas of high public transport access such as the OPDC area.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a	OSP1	+	M, L-T, I, R, M	West London and London wide	As explained in the policy supporting text, optimising development in this location could contribute to meeting London's identified need for homes, thereby contributing to the achievement of benefits against this objective. However, the types of homes are not specified within this policy.
		OSP2	++	M, L-T, D, R, M	West London and London wide	The policy specifies that the delivery of 24,000 homes will be supported in the Old Oak area, with 1,500 new homes to be delivered in Park Royal. However, the types of homes are not specified within this policy. Local Plan policies H4-H10 provide more detail in relation to housing types and tenures.
		OSP3	0			The policy will not directly contribute to benefits against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	range of types and tenures, to meet identified local needs	OSP4	+	M, L-T, D, R, M	West London and London wide	The policy seeks to deliver housing in appropriate locations, which could lead to benefits against this objective. However, the types of homes are not specified within this policy. Local Plan policies H4-H10 provide more detail in relation to housing types and tenures.
		OSP5	+			The policy references the importance of delivering lifetime neighbourhoods, which extols the importance of providing a range of housing types and tenures.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	OSP1	+	M, L-T, D, IR, L	OPDC area and surrounding boroughs	Optimising development in this brownfield location, which is largely at low risk of flooding, could indirectly help to reduce the pressure for development in areas, including greenbelt, which may be more susceptible to flood risk. However, some areas within the OPDC area are at risk of flooding. If these areas are developed, this could lead to negative effects, if not adequately mitigated. In addition, new large scale development could increase areas of hardstanding and built development, which could have negative effects in terms of surface water and sewer flooding, as well as contributing to increased microclimatic temperatures, if not adequately mitigated. However, this impact should be mitigated through the other policies of the Local Plan such as Policy EU3.
		OSP2	+/-	M, L-T, D, IR, L	OPDC area and surrounding boroughs	A significant increase in development could lead to an increase in hardstanding and built development, which could have negative effects in relation to surface water and sewer flooding. <i>This should be mitigated through the other policies of the Local Plan.</i>
		OSP3	+	M, L-T, D, R, M		<i>It is unclear what is meant by 'b) the highest standards of design for the public realm that can positively accommodate change over time' – should this mean adapting to climate change through the use of SuDS, this could be specified. The policy does refer to the need to respond to environmental change, however.</i>
		OOSP 4	+/-	M, L-T, D, IR, L	OPDC area and surrounding boroughs	A significant increase in the density of development could lead to an increase in hardstanding and built development, which could have negative effects in relation to surface water and sewer flooding. <i>This should be mitigated through the other policies of the Local Plan.</i>
		OSP5	?			The policy will not directly contribute to benefits against this objective.
7	To minimise contributions to climate change through	OSP1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	Optimising development in this location could help to create efficiencies in the potential for improving energy efficiency through shared generation facilities, as well as improving the viability of sustainable transport infrastructure. However, the increase in the demand for energy may outweigh these potential benefits. <i>Reducing the need for energy should be encouraged through site layouts and sustainable design. This could be referenced in the design policies of the Local Plan.</i>

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	OSP2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	A significant increase in development in this location could increase pressure on the need for resources, which could lead to negative effects against this objective. However, the mix of uses may lead to potential efficiencies through reducing the need to travel as well as the potential for shared energy generation and waste management facilities.	
	OSP3	++	L-T, D, R, M	OPDC area	The development of an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that is well-connected and legible, is likely to encourage walking and cycling as modes of transport, which could have benefits against this objective. <i>The policy could specify that improvements will seek to prioritise non-motorised uses within the street-scene, and encourage lower vehicle speeds through design – cross-reference could be made to Policy T1.</i>	
	OSP4	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	Optimising development in this location could help to create efficiencies in the potential for improving energy efficiency through shared generation facilities, as well as improving the viability of sustainable transport infrastructure. However, the increase in the demand for energy may outweigh these potential benefits. <i>Reducing the need for energy should be encouraged through site layouts and sustainable design. This could be referenced in the design policies of the Local Plan.</i>	
	OSP5	?			The policy will not directly contribute to benefits against this objective.	
8 To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well	OSP1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	Optimising development in this location could help to create efficiencies in the potential for improving waste management through shared facilities and the creation of a circular economy. However, the increase in the generation of waste through the extensive construction period of the development and the potential displacement of waste to neighbouring boroughs may outweigh these potential benefits. <i>Sustainable design and increasing the use of recycled materials during construction should be encouraged. This could be cross-referenced to Policy Eu5.</i>	
	OSP2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	A significant increase in development in this location could increase pressure on the need for resources, which could lead to negative effects against this objective. However, the mix of uses may lead to potential efficiencies through the potential for shared waste management facilities and the creation of a circular economy. <i>This could be specified in the supporting text and cross-reference to Policy EU5.</i>	
	OSP3	0			The policy will not directly contribute to benefits against this objective.	
	OSP4	+/-	S, M, L-T, D, IR, L	OPDC area and	A significant increase in development in this location could increase pressure on the need for resources, which could lead to negative effects against this objective.	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	as composting of all green waste		0		surrounding boroughs	However, the mix of uses may lead to potential efficiencies through the potential for shared waste management facilities and the creation of a circular economy. <i>This could be specified in the supporting text and cross-referenced to Eu5.</i>
		OSP5	0			The policy will not directly contribute to benefits against this objective.
9	Improve the quality of the water environment	OSP1	+/-	S, M, L-T, D, R, L	OPDC area and surrounding boroughs	The water quality in local area is currently low. Optimising development in this location could have benefits for water quality in the long term, in that development could lead to the remediation of contaminated land as well as replacing potentially contaminating land uses with housing development and 'cleaner' employment uses. This could reduce the runoff of contaminated water entering the water environment. However, this will be dependent on the efficiency of remediation and clean-up operations as well as the infrastructure to be developed to support new development. Increased development densities could also have negative effects on the water environment through increased demand for resources.
		OSP2	+/-	S, M, L-T, D, R, L	OPDC area and surrounding boroughs	The water quality in local area is currently low. Regeneration in this location could have benefits for water quality in the long term, in that development could lead to the remediation of contaminated land as well as replacing potentially contaminating land uses with housing development and 'cleaner' employment uses. This could reduce the runoff of contaminated water entering the water environment. Increased development densities could also have negative effects on the water environment through increased demand for resources.
		OSP3	?			It is assumed that sustainability covers the water environment to a degree. <i>However. It is unclear what is meant by 'b) the highest standards of design for the public realm that can positively accommodate change over time' – should this mean adapting to climate change through the use of SuDS, this could be specified.</i>
		OSP4	+/-	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	Increased development densities could have negative effects on the water environment through increased demand for resources, if not adequately mitigated. <i>It is recommended that water efficiency measures are designed into developments from the outset. This is addressed in Policy EU3 of the Local Plan.</i>
		OSP5	?			The policy will not directly contribute to benefits against this objective. See <i>recommendation under Objective 7.</i>
10	Create and enhance biodiversity and the	OSP1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The area includes a Local Nature Reserve (Wormwood Scrubs) and a nature conservation area of Metropolitan Importance adjacent to the Grand Union Canal. Anecdotal evidence as part of the scoping workshop has suggested that some of the brownfield areas within the site may have importance for biodiversity through the presence of colonising species. Optimising development in this location could have



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
diversity of habitats across the area and its surroundings						benefits for biodiversity in the long term, in that development could lead to the remediation of contaminated land as well as replacing potentially contaminating land uses which could improve soil quality. However, the density of development proposed could reduce the potential for biodiversity through a decrease in the potential land available for enhancement measures as well as increasing the local population, which could increase disturbance. Certainty in the prediction of effects is considered to be low. The construction period in the short and medium terms could have particularly negative consequences, as existing biodiversity resources on brownfield sites could be lost. This should be protected through Policy EU8.
	OSP2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The development proposed could reduce the potential for biodiversity through a decrease in the potential land available for enhancement measures as well as increasing the local population, which could increase disturbance. However, the replacement of industrial land overall with green infrastructure would provide opportunities. The construction period in the short and medium terms could have particularly negative consequences, as existing biodiversity resources on brownfield sites could be lost. This should be protected through Policy EU8. <i>It is recommended that a management plan or similar be developed, in order to guide development proposals. This could link to a wider green infrastructure strategy (See policy EU8), to ensure a holistic approach across the plan area. A Green Infrastructure strategy would be beneficial.</i>	
	OSP3	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy seeks to 'celebrate' existing amenity spaces including the canalside nature reserve, Wormwood Scrubs and the Grand Union Canal. This could lead to benefits against this objective, should the 'celebration' lead to enhancement and management of the biodiversity of these assets.  <i>Although hinted towards in the supporting text (including a reference to Policy EU8), It is recommended that this policy set out, as part of the strategic connections, that multi-functional green infrastructure will form a key part of the overall strategic plan and linkages. This could provide benefits for flood and surface water management, biodiversity, micro-climate, alongside the existing requirements for human connectivity.</i>	
	OSP4	-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The area includes a Local Nature Reserve (Wormwood Scrubs) and a nature conservation area of Metropolitan Importance adjacent to the Grand Union Canal. Anecdotal evidence as part of the scoping workshop has suggested that some of the brownfield areas within the site may have importance for biodiversity through the presence of colonising species. Increased development densities could have negative	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						effects on the biodiversity through increased demand for land resources and disturbance. Certainty in the prediction of effects is considered to be low although note that EU8 requires no net loss of biodiversity. <i>Recommendation: Need for biodiversity policy to identify that there is also biodiversity in areas not identified as SINC's and that this biodiversity should also be safeguarded or replaced to equal biodiversity value. Also recommend a GI strategy.</i>
		OSP5	+	S, M, L-T, I, R, L	OPDC area	The policy seeks to 'celebrate' existing features of the Grand Union Canal, Wormwood Scrubs which would benefit this SA Objective
11	To minimise air, noise and light pollution, particularly for vulnerable groups	OSP1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	Optimising development in this location could have benefits for air, noise and light pollution in the long term, in that development could lead to the replacement of potentially polluting industrial land uses in some areas. Further, the improvements in transport infrastructure could reduce levels of pollution from this source. However, the density of development proposed could reduce the potential for pollution through an increase in the local population, which could increase traffic levels as well as built development and its associated light and noise pollution in particular. The construction period in the short and medium terms could have particularly negative consequences through the generation of dust, night working and pollution related to traffic. This should be minimised through the environment policies contained within the Local Plan.
		OSP2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	Development in this location could have benefits for air, noise and light pollution in the long term, in that development could lead to the replacement of potentially polluting industrial land uses in some areas. However, the density of development proposed could reduce the potential for pollution through an increase in the local population, which could increase traffic levels as well as built development and its associated light and noise pollution in particular. The construction period in the short and medium terms could have particularly negative consequences through the generation of dust, night working and pollution related to traffic. This should be minimised through the environment policies contained within the Local Plan.
		OSP3	+	L-T, D, R, M	OPDC area	Insofar as the development could lead to an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that is well-connected and legible, this is likely to encourage walking and cycling as modes of transport, which could have benefits against this objective. <i>The policy could specify that the network will be <u>accessible</u> as well as legible, to accommodate vulnerable groups.</i>
		OSP4	+/-	L-T, D, R, M	OPDC area	Insofar as the development could lead to an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						is well-connected and legible, this is likely to encourage walking and cycling as modes of transport, which could have benefits against this objective. However, the density of development proposed could reduce the potential for pollution through an increase in the local population, which could increase traffic levels as well as built development and its associated light and noise pollution in particular.
		OSP5	0			The policy will not directly contribute to benefits against this objective.
12	To conserve and enhance the historic environment, heritage assets and their settings	OSP1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There are a number of undeclared heritage assets in the area. Therefore, optimising development in this location could lead to negative effects should these assets not be recognised as part of the regeneration of the area. However, the regeneration of the area could also lead to benefits in the medium and long-term, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. However, this is not specified in the policy. See Policy D6,
		OSP2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There are a number of undeclared heritage assets in the area. Therefore, development in this location could lead to negative effects should these assets not be recognised as part of the regeneration of the area. However, the regeneration of the area could also lead to benefits in the medium and long-term, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. However, this is not specified in the policy. However, this is not specified in the policy. See Policy D6,
		OSP3	++	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy specifically seeks to 'celebrate' existing amenity spaces including the heritage asset St Mary's Cemetery. This could lead to benefits against this objective, should the 'celebration' lead to enhancement and management of this asset.  <i>It is recommended that the policy could include reference to the celebrating the wider historic environment across the area, including improving legibility and the setting of other designated and undesignated heritage assets and conservation areas. This would be complementary to improving the design of the public realm alongside the development of a green infrastructure network.</i>

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		OOSP 4	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There are a number of undeclared heritage assets in the area. Therefore, development in this location could lead to negative effects should these assets not be recognised as part of the regeneration of the area. However, the regeneration of the area could also lead to benefits in the medium and long-term, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. However, this is not specified in the policy. See Policy D6. The supporting text to the policy states that 'sensitive locations' are considered to be areas adjacent to designated heritage assets, existing public amenity spaces and existing residential communities. <i>It is recommended that point e) of the policy is reworded to 'sensitive locations' as opposed to 'sensitive edges' to be consistent with the definition in the supporting text and to improve implementation.</i>
		OSP5	++	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy should lead to the enhancement of the historic environment through a focus on creating a series of attractive and locally distinctive places. Heritage is specified in the supporting text as a contributor to the identification of local distinctiveness.  <i>It is recommended that background studies to inform the development of place-making also include the development of a local historic environment study, to identify any locally important heritage assets. These could form part of the identification of 'valued buildings' as set out in the supporting text to the policy.</i>
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	OSP1	+	M, L-T, I, R, L	West London and London wide	As explained in the policy supporting text, optimising development in this location could contribute to meeting London's identified need for homes, thereby contributing to the achievement of benefits against this objective. The delivery of an improvement in economic prosperity and the delivery of strategic infrastructure could have long term benefits for community cohesion. This could be delivered through policy S11.
		OSP2	+	M, L-T, I, R, L	West London and London wide	The development of a new part of London could lead to an increased sense of community cohesion over the existing situation, as they development would generate a significant number of housing and jobs over the long term. The delivery of a 'full mix' of town centre uses, including schools, health centres and community space, could ensure that a sense of community and welfare is created. <i>The policy should specify requirements in relation to the quantum of services and facilities to be provided in relation to the incoming population.</i> This should be delivered through the Social Infrastructure policies of the Local Plan and the infrastructure table in the delivery and implementation chapter.
		OSP3	++	L-T, D, R, M	OPDC area	The development of an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that is well-connected

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						and legible, is likely to encourage walking and cycling as modes of transport, which could lead to benefits against this objective as increased community interaction could lead to an increase in a sense of community.
		OSP4	+	M, L-T, D, ID, R, M	West London and London wide	The policy seeks to deliver high density development in areas close to public transport nodes as well as key service areas such as Old Oak High Street. The development supports the delivery of high quality housing, retail, employment space and social infrastructure, which could lead to benefits against this objective through an increase in facilities for direct benefits, and increased community interaction for indirect benefits.
		OSP5	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy clearly states that proposals should demonstrate early engagement with existing residents and businesses to inform place-making. This could lead to significant benefits against this objective, creating a sense of community cohesion and ownership locally.
14	Improve safety and reduce crime and the fear of crime	OSP1	+	M, L-T, I, R, L	West London and London wide	The optimisation of development in this area, including strategic infrastructure that could improve traffic management, could lead to benefits against this objective through improved safety. See Policy D2.
		OSP2	+	L-T, I, R, L	West London and London wide	The development of a mix of uses including housing, employment and community facilities could increase a sense of community cohesion that, in turn, could lead to long term benefits for crime and fear of crime.
		OSP3	+	L-T, D, R, M	OPDC area and surrounding boroughs	The development of an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that is well-connected and legible, is likely to encourage walking and cycling as modes of transport, which could lead to benefits against this objective as increased community interaction could lead to an increase in a sense of community and a reduction in the fear of crime. <i>The policy could include a requirement to improve natural surveillance through design measures such as active frontages and open design (including lighting), which could reduce the fear of crime within public spaces. See Policy D2.</i>
		OSP4	+	L-T, I, R, L	West London and London wide	The development of a mix of uses including housing, employment and community facilities could increase a sense of community cohesion that, in turn, could lead to long term benefits for crime and fear of crime.
		OSP5	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy clearly states that proposals should demonstrate early engagement with existing residents and businesses to inform place-making. This could lead to benefits against this objective, creating a sense of community cohesion and ownership locally. High quality design could also lead to benefits against this objective, depending on the nature of design principles employed. <i>Active frontages and the principles of Secured by Design should be required – cross-reference to Town Centres chapter.</i>

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	OSP1	+/-	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	As explained in the policy supporting text, optimising development in this location could contribute to meeting London's identified need for homes, thereby contributing to the achievement of benefits against this objective. The delivery of an improvement in economic prosperity and the delivery of strategic infrastructure could also have benefits for health. Strategic infrastructure may increase the use of sustainable transport in the long term, which could have benefits for mental health as a result of community interaction as well as physical benefits through physical activity, such as from walking or cycling. There is potential, however, for short/medium term negative effects to arise during the construction period, through effects such as stress as well as direct effects from pollution including noise, air and light.
		OSP2	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	Development in this location could contribute to meeting London's identified need for homes as well as the provision of health centres, new schools and community spaces, thereby contributing to the achievement of benefits against this objective. The delivery of an improvement in economic prosperity and the delivery of strategic infrastructure could also have benefits for health. There is potential, however, for short/medium term negative effects to arise during the construction period, through effects such as stress as well as direct effects from pollution including noise, air and light.
		OSP3	++	L-T, D, R, M	OPDC area	The development of an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that is well-connected and legible, is likely to encourage walking and cycling as modes of transport, which could lead to benefits against this objective as it could increase access to health care, as well as providing indirect health benefits from physical activity and community interaction. <i>See recommendations under objective 11.</i>
		OSP4	+/-	S, M, L-T, D, R, L	West London and London wide	Focusing development in accessible locations could have benefits for health in terms of access to facilities as well as community interaction through the increase in the use of public transport, which could have further benefits. <i>High density housing development in tall buildings, however, may lead to problems in accessibility for some members of the community. Meeting the needs of these members of the community should be considered.</i>
		OSP5	?			The policy will not directly contribute to benefits against this objective. <i>However, it is considered that a multi-functional green infrastructure network, which could provide benefits such as pollution sequestration and walking and cycling routes, could contribute to the creation of place and local distinctiveness. This could be added to the list in the supporting text.</i>

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	OSP1	+	M, L-T, I, R, L	West London and London wide	The optimisation of development in this area, including strategic infrastructure that could lead to benefits against this objective. The social infrastructure policies of the Local Plan should provide benefits against this objective.
		OSP2	++	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	Development in this location could contribute to meeting London's identified need for homes and jobs as well as the provision of new schools and community spaces, thereby contributing to the achievement of benefits against this objective. The policy promotes the provision of associated infrastructure to support the new development.
		OSP3	0			The policy will not directly contribute to benefits against this objective.
		OSP4	+	S, M, L-T, I, R, L	West London and London wide	The development of a mix of uses including housing, employment and social infrastructure could improve access to education facilities. Focusing development in accessible locations could have further benefits for accessibility to education and training opportunities in the surrounding areas and across London.
		OSP5	+			The policy identifies that catalyst uses could include educational institutions and this would provide local residents with local opportunities to access higher education.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	OSP1	+/-	S, M, L-T, I, R, L	OPDC area, West London, London wide	As explained in the policy supporting text, optimising development in this location could contribute to driving forward the economic prosperity of the local area as well as the surrounding boroughs. Short term benefits may arise from the generation of employment during the construction period, although negative effects may also arise through the loss of local employment lost through the regeneration activities.
		OSP2	+	S, M, L-T, I, R, L	OPDC area, West London, London wide	As explained in the policy supporting text, the scale of development in the OPDC area can have a profound impact on both the London and the UK economies, providing an additional 65,000 jobs. However, locally, negative effects may also arise through the loss of local industrial employment and businesses lost through the regeneration activities.
		OSP3	0			The policy will not directly contribute to benefits against this objective.
		OSP4	+	S, M, L-T, I, R, L	West London and London wide	The development of a mix of uses including housing, employment and social infrastructure could improve access to employment and training opportunities. Focusing development in accessible locations could have further benefits for accessibility to opportunities in the surrounding areas and across London.
		OSP5	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy clearly states that proposals should demonstrate early engagement with existing residents and businesses to inform place-making. This could lead to benefits against this objective. The policy identifies that catalyst uses could include educational institutions and this would provide local residents with local opportunities to access higher education, including training opportunities.
18	To encourage	OSP1	+	M, L-T, I, R,	OPDC area,	As explained in the policy supporting text, optimising development in this location could

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
inward investment alongside investment within existing communities, to create sustainable economic growth				L	West London, London wide	contribute to driving forward the economic prosperity of the local area as well as the surrounding boroughs.
	OSP2	+		S, M, L-T, I, R, L	OPDC area, West London, London wide	As explained in the policy supporting text, the scale of development in the OPDC area can have a profound impact on both the London and the UK economies. This could have benefits against this objective.
	OSP3	+		M, L-T, I, R, L	OPDC area, West London, London wide	The policy could lead to indirect positive effects against this objective, as an improvement in the local environment and connectivity could improve the attractiveness of the area to inward investors.
	OSP4	+		M, L-T, I, R, L	OPDC area, West London, London wide	The policy could lead to indirect positive effects against this objective, as an improvement in connectivity and accessibility to public transport opportunities could improve the attractiveness of the area to inward investors.
	OSP5	+		S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy clearly states that proposals should demonstrate early engagement with existing residents and businesses to inform place-making. This could lead to benefits against this objective.



**Table G-2 Chapter 4: The Places**

- P1: Old Oak South
- P2: Old Oak North
- P3: Old Oak High Street
- P4: Grand Union Canal
- P5: Park Royal
- P6: Park Royal Centre
- P7: North Acton
- P8: Scrubs Lane
- P9: Old Oak West
- P10: Wormwood Scrubs

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P1	++	M, L-T, I, R, M	Old Oak South and OPDC area	As stated in the supporting text, the area specific policy should help to deliver a strong sense of place through development, reflecting and building upon the area's existing character. The vision for the area highlights that Old Oak South will see a new commercial hub, centred on the new Old Oak Common Station. The station, along with the a new London Overground station, will be 'fully embedded' into its surroundings, providing visitors, employees and residents with easy access to west London and the OPDC regeneration area. Wormwood Scrubs and the Grand Union Canal will be 'integral' to the creation of a unique sense of place. The land uses supported in the policy text should help to support the creation of a sense of place, leading to the prediction of significant positive effects against this objective. As the majority of Old Oak South is likely to come forward for development post-2026, medium to long term effects are predicted.
		P2	++	S, M-T, I, R, M	Old Oak North and OPDC area	The vision for the area highlights that Old Oak North will be redeveloped in the earlier states of the regeneration. The development will be residential-led with a mix of town centre uses. The future population will benefit from a new network of streets, open spaces and associated community infrastructure embedded into new buildings and in accessible locations. Early phases of development will be supported by a range of meanwhile uses and employment space for SMEs that help support place-making, deliver a mixed use place and act as a catalyst for wider regeneration. This could lead to significant benefits against this objective.
		P3	++	S, M, L-T, I, R, L	Old Oak South and Old Oak North	The vision for the area states that the street will be a primary north-south route through Old Oak, connecting Harlesden to Wormwood Scrubs and further south. The high street will be designed to the highest quality, materials and green infrastructure. The variation

IIA Objective	Performance of Policy	Temporal Scale	Nature of Impact	Geographical Extent	Commentary and Recommendations
					<p>in levels along the high street will create unique features and spaces that will play a defining role in shaping Old Oak's sense of place.</p> <p>The Vision for the area suggest that the character of the high streets will likely change along its length, with a commercial focus in Old Oak South, providing services for the large number of employees, and providing a mix of uses and spaces in Old Oak North to support the area's future residential population. However, this differs from the description of the three character areas in the policy wording. Positive effects are predicted.</p> <p><i>It is suggested that further clarity with regards to green infrastructure is provided strategically, to which the requirement within the policy could refer to. It is also recommended that it is referred to as 'multifunctional green infrastructure' as, although SuDS are referred to in the supporting text, green infrastructure has the potential to provide greater benefits.</i></p>
			++	S, M, L-T, I, R, L	<p>Old Oak North, Old Oak South and Park Royal</p> <p>The vision for the Grand Union Canal states that it will be central to creating a new part of London in Old Oak and enhancing Park Royal as a thriving industrial area.</p> <p>The policy states that the land along the canal will deliver housing and employment uses along its length in Old Oak, and industrial uses and ancillary uses with active frontages at ground floor level in Park Royal. This should help to create a sense of place.</p> <p><i>It is recommended that clarity is provided in the supporting text as to the nature of 'new and enhanced green and civic spaces' as required through the policy wording in relation to green infrastructure, and what their functions are intended to be.</i></p>
			++	S, M, L-T, I, R, L	<p>Park Royal</p> <p>The policy supports improvements to the road network to address congestion, as well as improving the frequency, capacity and connectivity of the local bus network. In addition to supporting the delivery of improvements to the walking and cycling network, the policy could lead to an improvement in the sense of place. In addition, design measures and the provision of public open spaces could help to reinforce a sense of local distinctiveness.</p>
			++	M, L-T, I, R, M	<p>Park Royal and OPDC area</p> <p>As stated in the Local Plan, the area currently lacks a defined character and its environment is dominated by the road network. These streets are framed by inactive building frontages and parking, creating a poor quality public realm. The vision for the area seeks to enhance the range of services, shared services and amenities in the area, to support local business, existing residential and medical communities. The public realm will be improved to benefit from new public open spaces alongside active street frontages. This is reflected in the policy wording and should lead to benefits against this objective.</p>

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
		P7	++	M, L-T, I, R, M	North Acton and OPDC area	The policy seeks to improve the public realm within the area, including supporting the development of active frontages. Alongside the delivery of a new public civic square, residential, employment, community infrastructure and improved connections across the area, the policy could lead to the generation of significant positive benefits against this objective.
		P8	++	M, L-T, I, R, M	Scrubs Lane and OPDC area	The policy seeks to contribute to and/or deliver new and improved walking and cycling routes, access to the Scrubs as well as a high quality coordinated public realm and street greening. Alongside the overall approach to the area, which focusses development around the important historic character of the area, these measures should lead to an improvement in local distinctiveness locally.
		P9	++	S, M, L-T, I, R, M	OPDC area	Currently, the public realm along Old Oak Lane is dominated by vehicular transport providing a poor walking and cycling experience. The vision for the area states that Old Oak West will be a diverse area, reflecting its location between Old Oak and Park Royal, centred on improving busy street environment and the industrial innovation area adjacent to the Grand Union Canal. The HS2 construction sites are included in the industrial areas north and south of the canal. The vision states that these sites will provide a space for industrial innovation within a high quality environment, which integrates with Old Oak and Harlesden. Public realm improvements may provide some benefits, although as a connecting place with large construction sites, effects are unlikely to be significant.
		P10	++	S, M, L-T, I, R, M	OPDC area	Wormwood Scrubs is described in the Local Plan as a 'green lung' that provides people and wildlife with the opportunity to enjoy open space. The policy seeks to supports the area as a public open space, alongside securing resources for its management, which should help to enhance its function locally.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P1	++	M, L-T, I, R, M	Old Oak South and OPDC area	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this Objective.
		P2	++	S, M-T, I, R, M	Old Oak South and OPDC area	The vision for the area highlights that densities in Old Oak North will include high density development in areas with good public transport access and facilities, with lower density development in sensitive areas such as the canal. This could lead to the efficient use of land in this area.
		P3	++	S, M, L-T, I, R, M	Old Oak South and Old Oak North	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this Objective.
		P4	++	S, M, L-T, I,	Old Oak South	The policy specifies the areas where high densities will be encouraged across the area.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M	and Old Oak North	This could lead to benefits against this Objective.
		P5	++	S, M, L-T, I, R, M	Park Royal	The vision for the Park Royal area states that the design of industrial buildings is likely to change, responding to the need for making optimum use of land as values rise and new technologies support structural change. This should lead to the optimisation of land in this location.
		P6	++	M, L-T, I, R, L	Park Royal area	The policy seeks to centralise the provision of services, shared services and amenities to support local businesses, residents and the medical community alongside providing improved accessibility by walking and cycling modes within the area. It also states that proposals will be required to demonstrate how they are optimising the use of land. This would create some benefits against this objective through creating a more efficient use of land.
		P7	++	S, M, L-T, I, R, M	North Acton	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this Objective.
		P8	++	S, M, L-T, I, R, M	North Acton	The policy specifies the areas where high densities will be encouraged across the area, seeking to recognise sensitive historic assets as locations where lower densities would be appropriate. This could lead to benefits against this Objective.
		P9	++	S, M, L-T, I, R, M	Old Oak West	The policy seek to intensify the use of sites within the SIL by requiring proposals to demonstrate how they are maximising the use of sites, including the provision of smaller unity, to support greater industrial employment densities. This could lead to benefits against this Objective.
		P10	+	S, M, L-T, I, R, M	Wormwood Scrubs	The continued protection of Wormwood Scrubs is considered to be an efficient use of space appropriate to its relevant designations.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of	P1	++	M, L-T, I, R, M	Old Oak South and OPDC area	The policy specifies the areas where high densities will be encouraged across the area. This would lead to benefits against this Objective.
		P2	++	S, M-T, I, R, M	Old Oak South and OPDC area	The vision for the area highlights that densities in Old Oak North will include high density development in areas with good public transport access and facilities, with lower density development in sensitive areas such as the canal. This could lead to the efficient use of land in this area, maximising the re-use of previously developed land.
		P3	++	S, M, L-T, I, R, M	Old Oak South and Old Oak North	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
contaminated land	P4	++	S, M, L-T, I, R, M	Old Oak South and Old Oak North	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this Objective.	
	P5	++	S, M, L-T, I, R, M	Park Royal	The vision for the Park Royal area states that the design of industrial buildings is likely to change, responding to the need for making optimum use of land as values rise and new technologies support structural change. This should lead to benefits against this objective.	
	P6	++	S, M, L-T, I, R, M	Park Royal Centre	The policy is likely to lead to the re-use and improved efficiency in the use of previously developed land, which should generate benefits against this objective.	
	P7	++	S, M, L-T, I, R, M	North Acton	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this Objective.	
	P8	++	S, M, L-T, I, R, M	North Acton	The policy specifies the areas where high densities will be encouraged across the area, seeking to recognise sensitive historic assets as locations where lower densities would be appropriate. This could lead to benefits against this Objective.	
	P9	++	S, M, L-T, I, R, M	Old Oak West	The policy seek to intensify the use of sites within the SIL by requiring proposals to demonstrate how they are maximising the use of sites, including the provision of smaller unity, to support greater industrial employment densities. This could lead to benefits against this Objective.	
	P10	0			The policy will not lead to the development of previously developed land.	
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport	P1	++	M, L-T, D, R, M	OPDC area, London wide and nationally	Supporting text to the policy highlights that walking and cycling access within the area is very constrained, which restricts movements to the north/south and east/west. The vision for Old Oak South includes that the area will be focussed on a new Old Oak Common station and a new London Overground station. In addition, a 'complete new network of streets and bridges will integrate Old Oak South with its surroundings.' The policy wording states that the delivery of a network of unique and connected neighbourhoods will be supported. This could lead to significant benefits against this objective through encouraging the use of non-motorised transport across the area. Further significant benefits may be realised from the supporting of new rail, bus, taxi and cycle infrastructure and ensuring that these integrated with their surroundings, including the provision of direct pedestrian and cycle access to Wormwood Scrubs. A direct vehicle connection over the Grand Union Canal, improving existing streets and supporting better connections to the Kensal Canalside Opportunity Area, could also lead to significant benefits against

IIA Objective	Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
network					<p>this objective.</p> <p><i>It is suggested that the 'delivery' and 'transport' sections of the policy repeat the supporting of transport infrastructure. These two sections could be merged, to avoid repetition. It is also suggested that the 'streets' section (o) repeats the need for the new transport infrastructure to integrate with its surroundings. These two sections could be streamlined to avoid repetition.</i></p>
	P2	++	M, L-T, D, R, M	OPDC area, London wide and nationally	<p>Willesden Junction station is situated in the northern part of Old Oak North and provides access to both the Bakerloo London Underground Line and the London Overground. However, at present, access from this station to the core development area is poor. The core development area also doesn't include any east-west links. The policy seeks to facilitate the delivery of a network of unique and connected neighbourhoods, an enhanced Willesden Junction Station and a new Overground Station on the West London line. Contributing to the new Old Oak High Street, providing better connections across the area should improve accessibility significantly.</p>
	P3	++	S, M, L-T, I, R, M	Old Oak South and Old Oak North, OPDC area and surrounding boroughs	<p>The policy seeks to provide legible connections to and from transport interchanges as well as providing a high quality public realm that is attractive to both pedestrians and cyclists. Alongside the provision of services and facilities, this could lead to significant benefits against this objective.</p>
	P4	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	<p>The Local Plan outlines that the current character of the Grand Union Canal is characterised by limited passive surveillance, which has a negative impact on the use of the tow path for walking, cycling and recreation. The canal itself is not currently extensively used for transport and is home to a community of residential moorings. The vision sets out that development in this area will provide a safe and convenient walking and cycling route enabling people to access the length of Old Oak, Park Royal and beyond. New bridge crossings will support easier north/south movement while the canal itself will be promoted and used for the transport of people and freight. This is reflected in the policy wording, with the addition of the use of the canal for leisure uses. This could lead to significant benefits against this objective.</p>
	P5	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	<p>As stated in the Local Plan, the Park Royal area currently suffers from high levels of road congestion generated by industrial functions and a reliance on private vehicular transport. The vision states that residential pockets and open spaces will be better connected by safe and inviting routes to allow existing and future residents in these areas to access the</p>

IIA Objective	Performance of Policy	Temporal Scale	Nature of Impact	Geographical Extent	Commentary and Recommendations
					range of new services that will be available in old oak. The policy supports improvements to the frequency, capacity and connectivity of the local bus network. In addition, the delivery of improvements to the walking and cycling network could lead to significant benefits against this objective.
	P6	++	S, M, L-T, I, R, M	Park Royal and OPDC area, and surrounding boroughs	The policy seeks to centralise services and amenities for the local business community, residents and the medical community. The policy also supports improvements to the bus network, highway network and the legibility of streets, including the delivery of cycling and walking infrastructure. This could lead to significant benefits against this objective.
	P7	++	M, L-T, I, R, L	North Acton and OPDC area, and surrounding boroughs	The vision for the area supports new and improved connections to Old Oak Common Station, and will ensure that North Acton is integrated into the wider regeneration area. The policy also has a significant focus on providing higher density development which is focussed around the North Acton station. Highways improvements and active frontages along streets are proposed, alongside new and/or improved connections across the A40 to West Acton. The policy also proposes new walking and cycling routes and significant employment as well as residential, thereby bringing homes and jobs closer together. These measures could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. It is also unclear what type of 'connections' across the A40 are supported by the policy.  <i>It is suggested that the proposed 'connections' across the A40 are explained more clearly in the policy text.</i>
	P8	++	M, L-T, I, R, L	Scrubs Lane and OPDC area, and surrounding boroughs	The policy recognised the potential for high and medium densities to the north of the canal and west of Scrubs Lane nearer to the proposed Hythe Road Station which should lead to benefits against this objective. Further, the policy seeks to contribute towards and/or deliver new and improved walking and cycling routes as well as vehicular routes and connections. These measures could lead to some benefits against this objective.
	P9	++	S, M, L-T, I, R, L	OPDC area, and surrounding boroughs	The policy seeks to minimise the impacts of construction traffic on the street network, existing residents and businesses, including through the use of consolidation centres. Developments should improve connections across the area, including vehicle, walking and cycling routes. These measures could lead to benefits against this objective.
	P10	++	S, M, L-T, D, R, M	OPDC area, and surrounding boroughs	The policy seeks to improve access to Wormwood Scrubs to and from Little Wormwood Scrubs, North Kensington, Old Oak Common Estate and other areas to the south and Old Oak. This could help to improve accessibility and help to connect communities within the area.

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						<i>The policy wording could specify that promoted access to Wormwood Scrubs would be via walking and cycling modes, as set out in the supporting text to the policy.</i>
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P1	+	M, L-T, D, R, M	OPDC area	The policy wording specifies that developments that deliver residential development across the whole of Old Oak South will be supported, which could lead to positive effects against this objective.
		P2	+	S, M-T, D, R, M	OPDC area	The vision for the area highlights that Old Oak North will be redeveloped in the earlier states of the regeneration. The development will be residential-led with a mix of town centre uses. Old Oak North will make a 'significant' contribution to the area's housing need.
		P3	+	S, M, L-T, D, R, M	Old Oak South and Old Oak North, OPDC area and surrounding boroughs	The policy states that residential uses will be provided on the upper floors of the high street. Alongside proposed policies for Old Oak South and Old Oak North, this will contribute to the achievement of this objective.
		P4	+	S, M, L-T, D, R, M	Grand Union Canal	The canal itself is not currently extensively used for transport and is home to a community of residential moorings. The vision sets out that new bridge crossings will support easier north/south movement while the canal itself will be promoted and used for the transport of people and freight. The policy states that new development will be supported where it supports the delivery of residential and visitor moorings in appropriate locations that do not adversely impact on the regeneration of the wider area or navigational function of the canal. It also identifies that residential uses with front doors on to the canal edge will be supported. This could lead to both positive and negative effects against this objective, as some existing residential moorings may be lost, where they are not considered to be in conformity with the regeneration proposals of the Local Plan. However, the overall net delivery of housing supply will be higher.
		P5	+	S, M, L-T, D, R, M	Park Royal	The east of the area includes a Gypsy and Traveller site. The justification text directs readers to policy H9 which provides guidance for Gypsy and Traveller Accommodation.  The First Central site will include a mix of uses including housing, which could deliver some benefits against this objective.  <i>The policy could provide further information following the completion of the OPDC Gypsy and Traveller Accommodation Needs Assessment in light of emerging legislation.</i>



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		P6	0			The policy does not specifically propose housing within the area and so no effects are predicted.
		P7	++	S, M, L-T, D, R, L	North Acton, OPDC area and surrounding boroughs	As stated in the Local Plan, the area is currently being regenerated with existing developments of residential and student housing being included within the land uses. The perfume factory sites is also expected to be redeveloped as a residential-led mixed use development. The vision for the area seeks to build upon this, to provide a substantial number of new homes in the area, which could lead to benefits against this objective. However, this is not reflected in the policy wording.
		P8	+	S, M, L-T, D, R, L	Scrubs Lane and OPDC area	The policy seeks to provide housing as part of mixed use developments within the area. This could contribute to positive effects against this objective.
		P9	+	M, L-T, D, R, L	OPDC area	The policy states that housing densities should be mindful of the surrounding context. Residential is supported outside the SIL.
		P10	0			The policy will not lead to the delivery of housing development.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P1	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	A significant increase in the density of development could lead to an increase in hardstanding and built development, which could have negative effects in relation to surface water and sewer flooding if not adequately mitigated through flood management and design as suggested in the Environment and Utilities Chapter. The policy specifies that development should seek to overcome current surface water flooding issues to the south of the canal and to the north of Wormwood Scrubs. This could lead to positive effects against this objective. However, how this might be achieved is not specified, although the issues are described as 'significant' in the supporting text, leading to low certainty in the prediction of effects.  <i>See recommendation under Objective 10.</i>
		P2	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues to the north of the West London Line. This could lead to positive effects against this objective. However, how this might be achieved is not specified, although the issues are described as 'significant' in the supporting text, leading to low certainty in the prediction of effects.  <i>See recommendation under Objective 10.</i>
		P3	+	S, M, L-T, I, R, M	Old Oak South and Old Oak	The policy seeks to support the delivery of green infrastructure along the length of the high street. This could create benefits against this objective, as the supporting text

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					North, OPDC area and surrounding boroughs	specifies that this could include SuDS. However, specific potential benefits of green infrastructure, nor reference to a wider strategy to maximise the benefits is provided. <i>See recommendation under Objective 1 with regards to green infrastructure.</i>
		P4	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects. <i>Supporting text could include a strategy for how surface water flood risk may be overcome. This could help deliverability and reduce flood risk.</i>
		P5	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects. <i>Supporting text could include a strategic for how surface water flood risk may be overcome. This could help deliverability and reduce flood risk.</i>
		P6	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects. <i>Supporting text could include a strategy for how surface water flood risk may be overcome. This could help deliverability and reduce flood risk.</i>
		P7	0			No reference is made within the policy to improving the local environment in order to adapt to the potential effects of climate change.  <i>A scheme of planting, connected to a wider green infrastructure network, which may also include SuDS, could be included as a requirement in the Local Plan.</i>
		P8	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects.  <i>Supporting text could include a strategic for how surface water flood risk may be overcome. This could help deliverability and reduce flood risk.</i>
		P9	+	S, M, L-T, D,	OPDC area	The policy specifies that development should seek to overcome current surface water

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				IR, L	and surrounding boroughs	flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects.  <i>Supporting text could include a strategic for how surface water flood risk may be overcome. This could help deliverability and reduce flood risk.</i>
		P10	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects. However, it is noted that flooding in the common will not create as much risk to people and property as it would elsewhere within the local plan area.  <i>Supporting text could include a strategy for how surface water flood risk may be overcome that further relates to the Water Policy. This could help deliverability and reduce flood risk.</i>
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P1	+/-	M, L-T, D, R, M	OPDC area, London wide and nationally	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
P2		+/-	S, M-T, D, R, M	Old Oak North and OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.  <i>The introductory text indicates that an Old Oak Common Decentralised Energy Strategy is currently in preparation. It is suggested that the findings of this study are reflected in the supporting text, to provide more detail in relation to the supported 'energy centre'. How potential pollution from this facility might be managed could be explained.</i>	
P3		+/-	S, M, L-T, D, R, M	Old Oak South and Old Oak North	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through a lengthy	

IIA Objective	Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					<p>construction programme if renewable sources of energy supply aren't secured.</p>
		P4	+/-	S, M, L-T, D, R, M	<p>Old Oak South and Old Oak North</p> <p>Minimising the need to travel and focussing development around new public transport infrastructure, walking and cycling, should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.</p>
		P5	+	S, M, L-T, D, IR, M	<p>Park Royal and surrounding boroughs</p> <p>The policy supports improvements to the road network to address congestion, as well as improving the frequency, capacity and connectivity of the local bus network. In addition, the delivery of improvements to the walking and cycling network, the policy could lead to an improvement local emissions levels. The vision for the Park Royal area states that the design of industrial buildings is likely to change, responding to the need for making optimum use of land as values rise and new technologies support structural change. This could help to improve energy efficiency through improving the performance of buildings. This may balance out a potential increase in demand for energy from new development, although the exact mix of uses and potential energy balance is unknown, leading to uncertainty in the prediction of effects.</p>
		P6	+/-	S, M, L-T, D, R, M	<p>Park Royal and OPDC area</p> <p>The policy seeks to centralise services and amenities for the local business community, residents and the medical community. The policy also supports improvements to the bus network and the legibility of streets, including the delivery of cycling and walking infrastructure. This could lead to some benefits against this objective. Improvements to the highway network could lead to some positive effects on local emissions, although could also encourage the use of vehicular transport as a mode of travel unless improvements to the public transport network are delivered in accordance with the Transport Chapter.</p>
		P7	+/-	S, M, L-T, D, R, M	<p>North Acton and OPDC area, and surrounding boroughs</p> <p>The vision for the area supports new and improved connections to Old Oak Common Station, and will ensure that North Acton is integrated into the wider regeneration area. It also encourages walking and cycling and proposes employment and jobs in the same area thereby reducing the possible distances travelled. Highways improvements and active frontages along streets are proposed, alongside new and/or improved connections across the A40 to West Acton. This could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. It is currently unclear what type of 'connections' across the A40 are supported by the policy. The increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction</p>

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						programme if renewable sources of energy supply aren't secured.  <i>It is suggested that following the development of further work on the A40, additional detail could be provided for the proposed 'connections' across the A40 .</i>
		P8	+/-	M, L-T, I, R, L	Scrubs Lane and OPDC area, and surrounding boroughs	The policy seeks to focus development around public transport infrastructure, which should lead to benefits against this objective. Further, the policy seeks to contribute towards and/or deliver new and improved walking and cycling routes as well as vehicular routes and connections. These measures could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. The increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		P9	+/-	S, M, L-T, I, R, L	OPDC area, and surrounding boroughs	The policy seeks to minimise the impacts of construction traffic on the street network, existing residents and businesses, including through the use of consolidation centres. Developments should improve connections across the area, including vehicle, walking and cycling routes. These measures could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. The increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		P10	+	S, M, L-T, I, R, L	OPDC area, and surrounding boroughs	The management of Wormwood Scrubs has the potential to be sensitively enhanced to improve its potential to enable the area to adapt to climate change, although this is not specified within the policy it is referred to in the justification text and in the Water Policy. The promotion of walking and cycling access to the park may reduce current emissions from people accessing the park, leading to some positive benefits against this objective.  <i>The policy or supporting text could state that management and sensitive enhancement measures could be implemented to improve the park's potential to enable the local area to reduce climate change emissions, such as through planting schemes.</i>
8	To minimise production of waste across all sectors in the plan area,	P1	-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies.
		P2	+/-	S, M-T, D, R, M	OPDC area and	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste					surrounding boroughs	programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies. The Powerday waste site will be protected through this policy, which could reduce the potential impact from the development on the surrounding boroughs, which may otherwise have received the displacement of such as facility. The delivery of an energy centre within the area may comprise an energy from waste facility, which could help to reduce waste being displaced from the OPDC area.
	P3	-	S, M, L-T, D, R, M		OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies..
	P4	-	S, M, L-T, D, R, M		OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies.
	P5	+/-	S, M-T, D, R, M		OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies. The Twyford Waste Transfer station will be protected through this policy, which could reduce the potential impact from the development on the surrounding boroughs, which may otherwise have received the displacement of such as facility. Redevelopment of the facility is supported in the local plan, which may help to address local capacity issues.
	P6	-	S, M, L-T, D, R, M		OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies..
	P7	-	S, M, L-T, D, R, M		OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies..
	P8	-	S, M, L-T, D, R, M		OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies..
	P9	-	S, M, L-T, D,		OPDC area	The intensification of new development could significantly increase the pressure on

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M	and surrounding boroughs	natural resources and generation of waste during operation as well as through the construction programme which includes the HS2 sites if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies.  <i>Should further information be provided by HS2 regarding their waste management plans, policies are alternative guidance should reflect this.</i>
		P10	0			The policy is unlikely to have an effect when considered against this objective.
9	Improve the quality of the water environment	P1	+/-	M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to celebrate the unique character of the Grand Union Canal and associated nature reserve as well as providing a network of connected open spaces for residents, employees and visitors. This could provide an opportunity for the positive management of water quality in these areas. However, the new vehicle connection across the Grand Union Canal could lead to some negative effects from pollution run off.  <i>See recommendation under Objective 10. The management of water quality in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects arise from its development.</i>
		P2	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Lower density development near to sensitive uses such as the Grand Union Canal, may help to reduce the potential impact from development on water quality in this area. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment. However, the extent of predicted benefits is uncertain.
		P3	+	S, M, L-T, I, R, M	Old Oak South and Old Oak North, OPDC area and surrounding boroughs	The policy seeks to support the delivery of green infrastructure along the length of the high street. This could create benefits against this objective, as the supporting text specifies that this could include SuDS. However, none of the other potential benefits of green infrastructure, nor reference to a wider strategy to maximise the benefits is provided.  <i>See recommendation under Objective 1 with regards to green infrastructure.</i>
		P4	+/-	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy wording seeks to ensure that the use of the Grand Union Canal for passenger and freight transport and leisure uses should take into account and impact on drainage functions. This could have some benefits against this objective. However, an increase in the use of the canal could increase the potential for negative effects on the water quality of this resource.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						<i>It is suggested that water quality issues are also included as a consideration when considering the future use of the canal. See recommendation under Objective 10.</i>
		P5	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Supporting text to the policy states that there are utilities infrastructure issues within the area and the policy seeks to support improvements to this. This could help to improve local water quality through increased capacity. Improvements in the local road infrastructure could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment. However, the extent of predicted benefits is uncertain. See <i>recommendation under Objective 6.</i>
		P6	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment. However, the extent of predicted benefits is uncertain. See <i>recommendation under Objective 6.</i>
		P7	+	S, M-T, D, IR, M	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants locally. See <i>recommendation under Objective 6.</i>
		P8	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment. However, the extent of predicted benefits is uncertain.. Street 'greening' could also create benefits to a certain degree, although it is unclear what exactly these measures might comprise. See <i>recommendation under Objective 6.</i>
		P9	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water



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						runoff entering the water environment. However, the extent of predicted benefits is uncertain.  <i>See recommendation under Objective 6.</i>
		P10	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment. However, the extent of predicted benefits is uncertain. The management of area in general could produce positive effects on water quality through planting schemes and pollution sequestration, although effects are uncertain due to the potential management measures being unknown.  <i>See recommendation under Objective 6.</i>
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P1	+/-	M, L-T, D, IR, M	OPDC area	The area includes a designated nature reserve to the southern edge of the Grand Union Canal. The policy seeks to celebrate the unique character of the Grand Union Canal and associated nature reserve as well as providing a network of connected open spaces for residents, employees and visitors. This could provide an opportunity for the positive management of biodiversity in these areas. However, the new vehicle connection across the Grand Union Canal could lead to some negative effects.  <i>Improving connections could be tied to the development of an area-wide multi-functional Green Infrastructure Strategy. The Local Plan text states that this is currently being developed. It is suggested that, when this is available, relevant text is added explicitly to the policy wording to improve deliverability.</i> <i>The management of biodiversity in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects arise from its development.</i>
		P2	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	Lower density development near to sensitive uses such as the Grand Union Canal, may help to reduce the potential impact from development on biodiversity in this area. The policy specifies that development should be 'mindful' of existing heritage and ecological spaces such as the Grand Union Canal, St Mary's Cemetery and Kensal Cemetery. This could provide some benefits against this objective, although it is unclear what is meant by 'mindful' in this context. Open spaces to be provided may include enhancements for biodiversity in the 'soft' spaces to be provided.

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						<i>The policy should provide further information in the supporting text relating to how development should be 'mindful' of these assets as well as how biodiversity may be enhanced within open spaces.</i>
		P3	+	S, M, L-T, I, R, M	Old Oak South and Old Oak North, OPDC area and surrounding boroughs	<p>The policy seeks to support the delivery of green infrastructure along the length of the high street. This could create benefits against this objective, although reference to the potential biodiversity benefits of green infrastructure, nor reference to a wider strategy to maximise the benefits is provided. <i>Similarly, potential benefits at public open spaces for biodiversity are not referenced and could be specified, including the potential for these to be integrated into a green infrastructure strategy.</i></p> <p><i>See recommendation under Objective 1 with regards to green infrastructure.</i></p>
		P4	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	<p>The vision for the area states that the ecological role of the canal will be enhanced and used to support the delivery of the green infrastructure network. The policy wording seeks to ensure that the use of the Grand Union Canal for passenger and freight transport and leisure uses should take into account and impact on biodiversity. The delivery of towpath lighting should also consider the potential impact on biodiversity, as set out in the policy wording. This could have some benefits against this objective. Supporting text highlights that the canal is designated as a Nature Conservation Area of Metropolitan Importance that will be integral to the OPDC green infrastructure network. <i>It is recommended that measures to enhance biodiversity are encouraged through the policy wording and set out in the supporting text, including the rationale behind a specific lighting strategy. This should help enable successful implementation. It is suggested that some elements of the policy are re-ordered, so that impacts on the water environment and biodiversity are set out under 'environment' in connection with the green infrastructure network.</i></p>
		P5	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	<p>The policy states that the Grand Union Canal and associated nature reserve becomes a focal point for the area. Development proposals should enhance existing biodiversity assets along railway corridors, within the First Central Site, the Grand Union Canal, existing public open spaces and at the junction of Abbey Road and Premier Park Road. This specificity could lead to significant positive effects locally.</p>
		P6	0			<p>The policy also does not make reference to biodiversity and relies on the Green Infrastructure and Biodiversity Policy. It is assumed that biodiversity importance in the area is low, and that the proposed development would not have a positive or negative impact on this baseline.</p>

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11	To minimise air,					<i>It is recommended that measures to improve local biodiversity, such as through the extension of the green infrastructure network into the area, or through street planting/landscaping schemes, could be promoted through the policy to improve both biodiversity.</i>
		P7	0			The policy also does not make reference to biodiversity and relies on the Green Infrastructure and Biodiversity Policy. It is assumed that biodiversity importance in the area is low, and that the proposed development would not have a positive or negative impact on this baseline.  <i>It is recommended that measures to improve local biodiversity, such as through the extension of the green infrastructure network into the area, or through street planting/landscaping schemes, could be promoted through the policy to improve both biodiversity.</i>
		P8	0			The policy also does not make reference to biodiversity and relies on the Green Infrastructure and Biodiversity Policy. It is assumed that biodiversity importance in the area is low, and that the proposed development would not have a positive or negative impact on this baseline. Street 'greening' could have the potential to improve local biodiversity, although it is unclear what exactly these measures might comprise.  <i>It is recommended that measures to improve local biodiversity, such as through the extension of the green infrastructure network into the area, or through street planting/landscaping schemes, could be promoted through the policy to improve both biodiversity.</i>
		P9	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy states that development should enhance existing biodiversity assets along the Grand Union Canal. This specifically could lead to positive effects locally.
		P10	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to sustain the existing Local Nature Reserve and sites of borough importance for nature conservation, which could lead to positive effects against this objective.  <i>The policy could seek to 'conserve and enhance' the designations in order to allow Wormwood Scrubs to be utilised for other functions as well as enhance its biodiversity potential.</i>
11	To minimise air,	P1	+/-	S, M, L-T, D,	OPDC area	Minimising the need to travel and focussing development around new public transport

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noise and light pollution, particularly for vulnerable groups				R, M		infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance.  <i>See recommendations under Objectives 7 and 10.</i>
	P2	+/-	S, M, L-T, D, R, M	OPDC area		Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance. Supporting text highlights that air quality and noise issues are generated from the Powerday waste facility and from rail uses and that new development will need to clearly demonstrated how design has successfully mitigated these issues. The development of a potential energy from waste facility within the area as identified in the justification text may also increase air pollution locally if not mitigated adequately.  <i>See recommendation under objective 7. The requirement from the supporting text could be referenced in light of policies EU11 EU12.</i>
	P3	+/-	S, M, L-T, D, R, M	OPDC area		Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance.  <i>See recommendations under Objectives 7 and 10.</i>
	P4	+/-	S, M, L-T, D, R, M	OPDC area		Minimising the need to travel and focussing development around new public transport infrastructure, walking and cycling as well as the creation of green infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance.
	P5	+	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs		The policy supports improvements to the road network to address congestion, as well as improving the frequency, capacity and connectivity of the local bus network. In addition, the delivery of improvements to the walking and cycling network, the policy could lead to

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						an improvement in air, noise and light pollution locally. However, the protection of industrial uses may mean that pollution levels remain higher in the SIL compared with the surrounding areas. This should be monitored and regulated by the regulatory control system, which is outside the remit of the Local Plan.
		P6	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance.  <i>See recommendation under Objective 10.</i>
		P7	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance.  <i>See recommendation under Objective 10.</i>
		P8	+/-	S, M, L-T, D, R, M	OPDC area	The policy seeks to focus development around public transport infrastructure, which should lead to benefits against this objective. Further, the policy seeks to contribute towards and/or deliver new and improved walking and cycling routes as well as vehicular routes and connections. These measures could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance.  <i>See recommendation under Objective 10.</i>
		P9	+/-	S, M, L-T, D, R, M	OPDC area	The policy seeks to minimise the impacts of construction traffic on the street network, existing residents and businesses, including through the use of consolidation centres. Developments should improve connections across the area, including vehicle, walking and cycling routes. These measures could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. In considering the potential impact from the HS2 construction programme, policies D7, EU11, EU12 and London Plan guidance should be implemented to manage impacts. In

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		P10	+	S, M, L-T, I, R, L	OPDC area, and surrounding boroughs	<p>light of this, mixed effects are considered to be delivered.</p> <p>The management of Wormwood Scrubs has the potential to address air and noise pollution, although this is not specified within the policy. The promotion of walking and cycling access to the park may reduce current pollution levels from people accessing the park, leading to some positive benefits against this objective.</p> <p><i>See recommendation under objective 7</i></p>
12	To conserve and enhance the historic environment, heritage assets and their settings	P1	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	<p>Supporting text to the policy highlights that the Grand Union Canal is a designated Conservation Area. The policy specifically states that supported developments will celebrate the unique character of Grand Union Canal, and that it becomes an accessible focal point for the area. This could provide some benefits against this objective.</p> <p><i>It is suggested that further detail relating to how development should reflect the historic character and appearance of the Old Oak area is reflected in the policy wording and supporting text. This should include the identification and protection of local views and the settings of historic assets. However, it is noted that the OPDC Heritage and Views Study is yet to be completed.</i></p>
		P2	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	<p>Under the 'density' subheading, the policy specifies that development should be 'mindful' of existing heritage and ecological spaces such as the Grand Union Canal, St Mary's Cemetery and Kensal Cemetery. This could provide some benefits against this objective, although it is further information should be provided to describe what is meant by 'mindful' in this context.</p> <p>Under 'open spaces' the ecological and historical character of the Gran Union Canal is to be 'celebrated'.</p> <p><i>The policy should seek to reduce repetition within the policy with regards to the ecological and historical character of the Grand Union Canal as well as provide further information in the supporting text relating to how development should be managed in relating to enhancing nature conservation and heritage assets.</i></p>
		P3	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	<p>Supporting text to the policy states that building heights and massing on the high street should vary, respond to local character and context and should not create a wall of massing. Any development proposals will need to be sensitive to its surroundings such as Wormwood Scrubs, the Grand Union Canal, Kensal Cemetery and nearby existing residential areas. This could create some benefits against this objective.</p>

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					<i>It is recommended that this requirement from the supporting text is included in the policy wording to improve implementation.</i>	
		P4	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	<p>The vision states that behind the canal, a 'string of waterside spaces will complement the canal's historic character' with many providing space for events, relaxation, socialising and the night time economy along busier stretches. However, it is unclear how this will complement the historic character of the canal.</p> <p>The policy wording seeks that development proposals recognise the Grand Union Canal Conservation Area as a sensitive area suitable for the lowest density development and that the canal and its setting should be protected and/or enhanced. This could lead to significant benefits against this objective.</p> <p><i>See recommendations for P1 – how the waterside spaces would complement the canal's historic character could be specified. Any repetition between P1, P2 and P4 should be sought to be removed.</i></p>
		P5	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	<p>The policy wording specifies that and proposed designated heritage assets and their setting should be protected and/or enhanced as part of development. This could provide some benefits against this objective.</p> <p>Supporting text should set out the heritage assets to be considered as part of this requirement. As stated, this will be included in the next iteration of the local plan.</p>
		P6	+	S, M, L-T, D, IR, M	OPDC area	As stated in the supporting text, Park Royal Centre lacks a defined character. The policy should help to enhance the local built environment, which could lead to some benefits for the historic environment in neighbouring 'places'.
		P7	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	As stated in the supporting text, North Acton suffers from a poor quality public realm. The policy should help to enhance the local built environment, which could lead to some benefits for the historic environment in neighbouring 'places' and surrounding boroughs including Ealing.
		P8	++	M, L-T, D, IR, M	OPDC area and surrounding boroughs	The Cumberland Park Factory site is proposed as a Conservation area. Further, the area north of the canal is bounded by St Mary's cemetery conservation area to the east. The current public realm along Scrubs Lane is dominated by vehicular transport and a poor walking and cycling environment. The Local Plan sets out that the Former Cumberland Park Factory provides the opportunity to inform the development of local character within Scrubs Lane and across Old Oak. The vision for the area seeks that Scrubs Lane is transformed into a pleasant street, respectful of heritage assets within a high quality public realm. The street will be framed by the active historic frontages of thriving micro,

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						small and medium sized employment uses within the Cumberland Park Factory alongside a series of new mixed-use developments. Development will be designed to respond to heritage assets and their settings. This is reflected in the policy wording, which should lead to significant benefits against this objective.
		P9	+	M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy specifically seeks to protect and/or enhance the Grand Union Canal and Old Oak Land Conservation Areas and their settings. This could lead to benefits against this objective in the long term, although it is unclear how this would be implemented during the construction phases of development.
		P10	0			The policy is unlikely to have an effect when considered against this objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P1	++	M,L-T, I, R, M	Old Oak South and OPDC area	The policy seeks that density considerations are mindful of existing residential communities in the area. Alongside measures to ensure the delivery of a sense of place and improve connectivity across the area, which could improve community interaction, this could have positive benefits against this objective. Further benefits may also be realised through the supporting of the creation of community space as part of the town centre uses.
		P2	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to deliver high quality, residential-led development alongside the delivery of town centre uses. The policy also seeks that density considerations are mindful of existing residential communities in the area. This should deliver benefits against this objective, however, the types of town centre uses are not specified.  <i>Supporting text could provide a link to the glossary to define town centre uses.</i>
		P3	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to deliver a major new town centre of the highest quality design that will contribute to delivering an excellent and accessible public realm. The types of town centre uses are specified as including a significant quantum of A-class uses as well as a range of culture, sports and leisure uses, visitor accommodation and social infrastructure. This could provide significant benefits against this objective through improving accessibility to services and facilities as well as increasing the potential for community interaction.
		P4	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seed to provide a range of green and civic spaces, that could contribute to increasing a sense of community wellbeing locally, leading to positive effects against this objective.
		P5	+	S, M, L-T, I, R, M	Park Royal and surrounding	The policy supports improvements to the road network to address congestion, as well as improving the frequency, capacity and connectivity of the local bus network and reducing



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					areas	severance caused by the A40 and A406. In addition to supporting the delivery of improvements to the walking and cycling network, the policy could lead to some improvement in community cohesion locally.
		P6	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to the potential severance caused by the road network locally. The policy seeks to centralise the provision of services, shared services and amenities to support local businesses, residents and the medical community alongside providing improved accessibility by walking and cycling modes within the area. Alongside measures to improve the built environment within this area, including the creation of more active frontages, which could encourage an increase in walking and cycling, these could create significant benefits against this objective above the existing baseline.
		P7	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy specifically requires that supported development will be of a lower density in more sensitive locations close to residential areas, as well as areas of open space such as Acton Cemetery. Land uses supported will include a mix of small-scale retail, leisure and community uses and eating and drinking establishments to serve local needs. The policy also seeks to improve connections between features within the area such as the station and the town centre uses, which should enable the achievement of significant benefits against this objective.
		P8	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy supports development as part of a mix of uses, which could help to create a sense of community locally. The proposed improvements to walking and cycling links, as well as reducing traffic congestion, could increase community interaction, resulting in greater cohesion. Improvements to the public realm based on the enhancement of historic assets could lead to a greater sense of place, which could have further benefits for the local sense of community.
		P9	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy specifically seeks that land uses do not negatively impact on the amenity of existing residential communities, which could lead to some benefits against this objective. However, as the area will be accommodating the HS2 construction site, it is considered that, although long term benefits may be positive, short term impacts on local communities could be negative, as a result of the significant construction impacts locally if not appropriately managed.
		P10	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The management of the facilities as a public open space for exercise and recreation could have significant positive effects against this objective. Increasing accessibility to the area through walking and cycling connections is likely to compound this effect.

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14	Improve safety and reduce crime and the fear of crime	P1	+	M,L-T, I, R, M	Old Oak South and OPDC area	The policy seeks that density considerations are mindful of existing residential communities in the area. Alongside measures to ensure the delivery of a sense of place and improve connectivity across the area, which could improve community interaction, this could have positive benefits against this objective. Further benefits may also be realised through the supporting of the creation of community space as part of the town centre uses, which could reduce the potential for anti-social behaviour.
		P2	+	S, M, L-T, D, IR, M	Old Oak South and OPDC area	The Local Plan describes the existing pedestrian environment in the area as 'hostile', with existing routes isolated from surrounding uses and suffering from a lack of natural surveillance. The creation of improved connections may reduce this effect alongside the support for activation of the area within the Spatial Vision. Although specific measures to improve natural surveillance have not been specified in the policy wording, these are managed through London Plan policies.
		P3	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to deliver a major new town centre of the highest quality design that will contribute to delivering an excellent and accessible public realm. The types of town centre uses are specified as including a significant quantum of A-class uses as well as a range of culture, sports and leisure uses, visitor accommodation and social infrastructure. This could provide significant benefits against this objective through increasing the potential for community interaction, active frontages and natural surveillance.
		P4	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The Local Plan outlines that the current character of the Grand Union Canal is characterised by limited passive surveillance, which has a negative impact on the use of the tow path for walking, cycling and recreation. The vision sets out that development in this area will provide a safe and convenient walking and cycling route enabling people to access the length of Old Oak, Park Royal and beyond including through the use of active frontages. The policy also specifically sets out the need for tow path lighting, which could reduce the fear of crime along the canal, leading to positive effects.
		P5	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	The policy supports improvements to the road network to address congestion, as well as improving the frequency, capacity and connectivity of the local bus network and reducing severance caused by the A40 and A406. In addition to supporting the delivery of improvements to the walking and cycling network, the policy could lead to some improvement in community cohesion locally which, in turn, could provide benefits for crime and the fear of crim.
		P6	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to increase community interaction. Alongside measures to improve the built environment within this area, including the creation of more active frontages, which could encourage an increase in walking and cycling, further

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					maximising natural surveillance, these measures could create significant benefits against this objective above the existing baseline.	
		P7	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy specifically requires that supported development will be of a lower density in more sensitive locations close to residential areas, as well as areas of open space such as Acton Cemetery, as well as improve connections between features within the area such as the station and the town centre uses, which should enable the achievement of benefits against this objective in terms of community cohesion and interaction, leading to a greater sense of wellbeing locally and an increase in natural surveillance. This effect could be compounded through the provision of an increase in active frontages in areas close to North Acton Station and along main streets.
		P8	+	S, M, L-T, i, R, M	OPDC area and surrounding boroughs	The policy supports development as part of a mix of uses, which could help to create a sense of community locally. The proposed improvements to walking and cycling links, as well as reducing traffic congestion, could increase community interaction, resulting in greater cohesion. Improvements to the public realm based on the enhancement of historic assets could lead to a greater sense of place, which could have further benefits for the local sense of community. In addition to an increase in the development of active frontages, this could have positive effects for crime and the fear of crime.  <i>Reference to active frontages, as included in the supporting text, should be specified in the policy wording to improve deliverability.</i>
		P9	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy specifically seeks that land uses do no negatively impact on the amenity of existing residential communities, which could lead to some benefits against this objective. An improvement in connectivity across the area and active frontages could help to improve community coherence and natural surveillance, leading to benefits against this objective. However, as the site will be the impact of the HS2 construction site will need to be mitigated.
		P10	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The management of the facilities as a public open space for exercise and recreation could have some positive effects against this objective. Increasing accessibility to the area through walking and cycling connections could also provide benefits.  <i>The management of the park could include measures to reduce crime and the fear of crime when using or accessing the park, particularly if it would be open during the evenings.</i>
15	Maximise the	P1	+	S, M, L-T, I, R, M	OPDC area and	The policy seeks that density considerations are mindful of existing residential communities in the area. Alongside measures to ensure the delivery of a sense of place

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health and wellbeing of the population, reduce inequalities in health and promote healthy living				surrounding boroughs	<p>and improve connectivity across the area, which could improve community interaction, this could have positive benefits against this objective. Further benefits may also be realised through the supporting of the creation of community space as part of the town centre uses. Accessibility to health services and physical activity may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. Long term potential air quality benefits may also have benefits for health. Access to green space could also provide both physical and mental health benefits. Some negative effects on health during the construction period may result from noise and air pollution if not adequately managed.</p> <p><i>See recommendation under objective 10 – multifunctional green infrastructure could improve the potential health benefits of connective routes through the increase in pollution sequestration, improved micro-climate and a sense of wellbeing.</i></p>
	P2	+	S, M, L-T, D, IR, M	Old Oak South and OPDC area	<p>Measures to ensure the delivery of a sense of place and improve connectivity across the area, which could improve community interaction, could have positive benefits against this objective. Further benefits may also be realised through the supporting of the creation of community uses as part of the town centre uses. Accessibility to health services and physical activity may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. Long term potential air quality benefits may also have benefits for health. Access to green space could also provide both physical and mental health benefits. Some negative effects on health during the construction period may result from noise and air pollution if not adequately managed. The Local Plan describes the existing pedestrian environment in the area as 'hostile'. The creation of improved connections may reduce this effect alongside the support for activation of the area within the vision. Although specific measures to improve natural surveillance have not been specified in the policy wording, these are managed through London Plan policies.</p> <p><i>See recommendation under Objective 14.</i></p>
	P3	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	<p>The policy seeks to deliver a major new town centre of the highest quality design that will contribute to delivering an excellent and accessible public realm. The types of town centre uses are specified as including a significant quantum of A-class uses as well as a range of culture, sports and leisure uses, visitor accommodation and social infrastructure. This could provide benefits against this objective through increasing the potential for community interaction. Further benefits may also be realised through the supporting of the creation of social infrastructure as part of the town centre uses. Access to green</p>

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						space could also provide both physical and mental health benefits. Some negative effects on health during the construction period may result from noise and air pollution if not adequately managed.  <i>See recommendation under objective 1 with regards to green infrastructure.</i>
		P4	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The Local Plan outlines that the current character of the Grand Union Canal is characterised by limited passive surveillance, which has a negative impact on the use of the tow path for walking, cycling and recreation. The vision sets out that development in this area will provide a safe and convenient walking and cycling route enabling people to access the length of Old Oak, Park Royal and beyond including through the use of active frontages. This could have benefits for physical and mental health through physical activity, increased community interaction and improved air quality in this area. The policy also specifically sets out the need for tow path lighting, which could reduce the fear of crime along the canal, leading to positive effects for health in this area.
		P5	+	S, M, L-T, D, R, M	Park Royal and surrounding areas	The policy supports improvements to the road network to address congestion, as well as improving the frequency, capacity and connectivity of the local bus network and reducing severance caused by the A40 and A406. In addition to supporting the delivery of improvements to the walking and cycling network, the policy could lead to some improvement in community cohesion locally, which could have benefits for health. A reduction in pollution and increase in connectivity via walking and cycling routes could also lead to positive health effects in this location. However, due to the low proportion of potential residents in this area and the retention of the area as an industrial location, effects are unlikely to be significant.
		P6	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to increase community interaction. Alongside measures to improve the built environment within this area, including the creation of more active frontages, which could encourage an increase in walking and cycling, these measures could create benefits against this objective above the existing baseline. However, due to the low proportion of potential residents in this area and the retention of the area as an industrial location, effects are unlikely to be significant.  <i>Health levels within the area could be improved through the extension of the green infrastructure network through this area, to create more pleasant walking and cycling routes.</i>
		P7	+	S, M, L-T, I,	North Acton	Land uses supported will include a mix of small-scale retail, leisure and community uses

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M	and surrounding areas	and eating and drinking establishments to serve local needs. The policy also specifically requires that supported development will be of a lower density in more sensitive locations close to residential areas, as well as areas of open space such as Acton Cemetery, as well as improve connections between features within the area such as the station and the town centre uses, which should enable the achievement of benefits against this objective in terms of community cohesion and interaction, as well as physical activity, leading to a greater sense of wellbeing locally and an increase in natural surveillance. Potential improvements in air, noise and light quality could further improve physical health. Walking and cycling is also encouraged.
		P8	+	M, L-T, I, R, M	Scrubs Lane and surrounding areas	The policy supports development as part of a mix of uses, which could help to create a sense of community locally. The proposed improvements to walking and cycling links, access to recreational space at Wormwood Scrubs, as well as reducing traffic congestion, could increase community interaction, resulting in greater cohesion as well as physical activity and improved physical health over time, also resulting from potential long term air quality improvements. Improvements to the public realm based on the enhancement of historic assets could lead to a greater sense of place, which could have further benefits for the local sense of community, leading to improvements in mental health. In addition to an increase in the development of active frontages, this could have positive effects for crime and the fear of crime, which could have benefits for health.
		P9	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy specifically seeks that land uses do no negatively impact on the amenity of existing residential communities, which could lead to some benefits against this objective. An improvement in connectivity across the area and active frontages could help to improve community coherence and natural surveillance, leading to benefits against this objective. However, as the area will be accommodating the HS2 construction site, it is considered that, although long term benefits may be positive, short term impacts on local communities could be negative, as a result of the significant construction impacts locally.
		P10	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The management of the facilities as a public open space for exercise and recreation could have significant positive effects against this objective. Increasing accessibility to the area through walking and cycling connections is likely to compound this effect.
16	To improve the education and skills levels of all members of the	P1	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.  <i>Town centre uses could be specified to include education facilities where necessary.</i>

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
population, particularly vulnerable groups	P2	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. <i>Town centre uses could be specified to include education facilities where necessary</i>	
	P3	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. The provision of social infrastructure within the high street may include educational facilities, although this isn't specified. <i>Town centre uses could be specified to include education facilities where necessary.</i>	
	P4	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. <i>Town centre uses could be specified to include education facilities where necessary</i>	
	P5	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.	
	P6	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.	
	P7	++	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. The policy specifically supports the delivery of education uses close to North Acton station, which could lead to significant benefits against this objective.	
	P8	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		P9	+	M, L-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P10	0			The policy is unlikely to have an effect when considered against this objective.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P1	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to deliver commercial space, including a range of flexible workspaces in accessible locations, as well as new retail and other town centre uses, including community space. This could lead to positive effects against this Objective.  <i>The provision of training facilities could be specified as a requirement in this area in addition to the guidance set out in policy E5.</i>
		P2	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to deliver a range of meanwhile uses and employment space for SMEs that help support place-making, deliver a mixed use place and act as a catalyst for wider regeneration, as well as new town centre uses. This could lead to positive effects against this Objective.  <i>The provision of training facilities could be specified as a requirement in this area in addition to the guidance set out in policy E5.</i>
		P3	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to provide a significant quantum of A-class uses as well as a range of culture, sports and leisure uses, visitor accommodation and social infrastructure. This could lead to positive effects against this objective.  <i>The provision of training facilities could be specified as a requirement in this area in addition to the guidance set out in policy E5.</i>
		P4	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of Old Oak and Park Royal, which could lead to some positive benefits against this objective arising from the implementation of this policy.
		P5	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of the industrial location of Park Royal, which could lead to some positive benefits against this objective arising from the implementation of this policy.
		P6	+	S, M,L-T, I, R, M	OPDC area and surrounding	The Policy seeks to support the economic functions of the industrial location of Park Royal, which could lead to some positive benefits against this objective arising from the implementation of this policy.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
		P7	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of Old Oak and Park Royal as well as the surrounding boroughs including Ealing, which could lead to some positive benefits against this objective arising from the implementation of this policy.  <i>It is unclear from the policy text under b) what exactly the policy is supportive of. This could be made clearer in the policy wording.</i>
		P8	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of Old Oak and Park Royal as well as the surrounding boroughs, which could lead to some positive benefits against this objective arising from the implementation of this policy.
		P9	+	S, M, L-T, I, R, M	Old Oak West	The policy seek to intensify the use of sites within the SIL by requiring proposals to demonstrate how they are maximising the use of sites, including the provision of smaller unity, to support greater industrial employment densities. This could lead to benefits against this Objective through maximising local employment levels.
		P10	0			The policy is unlikely to have an effect when considered against this objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P1	++	M, L-T, I, R, L	OPDC area and surrounding boroughs	The Policy seeks to support small and large scale catalyst uses as well as delivering commercial space and new retail and other town centre uses. This could encourage inward investment in the area. It is unclear as to whether the uses proposed would impact on neighbouring town centres. The policy also supports the redevelopment of all existing infrastructure, rail and industrial uses, which could have significant benefits against this objective. <i>It is recommended that this is a consideration, and measures to reduce the impact on neighbouring town centres be included within the policy or highlighted to ensure that the intention behind measures is made clear.</i>
		P2	++	M, L-T, I, R, L	OPDC area and surrounding boroughs	The existing land uses are characterised by a large second hand car dealership (Cargiant), rail infrastructure and a large waste recycling and processing plant (Powerday and European Metal Recycling). There are also a substantial number of SMEs in the area. New development will be residential-led with a mix of town centre uses including small and large scale catalyst uses. New employment spaces will cater mainly for SME and micro-businesses as part of new mixed-use buildings. Early phases will be supported by a range of meanwhile uses and employment space for SMEs that help support place-making, deliver a mixed use place and act as a catalyst for wider regeneration. The type of workspaces will differ from the large commercial spaces in Old Oak South. The policy

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
					wording encourages flexible workspace typologies at locations adjacent to transport or utilities infrastructure. This should help to provide benefits against this objective. Further benefits in terms of connections to Harlesden town centre, could further compound sustainability benefits.	
		P3	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to provide a significant quantum of A-class uses as well as a range of culture, sports and leisure uses, visitor accommodation and social infrastructure. This vision specifies that the Old Oak South area of the high street will be focussed on providing services for the large number of employees in the area. This could increase the attractiveness of the location to inward investors. However, this is not reflected in the policy wording.  <i>See recommendation under Objective 1.</i>
		P4	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy could increase the connectivity of the employment and residential areas across the plan area, as well as improving the local environment. This could be attractive to inward investors, leading to potential benefits against this objective.
		P5	++	M, L-T, I, R, L	London-wide and nationally	The Park Royal industrial estate is protected by a SIL designation. The policy supports this designation and seeks to deliver broad industrial type uses within the SIL. Mixed use development is encouraged on the First Central Site, including non-industrial employment and housing that supports walking, cycling and public transport access to Park Royal London Underground Station. The delivery of a range of walking and cycling infrastructural improvements are also set out in the policy. This clarity of land uses and potential improvement in the local environment and connectivity could improve the attractiveness of the area to inward investors.
		P6	++	M, L-T, I, R, L	London-wide and nationally	The policy supports a range of industrial types alongside affordable open workspaces and supporting services and amenities within a centralised, accessible, area. This should help to generate significant benefits against this objective.
		P7	++	M, L-T, I, R, L	London-wide and nationally	The policy seeks to provide a range of flexible workspaces and a significant quantum of new jobs and SME space, focussed on the station and major thoroughfares. Visitor accommodation will also be provided. This should help to deliver significant benefits against this objective.  <i>See recommendation under Objective 17.</i>
		P8	++	M, L-T, I, R, L	London-wide	The policy seeks to provide a range of flexible workspaces as part of the development of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				L	and nationally	the Cumberland Park Factory and new mixed use developments. This should help to deliver significant benefits against this objective.  <i>See recommendation under Objective 17.</i>
		P9	++	M, L-T, I, R, L	London-wide and nationally	The policy seeks to deliver development uses of broad industrial types appropriate for a SIL on the HS2 construction sites, once they are no longer in use. The policy also seeks to deliver employment and commercial uses. The policy seeks to intensify the use of sites within the SIL by requiring proposals to demonstrate how they are maximising the use of sites, including the provision of smaller units, to support greater industrial employment densities. Together, along with public realm improvements, these measures could help to encourage inward investment into the area in the medium to long term.
		P10	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The protection of this green open space could encourage inward investment to some degree, through increasing the attractiveness of the area as a place to live and work.

**Table G-3 Chapter 5: Sustainable development**

- SD1: Sustainable development

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	SD1	+	L-T, I, R, M	OPDC area and London-wide	Policy SD1 seeks to encourage the implementation of sustainable development through seeking to proactively work with applicants to jointly find solutions to ensure that development will improve the economic, social and environmental conditions in the area in accordance with Local Plan policies, the London Plan and the NPPF. This should help to realise benefits against this objective, although the specific benefits and potential negative effects of the policies have been assessed elsewhere in this IIA and will form the overall assessment of the effects of this policy.
2	To optimise the	SD1	+	L-T, I, R, M	OPDC area and London-	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	efficient use of land through increased development densities and building heights, where appropriate				wide	London Plan and the NPPF.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	on natural resources including fossil fuels for transport, heating and energy					
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
9	Improve the quality of the water environment	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
10	Create and enhance biodiversity and	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	the diversity of habitats across the area and its surroundings					
11	To minimise air, noise and light pollution, particularly for vulnerable groups	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
12	To conserve and enhance the historic environment, heritage assets and their settings	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
14	Improve safety and reduce crime and the fear of crime	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
18	To encourage inward investment	SD1	++	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF. A positive approach to working with developers should



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	alongside investment within existing communities, to create sustainable economic growth					encourage an increase in inward investment in the local area.

**Table G-4 Chapter 6: Design**

- D1: Strategic Policy: For Design
- D2: Streets and public realm
- D3: Open space
- D4: New buildings
- D5: Alterations & extensions
- D6: Heritage
- D7: Amenity
- D8: Inclusive design

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	D1	++	M, L-T, D, R, H	OPDC area	The policy seeks to contribute towards creating new character areas for places and neighbourhoods and enhancing positive elements of existing local character and context through the delivery of exemplar world class architectural and landscape design which would enable the enhancement of local distinctiveness and character and would directly support the IIA Objective.
		D2	++	M, L-T, D, R, H	OPDC area	The policy seeks to deliver exemplarily designed, welcoming, safe, resilient, flexible, inclusive and sustainable public realm network through supporting proposals that contribute to improving the quality of existing public realm and creating new public realm; improving local character areas or contributing to the delivery of new local character areas which would directly support the IIA Objective.
		D3	+	M, L-T, D, R, M	OPDC area	The protection and enhancement of existing public open spaces as well as contribution to the delivery of new public open spaces will support local distinctiveness and help to encourage place-making.
		D4	+	M, L-T, D, R, M	OPDC area	The policy seeks to deliver world class exemplary designed buildings which would contribute towards encouraging place-making.
		D5	+	M, L-T, D, R, M	OPDC area	Alterations and extensions would contribute to the IIA Objective through improving the architectural quality and character of existing building, as well as the provision of open and active frontages to the public realm.
		D5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy would seek the development of a streamlined local planning framework, however, this approach could result in negative impacts on the local character and context through an accumulation of unmanaged amendments to existing buildings.
		D6	+	S, M, L-T, I, R, M	OPDC area	The conservation and enhancement of the historic environment, heritage assets and their setting would contribute towards creating a sense of place.
		D7	+	S, M, L-T, I,	OPDC area	The provision of a high level of amenity and quality environment for building users would

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
			R, M		help to support place-making.
		D7 Option 1	+	S, M, L-T, I, R, M	OPDC area The use of the London Plan policy to manage amenity would partially contribute towards achieving the IIA Objective.
		D8	+	S, M, L-T, I, R, M	OPDC area The provision of an inclusive designed environment for Old Oak, Park Royal, and Wormwood Scrubs would support place-making.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	D1	+	S, M, L-T, I, R, M	OPDC area The creation of new character areas and enhancement of positive existing elements would inform optimising of development densities and location and/or range of building heights.
		D2	+	S, M, L-T, I, R, M	OPDC area The delivery of exemplarily designed, welcoming, safe, resilient, flexible, inclusive and sustainable public realm network will contribute to optimising densities in helping to support the functioning of buildings and quality of life of building users.
		D3	+	S, M, L-T, I, R, M	OPDC area The delivery of a network of public open spaces will contribute to optimising densities in helping to support the quality of life of building users.
		D4	+	S, M, L-T, I, R, M	OPDC area The policy seeks to deliver world class exemplary designed buildings and supports the delivery of densities within development that support those identified in the Overarching Spatial Policies and Places chapter of the Plan.
		D5	0	N/A	N/A There is no clear link between the policy and the IIA Objective.
		D5 Option 1	0	N/A	N/A There is no clear link between the policy and the IIA Objective.
		D6	+	S, M, L-T, I, R, M	OPDC area The need to conserve and / or enhance heritage assets will contribute to inform development densities and building heights.
		D7	+	S, M, L-T, I, R, M	OPDC area Ensuring that development delivers a high level of amenity and high quality environment for building users will inform development densities and buildings.
		D7 Option 1	+	S, M, L-T, I, R, M	OPDC area Using London Plan policy to ensuring that development delivers a high level of amenity and high quality environment for building users will inform development densities and buildings may not deliver the sufficient amount of amenity specific to Old Oak and Park Royal.
		D8	0	N/A	N/A There is no clear link between the Policy and IIA Objective.
3	Maximise the reuse of previously developed land	D1	0	N/A	N/A Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral. This is considered in the OSPs.
		D2	0	N/A	N/A Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	and existing buildings, including the remediation of contaminated land					neutral. This is considered in the OSPs.
		D3	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral. This is considered in the OSPs.
		D4	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver world class exemplary designed buildings and supports the delivery of densities within development that support those identified in the Overarching Spatial Policies and Places chapter of the Plan.
		D5	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral.
		<i>D5 Option 1</i>	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral.
		D6	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral.
		D7	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral.
		<i>D7 Option 1</i>	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral.
		D8	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised	D1	+	S, M, L-T, I, R, M	OPDC area	The delivery of exemplar design quality would involve good levels of accessibility which would support the IIA Objective.
		D2	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to contribute to or improve the network of streets and to contribute to connecting places together as well as breaking down severance which would support the improvement of accessibility and may contribute towards minimising the need to travel.
		D3	+	S, M, L-T, I, R, L	OPDC area	The provision of public open space would make partial contributions towards improving accessibility.
		D4	+	S, M, L-T, I,	OPDC area	The policy would include the delivery of development densities that accord with guidance

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	transportation methods and mitigate impacts on the transport network			R, L		set out in the OSP Chapter, thereby higher densities at stations would contribute to minimising the need to travel.
		D5	0	N/A	N/A	There is no clear link between the policy and the IIA Objective.
		<i>D5 Option 1</i>	0	N/A	N/A	There is no clear link between the policy and the IIA Objective.
		D6	0	N/A	N/A	There is no clear link between the policy and the IIA Objective.
		D7	0	N/A	N/A	There is no clear link between the policy and the IIA Objective.
		<i>D7 Option 1</i>	0	N/A	N/A	There is no clear link between the policy and the IIA Objective.
		D8	+	S, M, L-T, D, I, R, M	Old Oak, Park Royal, and Wormwood Scrubs	The policy specifically seeks to deliver inclusive and accessible designed environment for Old Oak, Park Royal, and Wormwood Scrubs and to reduce existing barriers.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	D1	++	S, M, L-T, I, R, L	OPDC area	The policy seeks to create new and enhance existing character areas for places and neighbourhoods. Across Old Oak and within non-industrial areas of Park Royal, this would include significant levels of housing.
		D2	0	N/A	N/A	The policy seeks the delivery of public realm and therefore has no direct link to the IIA Objective.
		D3	0	N/A	N/A	The policy addresses the delivery of open space and therefore has no direct link to the IIA Objective.
		D4	+	S, M, L-T, I, R, L	OPDC area	The policy addresses the delivery of new buildings and development densities in accordance with the OSP Chapter which would deliver significant levels of new housing, thereby supporting the IIA Objective.
		D5	0	N/A	N/A	The policy addresses alterations and extensions however ultimately does not directly relate to housing provision.
		<i>D5 Option 1</i>	0	N/A	N/A	The policy addresses alterations and extensions however ultimately does not directly relate to housing provision.
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	0	N/A	N/A	The policy primarily addresses amenity provision and has no direct link between the IIA Objective.
		<i>D7 Option 1</i>	0	N/A	N/A	The policy primarily addresses amenity provision and has no direct link between the IIA Objective.
		D8	+	S, M, L-T, D, I, R, M	Old Oak, Park Royal, and	The policy seeks inclusive design and it is noted that policy 3.8 of the London Plan requires development to deliver 10% of new housing to be designed to be wheelchair

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					Wormwood Scrubs	accessible or easily adaptable for residents who are wheelchair users.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	D1	+	S, M, L-T, D, I, R, L	OPDC area	New development has the potential to increase flood risk however this would only be associated with development within flood zones associated with the River Brent. However the provision of exemplar design would incorporate flood avoidance or adaptation measures. This should also be considered alongside the Environment and Utilities Chapter water proposed policy which sets out the suggested approach to flood risk. <i>Where necessary, appropriate mitigation measures should be incorporated into development.</i>
		D2	+	S, M, L-T, D, I, R, L	OPDC area	The nature of the policy itself to deliver an exemplarily designed, welcoming, safe, resilient, flexible, inclusive and sustainable public realm network may offer benefits towards the IIA Objectives through measures such as street greening There is no clear link between the policy and the IIA Objective.
		D3	+	S, M, L-T, D, I, R, L	OPDC area	The provision of open space has the potential to act as flood storage which could prevent adverse risk to housing areas and delivering green infrastructure to help address the urban heat island effect. <i>Where necessary and appropriate, flood risk mitigation measures and measures supporting climate change adaptation should be incorporated into the design of open space in accordance with the proposed water policy in the Environment and Utilities Chapter..</i>
		D4	0	N/A	N/A	New exemplarily designed and sustainable buildings would potentially incorporate flood alleviance or flood avoidance measures. This should also be considered alongside the Environment and Utilities Chapter water proposed policy which sets out the suggested approach to flood risk.
		D5	?	S, M, L-T, D, I, R, L	OPDC area	The extent of extensions could potentially have an effect on flood risk, however, this would only be associated with development within flood zones associated with the River Brent. <i>Where necessary and appropriate, flood risk mitigation measures and measures supporting climate change adaptation should be incorporated into the design of open space in accordance with the proposed water policy in the Environment and Utilities Chapter.</i>
		D5 Option 1	?	S, M, L-T, D, I, R, L	OPDC area	The policy states that guidance is not provided for alterations, extensions or shopfronts and could potentially have an effect on flood risk however this would only be associated with development within flood zones associated with the River Brent. <i>Where necessary and appropriate, flood risk mitigation measures and measures</i>

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						<i>supporting climate change adaptation should be incorporated into the design of open space in accordance with the proposed water policy in the Environment and Utilities Chapter.</i>
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		<i>D7 Option 1</i>	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D8	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	D1	0	N/A	N/A	The nature of the policy itself to demonstrate exemplar world class architectural and landscape design quality and may offer benefits towards the IIA Objectives through measures such as energy efficiency and reducing reliance on natural resources though not to a significant degree.
		D2	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D3	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D4	+	S, M, L-T, D, I, R, M	OPDC area	The policy seeks the development of world class exemplarily designed and sustainable buildings which would likely support the minimisation of contributions to climate change through high standards of sustainable design and the incorporation of incorporated measures for energy efficiency.
		D5	+	S, M, L-T, D, I, R, M	OPDC area	Alterations and extensions would require the use of materials and transportation during construction though appropriate measures could support climate change adaptation. <i>Development should seek to incorporate sustainability measures during construction and operation.</i>
		<i>D5 Option 1</i>	+/-	S, M, L-T, D, I, R, M	OPDC area	The policy does not provide guidance for alterations, extensions and shopfronts instead seeking the development through a streamlined planning framework approach. Lack of guidance could reduce the likelihood of meeting the IIA Objective <i>Development should seek to incorporate sustainability measures during construction and operation.</i>
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		<i>D7 Option 1</i>	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D8	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
8	To minimise	D1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D2	+	S, M, L-T, D,	Old Oak and	The policy seeks to coordinate the delivery of utilities infrastructure within the public realm

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste				I, R, M	Park Royal	which could include sub-surface waste transfer. This would help to support the IIA Objective.
	D3	0	N/A	N/A		The provision of open space is not likely to result in significant effects to waste.
	D4	+/-	S, M, L-T, D, I, R, M		OPDC area	Development of new buildings could have negative effects resulting in increased waste particularly during construction if not adequately mitigated through policies in the waste management policy in the Environment and Utilities Chapter. <i>Where appropriate waste and recycling facilities should be incorporated and waste minimisation techniques should be encouraged.</i>
	D5	+/-	S, M, L-T D, I, R, M		OPDC area	Alterations and extensions could have negative effects resulting in increased waste particularly during construction if not adequately mitigated through policies in the waste management policy in the Environment and Utilities Chapter.. <i>Where appropriate waste and recycling facilities should be incorporated and waste minimisation techniques should be encouraged.</i>
	D5 Option 1	+/-	S, M, L-T, D, I, R, M		OPDC area	Alterations and extensions through a streamlined planning framework approach could have negative effects resulting in increased waste particularly during construction if not adequately mitigated through policies in the waste management policy in the Environment and Utilities Chapter.. <i>Where appropriate waste and recycling facilities should be incorporated and waste minimisation techniques should be encouraged.</i>
	D6	0	N/A		N/A	There is no direct link between the policy and the IIA Objective.
	D7	0	N/A		N/A	There is no direct link between the policy and the IIA Objective.
	D7 Option 1	0	N/A		N/A	There is no direct link between the policy and the IIA Objective.
	D8	0	N/A		N/A	There is no direct link between the policy and the IIA Objective.
9 Improve the quality of the water environment	D1	+	S, M, L-T, D, I, R, M		OPDC area	The delivery of exemplar world class landscape design quality could include water efficiency measures such as SuDS which would contribute to improving the water environment.
	D2	0	N/A		N/A	There is no direct link between the policy and the IIA Objective.
	D3	+	S, M, L-T, D, I, R, M		OPDC area	New and existing open space could support the IIA Objective through providing opportunities for Sustainable Urban Drainage Systems (SuDS). <i>Sustainable water measures should be adopted where appropriate.</i>
	D4	+	S, M, L-T, D, I, R, M		OPDC area	The policy seeks to deliver exemplary design and sustainable buildings which could include water efficiency measures such as SuDS which would contribute to improving the



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						water environment. <i>Sustainable water measures should be adopted where appropriate.</i>
		D5	+	S, M, L-T, D, I, R, M	OPDC area	The delivery of alterations and extensions could include water efficiency measures such as SuDS which would contribute to improving the water environment. <i>Sustainable water measures should be adopted where appropriate.</i>
		D5 Option 1	+/-	S, M, L-T, D, I, R, M	OPDC area	The delivery of alterations, extensions and shopfronts could include water efficiency measures such as SuDS. However a lack of guidance for delivery could have implications for achieving the IIA Objective. <i>Sustainable water measures should be adopted where appropriate.</i>
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D8	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	D1	+	S, M, L-T, D, I, R, M	OPDC area	The delivery of world class architectural and landscape quality design could contribute towards including landscape features which may support the IIA Objective though to a limited degree.
		D2	+	S, M, L-T, D, I, R, M	OPDC area	The delivery of a sustainable public realm network could help to support biodiversity where spaces may include provision for street greening. <i>Where possible, green corridors should be encouraged within development.</i>
		D3	+	S, M, L-T, D, I, R, M	OPDC area	The delivery of open space could help to support biodiversity where spaces may include provision for green corridors. <i>Where possible, green corridors should be encouraged within development.</i>
		D4	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D5	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D5 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D8	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
11	To minimise air,	D1	+	S, M, L-T, D, I, R, M	OPDC area	The delivery of exemplar world class architectural and landscape design quality could include measures to minimise air, noise and light pollution.

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
noise and light pollution, particularly for vulnerable groups					
	D2	+	S, M, L-T, D, I, R, L	OPDC area	The provision of open space could bring about positive effects to air quality through the provision of street greening.
	D3	+	S, M, L-T, D, I, R, L	OPDC area	The provision of open space could bring about positive effects to air quality through the provision of vegetation.
	D4	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
	D5	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
	<i>D5 Option 1</i>	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
	D6	N/A	N/A	N/A	There is no direct link between the policy and the IIA Objective.
	D7	+	S, M, L-T, D, I, R, L	OPDC area	The need for development to deliver a high level of amenity would directly minimise air, noise and light pollution.
	<i>D7 Option 1</i>	+/-	S, M, L-T, D, I, R, L	OPDC area	The need for development to deliver a high level of amenity would directly minimise air, noise and light pollution. Relying on London Plan policy may not address Old Oak and Park Royal specific issues in relation to daylight/sunlight.
	D8	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
12 To conserve and enhance the historic environment, heritage assets and their settings	D1	+	S, M, L-T, I, R, M	OPDC area	The creation of new places within the plan area would support the IIA Objective as design would seek to enhance existing elements of local character and context ensuring a positive response to the surrounding environment. This would help to ensure that the setting of assets would be protected and enhanced as well helping to conserve the historic environment.
	D2	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver a public realm network that responds to the surrounding character. This would support the IIA Objective through the provision of public realm that respects and complements its existing surroundings including heritage assets and their setting.
	D3	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver open space that contributes to the character and activation of an area. This would support the IIA Objective through the provision of open space that respects and complements its existing surroundings including heritage assets and their setting.
	D4	+	S, M, L-T, I, R, M	OPDC area	The delivery of exemplary buildings would support the IIA Objective through careful design that respects its surroundings and conserves the historic environment, heritage assets and their setting.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		D5	+	S, M, L-T, I, R, M	OPDC area	The policy states that proposals for alterations and extensions would be supported where they relate sympathetically to any other sensitive sites that would be affected which would contribute to conserving heritage assets and their setting as well as protecting the historic environment.
		<i>D5 Option 1</i>	+/-	S, M, L-T, I, R, L	OPDC area	The policy also supports the IIA Objective however without guidance provided for alterations, extensions and shopfronts, unmanaged amendments to existing buildings could result in negative impacts on local character and potentially heritage assets.
		D6	++	S, M, L-T, D, R, H	OPDC area	The policy would directly support the IIA Objective as it seeks to identify, conserve, enhance and improve access to the historic environment, heritage assets and their setting. The policy also seeks to ensure heritage assets contribute to improving and creating a sense of place where appropriate and address Heritage at Risk.
		D7	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to provide high level amenity and quality environment for building users and surrounding areas which would enable an approach to development that would be sensitive to the existing local area and would respect and complement features including heritage assets and their setting.
		<i>D7 Option 1</i>	-	S, M, L-T, I, R, M	OPDC area	A London-wide standardised approach to the delivery of amenity would help to contribute to delivering the objective, however OPDC would not be able to manage specific amenity issues in relation to higher density development.
		D8	0	N/A	N/A	The policy seeks to deliver exemplary inclusive and accessible design that could support sensitive development however would not make significant contributions towards achieving the IIA Objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	D1	+	S, M, L-T, I, R, L	OPDC area	The provision of new character areas and improvements to existing character areas would support a sense of place and would help to increase community cohesion.
		D2	+	S, M, L-T, I, R, L	OPDC area	The policy seeks provision of public realm that facilitates the use and enjoyment of spaces and to improve the network of streets, to connect places together and breakdown severance all of which would contribute towards increasing community cohesion and reducing social exclusion.
		D3	+	S, M, L-T, I, R, L	OPDC area	The provision of open space, the protection of existing spaces and the delivery of temporary spaces that contribute to the vitality character and activation of an area supporting the development of permanent development would help to increase community cohesion and encourage a sense of community welfare.
		D4	+	S, M, L-T, I, R, L	OPDC area	The delivery of new buildings would contribute to creating a sense of place and would partially support the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		D5	N/A	N/A	N/A	Alterations and extensions would not contribute significantly towards the achievement of the IIA Objective.
		D5 Option 1	N/A	N/A	N/A	Alterations and extensions would not contribute significantly towards the achievement of the IIA Objective.
		D6	+	S, M, L-T, I, R, L	OPDC area	The improvement and enhancement of the historic environment and heritage features within the area may contribute partially towards supporting community cohesion.
		D7	+	S, M, L-T, I, R, L	OPDC area	The provision of a high level of amenity and quality environment would help to support community cohesion and welfare.
		D7 Option 1	+	S, M, L-T, I, R, L	OPDC area	A London-wide standardised approach to the delivery of amenity would help to contribute to delivering the objective, however OPDC would not be able to manage specific amenity issues in relation to higher density development
		D8	+	S, M, L-T, I, R, L	Old Oak, Park Royal, and Wormwood Scrubs	The development of inclusive design that is safe and accessible and addresses existing barriers would contribute towards community cohesion.
14	Improve safety and reduce crime and the fear of crime	D1	++	S, M, L-T, I, R, L	OPDC area	The policy primarily focuses on place-making through the provision of architectural and landscape design quality which incorporates safety and could make contributions towards reducing fear of crime.
		D2	+	S, M, L-T, I, R, L	OPDC area	The policy seeks to provide safe public realm and improving the network of streets which would help to improve safety. <i>Development design should seek to optimise natural surveillance and ensure that new spaces and routes are safe.</i>
		D3	+	S, M, L-T, I, R, L	OPDC area	The design of open space could support the reduction of crime and could improve safety.
		D4	+	S, M, L-T, I, R, L	OPDC area	The delivery of world-class exemplary and sustainable building design would likely incorporate safety into its design which would support the IIA Objective however this is not explicitly stated within the policy.
		D5	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D5 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	+	S, M, L-T, I, R, L	OPDC area	The design of open space could support the reduction of crime and could improve safety.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		D7 <i>Option 1</i>	+	S, M, L-T, I, R, L	OPDC area	A London-wide standardised approach to the delivery of amenity would help to contribute to delivering the objective, however OPDC would not be able to manage specific amenity issues in relation to higher density development
		D8	+	S, M, L-T, I, R, L	Old Oak, Park Royal, and Wormwood Scrubs	Safety could be improved through development design.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	D1	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to enhance existing local character and context and contribute towards creating new character areas for places and neighbourhoods for locations within Old Oak this would contribute to place-making and maximising the wellbeing of the population.
		D2	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to provide welcoming and safe public realm network that facilitates the use and enjoyment of spaces while responding to local character and integrating with surroundings. This would contribute towards maximising the wellbeing of the population through enabling safety, enhancing community spirit all of which would support community cohesion. It would also contribute to promoting healthy living giving greater opportunities for walking and cycling which would promote health benefits.
		D3	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to protect and enhance existing public open spaces, create and connect new public open spaces to meet needs identified and deliver private and communal open space to support the needs of residents which would contribute to maximising health and wellbeing as well as helping to promote healthy living.
		D4	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver world class exemplarily designed and sustainable new buildings that would contribute to maximising the wellbeing of the population.
		D5	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D5 <i>Option 1</i>	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high level of amenity and quality environment for building users that would not negatively impact upon the amenity of existing local communities would contribute towards maximising the health and wellbeing of the population.
		D7 <i>Option 1</i>	+	S, M, L-T, I, R, M	OPDC area	A London-wide standardised approach to the delivery of amenity would help to maximise health and wellbeing of the population however OPDC would not be able to manage specific amenity issues in relation to higher density development.
		D8	+	S, M, L-T, I, R, L	Old Oak, Park Royal, and	The delivery of inclusive design which is accessible and addresses existing barriers of the physical environment would make contributions towards maximising wellbeing of the

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					Wormwood Scrubs	population.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	D1	0	N/A	N/A	The policy primarily addresses place-making and has no direct link to improving education and skills.
		D2	0	N/A	N/A	The policy primarily addresses streets and public realm and has no direct link to improving education and skills.
		D3	0	N/A	N/A	The policy primarily addresses open space and has no direct link to improving education and skills.
		D4	+	M, L-T, I, R, L	OPDC area	The policy primarily addresses new building design, including social infrastructure which could include the integration of schools which would support the improvement of education.
		D5	0	N/A	N/A	There is no direct link between the policy and improving education and skills.
		D5 Option 1	0	N/A	N/A	There is no direct link between the policy and improving education and skills.
		D6	0	N/A	N/A	There is no direct link between the policy and improving education and skills.
		D7	0	N/A	N/A	There is no direct link between the policy and improving education and skills.
		D7 Option 1	0	N/A	N/A	There is no direct link between the policy and improving education and skills.
		D8	0	N/A	N/A	There is no direct link between the policy and improving education and skills.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	D1	+	S, M, L-T, I, R, L	OPDC area	The policy seeks to provide new character areas and enhance the positive elements of existing character areas which would partially support the IIA Objective in helping to maximise social and economic wellbeing of the local and regional population.
		D2	+	S, M, L-T, I, R, L	OPDC area	Social and economic wellbeing could be partly supported through improvements to public realm and street network.
		D3	+	S, M, L-T, I, R, L	OPDC area	The provision of public open space would partly support the IIA Objective by contributing to maximising social wellbeing.
		D4	+	S, M, L-T, I, R, L	OPDC area	The delivery of exemplary designed buildings could help to support social and economic wellbeing.
		D5	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D5 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D6	+	S, M, L-T, I, R, M	OPDC area	The conservation, enhancement and improvement of the historic environment and heritage assets help to generate social and economic benefits for Old Oak and Park Royal and would therefore partially support the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		D7	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high level amenity and quality environment for building users and surrounding areas would help to support social and economic wellbeing.
		<i>D7 Option 1</i>	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D8	0	N/A	N/A	Social and economic wellbeing could be partly supported by delivering an exemplarily inclusive and accessible designed environment for all.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	D1	+	S, M, L-T, I, R, L	OPDC area	An increase in exemplar design that contributes to enhancing character and creating new character areas would contribute towards encouraging inward investment alongside investment within existing communities.
		D2	+	S, M, L-T, I, R, L	OPDC area	Inward investment would be encouraged through the delivery of public realm that facilitates the use and enjoyment of spaces.
		D3	0	N/A	N/A	Whilst the provision of open space would not significantly contribute towards achieving the IIA Objective, it would help to increase attractiveness of the local area.
		D4	+	S, M, L-T, I, R, M	OPDC area	The delivery of exemplary and sustainable buildings would enable the creation of attractive areas which would help to encourage inward investment alongside investment within existing communities.
		D5	+	S, M, L-T, I, R, L	OPDC area	Alterations and extensions would provide for improvements to the architectural quality and character of buildings which would make partial contributions towards achieving the IIA Objective.
		<i>D5 Option 1</i>	+	S, M, L-T, I, R, L	OPDC area	Alterations and extensions would provide for improvements to the architectural quality and character of buildings which would make partial contributions towards achieving the IIA Objective.
		D6	+	S, M, L-T, I, R, L	OPDC area	Conserving and enhancing the historic environment and heritage assets would make partial contributions towards achieving the IIA Objective.
		D7	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high level amenity and quality environment for building users and surrounding areas would help to promote the attractiveness of the local area as a place to live and work which would help to attract inward investment and would support the creation of economic growth.
		<i>D7 Option 1</i>	+	S, M, L-T, I, R, L	OPDC area	The management of amenity through a London wide plan similarly with the preferred option would help to promote the attractiveness of the local area as a place to live and work which would help to attract inward investment however the policy would not enable the management of specific amenity issues relevant to Old Oak and Park Royal and therefore would support the IIA Objective to a lesser extent than the preferred option.
		D8	+	S, M, L-T, I,	Old Oak, Park	The delivery of an inclusive and accessible design environment within Old Oak, Park

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M	Royal, and Wormwood Scrubs	Royal and Wormwood Scrub would increase attractiveness within these areas and would help to encourage inward investment.



**Table G-5 Chapter 7: Housing Policies and Policy Options**

- H1: Strategic Policy for Housing
- H2: Housing Supply
- H3: Housing Mix
- H4: Affordable Housing
- H5: Existing Housing
- H6: Housing in the Private Rented Sector
- H7: Housing with shared facilities
- H8: Specialist housing for older people and / or vulnerable people
- H9: Gypsy and Travellers Accommodation
- H10: Student housing

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	H1	++	L-T, I, R, M	OPDC area and London-wide	The policy seeks to deliver housing to contribute to meeting the housing needs identified in the London Plan. The requirement for high quality design and lifetime neighbourhoods should lead to significant benefits against this objective.
		H2	+	L-T, I, R, L	OPDC area	The policy could have some benefits against this objective in that it seeks to bring vacant dwellings back into use, which could improve sense of place locally.
		H2 Option 1	+/-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective.
		H3	+	L-T, I, R, L	OPDC area	The policy could lead to the generation of some benefits against this objective, in that it will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods.  <i>It is suggested that bullet point 3 of the policy is unnecessary and provides repetition that could be excluded.</i>
		H3 Option 1	+	L-T, I, R, L	OPDC area	The policy option relates to alternatives in the provision of housing types, which is unlikely to significantly affect the predicted effect of this policy compared to the preferred option.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>H4 Option 2</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option 3</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option 4</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	+	M, L-T, I, R, L	OPDC area	The policy could have some benefits against this objective in that it seeks to bring vacant dwellings back into use, as well as resist the loss of existing housing stock, with the exception of land within the SIL, which could improve sense of place locally.
		<i>H5 Option 1</i>	-	M, L-T, I, R, L	OPDC area	The policy option relates to the conversion of buildings to other uses and the potential loss of existing housing stock, which could have a negative effect in relation to the creation of a sense of place adhering to the principles of lifetime neighbourhoods.
		<i>H5 Option 2</i>	+	M, L-T, I, R, L	OPDC area	The policy option would include a lower percentage of family sized accommodation, which could reduce the potential for the creation of mixed communities locally. However, effects would still be positive overall.
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments are of a high standard of design, which is managed, should seek to benefit this objective to some degree.
		<i>H6 Option 1</i>	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	In addition to the above, the policy option could have benefits for the creation of more sustainable communities through leading to positive impacts for the residents. However, the requirements for all PRS proposals to sign up to the London Rental Scheme could have impacts on deliverability, which could affect the overall housing mix, which could lead to negative effects against this objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility and facilities, could lead to some benefits against this objective. Supporting text indicates that where quality concerns exist about existing shared housing, their loss to an alternative housing uses will not be resisted or proposals to improve standards will be considered.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						<p><i>The policy could seek to enhance the creation of local communities as opposed to only seeking that shared housing do not give rise to unacceptable impacts on local amenity.</i></p> <p><i>The policy could include a requirement relating to existing shared housing, similar to that included within the supporting text, within the policy wording.</i></p>
		H7 Option 1	-	S, M, L-T, I, R, L	OPDC area and London-wide	This option could have a negative effect on the objective. The conversion or loss of shared housing would remove this type of housing from supply and would not help meet London's housing demand.
		H8	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments are of a high standard of design, and are accessible to public transport, shops, services, community facilities and social networks, should seek to benefit this objective to some degree.
		H9	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	<p>The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. The policy seeks to ensure that the development of student accommodation does not lead to an over-concentration of student accommodation in a particular location. In addition, proposals should not have an unacceptable impact on the immediate and surrounding areas, including residential amenity. Sites should be in accessible locations and not lead to the net loss of other forms of housing. These measures should ensure that a sense of place and community is maintained, although will not necessarily contribute towards the creation of communities.</p> <p><i>Measures that could be included to create places within the local communities as a result of student housing could be suggested to enhance their presence within the built environment.</i></p>
		H10 Option 1	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
2	To optimise	H1	+	S, M, L-T, D, R, M	OPDC area and London-	The policy seeks to deliver a significant number of houses within London, which is likely to lead to the optimisation in the use of land.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
the efficient use of land through increased development densities and building heights, where appropriate					wide	
	H2	0				The policy is unlikely to have an effect against achievements against this objective directly.
	<i>H2 Option 1</i>	0				The policy option is unlikely to have an effect against achievements against this objective directly.
	H3	0				The policy is unlikely to have an effect against achievements against this objective directly.
	<i>H3 Option 1</i>	0				The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
	H4					No preferred policy is provided for affordable housing in this iteration of the Local Plan.
	<i>H4 Option 1</i>					See assessment of strategic options Table 5-2 'Affordable Housing Approaches'
	<i>H4 Option 2</i>					See assessment of strategic options Table 5-2 'Affordable Housing Approaches'
	<i>H4 Option 3</i>					See assessment of strategic options Table 5-2 'Affordable Housing Approaches'
	<i>H4 Option 4</i>					See assessment of strategic options Table 5-2 'Affordable Housing Approaches'
	H5	+	M, L-T, I, R, M		OPDC area	The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings.
	<i>H5 Option 1</i>	+	M, L-T, I, R, M		OPDC area	The policy option could have some benefits against this objective in that it seeks to optimise development through the conversion of existing dwellings for other uses.
	<i>H5 Option 2</i>	+	M, L-T, I, R, M		OPDC area	The policy option could have some benefits against this objective in that it seeks to optimise development through the conversion of existing dwellings for other uses.
H6	0				The policy is unlikely to have an effect against achievements against this objective directly.	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>H6 Option 1</i>	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	Meeting an identified need for shared housing within the plan area is considered to be an efficient use of land.
		<i>H7 Option 1</i>	-	S, M, L-T, I, R, L	OPDC area and London-wide	The option seeks to encourage the loss of shared housing which is not a way to optimise the efficient use of land
		H8	+	S, M, L-T, I, R, L	OPDC area and London-wide	The key issues to within the Local Plan in relation to this policy highlight that new specialist need housing should be provided in new high density buildings. However, this is not reflected in the policy wording.  <i>The policy wording could usefully identify the need for developments to be high density, if this is appropriate.</i>
		H9	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	Gypsy and traveller sites are likely to be characterised by low density development, which could lead to negative effects against this objective. However, there is only site in the OPDC area. Any future site identified would need to meet the required number of pitches, which would be in line with the regulations/guidance.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	Student accommodation could be considered to be an efficient use of land as it is likely to be high density.
		<i>H10 Option 1</i>	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
3	Maximise the reuse of previously developed land and existing buildings, including the	H1	+	S, M, L-T, D, R, M	OPDC area and London-wide	The policy seeks to deliver a significant number of houses within London, which is likely to maximise the use of previously developed land and buildings, through the implementation of this strategic policy.
		H2	+	L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to bring vacant dwellings back into use.
		<i>H2 Option 1</i>	+	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H3	0			The policy is unlikely to have an effect against achievements against this objective

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
remediation of contaminated land						directly.
	<i>H3 Option 1</i>	0				The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
	H4					No preferred policy is provided for affordable housing in this iteration of the Local Plan.
	<i>H4 Option 1</i>					See assessment of strategic options Table F-1 'Affordable Housing Approaches'
	<i>H4 Option 2</i>					See assessment of strategic options Table F-1 'Affordable Housing Approaches'
	<i>H4 Option 3</i>					See assessment of strategic options Table F-1 'Affordable Housing Approaches'
	<i>H4 Option 4</i>					See assessment of strategic options Table F-1 'Affordable Housing Approaches'
	H5	+	M, L-T, I, R, M	OPDC area		The policy could have some benefits against this objective in that it seeks to bring vacant dwellings back into use.
	<i>H5 Option 1</i>	+	M, L-T, I, R, M	OPDC area		The policy option could have some benefits against this objective in that it seeks to optimise development through the conversion of existing dwellings for other uses.
	<i>H5 Option 2</i>	+	M, L-T, I, R, M	OPDC area		The policy option could have some benefits against this objective in that it seeks to optimise development through the conversion of existing dwellings for other uses.
	H6	0				The policy is unlikely to have an effect against achievements against this objective directly.
	<i>H6 Option 1</i>	0				The policy option is unlikely to have an effect against achievements against this objective directly.
	H7	+	S, M, L-T, I, R, L	OPDC area and London-wide		Meeting an identified need for shared housing within the plan area is considered to be an efficient use of land.
<i>H7 Option</i>	-	S, M, L-T, I, R, L	OPDC area and London-		The option seeks to encourage the loss of shared housing which is not a way to optimise the efficient use of land.	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		1			wide	
		H8	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H9	-	S, M, L-T, I, R, L	OPDC area and London-wide	Gypsy and traveller sites are likely to be characterised by low density development, which could lead to negative effects against this objective. .
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	Student accommodation could be considered to be an efficient use of land as it is likely to be high density.
		H10 Option 1	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	H1	+	M, L-T, I, R, M	OPDC area	The policy specifically seeks the delivery of 'Lifetime Neighbourhoods'. The principles of Lifetime Neighbourhoods include the creation of walkable communities and ' <i>sustaining a diverse range of methods of transportation that enable people to get around, especially by using public transport, or by other means if they cannot use this type of service</i> ' <sup>9</sup> The implementation of this policy should lead to benefits against this objective locally.
		H2	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H2 Option 1	+/-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. Nevertheless, construction traffic impacts, unless not mitigated, will be managed and policies relating to this are contained in the transport chapter.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.

<sup>9</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6248/2044122.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf)

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H4			No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		<i>H4 Option 1</i>			See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option 2</i>			See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option 3</i>			See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option 4</i>			See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	0		The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H5 Option 1</i>	+/-	M, L-T, I, R, M	OPDC area The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		<i>H5 Option 2</i>	+/-	M, L-T, I, R, M	OPDC area The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0		The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H6 Option 1</i>	0		The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	+	M, L-T, I, R, M	OPDC area The policy seeks that new shared houses should be located in areas with high public transport access and facilities and services. This could help to create benefits against this objective.
		<i>H7 Option 1</i>	+	S, M, L-T, I, R, L	OPDC area and London-wide This option could have a negative effect on the objective. The conversion or loss of shared housing would remove this type of housing from supply and would not help meet London's housing demand. Despite the change in nature of accommodation type this should not have an effect on public transport accessibility therefore the option could lead to some benefits.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H8	+	M, L-T, I, R, M	OPDC area	The policy seeks that new specialist housing should be located in areas with high public transport access and facilities and services. This could help to create benefits against this objective.
		H9	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be accessible to transport, services and facilities. This could help to create benefits against this objective.
		H10	+	M, L-T, I, R, M	OPDC area	The policy requires that new student housing should be in accessible locations, which could lead to some benefits against this objective.
		<i>H10 Option 1</i>	+	M, L-T, I, R, M	OPDC area	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	H1	++	L-T, D, R, L	OPDC area and London-wide	<p>The delivery of a significant number of high quality dwellings, to meet London's housing needs, should lead to significant positive benefits against this objective. The policy specifically requires a mix of housing types to meet a wide variety of needs, whilst specifying that 90% of units must be accessible and adaptable and 10% of units must be accessible to wheelchair users.</p> <p><i>Details pertaining to what the housing needs will be within the area, in order to identify whether these needs are being 'met' within the housing policies, could be provided in the supporting text. This may be implemented in the next stage of the Local Plan, once the evidence-base studies are complete.</i></p> <p><i>It is unclear where the 10% of housing to meet building regulation M4(3) 'wheelchair user dwellings' has come from. Reference to the evidence-base for this proportion could be usefully provided in the supporting text. If this is a standard requirement within the building regulations, it is suggested that it need not be included within the policy wording.</i></p>
		H2	++	L-T, D, R, M	OPDC area and London-wide	The policy should help the delivery of housing within the area, through the creation of targets, promotion of development opportunities and conversion of existing buildings, as well as through monitoring. The supporting text highlights that the conversion of larger dwellings to smaller, more affordable dwellings, will contribute to the supply of housing. This could create significant benefits against this objective.
		<i>H2 Option 1</i>	+/-	M, L-T, D, R, M	OPDC area and London-wide	Delivering a higher proportion of housing units within the plan period could lead to housing needs being met at an earlier stage. However, potential impacts on viability could lead to negative effects in deliverability, leading to the prediction of both positive

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
					and negative effects against this objective.	
		H3	++	L-T, I, R, L	OPDC area	The policy could lead to the generation of significant benefits against this objective, in that it will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods.  <i>It is suggested that bullet point 3 of the policy is unnecessary and provides repetition that could be excluded.</i>
		H3 Option 1	+	L-T, D, R, L	OPDC area and London-wide	The policy option would have similar effects to that assessed for the preferred option, although effects may be less significant as, although the option could deliver a more flexible range of unit types, these would not be designed to meet lifetime needs, and thus may not meet all of the housing needs in the area.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	+	M, L-T, I, R, L	OPDC area	The policy could generate positive effects against this objective through the creation of additional housing through the conversion of existing dwellings and other types of buildings. However, the policy seeks to provide at least one family sized unit within conversions. This should help to maintain a mix of housing, however, it is unclear whether or not this proportion would meet local needs or not. As stated in the supporting text for policy H3, housing mix and needs will be identified more clearly in the next iteration of the local plan.  <i>See recommendation under Objective 1. It is further recommended that repetition with regards to housing mix is removed between housing policies H3 and H5. The policy</i>

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						<i>could seek to require that conversions of existing and vacant buildings include provision for ensuring that the accessibility of buildings is brought up to the standard required for new developments.</i>
		H5 Option 1	+/-	M, L-T, I, R, L	OPDC area	The policy option would allow the conversion of existing residential uses for non-residential uses, which could lead to the loss of housing stock. This could lead to negative effects against this objective. However, existing stock may be of unsatisfactory standards; in inappropriate locations or of lower density. The loss of such accommodation will only be negative if it is not replaced, and in instances where it is replaced at higher density, it will have a positive impact.
		H5 Option 2	+/-	M, L-T, I, R, L	OPDC area	The policy option may lead to negative effects against the provision of a mix of housing to meet local needs through the loss of family accommodation. However, the loss of smaller family homes could be to provide a single large family home.
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to benefits against this objective as it seeks to support an identified housing need in London.
		H6 Option 1	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	In addition to the above, the requirements for all PRS proposals to sign up to the London Rental Scheme could have impacts on deliverability, which could affect the overall housing mix, which could lead to negative effects against this objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. Supporting text indicates that where quality concerns exist about existing shared houses, their loss to an alternative housing uses will not be resisted or proposals to improve standards will be considered. This could help to increase quality locally over time.  <i>See second recommendation under Objective 1.</i>
		H7 Option 1	-	S, M, L-T, I, R, L	OPDC area and London-wide	This option could have a negative effect on the objective. The conversion or loss of shared housing would remove this type of housing from supply and would not help meet London's housing demand. The option could result in particular households being unable to this form of affordable housing.
		H8	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to benefits against this objective as it seeks to support an identified housing need in London. Affordable housing is also sought within the policy, for developments that include market led development aimed at older or vulnerable people.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H9	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to benefits against this objective as it seeks to support an identified housing need in London. The extent of how significant the potential benefits will be will be dependent on the outcomes of the study, which will be included in the next stage of the Local Plan. This may include the need to identify new sites for the accommodation of gypsies and travellers.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to benefits against this objective as it seeks to support an identified housing need in London. Specific requirements with regard to design are not included within the policy.
		<i>H10 Option 1</i>	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy option is likely to have similar effects against the objective compared with the preferred option, although these effects may be slightly less positive, as the option does not allow for the flexible future use of the student accommodation.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	H1	+	M, L-T, I, R, L	OPDC area	The policy specifically refers to the need for developments to be flexible and adaptable to accommodate 'future need, innovation and smart technologies'. The supporting text doesn't specify what these measures may include, but goes on to state that development 'will need to cater for a wide variety of needs promoting consideration of aspects such as natural lighting, ventilation and the efficient use of space'. This could lead to indirect benefits against this objective in terms of sustainable design.
		H2	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H2 Option 1</i>	-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. Note that the Environment and Utilities policies contain some measures to mitigate this.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H3 Option 1</i>	0			The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		<i>H4 Option 1</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>Option 2</i>			
		<i>H4 Option 3</i>			See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option 4</i>			See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	0		The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H5 Option 1</i>	0		The policy option is unlikely to have an effect against achievements against this objective directly.
		<i>H5 Option 2</i>	0		The policy option is unlikely to have an effect against achievements against this objective directly.
		H6	0		The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H6 Option 1</i>	0		The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0		The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H7 Option 1</i>	0		The option is unlikely to have an effect against this objective.
		H8	0		The policy is unlikely to have an effect against achievements against this objective directly.
		H9	0		The policy is unlikely to have an effect against achievements against this objective directly. Should new sites be proposed, the policy should seek that flood risk minimisation measures are incorporated into the site.
		H10	0		The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H10 Option</i>	0		The policy is unlikely to have an effect against achievements against this objective directly.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	1				
		H1	+	M, L-T, I, R, L	OPDC area	The policy specifically refers to the need for developments to be flexible and adaptable to accommodate 'future need, innovation and smart technologies'. The supporting text doesn't specify what these measures may include, but goes on to state that development 'will need to cater for a wide variety of needs promoting consideration of aspects such as natural lighting, ventilation and the efficient use of space'. This could lead to indirect benefits against this objective in terms of sustainable design.
		H2	+/-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for energy and transport. However, design objectives could minimise this effect. However, the delivery phasing and design of schemes will mitigate for the impact on climate change as will the use of sustainable construction methods.
		H2 Option 1	-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. However, be aware that the policies in the transport chapter will require mitigation of construction impact.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
H4 Option				See assessment of strategic options Table F-1 'Affordable Housing Approaches'		

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
		4				
		H5	+/-	M, L-T, I, R, M	OPDC area	<p>The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings, which could reduce the embodied energy required compared with the creation of new dwellings to meet the entire housing need. However, increased pressure on local infrastructure through an intensification of the population, could lead to negative effects on resource requirements. However, the policy seeks to minimise this effect through requiring that conversions do not result in cumulative stress on services and would not result in an adverse impact on parking or other local amenities.</p> <p><i>The policy could seek to require that conversions of existing and vacant buildings include provision for ensuring that the energy efficiency of buildings is brought up to the standard required for new developments.</i></p>
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new shared houses are located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on the emissions of greenhouse gases.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new specialist housing is located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on the emissions of greenhouse gases.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						<i>It is recommended that high quality design aspects also specify the need for energy efficient design, which should help to reduce the cost of living for older people and improve their health.</i>
		H9	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be accessible to transport, services and facilities. This could help to create benefits against this objective.
		H10	+	M, L-T, I, R, M	OPDC area	The policy requires that new student housing should be in accessible locations, which could lead to some benefits against this objective.
		<i>H10 Option 1</i>	+	M, L-T, I, R, M	OPDC area	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	H1	+/-	L-T, I, R, L	OPDC area	The delivery of a significant number of houses within the area is likely to have negative implications for the creation of waste. This may be partly mitigated by the policies encouraging recycling.
		H2	+/-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources and the creation of waste. However, design objectives could minimise this effect.
		<i>H2 Option 1</i>	+/-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. Note that other policies in the construction sections of the plan could help to mitigate this.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H3 Option 1</i>	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		<i>H4 Option 1</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'



IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
		2				
		H4 Option 3			See assessment of strategic options Table F-1 'Affordable Housing Approaches'	
		H4 Option 4			See assessment of strategic options Table F-1 'Affordable Housing Approaches'	
		H5	+/-	M, L-T, I, R, M	OPDC area	<p>The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings, which could reduce the waste generated during construction activities. However, increased pressure on local infrastructure through an intensification of the population, could lead to negative effects on resource requirements. The policy seeks to minimise this effect through requiring that conversions do not result in cumulative stress on services and would not result in an adverse impact local amenities.</p> <p><i>The policy could add a requirement that conversions do not result in cumulative stress on the local environment, including pollution levels such as air, noise and light pollution as well as the potential impact on biodiversity, land quality and water quality.</i></p>
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	0			The policy is unlikely to have an effect against achievements against this objective

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						directly.
		H9	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H10 Option 1</i>	0			The policy option is unlikely to have an effect against achievements against this objective directly.
9	Improve the quality of the water environment	H1	+/-	L-T, I, R, L	OPDC area	The delivery of a significant number of houses within the area is likely to have negative implications for the natural environment through a potential increase in polluted runoff and increase demand for natural resources. However, design objectives could minimise this effect – see water management policies.
		H2	+/-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect – see water management policies.
		<i>H2 Option 1</i>	-	M, L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H3 Option 1</i>	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		<i>H4 Option 1</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option 2</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		3			
		H4 Option 4			See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	+/-	M, L-T, I, R, M	OPDC area The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings, which could reduce the pollution generated during construction activities. However, increased pressure on local infrastructure through an intensification of the population, could lead to negative effects on resource requirements and potential pollution. The policy seeks to minimise this effect through requiring that conversions do not result in cumulative stress on services and would not result in an adverse impact local amenities.  <i>See recommendation under Objective 8.</i>
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0		The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0		The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0		The policy is unlikely to have an effect against achievements against this objective directly.
		H7 Option 1	0		The option is unlikely to have an effect against this objective.
		H8	0		The policy is unlikely to have an effect against achievements against this objective directly.
		H9	+	M, L-T, I, R, M	OPDC area The policy seeks that any new gypsy and traveller sites should be capable of connecting to utilities infrastructure and services. This could help to create benefits against this objective. Access to utilities at the current site in Ealing is unknown.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						<i>The policy could include a requirement for the improvement of connections to services and facilities including utilities to the existing site, should this be necessary. Detail relating to this could be included in the supporting text.</i>
		H10	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H10 Option 1</i>	0			The policy option is unlikely to have an effect against achievements against this objective directly.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	H1	-	L-T, I, R, L	OPDC area	The delivery of a significant number of houses within the area is likely to have negative implications for the natural environment through a potential increase in polluted runoff and increase demand for natural resources. However, design objectives could minimise this effect.
		H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		<i>H2 Option 1</i>	-	M, L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. Note that the GI policies in the Environment and Utilities chapter may help to mitigate this.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H3 Option 1</i>	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		<i>H4 Option 1</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option 2</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		3			
		H4 Option 4			See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	0		The policy is unlikely to have an effect against achievements against this objective directly.
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0		The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0		The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0		The policy is unlikely to have an effect against achievements against this objective directly.
		H7 Option 1	0		The option is unlikely to have an effect against this objective.
		H8	0		The policy is unlikely to have an effect against achievements against this objective directly.
		H9	0		The policy is unlikely to have an effect against achievements against this objective directly.
		H10	0		The policy is unlikely to have an effect against achievements against this objective directly.
		H10 Option 1	0		The policy option is unlikely to have an effect against achievements against this objective directly.
11	To minimise air, noise and light pollution,	H1	+/-	M, L-T, I, R, M	OPDC area The delivery of a significant number of houses within the area is likely to have negative implications for the natural environment through a potential increase in polluted runoff and increase demand for natural resources. However, design objectives could minimise this effect. The policy specifically seeks the delivery of 'Lifetime

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
particularly for vulnerable groups						Neighbourhoods'. The principles of Lifetime Neighbourhoods include the creation of walkable communities and ' <i>sustaining a diverse range of methods of transportation that enable people to get around, especially by using public transport, or by other means if they cannot use this type of service</i> ' <sup>10</sup> The implementation of this policy should lead to benefits against this objective locally. In addition, some indirect effects through high quality design measures, may also lead to some benefits.
	H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in noise and pollution. However, design objectives could minimise this effect including via policies in other chapters.	
	H2 Option 1	-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective.	
	H3	0			The policy is unlikely to have an effect against achievements against this objective directly.	
	H3 Option 1	0			The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.	
	H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.	
	H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'	
	H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'	
	H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'	
	H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'	

<sup>10</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6248/2044122.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf)

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H5	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H5 Option 1</i>	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		<i>H5 Option 2</i>	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H6 Option 1</i>	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new shared houses are located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on local pollution levels.
		<i>H7 Option 1</i>	0			The option is unlikely to have an effect against this objective.
		H8	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new specialist housing is located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on local pollution levels.
		H9	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be accessible to transport, services and facilities. This could help to create benefits against this objective.
		H10	+	M, L-T, I, R, M	OPDC area	The policy requires that new student housing should be in accessible locations, which could lead to some benefits against this objective through a potential reduction in an increase in vehicular transport. Further, the requirement for consideration of the potential impact on the immediate and surrounding area and residential amenity, could help to reduce potential impacts from noise, air and light pollution.
		<i>H10</i>	+	M, L-T, I, R,	OPDC area	The policy option is unlikely to noticeably affect the predicted effect of this policy

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>Option 1</i>		M		compared to the preferred option.
12	To conserve and enhance the historic environment, heritage assets and their settings	H1	+/-	L-T, I, R, L	OPDC area	The delivery of a significant number of houses within the area is likely to have negative implications for the historic environment through a significant change in the setting of the local area. However, the design and heritage policies could minimise this effect.
		H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative implications for the historic environment through a significant change in the setting of the local area. However, the design and heritage policies could minimise this effect.
		<i>H2 Option 1</i>	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H3	+	M, L-T, I, IR, L	OPDC area and surrounding boroughs	The policy could lead to benefits against this objective, in that new housing will need to take into consideration the local character of the site and its ability to accommodate a mix of housing types and sizes.
		<i>H3 Option 1</i>	+	M, L-T, I, IR, L	OPDC area and surrounding boroughs	The policy option is likely to generate similar effects to the preferred option.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		<i>H4 Option 1</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option 2</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option 3</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option 4</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	+	M, L-T, I, IR, L	OPDC area and surrounding	The policy seeks to ensure that conversions of existing buildings maintain the general character of the surrounding area. This could help to ensure that effects on the historic environment are minimised.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	+	M, L-T, I, IR, L	OPDC area and surrounding boroughs	The policy is unlikely to have an effect against achievements against this objective directly. Supporting text indicates that new development should take into account the location and character of the area. However, this is not reflected in the policy wording.
		H9	?			Proposals for new gypsy and traveller sites could impact on the local historic environment. However, whether there is a need for new sites is currently unknown until the outcomes of the study are published. <i>This could be included in the policy wording as a consideration.</i>
		H10	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
13	Increase community cohesion and reduce social	H1	++	M, L-T, I, R, M	OPDC area	The policy specifically seeks the delivery of 'Lifetime Neighbourhoods'. The principles of Lifetime Neighbourhoods include the creation of a number of features, which could have significant positive effects in relation to this objective. These measures includes requirements relating to: resident empowerment; access; the provision of a range of services and amenities; accessible greenspace; opportunities to enhance social

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
exclusion to encourage a sense of community and welfare						networks and wellbeing; and the meeting of inclusive design principles. Specific requirements relating to social networks include: <i>'Informal/formal opportunities and activities (social, learning/training, volunteering), where people feel safe and confident and which respect and reflect the needs of different ages, cultures and ethnicities.'</i> <sup>11</sup> Adherence to these principles should ensure that the provision of opportunities reflects the diversity of the local area and the incoming population.
	H2	+	M, L-T, I, R, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership.	
	H2 Option 1	-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective.	
	H3	++	L-T, I, R, L	OPDC area	The policy could lead to the generation of benefits against this objective, in that it will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. This could generate significant benefits against this objective, through the potential creation of greater social equity through reducing geographical inequalities.	
	H3 Option 1	+	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of housing types, which, although could offer a more flexible range of unit types compared with the preferred policy option, is unlikely to meet local needs as significantly.	
	H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.	
	H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'	
	H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'	
	H4 Option				See assessment of strategic options Table F-1 'Affordable Housing Approaches'	

<sup>11</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6248/2044122.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf)

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		3			
		H4 Option 4			See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	+	M, L-T, I, IR, L	OPDC area  The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership. Further, the policy seeks that conversions of existing dwellings maintain the amenity of neighbours, the general character of the surrounding area, and do not result in the cumulative stress on services.  <i>The policy could be reworded to seek that the conversion of existing dwellings and vacant buildings seeks to enhance the amenity of the local community, as opposed to seeking a minimal effect.</i>
		H5 Option 1	-	M, L-T, I, R, L	OPDC area The policy option would allow the conversion of existing residential uses for non-residential uses, which could lead to the loss of housing stock. This could lead to negative effects against this objective.
		H5 Option 2	-	M, L-T, I, R, L	OPDC area The policy option may lead to negative effects against the provision of a mix of housing to meet local needs through the loss of family accommodation. This could also lead to negative effects against this objective through a reduction in the mix of the community and resulting potential negative effects to the generation of inequalities.
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London, which could help to reduce inequalities and provide benefits against this objective to some degree. A requirement to ensure that developments are of a high standard of design, which is managed, should also seek to benefit this objective to some degree.
		H6 Option 1	+/-	S, M, L-T, I, R, L	OPDC area and London-wide In addition to the above, the policy option could have benefits for the creation of more sustainable communities through leading to positive impacts for the residents. However, the requirements for all PRS proposals to sign up to the London Rental Scheme could have impacts on deliverability, which could affect the overall housing mix, which could lead to negative effects against this objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						and facilities, could also lead to benefits against this objective. Further, new shared houses should not give rise to unacceptable impacts on amenity.  <i>See first recommendation under Objective 1.</i>
		H7 Option 1	-	S, M, L-T, I, R, L	OPDC area and London-wide	This option could have a negative effect on the objective. The conversion or loss of shared housing would remove this type of housing from supply and would not help meet London's housing demand. The shortage of available affordable housing and more non-affordable self-contained accommodation may alienate certain groups and create unrest in the community.
		H8	++	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Significant positive effects may be achieved through a requirement that accessible social networks are appropriate to the needs of the intended occupiers.
		H9	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy seeks to ensure that any new sites are accessible to services and facilities, and local social infrastructure. This could provide some benefits against this objective.  <i>The policy could usefully consider the potential integration of new sites within the surrounding community, as part of the assessment of impacts.</i>
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. The policy seeks to ensure that the development of student accommodation does not lead to an over-concentration of student accommodation in a particular location. In addition, proposals should not have an unacceptable impact on the immediate and surrounding areas, including residential amenity. Sites should be in accessible locations and not lead to the net loss of other forms of housing. These measures should ensure that a sense of place and community is maintained, although will not necessarily contribute towards the creation of more cohesive communities.  <i>See recommendations under objective 1.</i>
		H10 Option 1	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
14	Improve safety and reduce crime and the fear of crime	H1	+	M, L-T, I, R, M	OPDC area	The policy specifically seeks the delivery of 'Lifetime Neighbourhoods'. The principles of Lifetime Neighbourhoods include the creation of a number of features. These measures includes requirements relating to: resident empowerment; access; the provision of a range of services and amenities; accessible greenspace; opportunities to enhance social networks and wellbeing; and the meeting of inclusive design principles. These measures could lead to an increase in natural surveillance and general feeling of community, which could create positive indirect benefits against this objective.
		H2	+	M, L-T, I, R, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership.
		<i>H2 Option 1</i>	+	L-T, I, R, L	OPDC area	'Secure by design' policies implemented for housing development will mitigate for the fear of crime and improve safety.
		H3	+	L-T, I, R, L	OPDC area	The policy could lead to the generation of some benefits against this objective, in that it will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. This could generate benefits against this objective, through the potential creation of greater social equity through reducing geographical inequalities.
		<i>H3 Option 1</i>	+	M, L-T, I, R, L	OPDC area	The policy option relates to alternatives in the provision of housing types, which, although could offer a more flexible range of unit types compared with the preferred policy option, is unlikely to meet local needs as significantly, which may lead to less benefits in relation to social equity.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		<i>H4 Option 1</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option 2</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option 3</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		<i>H4 Option</i>				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
		4				
		H5	+	M, L-T, I, IR, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership. Further, the policy seeks that conversions of existing dwellings maintain the amenity of neighbours, which could have some benefits.  <i>See recommendation under objective 13.</i>
		H5 Option 1	+	M, L-T, I, IR, L	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+	M, L-T, I, IR, L	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London, which could help to reduce inequalities and provide benefits against this objective to some degree.
		H6 Option 1	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	In addition to the above, the policy option could have benefits for the creation of more sustainable communities through leading to positive impacts for the residents. However, the requirements for all PRS proposals to sign up to the London Rental Scheme could have impacts on deliverability, which could affect the overall housing mix, which could lead to negative effects against this objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards and are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Further, new shared houses should not give rise to unacceptable impacts on amenity, which should help to reduce potential impacts on crime.
		H7 Option 1	-	S, M, L-T, I, R, L	OPDC area and London-wide	This option could have a negative effect on the objective. The conversion or loss of shared housing to non-affordable accommodation may increase the possibility of crime.
		H8	0			The policy is unlikely to have an effect against achievements against this objective directly.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H9	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	<p>The policy seeks to ensure that any new sites are accessible to services and facilities, and local social infrastructure. This could provide some benefits against this objective through potentially reducing the potential for anti-social behaviour.</p> <p><i>The policy could usefully consider the potential integration of new sites within the surrounding community, as part of the assessment of impacts. This could help to reduce a possible perception of fear of crime.</i></p>
		H10	+/-	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	<p>The introduction of student housing into the area could increase the potential for local crime, as students can be targets for crime, as well as causing potential anti-social behaviour. Ensuring a mix of housing in student areas could lead to the minimisation of this potentially negative effect – see supporting policy text.</p>
		<i>H10 Option 1</i>	+/-	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	<p>The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.</p>
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	H1	++	M, L-T, I, R, M	OPDC area	<p>The policy specifically seeks the delivery of ‘Lifetime Neighbourhoods’. The principles of Lifetime Neighbourhoods include the creation of a number of features, which could have significant positive effects in relation to this objective. These measures includes requirements relating to: resident empowerment; access; the provision of a range of services and amenities; accessible greenspace; opportunities to enhance social networks and wellbeing; and the meeting of inclusive design principles. In addition, the supporting text to the policy indicates that the policy requirement for ‘developments to be flexible and adaptable to accommodate future need, innovation and smart technologies’ refers to the need for developments to be reflective of the health impacts of new housing. The supporting text refers to aspects such as natural lighting, ventilation and the efficient use of space to be considered specifically, whilst encouraging developers to consider positively the impact on mental and physical health through the quality of housing provision.</p> <p><i>The policy wording could specifically refer to the need for developments to be designed with the health and wellbeing of residents in mind. Design measures might also include measures such as high levels of thermal insulation and the provision of outside space/green roofs for all residents.</i></p>
		H2	+	M, L-T, I, R, L	OPDC area	<p>The policy could lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of</p>

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						community wellbeing and thus improvements in mental health, as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership.
		H2 Option 1	-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. Note construction policy in transport chapter for mitigation measures. And environment chapter policies relation to air quality.
		H3	+	L-T, I, R, L	OPDC area	The policy could lead to the generation of some benefits against this objective, in that it will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. This could generate benefits against this objective, through the potential creation of greater social equity through reducing geographical inequalities, leading to potential benefits for mental health as well as physical health, through the provision of appropriate housing types. It is noted that more details relating to housing mix will be provided at the next stage of the Local Plan's development, which could lead to more significant effects being generated against this objective.  <i>It is recommended that the next iteration of the Local Plan considers human health as part of the mix of housing provision, through the consideration of design principles alluded to in the supporting text provided for policy H1. It is suggested that the requirements relating to housing mix within policies H1 and H3 are consolidated into the same policy.</i>
		H3 Option 1	+	M, L-T, I, R, L	OPDC area	The policy option relates to alternatives in the provision of housing types, which, although could offer a more flexible range of unit types compared with the preferred policy option, is unlikely to meet local needs as significantly, which may lead to less benefits in relation to social equity.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option				See assessment of strategic options Table F-1 'Affordable Housing Approaches'



IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
		2				
		H4 Option 3			See assessment of strategic options Table F-1 'Affordable Housing Approaches'	
		H4 Option 4			See assessment of strategic options Table F-1 'Affordable Housing Approaches'	
		H5	+	M, L-T, I, R, L	OPDC area	<p>The policy could lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing and thus improvements in mental health, as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership. Further, the policy seeks that conversions of existing dwellings maintain the amenity of neighbours, and do not result in the cumulative stress on services. This could help to maintain existing health levels.</p> <p><i>See recommendation under objective 13. The requirements for new development in terms of requirements for improving mental and physical health should also be applied to the conversion of existing and vacant dwellings, to seek that inequalities are not exacerbated.</i></p>
		H5 Option 1	+	M, L-T, I, R, L	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+	M, L-T, I, R, L	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London, which could help to reduce inequalities and provide benefits against this objective to some degree.
		H6 Option 1	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	In addition to the above, the policy option could have benefits for the creation of more sustainable communities through leading to positive impacts for the residents. However, the requirements for all PRS proposals to sign up to the London Rental Scheme could have impacts on deliverability, which could affect the overall housing mix, which could lead to some negative effects against this objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					wide	relevant quality standards are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Further, new shared houses should not give rise to unacceptable impacts on amenity, which could have some benefits against this objective.  <i>See first recommendation under Objective 1.</i>
		H7 Option 1	+	S, M, L-T, I, R, L	OPDC area and London-wide	This option could have a negative effect on the objective. The conversion or loss of shared housing would remove this type of housing from supply and would not help meet London's housing demand. Despite the change in nature of accommodation type this should not have an effect on social infrastructure or public transport accessibility therefore the option could lead to some benefits.
		H8	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments are of a high standard of design, and are accessible to public transport, shops, services, community facilities and social networks, should seek to also benefit this objective to some degree through a potential increase in walking to services and facilities, as well as reduction in air pollution, which could provide health benefits.  <i>See recommendation under Objective 7.</i>
		H9	+/-	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy could lead to the generation of health benefits for potential communities on new sites, as the policy requires that new sites are supported by appropriate facilities, layout and design quality to support health and wellbeing. However, the continued use of the existing site could lead to long term health implications, as access improvements to health facilities are described as limited in the supporting text.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support sites which are in accessible locations to public transport. However, the policy also seeks to ensure the new student housing does not have an unacceptable impact on residential amenity, which doesn't necessarily ensure the health and wellbeing of the student communities.  <i>It is recommended that the policy ensures that new student accommodation is supported by an appropriate level of services and facilities, to meet the needs of the students. This could also help to reduce impacts on residential amenity in a positive way. The creation of new facilities and services might include sports facilities, which</i>

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						<i>could be shared locally.</i>
		H10 Option 1	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	H1	+	M, L-T, I, R, L	OPDC area	The policy specifically seeks the delivery of 'Lifetime Neighbourhoods'. The principles of Lifetime Neighbourhoods include the creation of a number of features. These measures includes requirements relating to: resident empowerment; access; the provision of a range of services and amenities; accessible greenspace; opportunities to enhance social networks and wellbeing; and the meeting of inclusive design principles. Specific requirements include: ' <i>Informal/formal opportunities and activities (social, learning/training, volunteering)</i> ' <sup>12</sup> These measures may lead to some benefits against this objectives in relation to learning opportunities.
		H2	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H2 Option 1	+	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. However, the social infrastructure policies may help mitigate this.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

<sup>12</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6248/2044122.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf)

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H9	+	M, L-T, I, R, L	OPDC area	The policy requires that new gypsy and traveller site should be capable of support by local social infrastructure. This could include education facilities, leading to potential benefits against this objective.
		H10	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
17	Maximise the	H1	+	M, L-T, I, R,	OPDC area	The policy specifically seeks the delivery of 'Lifetime Neighbourhoods'. The principles

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
social and economic wellbeing of the local and regional population and improve access to employment and training				L		of Lifetime Neighbourhoods include the creation of a number of features. These measures includes requirements relating to: resident empowerment; access; the provision of a range of services and amenities; accessible greenspace; opportunities to enhance social networks and wellbeing; and the meeting of inclusive design principles. Specific requirements include: <i>'Informal/formal opportunities and activities (social, learning/training, volunteering)'</i> <sup>13</sup> These measures may lead to some benefits against this objectives in relation to learning opportunities.
	H2	0				The policy is unlikely to have an effect against achievements against this objective directly.
	<i>H2 Option 1</i>	+	L-T, I, R, L	OPDC area		The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. Also, a larger number of homes could increase the number of opportunities to employment and training.
	H3	0				The policy is unlikely to have an effect against achievements against this objective directly.
	<i>H3 Option 1</i>	0				The policy is unlikely to have an effect against achievements against this objective directly.
	H4					No preferred policy is provided for affordable housing in this iteration of the Local Plan.
	<i>H4 Option 1</i>					See assessment of strategic options Table F-1 'Affordable Housing Approaches'
	<i>H4 Option 2</i>					See assessment of strategic options Table F-1 'Affordable Housing Approaches'
	<i>H4 Option 3</i>					See assessment of strategic options Table F-1 'Affordable Housing Approaches'
	<i>H4 Option</i>					See assessment of strategic options Table F-1 'Affordable Housing Approaches'

<sup>13</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6248/2044122.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf)

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		4				
		H5	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H5 Option 1</i>	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		<i>H5 Option 2</i>	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H6 Option 1</i>	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H7 Option 1</i>	0			The option is unlikely to have an effect against this objective.
		H8	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H9	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H10 Option 1</i>	0			The policy option is unlikely to have an effect against achievements against this objective directly.
18	To encourage inward investment alongside investment within existing	H1	+	L-T, I, R, L	OPDC area, London-wide and nationally	The creation of high quality design and the meeting of housing needs may encourage inward investment into the area indirectly through the attraction of a diverse workforce through the creation of an area where people want to live.
		H2	+	L-T, I, R, L	OPDC area, London-wide and	The policy could increase the potential deliverability of housing in the area, which could increase the attractiveness of the area to inward investors.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
communities, to create sustainable economic growth					nationally	
	<i>H2 Option 1</i>	0				The policy option is unlikely to have an effect against achievements against this objective directly.
	H3	0				The policy is unlikely to have an effect against achievements against this objective directly.
	<i>H3 Option 1</i>	0				The policy is unlikely to have an effect against achievements against this objective directly.
	H4					No preferred policy is provided for affordable housing in this iteration of the Local Plan.
	<i>H4 Option 1</i>					See assessment of strategic options Table F-1 'Affordable Housing Approaches'
	<i>H4 Option 2</i>					See assessment of strategic options Table F-1 'Affordable Housing Approaches'
	<i>H4 Option 3</i>					See assessment of strategic options Table F-1 'Affordable Housing Approaches'
	<i>H4 Option 4</i>					See assessment of strategic options Table F-1 'Affordable Housing Approaches'
	H5	0				The policy is unlikely to have an effect against achievements against this objective directly.
	<i>H5 Option 1</i>	0				The policy option is unlikely to have an effect against achievements against this objective directly.
	<i>H5 Option 2</i>	0				The policy option is unlikely to have an effect against achievements against this objective directly.
	H6	0				The policy is unlikely to have an effect against achievements against this objective directly.
	<i>H6 Option 1</i>	0				The policy option is unlikely to have an effect against achievements against this objective directly.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H7	0			The policy is unlikely to have an effect against achievements against this objective directly.
		<i>H7 Option 1</i>	0			The option is unlikely to have an effect against this objective.
		H8	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H9	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10	+	M, L-T, I, R, L	OPDC area, London-wide	An increase in students in the area may attract local investment through the potential for a highly skilled and potentially flexible workforce.
		<i>H10 Option 1</i>	+	M, L-T, I, R, L	OPDC area, London-wide	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.



**Table G-6 Chapter 8: Employment Policies and Policy Options**

- E1: Strategic Policy: Delivering a diverse economy
- E2: Old Oak
- E3: Park Royal
- E4: Open workspaces
- E5: Local access to employment and training

IIA Objective		Performance of Policy		Temporal Scale	Geographical Extent	Commentary and Recommendations
				Nature of Impact		
1	To enhance the built environment and encourage 'place-making'	E1	+	S, M, L-T, I, R, M	Old Oak and Park Royal	The policy seeks to promote Old Oak and Park Royal as a place for enterprise and innovation. The area possesses a diverse economic profile and the delivery of economic growth through contribution to the delivery of a range of employment uses in areas outside Strategic Industrial Locations (SIL) and a range of industrial uses within Park Royal SIL would help to enhance the built environment and encourage place making.
		E2	+	S, M, L-T, I, R, M	Old Oak	The policy states that Old Oak would become a mixed employment hub through requiring a range of flexible workspace typologies from proposals and town centre uses which generate employment along the High Street, in and around Old Oak Common Station and in other accessible locations. Supporting Old Oak to become a mixed employment hub would help towards enhancing the built environment and encouraging placemaking.
		<i>E2 Option 1</i>	+	S, M, L-T, I, R, L	Old Oak	The policy would not support focus on B1(a) uses around Old Oak Common Station which would provide for a flexible approach to office distribution across Old Oak. This would not greatly affect place-making compared to the preferred option.
		<i>E2 Option 2</i>	+/-	S, M, L-T, I, R, M	Old Oak	The benefit of not focussing support on B1(b) and B1(c) uses in Old Oak north would be that additional floorspace for non-industrial uses would be provided which would benefit the built environment. However locations not suited to retail, office, leisure or residential uses could remain vacant and could negatively impact upon the amenity of the public realm which could also negatively impact upon placemaking.
		E3	+	S, M, L-T, I, R, M	Park Royal	The protection and enhancement of SIL and the support of adjacent uses and provision for smaller units to support greater employment densities would make contributions towards enhancing the built environment.
		<i>E3 Option 1</i>	+	S, M, L-T, I, R, M	Park Royal	The option states that the SIL boundary would not be extended which would benefit the delivery of non-industrial uses however not designating SIL appropriate sites could be considered a lost opportunity to help support the continued success of Park Royal. The policy would support the enhancement of the built environment though to a lesser extent than the preferred option.
		<i>E3 Option 2</i>	+/-	S, M, L-T, I, R, M	Park Royal	The option states that additional land would be released to accommodate other forms of development which could help to support the enhancement of the built environment. However, there would be increased pressure on industrial land capacity.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		E4	+	S, M, L-T, I, R, M	OPDC area	The policy supports placemaking and the enhancement of the built environment as it seeks to support proposals for affordable workspaces and open workspaces that protect existing viable open workspace typologies and contribute to the wider regeneration of the OPDC area.
		E4 Option 1	+/-	S, M, L-T, I, R, M	OPDC area	Delivery of onsite open workspaces for residential and or/ commercial proposals would provide a large range of employment workspace to support a diverse local economy which in turn would also contribute towards placemaking. However, providing these spaces without appropriate market assessment may result in them remaining vacant.
		E4 Option 2	+/-	S, M, L-T, I, R, M	OPDC area	Delivery of small scale workspaces would contribute towards placemaking and the built environment though on a slightly different scale compared to policies E4 and E4 Option 1. There is a risk that if the employment or housing unit is vacant, then the joined unit would also be vacant.
		E5	+	S, M, L-T, I, R, L	OPDC area	The policy primarily focuses on improving access to employment and training and it seeks to provide physical access to jobs for local people which would help the area become more defined and would contribute to placemaking.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	E1	+	S, M, L-T, I, R, L	Old Oak and Park Royal	Policy supports the establishment of new commercial hub and the consolidation and intensification of Park Royal SIL, both of which aim to make the most efficient use the use of land.
		E2	+	S, M, L-T, I, R, L	Old Oak	The policy seeks to provide a new commercial area and town centre uses.
		E2 Option 1	0	N/A	Old Oak	There is no direct link with the policy and SA Objective.
		E2 Option 2	0	N/A	Old Oak	There is no direct link with the policy and SA Objective.
		E3	+	S, M, L-T, I, R, L	Park Royal	The policy requires proposals to demonstrate how they are maximising the use of sites in Park Royal. This would support the objective.
		E3 Option 1	0	N/A	Park Royal	There is no direct link with the policy and SA Objective.
		E3 Option 2	0	N/A	Park Royal	There is no direct link with the policy and SA Objective.
		E4	+	S, M, L-T, I, R, L	OPDC area	The policy focus is on the support of open workspace typologies and it seeks to support proposals that make maximum use of their site and are appropriately located and designed. This would support the objective.

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		E4 Option 1	0	N/A	N/A	There is no direct link with the policy and SA Objective.
		E4 Option 2	0	N/A	N/A	There is no direct link with the policy and SA Objective.
		E5	0	N/A	N/A	There is no direct link with the policy and SA Objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	E1	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E2	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E2 Option 1	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E2 Option 2	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E3	+	S, M, L-T, I, R, L	OPDC area	Part d requires proposals to demonstrate how they are maximising the use of the site. This would support the objective.
		E3 Option 1	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E3 Option 2	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E4	+	S, M, L-T, I, R, L	OPDC area	The policy focus is on the support of open workspace typologies and it seeks to support proposals that make maximum use of their site and are appropriately located and designed. This would support the objective.
		E4 Option 1	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E4 Option 2	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E5	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
4	Minimise the need to travel,	E1	+	M, L-T, I, R, L	Old Oak and Park Royal	The delivery of a range of employment uses in areas outside of the SIL and the delivery of a range of industrial uses within Park Royal's SIL would improve accessibility to jobs and encourage transport links into the area.

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improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	E2	+	M, L-T, I, R, L	Old Oak	The policy states that Old Oak will become a mixed employment hub and would require proposals to provide town centre uses generating employment along the High Street, in and around Old Oak Common Station and in other accessible locations. This would contribute towards achieving the SA Objective through helping to improve accessibility to employment.	
	<i>E2 Option 1</i>	+	M, L-T, I, R, L	Old Oak	The policy would not provide support for focussing B1(a) uses in and around Old Oak Common Station and would contribute towards improving accessibility though to a lesser extent than the preferred policy.	
	<i>E2 Option 2</i>	+	M, L-T, I, R, L	Old Oak	The policy would not provide support for B1(b) and B1(c) uses in Old Oak north and would contribute towards improving accessibility though to a lesser extent than the preferred policy.	
	E3	+	M, L-T, I, R, L	Park Royal	The focus of the policy is the enhancement of SIL and it designates five new SIL sites and in the long term this would improve accessibility to jobs and encourage transport links into the area.	
	<i>E3 Option 1</i>	0	N/A	N/A	The policy does not directly link with the SA Objective.	
	<i>E3 Option 2</i>	0	N/A	N/A	The policy does not directly link with the SA Objective.	
	E4	+	S, M, L-T, I, R, L	OPDC area	Appropriate location of open workspace may make partial contributions to improving accessibility though to a limited extent.	
	<i>E4 Option 1</i>	+	M, L-T, I, R, L	OPDC area	The delivery of onsite open workspace for residential and/or commercial proposals may bring employment opportunities closer to residential areas and would make partial contributions towards minimising the need to travel.	
	<i>E4 Option 2</i>	+	M, L-T, I, R, M	OPDC area	The delivery of small scale workspaces supported with coordinated delivery of rented small scale residential units outside of the SIL would in the long term enable improve accessibility. The delivery of workspaces that link with residential units would also help to support the mitigation of impacts on the transport network with linked sites promoting more sustainable travel.	
E5	+	S, M, L-T, I, R, L	OPDC area	The policy seeks to maximise access to employment and skills for local people and which would indirectly support improved accessibility.		
5 Improve access to well designed, well-located,	E1	0	N/A	N/A	The focus of the policy is to deliver employment and industrial uses which will support economic growth and therefore has no link with the SA Objective.	
	E2	0	N/A	N/A	The policy seeks to enhance SIL and therefore has no link with the SA Objective.	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	E2 Option 1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E2 Option 2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3 Option 1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3 Option 2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4 Option 1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4 Option 2	+/-	M, L-T, D, R, M	OPDC area	The policy would partly support the SA Objective as it seeks to deliver small scale workspace with coordinated delivery of rented small residential units outside the SIL. The policy would enable the delivery of a range of housing typologies which could help to meet local needs. However, the disadvantage would be the risk that if one of the employment or housing units is vacant, the related joined unit would also be vacant.
		E5	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	E1	0	N/A	N/A	The policy focuses on establishing Old Oak as a recognised employment hub, consolidating SILs at Park Royal and supporting the delivery of economic growth. These aims do not link with the SA Objective. It is also noted that there are no flood zones in Old Oak.
		E2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E2 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E2 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		E3	+	M, L-T, I, R, L	Park Royal	The policy focuses on enhancing SIL through demonstrating the use and design of sites and will support the integrity and effectiveness of industrial sites. Flood zones in the OPDC area and risk of flooding is associated with the river Brent. Elements of site design, where located in a flood zones could also include adaptation measures which could minimise flood risk. <i>Appropriate climate change mitigation and adaptation measures should be incorporated where possible - as per Preferred Policy Option EU3:Water</i>
		E3 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E3 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E4	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E4 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E4 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E5	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for	E1	+/-	M, L-T, I, R, M	Old Oak and Park Royal	The consolidation of SIL at Park Royal and support of economic growth has the potential to impact upon climate change through increased industrial activity in the long term contribute to effects upon natural resources and fossil fuels use linked to industrial activities if not managed through London Plan Policy and guidance within the Environment and Utilities Chapter. Elements of site design could incorporate measures such as energy efficiency which would help to minimise contributions to climate change.
		E2	+/-	M, L-T, I, R, M	Old Oak	The policy states that Old Oak will become a mixed employment hub which may contribute to climate change if not managed through London Plan Policy and guidance within the Environment and Utilities Chapter. .. Elements of site design could incorporate measures such as energy efficiency which would help to minimise contributions to climate change.
		E2 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E2 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
transport, heating and energy	E3	+/-	M, L-T, I, R, M	Park Royal	The policy focuses on enhancing SIL through demonstrating the use and design of sites which will support the integrity and effectiveness of industrial sites. Elements of site design could incorporate measures such as energy efficiency which would help to minimise contributions to climate change. The development of industry would however in the long term contribute to effects upon natural resources and fossil fuels linked to industrial activities if not managed through London Plan Policy and guidance within the Environment and Utilities Chapter.	
	E3 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.	
	E3 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.	
	E4	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.	
	E4 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.	
	E4 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.	
	E5	+	M, L-T, I, R, L	OPDC area	The primary focus of the policy is to improve access to employment and skills for local people and improved accessibility could contribute towards reducing journey times thus helping to minimise contributions to climate change.	
8 To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use,	E1	?	M, L-T, I, R, L	OPDC area	The policy focuses on the promotion of Old Oak and Royal Park as a place for enterprise and innovation and the focus on employment development could have implications for increase in waste as well as opportunities for waste facilities and recycling. This would be linked to building design and methods for transporting waste which are considered as per Preferred Policy Option on Waste Minimisation and Preferred Strategic Policy for Transport. However, this is uncertain.	
	E2	?	M, L-T, I, R, L	OPDC area	The focus on the provision of workspaces and town centre uses could have implications for increase in waste as well as opportunities for waste facilities and recycling. This would be linked to building design and methods for transporting waste which are considered as per Preferred Policy Option on Waste Minimisation and Preferred Strategic Policy for Transport. However, this is uncertain.	
	E2 Option 1	0	N/A	N/A	There is no direct link between the policy and achieving the SA Objective.	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
recycling and recovery rates as well as composting of all green waste	E2 Option 2	0	N/A	N/A		There is no direct link between the policy and achieving the SA Objective.
	E3	+	M, L-T, I, R, L	OPDC area		The policy focuses on enhancing SIL through demonstrating the use and design of sites will support the integrity and effectiveness of industrial sites. Elements of site design could incorporate waste or recycling facilities which would help to increase recycling rates and waste recovery.
	E3 Option 1	0	N/A	N/A		There is no direct link between the policy and achieving the SA Objective.
	E3 Option 2	0	N/A	N/A		There is no direct link between the policy and achieving the SA Objective.
	E4	0	N/A	N/A		There is no direct link between the policy and achieving the SA Objective.
	E4 Option 1	0	N/A	N/A		There is no direct link between the policy and achieving the SA Objective.
	E4 Option 2	0	N/A	N/A		There is no direct link between the policy and achieving the SA Objective.
	E5	0	N/A	N/A		There is no direct link between the policy and achieving the SA Objective.
9 Improve the quality of the water environment	E1	?	M, L-T, I, R, L	Old Oak and Park Royal		The primary focus on employment and industrial development could have implications for increased water usage as well as opportunities to incorporate measures such as Sustainable Urban Drainage Systems (SuDS). This would be linked to building design, which is considered as part of Preferred Policy on Water. However, this is uncertain.
	E2	?	M, L-T, I, R, L	Old Oak		The primary focus on the provision of workspaces and town centre uses could have implications for increased water usage as well as opportunities to incorporate measures such as SuDS. Waste facilities and recycling. This would be linked to building design however this is uncertain.
	E2 Option 1	0	N/A	N/A		The principle of the policy has no direct link with improving the water quality of the environment.
	E2 Option 2	0	N/A	N/A		The principle of the policy has no direct link with improving the water quality of the environment.
	E3	?	M, L-T, I, R, L	Park Royal		The policy focuses on enhancing SIL through demonstrating the use and design of sites will support the integrity and effectiveness of industrial sites. Elements of site design could potentially include design that incorporates measures such as SuDS.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						<i>Sustainable water measures should be adopted where appropriate as per Preferred Policy on Water.</i>
		E3 Option 1	0	N/A	N/A	The principle of the policy has no direct link with improving the water quality of the environment.
		E3 Option 2	0	N/A	N/A	The principle of the policy has no direct link with improving the water quality of the environment.
		E4	0	N/A	N/A	There is no direct link between the policy and achieving the SA Objective.
		E4 Option 1	0	N/A	N/A	The principle of the policy has no direct link with improving the water quality of the environment.
		E4 Option 2	0	N/A	N/A	The principle of the policy has no direct link with improving the water quality of the environment.
		E5	0	N/A	N/A	The principle of the policy has no direct link with improving the water quality of the environment.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	E1	?	M, L-T, I, R, L	Old Oak and Park Royal	The delivery of employment and industrial uses has the potential to positively impact upon enhancing the diversity of habitats through landscape design though this would be to a limited extent.
		E2	?	M, L-T, I, R, L	Old Oak	The provision of workspaces and town centre uses within Old Oak has the potential to positively impact upon enhancing the diversity of habitats through landscape design though this would be to a limited extent.
		E2 Option 1	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
		E2 Option 2	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
		E3	?	M, L-T, I, R, L	Park Royal	The delivery of SIL has the potential to positively impact upon enhancing the diversity of habitats through landscape design though this would be to a limited extent.
		E3 Option 1	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
		E3 Option 2	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
		E4	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>E4 Option 1</i>	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
		<i>E4 Option 2</i>	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
		E5	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	E1	?	M, L-T, I, R, L	Old Oak and Park Royal	The delivery of employment and industrial uses has the potential to minimise air, noise and light pollution however this would be dependent upon appropriate design, which is considered as part of Preferred Policy Options on Air Quality and Noise.
		E2	?	M, L-T, I, R, L	Old Oak	The provision of workspaces and town centre uses within Old Oak has the potential to minimise air, noise and light pollution however this would be dependent upon appropriate design, which is considered as part of Preferred Policy Options on Air Quality and Noise..
		<i>E2 Option 1</i>	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		<i>E2 Option 2</i>	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		E3	?	M, L-T, I, R, L	Park Royal	The delivery of SIL has the potential to minimise air, noise and light pollution however this would be dependent upon appropriate design and implementation of Environment and Utilities policies.
		<i>E3 Option 1</i>	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		<i>E3 Option 2</i>	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		E4	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		<i>E4 Option 1</i>	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		<i>E4 Option 2</i>	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		E5	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
12	To conserve and	E1	+	M, L-T, I, R, L	Old Oak and Park Royal	The delivery of employment and industrial uses has the potential to contribute towards conserving the historic environment and protecting heritage assets and their setting

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
enhance the historic environment, heritage assets and their settings						through appropriate design in accordance with Preferred Policy Option for Heritage.
	E2	?	M, L-T, I, R, L	Old Oak		The provision of workspaces and town centre uses within Old Oak has the potential to contribute towards conserving the historic environment and protecting heritage assets and their setting through appropriate design in accordance with Preferred Policy Option for Heritage, but this is uncertain at this stage.
	E2 Option 1	0	N/A	N/A		The policy does not have direct links to conserving and enhancing the historic environment, heritage assets and their settings.
	E2 Option 2	0	N/A	N/A		The policy does not have direct links to conserving and enhancing the historic environment, heritage assets and their settings.
	E3	?	M, L-T, I, R, L	Park Royal		The delivery of SIL has the potential to contribute towards conserving the historic environment and protecting heritage assets and their setting through appropriate design in accordance with Preferred Policy Option for Heritage, but this is uncertain at this stage.
	E3 Option 1	0	N/A	N/A		The policy seeks to enhance SIL and does have direct links to conserving and enhancing the historic environment, heritage assets and their settings.
	E3 Option 2	0	N/A	N/A		The policy seeks to enhance SIL and does have direct links to conserving and enhancing the historic environment, heritage assets and their settings.
	E4	+	S, M, L-T, I, R, L	OPDC area		The policy seeks to support open workspace typologies that are appropriately located and designed which could support the SA Objective through appropriate design that respects its surrounding environment, helping to conserve heritage assets and their setting.
	E4 Option 1	?	N/A	N/A		The policy seeks to deliver onsite open workspaces for residential and/or commercial though unlike the preferred option does not explicitly reference appropriate location and design and therefore effects against the SA Objective would be uncertain.
	E4 Option 2	?	N/A	N/A		The policy seeks to deliver small scale workplaces with coordinated delivery of rented small-scale residential units outside of the SIL though unlike the preferred option does not explicitly reference appropriate location and design and therefore effects against the SA Objective would be uncertain.
	E5	0	N/A	N/A		The primary focus of the policy is to maximise access to employment and training therefore it does not directly link with the SA Objective.
13	Increase community	E1	+	S, M, L-T, I, R, L	OPDC area	The policy principally seeks to establish Old Oak as a recognised employment hub and seeks the delivery of a diverse economy that supports growth. This is considered to help achieve the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
cohesion and reduce social exclusion to encourage a sense of community and welfare	E2	+	S, M, L-T, I, R, L	Old Oak	The policy states that Old Oak would become a mixed development hub with town centre uses generating employment in accessible locations. In light of OPDC regeneration programmes the policy would make partial contributions towards increasing community cohesion.	
	E2 Option 1	0	N/A	N/A	The policy focus is a more flexible approach to office distribution across and would not significantly contribute towards achieving the SA Objective.	
	E2 Option 2	0	N/A	N/A	The policy focus is on the provision of additional floor space not for industrial use which would not significantly contribute towards achieving the SA Objective.	
	E3	0	N/A	N/A	There is no direct link between the policy and increasing community cohesion, reducing social exclusion or encouraging a sense of community and welfare.	
	E3 Option 1	0	N/A	N/A	There is no direct link between the policy and increasing community cohesion, reducing social exclusion or encouraging a sense of community and welfare.	
	E3 Option 2	?	S, M, L-T, I, R, L	Park Royal	The policy would release additional land within Park Royal to accommodate other forms of development which could have the potential to benefit community cohesion but this is uncertain.	
	E4	0	N/A	N/A	The policy focus is on the provision of open workspaces which doesn't not directly link with the SA Objective.	
	E4 Option 1	0	N/A	N/A	The policy focus is on the provision of onsite workspaces which doesn't not directly link with the SA Objective.	
	E4 Option 2	0	N/A	N/A	The policy focus is on the provision of small scale workspaces which doesn't not directly link with the SA Objective.	
	E5	+	S, M, L-T, I, R, L	OPDC area	The policy focus is on maximising access to employment, skills training, apprenticeships and pre-employment support and the opportunity to provide pathways to employment could indirectly support the SA Objective by encouraging community cohesion and welfare.	
14 Improve safety and reduce crime and the fear of crime	E1	0	N/A	N/A	Establishing Old Oak as a recognised employment hub would not directly link with improving safety or reducing crime.	
	E2	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.	
	E2 Option 1	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.	
	E2 Option 2	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		E3	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E3 Option 1	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E3 Option 2	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E4	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E4 Option 1	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E4 Option 2	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E5	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	E1	+	S, M, L-T, I, R, L	Old Oak and Park Royal	Whilst delivery of a diverse economy would not directly relate to health, the provision of employment uses would ultimately secure jobs which would help contribute towards maximising wellbeing.
		E2	+	S, M, L-T, I, R, L	Old Oak	Old Oak as a mixed use employment hub will ultimately provide employment and will contribute towards maximising wellbeing.
		E2 Option 1	+	S, M, L-T, I, R, L	Old Oak	The policy would ultimately secure employment which would contribute towards achieving a sense of wellbeing among the population.
		E2 Option 2	+	S, M, L-T, I, R, L	Old Oak	The policy would ultimately secure employment which would contribute towards achieving a sense of wellbeing among the population.
		E3	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3 Option 1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3 Option 2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4	+	S, M, L-T, I, R, L	OPDC area	The provision of workspace typologies would not directly relate to health but would ultimately create jobs and maximise wellbeing.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		E4 Option 1	+	S, M, L-T, I, R, L	OPDC area	The provision of onsite open workspace typologies would not directly relate to health but would ultimately create jobs and maximise wellbeing.
		E4 Option 2	+	S, M, L-T, I, R, L	OPDC area	The provision of small scale workspace typologies would not directly relate to health but would ultimately create jobs and maximise wellbeing.
		E5	+	S, M, L-T, I, R, L	OPDC area	Maximising access to employment and training could have a positive effect on the wellbeing of the population.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	E1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E2 Option 1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E2 Option 2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3 Option 1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3 Option 2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4 Option 1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4 Option 2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E5	++	S, M, L-T, I, R, M	OPDC area	The policy seeks to maximise access to skills training, apprenticeships and pre-employment support all of which would contribute towards improving the skills level of the population.
17	Maximise the social and	E1	++	S, M, L-T, I, R, M	Old Oak and Park Royal	The policy seeks to deliver a diverse economy through promoting Old Oak and Park Royal as a place for enterprise and innovation which would contribute partially towards achieving the SA Objective by maximising economic wellbeing.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
economic wellbeing of the local and regional population and improve access to employment and training	E2	++	M, L-T, I, R, M	Old Oak	The policy states that Old Oak will become a mixed employment hub with a range of flexible workspace typologies and town centre uses generating employment along High Street, in and around Old Oak Common Station and in other accessible locations which would support the improvement of access to employment and maximising economic wellbeing.	
	E2 Option 1	+	M, L-T, I, R, M	Old Oak	The policy would give a more flexible approach to office distribution around Old Oak which could contribute towards improving access to employment in the long term.	
	E2 Option 2	+/-	M, L-T, I, R, M	Old Oak	The policy would not support B1(b) and B1(a) uses in Old Oak north which would provide for additional floorspace for non-industrial uses however may result in locations unsuited to uses such as retail and office use would remain vacant.	
	E3	++	M, L-T, I, R, M	Park Royal	The enhancement of SIL through intensifying use of land including the provision of smaller units to support greater employment densities will help to facilitate employment opportunities which in the long term would contribute towards improving access to employment.	
	E3 Option 1	+	M, L-T, I, R, L	Park Royal	The delivery of non-industrial uses to support the functioning of SIL may in the long term contribute towards improving employment access.	
	E3 Option 2	+	M, L-T, I, R, L	Park Royal	Additional land release in Park Royal may in the long term contribute towards improving employment access, if it is accommodates appropriate development.	
	E4	+	M, L-T, I, R, M	OPDC area	The policy seeks to support affordable workspaces and open workspaces which are appropriately located and do no result in net loss of employment land or floorspace.	
	E4 Option 1	+	M, L-T, I, R, M	OPDC area	Delivery of onsite open workspaces for commercial proposals would help to support a diverse local economy and support social and economic wellbeing.	
	E4 Option 2	+	M, L-T, I, R, M	OPDC area	The policy could help to support employment access improvements through delivery of small scale workspaces supported with coordinate delivery of rented small scale residential units outside of the SIL.	
	E5	++	S, M, L-T, I, R, M	OPDC area	The policy seeks to maximise employment, skills training, apprenticeships and pre-employment as well as delivering OPDC projects all of which would directly support the SA Objective.	
18 To encourage inward investment alongside investment	E1	++	M, L-T, I, R, M	Old Oak and Park Royal	The policy seeks to deliver a strong, sustainable, robust local economy that promotes Old Oak and Park Royal as a place for enterprise and innovation which contributes to London's economic growth all of which would help to encourage inward investment alongside investment within existing communities.	
	E2	++	M, L-T, I, R, L	Old Oak	Old Oak would become a mixed employment hub providing town centre uses which generate employment along High Street, in and around Old Oak Common Station and in	

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
within existing communities, to create sustainable economic growth					other accessible areas, supporting this SA Objective.
	<i>E2 Option 1</i>	+	M, L-T, I, R, L	Old Oak	The policy would not focus B1(a) uses in and around Old Oak Common Station though the flexible approach to office distribution could support sustainable growth of the economy. The policy would however mean that the commercial centre around Old Oak Common Station could become less defined so it is considered that the preferred option performs more strongly against this SA Objective.
	<i>E2 Option 2</i>	+/-	M, L-T, I, R, L	Old Oak	The policy would not support B1(b) and B1(c) and this approach would provide for additional floorspace for non-industrial uses which would offer benefits to the SA Objective. The disadvantage of the policy however, would be that locations not suited to retail, office, leisure or residential uses could remain vacant which could negatively impact on the amenity of the public realm and may have a negative effect with regards to encouraging inward investment and creating sustainable growth.
	<i>E3</i>	++	M, L-T, I, R, M	Park Royal	The policy seeks to protect SIL and support adjacent uses. It also designates five new SIL sites and this in the long term could help to encourage inward investment.
	<i>E3 Option 1</i>	+	M, L-T, I, R, M	Park Royal	The policy proposes not to extend the SIL boundary which could deliver non-industrial uses which support the functioning of SIL and would contribute to encouraging investment.
	<i>E3 Option 2</i>	+/-	M, L-T, I, R, L	Park Royal	Inward investment would be encouraged through the release of additional land in Park Royal to accommodate other forms of development, however, this could put pressure on industrial land capacity and threaten the economic growth of Park Royal.
	<i>E4</i>	+	M, L-T, I, R, M	OPDC area	The policy would contribute to supporting inward investment as it seeks to support open workspace typologies and temporary workspaces contributing to establishing and/or growing an existing new business sector that would positively contribute to economic and social regeneration of the area.
	<i>E4 Option 1</i>	+	M, L-T, I, R, M	OPDC area	The delivery of onsite open workspaces for residential or commercial proposals could help to support a diverse local economy and could help to attract inward investment.
	<i>E4 Option 2</i>	+	M, L-T, I, R, M	OPDC area	The delivery of small scale workspaces coordinated with delivery of rented small-scale residential units outside SIL could partially contribute to attracting investment as development would support start-up businesses.
<i>E5</i>	+	M, L-T, I, R, M	OPDC area	The policy principally seeks to maximise access to employment and training for local people which could contribute towards attracting inward investment	

Table G-7 Chapter 9: Town Centre Uses



- TC1: Strategic Policy: Town Centre uses
- TC2: Town centre hierarchy
- TC3: Vibrancy
- TC4: Retail and eating and drinking establishment needs
- TC5: Culture, Sports and Leisure Facilities
- TC6: Visitor Accommodation
- TC7: Hours of operation for night time economy uses

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	TC1	++	S,M,L-T, D,R,H	Old Oak and Park Royal	The policy states that ' <i>Town centre uses can play a critical role in place-making, adding vibrancy to buildings and the public realm and helping to attract people to live, work and visit the area</i> '.
		TC2	++	S,M,L-T, D,R,H	Old Oak High Street, Park Royal and North Acton.	The policy demands that the centres should be of a sufficient size that they meet needs, promote sustainability and assist with place-making. A new major town centre in Old Oak would have significant benefits to place-making in the area, providing opportunities for the provision of a range of culture, sports and leisure facilities which as well as meeting local need, could make a significant contribution to strategic provision and help to promote London as the world's cultural capital, as set out in the Mayor's Cultural Strategy.
		TC2 Option 1	+/-	S,M,L-T, D,R,H	OPDC area	This option would have benefits in terms of making Old Oak a destination that people will be attracted to and could have benefits for place-making by attracting higher footfall. However, this option could impact on the vitality and viability of the surrounding town centre hierarchy and the neighbouring town centres of Ealing, Shepherd's Bush and Kingston.
		TC2 Option 2	+	S,M,L-T, I,R,L	OPDC area and Old Oak High Street	Two new centres at Old Oak and Old Oak Common Station would have benefits to place-making in the area meeting local need. However, this option does not directly support the delivery of catalyst uses around Old Oak Common Station.
		TC2 Option 3	+/-	S,M,L-T, D,R,H	OPDC and surrounding area	The designation of a district centre to the south of the canal would better capture the scale of need for town centre uses arising from the population living, working and visiting the area than in option 2. However, to the north of the canal, the designation of a neighbourhood centre would not be capable of providing sufficient town centre uses to meet the areas need. This could be met to a certain degree by the District Centre at Old Oak Common station and the District Centre at Harlesden, but there would also be a risk that premises in this area would struggle and the limited quantum of town centre uses may impact on place-making.

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	TC2 <i>Option 4</i>	+/-	S,M,L-T, I,R,L	OPDC area	This option would have benefits for delivering new employment space within Park Royal. However, the potential dispersal of town centre walk-to uses may have negative impacts on accessibility of these uses and, in turn, impacts on road congestion.
	TC3	++	S,M,L-T, D,R,H	OPDC and surrounding area	Town centre uses play an important role in place-making, by attracting people to an area and helping to enliven it. Town centre uses within the OPDC area, particularly in Old Oak, will help to play a critical role in the approach to place-making. An important way of achieving this is through activating and overlooking the public realm, by providing outdoor uses such as event space, outdoor seating associated with eating and drinking establishments and through the provision of street markets.
	TC3 <i>Option 1</i>	+	S,M,L-T, D,R,H	OPDC and surrounding area	The choice of land use may affect the ability to create a sense of place. The option maintains that Town centre uses within the OPDC area will help to play a critical role in the approach to place-making with flexibility around uses such as betting shops, pay-day loan shops and takeaways.
	TC4	++	S,M,L-T, D,R,H	OPDC and surrounding area	The policy states that if there is not enough A-class floorspace, people will be required to travel further for their needs, putting increased pressures on the transport network and undermining the place-making benefits that A-class floorspace could bring to the OPDC area. The policy seeks to deliver the necessary place-making benefits for the OPDC area.
	TC4 <i>Option 1</i>	+/-	S,M,L-T, D,R,H	OPDC and surrounding area	This option would have potential benefits in terms of place-making, by creating a greater retail draw and providing more opportunities for active uses. However, this option could impact on the vitality and viability of surrounding retail centres outside of the OPDC area and as a consequence, this policy approach has not been identified as the preferred option.
	TC5	+	S,M,L-T, D,R,H	OPDC and surrounding area	The policy states that culture, sports and leisure facilities make an important contribution to place-making, could be important catalyst uses and could help to define and shape the place and add to vibrancy and activity by attracting visitors to an area. It can also help and support place-making and/or act as a catalyst for regeneration.
	TC5 <i>Option 1</i>	+	S,M,L-T, D,R,M	OPDC and surrounding area	This option would provide a clearer indication of the acceptable quantum of floorspace for other town centre uses, providing greater certainty to stakeholders, but this approach would constrain the ability for these sorts of uses to aid with place-making and could potential prevent a major cultural, sports or leisure use from locating the area that could act as a catalyst for regeneration and provide a strategic cultural or leisure destination.
	TC6	+	S,M,L-T, I,R,L	OPDC and	Visitor accommodation is an element that contributes to creating a place. The policy

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding area	highlights the importance of hotels for leisure and business that could help the tourism sector in the area.
		TC7	++	S,M,L-T, D,R,M	OPDC and surrounding area	Night-time economy uses play an important role in place-making, by attracting people to an area and helping to enliven it. Eating and drinking establishments and culture, sports and entertainment uses should create a sense of place for local residents and visitors to the area. Limits have been imposed to ensure activity is kept within sensible hours.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	TC1	+	S,M,L-T, I,R,L	OPDC area and London wide	The policy relates to focussing development i higher density town centre locations such as Old Oak and Park Royal.
TC2		+	S,M,L-T, I,R,M	OPDC area	The policy states the centres should be of sufficient size to accommodate residents and users. The aim is for higher densities in appropriate areas trying to seek the best balance of efficient land use. This must take into account the use of land within the centre boundary.	
TC2 Option 1		+	S,M,L-T, I,R,L	Old Oak High Street	The option to concentrate town centre development in this area should optimise the efficient use of land at Old Oak High Street. The delivery of a Metropolitan Centre would enable the delivery of greater amounts of town centre uses representing a potential greater optimisation of the use of land.	
TC2 Option 2		+	S,M,L-T, I,R,L	Old Oak	The option to concentrate town centre development in this area should optimise the efficient use of land at Old Oak. The delivery of smaller town centre typologies would not enable the delivery of the same amount of retail uses compared to the preferred policy option.	
TC2 Option 3		+	S,M,L-T, I,R,L	Old Oak	The option to concentrate town centre development in this area should optimise the efficient use of land at Old Oak. The delivery of smaller town centre typologies would not enable the delivery of the same amount of retail uses compared to the preferred policy option.	
TC2 Option 4		+	S,M,L-T, I,R,L	Park Royal	The option to use Park Royal Centre for other uses may enable more employment floorspace to be delivered thereby affecting the area's density and building heights.	
TC3		0			The policy seeks to optimise the development of brownfield land, which could have direct significant benefits against this objective. Measures to improve vibrancy would not affect efficient land use.	
TC3 Option 1		0			This option would not affect efficient land use.	
TC4		+	S,M,L-T, I,R,L	OPDC area	The preferred policy to deliver A classes that serve the needs of the development and complement nearby centres would support the efficient use of land.	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC4 Option 1	++	S,M,L-T, I,R,L	OPDC area	The preferred policy option to deliver a higher amounts of A classes would enable greater optimisation of the efficient use of land.
		TC5	+	S,M,L-T, I,R,L	Old Oak	The preferred policy option to deliver culture, sports and leisure facilities would support the efficient use of land.
		TC5 Option 1	0			This option would not affect efficient land use.
		TC6	+	S,M,L-T, I,R,L	OPDC area	The preferred policy option to deliver visitor accommodation would support the efficient use of land.
		TC7	0			The policy would not affect efficient land use.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	TC1	+	S,M,L-T, I,R,L	OPDC area and London wide	Any new development within the town centre would be built on brownfield sites.
		TC2	++	S,M,L-T, I,R,M	OPDC area	The policy states the centres should be of sufficient size to accommodate residents and users. Town Centre regeneration in this location could have benefits in that development could lead to the remediation of contaminated land as well as replacing potentially contaminating land uses with other developments.
		TC2 Option 1	+	S,M,L-T, I,R,L	OPDC area	The option to concentrate town centre development in this area should maximise the reuse of brownfield land at Old Oak High Street.
		TC2 Option 2	+	S,M,L-T, I,R,L	OPDC area	The option to concentrate town centre development in this area should maximise the reuse of brownfield land at Old Oak.
		TC2 Option 3	+	S,M,L-T, I,R,L	OPDC area	The option to concentrate town centre development in this area should maximise the reuse of brownfield land at Old Oak.
		TC2 Option 4	+/-	S,M,L-T, I,R,L	OPDC area	The option to use Park Royal for other uses may affect the choice of land for development.
		TC3	0			The policy seeks to optimise the development of brownfield land, which could have direct significant benefits against this objective. Measures to improve vibrancy would not affect efficient land use.
		TC3 Option 1	0			This option would not affect efficient land use.
		TC4	+	S,M,L-T, I,R,L	OPDC area	The preferred policy option to deliver A classes that serve the needs of the development and complement nearby centres would support the maximum reuse of brownfield land..
		TC4 Option 1	++	S,M,L-T, I,R,L	OPDC area	The preferred policy option to deliver a higher amounts of A classes would enable greater optimisation of the efficient use of land.
TC5	+	S,M,L-T, I,R,L	Old Oak	The preferred policy option to deliver culture, sports and leisure facilities would support the maximum reuse of brownfield of land.		

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC5 Option 1	0			This option would not affect efficient land use.
		TC6	+	S,M,L-T, I,R,L	OPDC area	The preferred policy option to deliver visitor accommodation would support the maximum reuse of brownfield land.
		TC7	0			The policy would not maximise the use of previously developed land.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	TC1	+	S,M,L-T, I,R,L	OPDC area and London wide	The policy states the need to develop a network of new town and local centres that are the focus for town centre uses and which complement and enhance London's wider network of centres. This can indirectly minimise the excessive need for travel with a well-connected transport network.
		TC2	++	S,M,L-T, D,R,H	OPDC area and London wide	Reduce the need to travel by car and do not have an adverse impact on the operation of the road network. The public transport accessibility that will be afforded to the area, making Old Oak a highly sustainable location for town centre uses, reducing the need for people in the surrounding area to travel to these uses by private vehicle. Retail and other town centre uses should be focussed within the designated town centres and neighbourhood centres. However, in accordance with the sequential test, if there are no suitable sites within these designated centres there may be the potential for town centre uses in edge of centre or out of centre locations. This would be supported where it addresses a specific deficiency in need, such as in areas further away from the designated centres or where they provide local convenience retail that reduces the need to travel. The proposed hierarchy could work well in terms of maximising sustainable transport use by focussing key services and attractions in the largest accessible locations with smaller amounts in more local areas for local needs.
		TC2 Option 1	+	S,M,L-T, D,R,M	OPDC area	This option focuses on high public transport accessibility to promote Old Oak High Street as a major metropolitan centre destination. Access to the town centre typologies in this option would rely on the same transport network as the preferred policy option.
		TC2 Option 2	+	S,M,L-T, D,R,M	OPDC area	New district and neighbourhood centres would require sufficient transport networks to and from the sites. Access to the town centre typologies in this option would rely on the same transport network as the preferred policy option.
		TC2 Option 3	+	S,M,L-T, D,R,M	OPDC area	New district and neighbourhood centres would require sufficient transport networks to and from the sites. Access to the town centre typologies in this option would rely on the same transport network as the preferred policy option.
		TC2 Option 4	+/-	S,M,L-T, D,R,M	OPDC and surrounding area	An approach to minimise this impact might be to de-designate the centre and allow for its gradual erosion to other uses such as employment and residential including local 'walk to' services. However, this approach could also result in worse impacts on the highway network as if the town centre uses were diminished, workers and residents in Park Royal

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						would have to travel further for their services. It would also see the loss of well used existing local services over time.
		TC3	++	L-T, I, R, L	OPDC area	The policy seeks to deliver a range of land uses and associated town centre infrastructure. This could help to reduce the need to travel for both existing and incoming communities, which could have long term benefits against this objective.
		TC3 <i>Option 1</i>	++	M-T, D,R,M	OPDC area	This option could help to reduce the need to travel and would not look to resist these uses and would instead consider proposals for such uses on their merits, having regard to their impact on amenity, transport and other Local Plan considerations.
		TC4	++	M-T, D,R,M	OPDC area	The policy seeks to deliver A Use Class land uses which could help to reduce the need to travel for both existing and incoming communities and could have long term benefits against this objective
		TC4 <i>Option 1</i>	+/-	S,M,L-T, D,R,M	OPDC and wider area	The option for OPDC to be a greater retail destination with a higher quantum of retail over and above that required to serve the needs of the development. This would impose greater demand on the transport network and generate more trips from a wider area but could also be used to inform public transport services business planning to inform the delivery of additional infrastructure. However, should this not be undertaken, higher amounts of town centre uses may cause disruption and highway pressure on the area.
		TC5	+	M-T, D,R,M	OPDC area	The policy clarifies that OPDC will be supportive of the provision of new facilities, where they demonstrably address either a local or strategic need and do not give rise to an unacceptable impact on the amenity of existing and future residents, businesses or on the transport network.
		TC5 <i>Option 1</i>	+	S,M,L-T, D,R,M	OPDC area	This approach could potentially prevent a major cultural, sports or leisure use from locating the area that could act as a catalyst for regeneration and provide a strategic cultural or leisure destination. This more reserved option should limit the impact on the transport network.
		TC6	++	S,M,L- T,D,R,M	OPDC and surrounding area	The policy states that hotels are well suited to areas of high public transport access and therefore, parts of the OPDC area and particularly the Old Oak area would be appropriate locations to consider promoting visitor accommodation.
		TC7	0			The policy proposes closing times of establishments. This may relieve pressure to provider late night public transport services. This may have an indirect effect on the transport network.
5	Improve access to well designed, well-located, market,	TC1	0			The policy would not have any significant effects for the objective.
		TC2	0			The policy would not have any significant effects for the objective.
		TC2 <i>Option 1</i>	0			The option would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
affordable and inclusive housing of a range of types and tenures, to meet identified local needs	TC2 Option 2	0				The option would not have any significant effects for the objective
	TC2 Option 3	0				The option would not have any significant effects for the objective
	TC2 Option 4	0				The option would not have any significant effects for the objective
	TC3	0				The policy would not have any significant effects for the objective.
	TC3 Option 1	0				The option would not bring any benefits for the objective
	TC4	0				The policy would not have any significant effects for the objective.
	TC4 Option 1	0				The option would not have any significant effects for the objective
	TC5	0				The policy would not have any significant effects for the objective.
	TC5 Option 1	0				The option would not have any significant effects for the objective
	TC6	0				The policy would not have any significant effects the objective.
TC7	0				The policy would not have any significant effects the objective.	
6 Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	TC1	0	S,M,L-T, I,R,L	Old Oak High Street, Park Royal Centre, North Acton		The policy does not specifically address climate change issues as it relates to town centre uses – such issues are addressed in Policy EU1.
	TC2	-	M, L-T, D, IR, L	OPDC area and surrounding boroughs		An increase in development at Old Oak High Street, North Acton and Park Royal could lead to an increase in built development. This could have negative effects in relation to surface water and flooding if not adequately mitigated through the implementation of policies within the Environment and Utilities Chapter.
	TC2 Option 1	-	M, L-T, D, IR, L	OPDC area and surrounding boroughs		Development at Old Oak High Street could lead to an increase in built development. This could have negative effects in relation to surface water and flooding if not adequately mitigated through the implementation of policies within the Environment and Utilities Chapter.
	TC2 Option 2	-	M, L-T, D, IR, L	OPDC area and surrounding boroughs		Development at Old Oak could lead to an increase in built development. This could have negative effects in relation to surface water and flooding if not adequately mitigated through the implementation of policies within the Environment and Utilities Chapter.
	TC2 Option 3	-	M, L-T, D, IR, L	OPDC area and		Development at Old Oak could lead to an increase in built development. This could have negative effects in relation to surface water and flooding if not adequately mitigated

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding boroughs	through the implementation of policies within the Environment and Utilities Chapter.
		TC2 Option 4	-	M, L-T, D, IR, L	OPDC area and surrounding boroughs	Development at Park Royal could lead to an increase in built development. This could have negative effects in relation to surface water and flooding if not adequately mitigated through the implementation of policies within the Environment and Utilities Chapter.
		TC3	0			The policy would not have any significant effects for the objective.
		TC3 Option 1	0			The option would not have any significant effects for the objective.
		TC4	0			The policy would not have any significant effects for the objective.
		TC4 Option 1	0			The option would not have any significant effects for the objective.
		TC5	0			The policy would not have any significant effects for the objective.
		TC5 Option 1	0			The option would not have any significant effects for the objective.
		TC6	0			The policy would not have any significant effects for the objective.
TC7	0			The policy would not have any significant effects for the objective.		
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	TC1	+	S,M,L-T, I,R,L	Nationwide	Town centres provide clusters and higher densities which may make it easier for shared power and heating. This would also make travel by sustainable means to the key uses proposed more viable.
		TC2	+	S,M,L-T, I,R,L	Nationwide	Town centres provide clusters and higher densities which may make it easier for shared power and heating. This would also make travel by sustainable means to the key uses proposed more viable.
		TC2 Option 1	+	S,M,L-T, I,R,L	Nationwide	Town centres provide clusters and higher densities which may make it easier for shared power and heating. This would also make travel by sustainable means to the key uses proposed more viable.
		TC2 Option 2	+	S,M,L-T, I,R,L	Nationwide	Town centres provide clusters and higher densities which may make it easier for shared power and heating. This would also make travel by sustainable means to the key uses proposed more viable.
		TC2 Option 3	+	S,M,L-T, I,R,L	Nationwide	Town centres provide clusters and higher densities which may make it easier for shared power and heating. This would also make travel by sustainable means to the key uses proposed more viable.
		TC2 Option 4	+	S,M,L-T, I,R,L	Nationwide	Town centres provide clusters and higher densities which may make it easier for shared power and heating. This would also make travel by sustainable means to the key uses proposed more viable.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						proposed more viable.
		TC3	0			The policy would not have any significant effects for the objective.
		TC3 Option 1	0			This option would not have any significant effects for the objective.
		TC4	0			The policy would not have any significant effects for the objective.
		TC4 Option 1	0			This option would not have any significant effects for the objective.
		TC5	0			The policy would not have any significant effects for the objective.
		TC5 Option 1	0			This option would not have any significant effects for the objective.
		TC6	0			The policy would not have any significant effects for the objective.
		TC7	0			The policy would not have any significant effects for the objective.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	TC1	+	S,M,L-T, I,R,L	OPDC area	The principle of focusing retail and leisure uses in town centres can benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity.
		TC2	+	S,M,L-T, I,R,L	OPDC area	The principle of focusing retail and leisure uses in town centres can benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity.
		TC2 Option 1	+/-	S,M,L-T, I,R,M	OPDC area	The principle of focusing retail and leisure uses in town centres can benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity. This option would deliver greater amounts of town centre uses which may result in higher levels of operational waste generated if not adequately managed by waste policies in the Environment and Utilities Chapter.
		TC2 Option 2	+	S,M,L-T, I,R,L	OPDC area	The principle of focusing retail and leisure uses in town centres can benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity.
		TC2 Option 3	+	S,M,L-T, I,R,L	OPDC area	The principle of focusing retail and leisure uses in town centres can benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity.
		TC2 Option 4	+/-	S,M,L-T, I,R,M	OPDC area	This option would potentially see town centre walk to uses dispersed across Park Royal which may result in less efficient collection of operational waste if not adequately managed by waste policies in the Environment and Utilities Chapter.
		TC3	?			The policy will not directly contribute to benefits against this objective However, the emphasis on high quality places should contribute to the use of visibly aesthetic recyclable materials and aim to minimise transporting waste.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC3 <i>Option 1</i>	+	S,M,L-T, I,R,M	OPDC area	Managing the number of takeaways and fast food outlets could have a positive impact on managing operational waste created by these uses.
		TC4	+/-	S,M,L-T, I,R,M	OPDC area	Delivery of A Use Classes will need to be supported by the implementation of Environment and Utilities policies to manage operational waste.
		TC4 <i>Option 1</i>	+/-	S,M,L-T, I,R,M	OPDC area	Delivery of A Use Classes will need to be supported by the implementation of Environment and Utilities policies to manage operational waste.
		TC5	+/-	S,M,L-T, I,R,M	OPDC area	Delivery of culture, leisure and sports facilities will need to be supported by the implementation of Environment and Utilities policies to manage operational waste.
		TC5 <i>Option 1</i>	0			The option would not have any significant effects for the objective.
		TC6	+/-	S,M,L-T, I,R,M	OPDC area	Delivery of visitor accommodation will need to be supported by the implementation of Environment and Utilities policies to manage operational waste.
		TC7	0			Existing or new night-time economy uses should not have a significant effect on the production of waste. Waste generated by the facility will be dealt with the same as any other use.
9	Improve the quality of the water environment	TC1	0			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC2	0			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC2 <i>Option 1</i>	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC2 <i>Option 2</i>	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC2 <i>Option 3</i>	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC2 <i>Option 4</i>	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC3	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						development ahead of occupation.
		TC3 <i>Option 1</i>	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC4	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC4 <i>Option 1</i>	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC5	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC5 <i>Option 1</i>	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC6	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC7	0			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	TC1	0			. The policy would not have any significant effects for the objective.
		TC2	0			. The policy would not have any significant effects for the objective.
		TC2 <i>Option 1</i>	0			This option would not have any significant effects for the objective.
		TC2 <i>Option 2</i>	0			This option would not have any significant effects for the objective.
		TC2 <i>Option 3</i>	0			This option would not have any significant effects for the objective.
		TC2 <i>Option 4</i>	0			This option would not have any significant effects for the objective.
		TC3	0			. The policy would not have any significant effects for the objective.
		TC3 <i>Option 1</i>	0			The policy would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC4	0			The policy would not have any significant effects for the objective.
		TC4 Option 1	0			The option would not have any significant effects for the objective.
		TC5	0			The policy would not have any significant effects for the objective.
		TC5 Option 1	0			The option would not have any significant effects for the objective.
		TC6	0			The policy would not have any significant effects for the objective.
		TC7	0			The policy would not have any significant effects for the objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	TC1	+/-	S,M,L-T, I,R,L	OPDC area	There is no direct relationship between objective and policy. However, focussing retail and leisure uses within town centres will encourage people to use sustainable public transport. \ Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TC2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There is no direct relationship between objective and policy. However, focussing retail and leisure uses within town centres will encourage people to use sustainable public transport. \ Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TC2 Option 1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There is no direct relationship between objective and policy. However, focussing retail and leisure uses within town centres will encourage people to use sustainable public transport. \ Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TC2 Option 2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There is no direct relationship between objective and policy. However, focussing retail and leisure uses within town centres will encourage people to use sustainable public transport. \ Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TC2 Option 3	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There is no direct relationship between objective and policy. However, focussing retail and leisure uses within town centres will encourage people to use sustainable public transport. \ Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TC2 Option 4	+/-	S, M, L-T, I, R, M	OPDC area and	This option could result in town centre walk-to uses being dispersed across Park Royal which may result in additional use of private transport and impacts on air quality.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding boroughs	
		TC3	0			Minimisation of air, noise and light pollution caused by traffic and commercial uses during the construction and operation of development on existing town centres and communities will help maintain the vibrancy of the area.
		<i>TC3 Option 1</i>	0			The policy would not have any significant effects for the objective.
		TC4	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There is no direct relationship between objective and policy. However, focussing A use classes within town centres will encourage people to use sustainable public transport. \ Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		<i>TC4 Option 1</i>	+/-	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	There is no direct relationship between objective and policy. However, a greater amount of retail floorspace will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TC5	0			The policy would not have any significant effects for the objective.
		<i>TC5 Option 1</i>	0			The policy would not have any significant effects for the objective.
		TC6	-	S, M, L-T, I, IR, L	OPDC area and surrounding boroughs	Greater volumes of tourists to the area may result in higher amounts of vehicular transport and resultant air pollution if the area is not supported by appropriate public transport infrastructure.
		TC7	+	S, M, L-T, I, IR, L	OPDC area	The policy states that proposals for late licenses will be assessed in terms of the uses impact on residential amenity and will consider issues such as noise within the premises, smells, light pollution and the impact of those going to and from the facility, considering issues such as traffic and car parking and anti-social behaviour. As such this would benefit the objective.
12	To conserve and enhance the historic environment, heritage assets and their settings	TC1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D6 and London Plan policy.
		TC2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	effect on any existing heritage assets unless adequately managed by Policy D6 and London Plan policy..
		TC2 Option 1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D6 and London Plan policy.
		TC2 Option 2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D6 and London Plan policy.
		TC2 Option 3	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D6 and London Plan policy.
		TC2 Option 4	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D6 and London Plan policy.
		TC3	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy could lead to the preservation of the historic environment through a focus on creating an attractive, locally distinctive, vibrant town centre. Regeneration and intensification must recognise the importance of heritage and historic environment as referred to in Policy D6.
		TC3 Option 1	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	This option could lead to the preservation of the historic environment due to the more flexible approach of OPDC over proposals.
		TC4	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy could lead to the preservation of the historic environment through a focus on not adversely affecting the vitality and viability of nearby centres in the development of any new A-class uses.
		TC4	?			This option may have a detrimental effect on the objective due to a lesser importance

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>Option 1</i>				placed on the vitality and viability of the town centre.
		TC5	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy could lead to the preservation of the historic environment depending on the nature of the cultural, sports and leisure uses.
		<i>TC5 Option 1</i>	?			The policy would not have any significant effects for the objective.
		TC6	+/-	S, M, L-T, I, R, M	OPDC and London wide	The policy could lead to the preservation of the historic environment but the potential design of proposals may have a detrimental effect on the character of the area if not adequately managed by design policies within the Design Chapter and London Plan.
		TC7	0			As explained in the policy London Plan policy 4.6 requires local planning authorities in their Local Plans to minimise the impact of night time economy uses on other land uses taking account of the cumulative effects of night time uses and saturation levels beyond which they have unacceptable impacts on the environmental standards befitting a world city and quality of life for local residents. This statement should protect the historic environment and any heritage assets.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	TC1	++	S,M,L-T, D,R,H	Nationwide	The policy states that the NPPF promotes the role that town centre uses can play in supporting the needs of those living, working and visiting an area and that town centres should sit as the heart of communities. This encompasses all of the community and increases cohesion.
		TC2	+	M, L-T, I, R, L	OPDC area	The development of new town centres could lead to an increased sense of community cohesion over the existing situation, as the development would generate a significant number of housing, jobs and a mix of other community focused uses.
		<i>TC2 Option 1</i>	+/-	M, L-T, D, R, M	OPDC area	The development of a new metropolitan centre at Old Oak Street could lead to an increased sense of community cohesion and this option would have benefits in terms of making Old Oak a destination that people will be attracted to and could improve the community. However, this could have a detrimental effect on the other town centres in the OPDC area.
		<i>TC2 Option 2</i>	+/-	M, L-T, D, R, M	OPDC area	The development of a new district centre and neighbourhood centre in Old Oak could lead to an increased sense of community cohesion and minimise impacts on nearby town centres such as Harlesden, Ealing and Shepherd's Bush. However, the designation would be likely to only provide sufficient floorspace to provide for retail needs and would not allow for the provision of a significant quantum of culture, sports or leisure uses within these centres.
		<i>TC2</i>	+/-	M, L-T, D, R,	OPDC area	The development of a new district centre and neighbourhood centre in Old Oak could

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Option 3		LM		lead to an increased sense of community cohesion and minimise impacts on nearby town centres. There would also be a risk that premises in this area would struggle and the limited quantum of town centre uses may impact on the community.
		TC2 Option 4	-	M, L-T, D, R, M	OPDC area	This option could result in negative impacts on the highway network as the town centre uses were diminished or dispersed, workers and residents in Park Royal would have to travel further for their services. It would also see the loss of well used existing local services over time which would have a negative effect on the community.
		TC3	++	M, L-T, D, R, M	OPDC area and London wide	Vibrant town centre uses, regeneration links with London and a healthy mix of retailers in the area should benefit the community cohesion through entertainment, employment and social infrastructure.
		TC3 Option 1	+/-	M, L-T, D, R, LM	OPDC area and surrounding boroughs	This option would take careful consideration over the uses in the area and the impact it would have on the existing services and the community. This would allow the OPDC to be more responsive to market demands, thereby, satisfying the local people. However, the option could result in a spread of these uses away from the OPDC area
		TC4	++	S,M,L-T, D,R,H	OPDC area	It is important that an appropriate quantum of A-class uses are provided to support the needs of those living, working and visiting Old Oak and Park Royal. It will be important to achieve the right balance and consider how OPDC can be flexible and respond to future changing market conditions and local need.
		TC4 Option 1	+/-	S,M, L-T, D, R, LM	OPDC area and surrounding boroughs	The option would potential benefits by creating more retail opportunities but this could impact on the surrounding retail centres meaning the effects on the community would be mixed. However, most people would travel from outside the area to use the shops.
		TC5	+	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC is keen to ensure that there is access to all new sports facilities for local communities and OPDC will seek to secure a proportion of affordable sports and leisure provision. This should improve community cohesion and reduce social exclusion.
		TC5 Option 1	?	S,M,L-T, I,R,M	OPDC area	The quantum threshold for culture, sports and leisure uses could constrain the ability for these sorts of uses to help the community and could potential prevent a major cultural, sports or leisure use from locating the area that could act as a catalyst for regeneration and provide a strategic cultural or leisure destination.
		TC6	+	S,M,L-T, D,R,H	OPDC and surrounding area	More high quality visitor accommodation will improve the tourism sector in the area, thereby, improving the local economy with community benefits. A more prosperous local economy should create more community cohesion.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC7	+	S,M,L-T, D,R,H	OPDC area	Night time entertainment should play an important role in the vibrancy of the area, thereby, improving community cohesion and adding activity to the public realm and supporting the local economy. This is supported as the policy seeks to impose sensible limits on hours.
14	Improve safety and reduce crime and the fear of crime	TC1	+/-	S,M,L-T, I,R,M	OPDC and surrounding area	Supporting the area with new cultural destinations and town centres should enhance security and surveillance in the area. However, it will also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TC2	+/-	M,L-T, I, R, L	OPDC and surrounding area	Supporting the area with new cultural destinations and town centres should enhance security and surveillance in the area. However, it will also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TC2 Option 1	+/-	M,L-T, I, R, M	OPDC and surrounding area	Supporting the area with a metropolitan town centre should enhance security and surveillance in the area. However, it will also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TC2 Option 2	+/-	M,L-T, I, R, M	OPDC and surrounding area	Supporting the area with a district and neighbourhood town centre should enhance security and surveillance in the area. However, it will also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TC2 Option 3	+/-	M,L-T, I, R, M	OPDC and surrounding area	Supporting the area with a district and neighbourhood town centre should enhance security and surveillance in the area. However, it will also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TC2 Option 4	-	S,M,L-T, I,R,M	OPDC area	This option may see town centre uses dispersed across Park Royal. If not supported to by public realm and building design improvements set out in the Places Chapter, this may have a negative impact on safety and fear of crime.
		TC3	+	M, L-T, I, R, L	London wide	The optimisation of development in the town centres, including facility security and strategic infrastructure that could improve traffic management, could lead to benefits against this objective through improved safety.
		TC3 Option 1	+	M, L-T, I, R, L	London wide	The optimisation of development in the town centres, including facility security and strategic infrastructure that could improve traffic management, could lead to benefits against this objective through improved safety.
		TC4	+	M, L-T, I, R, L	London wide	The optimisation of A-class development, including facility/customer security and strategic infrastructure that could improve traffic management, could lead to benefits against this objective through improved safety.
TC4 Option 1	+	M, L-T, I, R, L	London wide	The optimisation of A-class development, including facility/customer security and strategic infrastructure that could improve traffic management, as there will be more incoming traffic due to increased retail use. This could lead to benefits against this objective through improved safety.		

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC5	+	M, L-T, I, R, M	London wide	A new leisure facility should provide high level security and natural surveillance to increase the safety of the users.
		TC5 Option 1	+	M, L-T, I, R, M	London wide	A new leisure facility should provide high level security and natural surveillance to increase the safety of the users.
		TC6	?			Visitor accommodation should provide high level security and natural surveillance to increase the safety of their guests. The accommodation will attract more visitors with uncertain effects on crime.
		TC7	+/-	S,M,L-T, I,R,L	OPDC area	Security is an important aspect of night-time uses. The safety and wellbeing of local residents and users at drinking establishments must have high security and surveillance in place during and after operating hours. Imposing hours for trade may help prevent crime but the certainty is low.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	TC1	+	S,M,L-T, I,R,M	OPDC area	The policy makes it clear that OPDC will support proposals for town centres uses that promote social and economic regeneration and healthy lifestyles. Town centre uses can also promote healthy lifestyles and OPDC's role as a 'Healthy New Town'.
		TC2	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	New town centre development and maintenance of existing centres could contribute to meeting the need for homes as well as the provision of health centres contributing to the achievement of benefits against this objective.
		TC2 Option 1	+	S, M, L-T, I, R, M	OPDC area	Old Oak High Street as a metropolitan centre could provide and attract additional social infrastructure such as health centres.
		TC2 Option 2	+	S, M, L-T, I, R, M	OPDC are	Old Oak District Centre could provide social infrastructure such as health centres.
		TC2 Option 3	+	S, M, L-T, I, R, M	OPDC area	Old Oak District Centre could provide social infrastructure such as health centres.
		TC2 Option 4	-	S, M, L-T, I, R, M	OPDC and surrounding area.	Not using Park Royal as a Neighbourhood Centre may mean employees and residents would have to travel further for their health services. It would also see the loss of well used existing local services over time.
		TC3	+	S, M, L-T, D, R, H	London wide	As explained in the policy the London Plan (2015) policies 2.15 and 4.8 support proposals that sustain and enhance the viability of a town centre, promote healthy living, support and enhance the competitiveness, quality and diversity of town centre uses and that contribute towards enhancing the public realm.
		TC3 Option 1	-	S, M, L-T, D, R, L	OPDC area	The option would have perceptual significant negatives as it could result in the proliferation of these uses and would not promote OPDC's role as a healthy new part of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						London.
		TC4	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to facilitate the supply of local food through the provision of space for uses such as allotments or farmers markets and reduce the potential for an over-concentration of hot food takeaways in the local area. This should contribute to benefits against the objective.
		<i>TC4 Option 1</i>	+	S, M, L-T, I, R, M	OPDC area	.A strong retail focus with accompanying eating establishments would not have a direct effect on the health of the community but a facility that supports the need of the user should improve healthy living. From a retail perspective, this would be more likely to be achieved through greater active uses.
		TC5	++	S, M, L-T, D, R, H	OPDC and London wide	Culture, sports and leisure facilities will be expected to cater for a range of incomes, particularly those in low incomes who are often excluded from access to such facilities or whose choice is often limited. This will be especially important for access to sports facilities. There is a direct correlation between income deprivation and obesity and as a healthy new London quarter, OPDC is keen to ensure that there is access for all to new sports facilities for local communities and OPDC will seek to secure a proportion of affordable sports and leisure provision.
		<i>TC5 Option 1</i>	+	S, M, L-T, D, R, M	OPDC and London wide	OPDC is keen to ensure that there is access for all to new sports facilities for local communities and OPDC will seek to secure a proportion of affordable sports and leisure provision. However, the option imposes a limit on these uses.
		TC6	0			The option will not directly contribute to benefits against this objective.
		TC7	+	S, M, L-T, I, R, M	OPDC area	Seeking to manage the hours of operation of evening and night time economy uses would help to manage the impact on building user amenity and users' health and well-being.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	TC1	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	New town centre development and maintenance of existing centres could contribute to meeting the need for homes as well as the provision of new schools contributing to the achievement of benefits against this objective.
		TC2	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The provision of retail space will help to generate new job and skills development opportunities that will benefit local people.
		<i>TC2 Option 1</i>	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The provision of a greater amount of retail space within a metropolitan centre will help to generate new job and skills development opportunities that will benefit local people.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC2 Option 2	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The provision of retail space will help to generate new job and skills development opportunities that will benefit local people.
		TC2 Option 3	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The provision of retail space will help to generate new job and skills development opportunities that will benefit local people.
		TC2 Option 4	0			The option will not directly contribute to benefits against this objective.
		TC3	0			The policy will not directly contribute to benefits against this objective.
		TC3 Option 1	0			The option will not directly contribute to benefits against this objective.
		TC4	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The delivery of new A Use Class development will help to generate new job and skills development opportunities that will benefit local people.
		TC4 Option 1	0			The option will not directly contribute to benefits against this objective.
		TC5	++	S, M, L-T, D, R, H	London wide	The Mayor's Cultural Strategy promotes London as the world's cultural capital and how this role can help widen the reach of and access to culture, support education skills and careers and enhance the physical environment. The delivery of new cultural, sports and leisure facilities will help to generate new job and skills development opportunities that will benefit local people.
		TC5 Option 1	+	S, M, L-T, D, R, H	OPDC and London wide	The option will offer leisure and sports education in the area.
		TC6	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The delivery of new visitor accommodation will help to generate new job and skills development opportunities that will benefit local people.
TC7	0			The option will not directly contribute to benefits against this objective.		
17	Maximise the social and economic wellbeing of the	TC1	++	S,M,L-T, I,R,M	OPDC area	Town centre uses can also add to the economic prosperity of an area, helping to provide a range of employment opportunities over a wide range of sectors and skill levels. Town centre uses will play a critical role in achieving this, providing new employment and services and adding vibrancy and activity. To support these centres, employment and

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
local and regional population and improve access to employment and training						residential uses will also be supported as part of the mix of uses, which can help to increase footfall and add to vibrancy and vitality. New town centre uses will also play a critical role in overcoming the socio-economic deprivation experienced in and around the OPDC area by providing a range of new opportunities for employment and training across a breadth of sectors.
	TC2	++	S,M,L-T, I,R,H		OPDC area	As explained in the policy the London Plan Policy 2.15 promotes the designation of new town centres, giving priority to areas with a need for regeneration and better access to services, facilities and employment, which is true for both Old Oak and Park Royal which are identified as Opportunity Areas (Policy 2.13).
	TC2 Option 1	++	S,M,L-T, I,R,H		OPDC area	As explained in the policy the London Plan Policy 2.15 promotes the designation of new town centres, giving priority to areas with a need for regeneration and better access to services, facilities and employment, which is true for both Old Oak and Park Royal which are identified as Opportunity Areas (Policy 2.13). The delivery of a metropolitan centre will help to further deliver this guidance.
	TC2 Option 2	+	S,M,L-T, I,R,H		OPDC area	As explained in the policy the London Plan Policy 2.15 promotes the designation of new town centres, giving priority to areas with a need for regeneration and better access to services, facilities and employment, which is true for both Old Oak and Park Royal which are identified as Opportunity Areas (Policy 2.13). The delivery of a district and neighbourhoods centre may not deliver the same level of benefits as a major centre.
	TC2 Option 3	+	S,M,L-T, I,R,H		OPDC area	As explained in the policy the London Plan Policy 2.15 promotes the designation of new town centres, giving priority to areas with a need for regeneration and better access to services, facilities and employment, which is true for both Old Oak and Park Royal which are identified as Opportunity Areas (Policy 2.13). The delivery of a district and neighbourhoods centre may not deliver the same level of benefits as a major centre.
	TC2 Option 4	+/-	S,M,L-T,I,R,L		OPDC area	This option could see the dispersal of services across Park Royal limiting their access.
	TC3	+	S,M,L-T,I,R,M		OPDC area	The policy promotes vibrancy that can attract inward investment which is a positive for socio-economic wellbeing.
	TC3 Option 1	+/-	S,M,L-T,I,R,M		OPDC area	The option states that the vibrancy will attract investment but the proliferation of these types of business may detract potential investors.
	TC4	+	S, M, L-T, I, R, L		OPDC area and surrounding boroughs.	The delivery of new A Use Class development will help to generate new job and skills development opportunities that will benefit local people.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>TC4 Option 1</i>	0			The option will not directly contribute to benefits against this objective.
		TC5	++	S, M, L-T, D, R, H	London wide	The Mayor's Cultural Strategy promotes London as the world's cultural capital and how this role can help widen the reach of and access to culture, support education skills and careers and enhance the physical environment. The delivery of new cultural, sports and leisure facilities will help to generate new job and skills development opportunities that will benefit local people.
		<i>TC5 Option 1</i>	+	S, M, L-T, D, R, H	OPDC and London wide	The option will offer leisure and sports education in the area.
		TC6	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The delivery of new visitor accommodation will help to generate new job and skills development opportunities that will benefit local people.
		TC7	+/-	S,M,L-T, I,R,M	OPDC area	Operational hours may have an effect on employment resource required at the venues. A new facility could create employment opportunities for the local people. The policy also ensures proposals would not result in harmful cumulative impacts in association with other late licensed properties leading to loss of employment.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	TC1	++	S,M,L-T, I,R,M	London wide	The policy emphasises London's growing needs and the role that these town centre facilities can play in promoting economic prosperity and maintaining London's status as one of the world's greatest cities.
		TC2	+	S,M,L-T, I,R,H	Nationwide	As explained in the policy the NPPF should consider the impact of the proposal on existing, committed and planned investment in nearby centres within its catchment and the impact of the proposal on the vitality and viability of nearby centres. The NPPF requires local authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes. This options meets this requirement.
		<i>TC2 Option 1</i>	+/-	S,M,L-T, I,R,M	London wide	This option could impact on the vitality and viability of the surrounding town centre hierarchy. It may also dilute investment in other centres and could also impact on a wider catchment and a greater number of town centres in West London. However, Old Oak High Street should see direct investment opportunities which may act as a catalyst for the OPDC area.

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
		TC2 Option 2	+/-	S,M,L-T, D,R,H	OPDC and surrounding areas	There is a significant opportunity for the land uses around the Old Oak Common station to attract interchangers into the surrounding hinterland and to help activate the place and capture economic benefits for the area and its hinterland. This opportunity would be limited through the designation of a Neighbourhood Centre here, rather than a Major Centre.
		TC2 Option 3	+/-	S,M,L-T, D,R,H	OPDC area	Old Oak and the station should see direct investment opportunities which may act as a catalyst for the OPDC area. The designation of a Neighbourhood Centre may limit opportunity.
		TC2 Option 4	+	S,M,L-T, D,R,H	Park Royal	Park Royal should see direct investment opportunities which may act as a catalyst for the OPDC area.
		TC3	+	M, L-T, I, R, L	OPDC area and London wide	The policy could lead to indirect positive effects against this objective, as an improvement to the aesthetics and vibrancy could improve the attractiveness of the town centres to inward investors.
		TC3 Option 1	+/-	M, L-T, I, R, L	OPDC area and London wide	The vibrancy of the location could lead to positive effects against this objective but the proliferation of the use may detract potential investment.
		TC4	+/-	S,M,L-T, I,R,M	OPDC and surrounding areas	The policy states that if you provide too much A-class floorspace, units could remain vacant or the uses could start to draw significant levels of trade away from the surrounding retail hierarchy and existing community. This could have a detrimental effect on the local economy. However, more a-class uses in the town centres will bring investment and incentives for businesses to move into the area.
		TC4 Option 1	+	S,M,L-T, I,R,M	OPDC area	More a-class uses, especially retail, in OPDC will bring investment and incentives for businesses to move into the area.
		TC5	+	S,M,L-T, D,R,M	OPDC and surrounding areas	More facilities may provide inward investment and community benefits for the area.
		TC5 Option 1	+	S,M,L-T, D,R,M	OPDC and surrounding areas	More facilities may provide inward investment and community benefits for the area.
		TC6	+	S,M,L-T, D,R,H	OPDC and surrounding area	More high quality visitor accommodation businesses will attract investment into the area which help create and build sustainable economic growth in the OPDC and surrounding area.
		TC7	++	S,M,L-T, D,R,H	OPDC and surrounding area	The policy supports the role that eating and drinking establishments and culture, sports and leisure uses can play in contributing to the vibrancy and vitality of the OPDC area and adding activity to the public realm and supporting the local economy. The operating

IIA Objective	Performance of Policy	Temporal Scale	Nature of Impact	Geographical Extent	Commentary and Recommendations
					hours should benefit the local community and develop economic growth in the area.



**Table G-8 Chapter 10: Social Infrastructure**

- SI1: Strategic Policy: Social infrastructure
- SI2: Educational
- SI3: Health
- SI4: Community facilities
- SI5: Public houses

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	SI1	+	S-T,I,R,L	OPDC area	The policy seeks to improve social infrastructure and upgrade existing facilities. The scale of development in Old Oak and Park Royal should enhance the built environment in the area.
		SI1 Option 1	+	S, M, L-T, D, R, L	OPDC area	The policy states that new place-making would be enhanced by new social infrastructure delivering a range of community facilities on-site in earlier development phases. However, the early provision may be isolated from existing communities.
		SI2	+	M-T, I, IR, L	OPDC area	The scale of the development and higher education facilities in the area may promote OPDC as an appropriate location and may act as a catalyst for regeneration and creating a greater sense of 'place'.
		SI2 Option 1	0	M-T, I, IR, L	OPDC area	The option does not promote OPDC as an appropriate location for an educational facility and therefore does not recognise this potential catalyst for regeneration and creating a greater sense of 'place'.
		SI3	+	S,M,L-T,D,R,M	OPDC area	The policy seeks to support development in Old Oak and Park Royal as a 'Healthy New Town' which could contribute to enhancing the built environment and encouraging place making.
		SI4	++	S, M, L-T, D, R, M	OPDC area	The policy emphasises the importance of community facilities in place-making specifically in the OPDC area creating key hubs of activity and focal points for the neighbourhood.
		SI5	++	S-T, D, R, M	OPDC area	As a place of social, community focused and entertainment, protection of public houses can be seen as a crucial aspect of maintaining and contributing towards 'place-making'.
		SI5 Option 1	-	S-T, D, R, M	OPDC area	Vacant pubs could be more likely to be lost to other uses if there is no policy to protect their retention for community uses.
2	To optimise the efficient use of land through increased development densities and building heights,	SI1	++	S, M, L-T, D, R, M	OPDC area	The policy promotes the co-location and multifunctionality of social infrastructure which will to make the most efficient use of land and optimise the development of brownfield land, which could have direct significant benefits against this objective.
		SI1 Option 1	++	S, M, L-T, D, R, M	OPDC area	On-site development rather than expanding to surrounding existing facilities may increase building densities.
		SI2	0	N/A	OPDC area	There is no direct link to this IIA Objective.
		SI2 Option 1	0	N/A	OPDC area	There is no direct link to this IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	where appropriate	<i>Option 1</i>				
		SI3	++	S,M,L-T, D,R,M	OPDC area	Co-location of health facilities with other uses will increase development densities.
		SI4	+	S,M,L-T,D,R,L	OPDC area	Co-location of community facilities with other uses will increase development densities.
		SI5	0			This option would not bring any benefits for the objective.
		<i>SI5 Option 1</i>	0			This option would not bring any benefits for the objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	SI1	++	S, M, L-T, D, R, M	OPDC area	The policy objectives enhance existing educational provision and promote co-location which could have direct significant benefits against this objective.
		<i>SI1 Option 1</i>	+	S, M, L-T, D, R, M	OPDC area	Providing new social infrastructure on-site would help meet this objective if the land is previously developed.
		SI2	+	S-T, D,IR,M	OPDC area	The policy seeks to look at existing schools for expansion opportunities as well as securing new sites for schools. These objectives will likely result in re-use of previously developed land and of existing buildings.
		<i>SI2 Option 1</i>	+	S-T, D,IR,M	OPDC area	The option does not promote OPDC as an appropriate location for an educational facility. There is no direct link to this SA Objective.
		SI3	+	S,M,L-T,I,IR,L	OPDC and surrounding area	Colocation of health facilities with other users with prevent the use of greenfield space and increase the use of previously developed land.
		SI4	+	S,M,L-T,I,IR,L	OPDC and surrounding area	Colocation of community facilities with other users with prevent the use of greenfield space and increase the use of previously developed land.
		SI5	+	S,M,L-T,I,R,L	London wide and national	The policy clearly states that National, regional and local planning authorities seek to safeguard valued community assets. This would help maintain the use of these buildings.
		<i>SI5 Option 1</i>	+	S,M,L-T,D,IR,L	OPDC area	This option could lead to the re-use of vacant buildings for other uses, however, these uses may not offer the same benefit in terms of a community asset.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation	SI1	+	L-T, I, R, M	London-wide and national	Development in OPDC and London could provide improved accessibility to new and improved social infrastructure.
		<i>SI1 Option 1</i>	+	S, M, L-T, D, R, L	OPDC area	The policy demonstrates benefits on the transport network as new residents would not have to travel as far to access community uses. However, the early provision may be isolated from existing communities.
		SI2	++	S,M,L-T,D,R,M	OPDC and surrounding area.	The policy seeks to increase the co-location of education services and facilities as part of developments therefore improving accessibility and mitigating impacts on the transport network in the area.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	methods and mitigate impacts on the transport network	S/2	++	S,M,L-T,D,R,M	OPDC area	The option does not promote OPDC as an appropriate location for an educational facility. There is no direct link to this SA Objective.
		Option 1				
		S/3	++	S,M,L-T,	OPDC area	Facilities should be located in designated town centres and close to areas of high public transport access, as well as providing facilities with multiple uses, which would be easily accessible and visible for members of the public.
		S/4	++	S,M,L-T,	OPDC area	OPDC will secure a range of new high quality community facilities that are located at key destination points within the OPDC area, close to destinations of high footfall and high public transport access, leading to benefits against this objective.
		S/5	0			There is no direct relationship between objective and policy.
		S/5	0			There is no direct relationship between objective and policy.
		Option 1				
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	S/1	0			The policy does not directly affect the objective.
		S/1	0			The policy does not directly affect the objective.
		Option 1				
		S/2	0			The provision of education does not affect access to housing.
		S/2	0			There is no direct relationship between the access to housing objective and the provision of education.
		Option 1				
		S/3	0			The policy does not directly affect the objective.
S/4	0			The policy does not directly affect the objective.		
S/5	0			The use of public houses does not directly support access to different housing types.		
		S/5	0			There is no direct relationship between objective and policy.
		Option 1				
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	S/1	+	L-T, I, R, L	OPDC area and surrounding boroughs	High quality design of social infrastructure may enable buildings to adapt to the changing climate including natural ventilation, temperature adaptation and minimise the risk of flooding on site.
		S/1	+	L-T, I, R, L	OPDC area and surrounding boroughs	High quality design of social infrastructure may enable buildings to adapt to the changing climate including natural ventilation, temperature adaptation and minimise the risk of flooding on site.
		Option 1				
		S/2	0			The choice of land use for education will not have an effect on the objective surrounding climate change issues.
		S/2	0			The choice of land use for education will not have an effect on the objective surrounding climate change issues.
		Option 1				
		S/3	0			The policy does not directly affect the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		SI4	+	S,M,L-T, I, IR, L	OPDC area	Design measures may include improvements to energy efficiency, which could lead to further benefits against this objective in accordance with Preferred Policy Options for the Environment and Utilities policies.
		SI5	0			There is no direct relationship between objective and policy.
		SI5 Option 1	0		OPDC area	There is no direct relationship between objective and policy.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	SI1	+	S, M, L-T, I, IR, L	OPDC area and surrounding boroughs	A lesser need to travel to community facilities should reduce carbon emissions and make a contribution to tackling climate change. High quality design could also provide benefits in relation to this objective.
		SI1 Option 1	+	S, M, L-T, I, IR, L	OPDC area and surrounding boroughs	A lesser need to travel to community facilities should reduce carbon emissions and make a contribution to tackling climate change. High quality design could also provide benefits in relation to this objective.
		SI2	+	S, M, L-T, I, IR, L	OPDC area and surrounding boroughs	A lesser need to travel to education facilities should reduce carbon emissions and make a contribution to tackling climate change. High quality design could also provide benefits in relation to this objective.
		SI2 Option 1	0			The policy does not directly affect the objective.
		SI3	+	S,M,L-T, I, IR, L	OPDC area	The provision and co-location of facilities could reduce the need to travel leading to benefits against this objective.
		SI4	+	S,M,L-T, I, IR, L	OPDC area	The provision and co-location of facilities in areas with high footfall and public transport access could reduce the need to travel leading to benefits against this objective. Design measures may include improvements to energy efficiency, which could lead to further benefits against this objective, although these measures are not specified in the policy or supporting text.
		SI5	0			There is no direct relationship between objective and policy.
		SI5 Option 1	0			There is no direct relationship between objective and option.
8	To minimise production of waste across all sectors in the plan area,	SI1	+	S,M,L-T, D, IR, L	OPDC area	High quality design with the selection of sustainable materials for new buildings could contribute to higher recovery rates and minimise the production of waste. The expansion of existing facilities and the use of facilities for multiple uses could create efficiencies in the use of construction resources.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste						<i>New development should promote the consideration of recycled materials for the construction of the building can help minimise waste as considered in Preferred Policy Options on Waste.</i>
	S11	0				There is no direct relationship between the policy and the objective surrounding waste minimisation.
	S12	0				High quality design with the selection of sustainable materials for new buildings could contribute to higher recovery rates and minimise the production of waste.  <i>New development should promote the consideration of recycled materials for the construction of the building can help minimise waste as considered in Preferred Policy Option on Waste.</i>
	S12 Option 1	0				There is no direct relationship between the policy and the objective surrounding waste minimisation.
	S13	0				There is no direct relationship between objective and policy.
	S14	+	S,M,L-T, D, IR, L	OPDC area		High quality design with the selection of sustainable materials for new buildings could contribute to higher recovery rates and minimise the production of waste.  <i>New development should promote the consideration of recycled materials for the construction of the building can help minimise waste as considered in Preferred Policy Option on Waste.</i>
	S15	+	S,M,L-T, D, IR, L	OPDC area		The re-use of vacant pubs could reduce the need for materials in new development.
	S15 Option 1	+	S,M,L-T, D, IR, L	OPDC area		The re-use of vacant pubs could reduce the need for materials in new development.
9 Improve the quality of the water environment	S11	0				There is no direct relationship between the option and the objective surrounding the quality of the water environment.
	S11 Option 1	0				There is no direct relationship between the option and the objective surrounding the quality of the water environment.
	S12	0				There is no direct relationship between the objective and policy.
	S12 Option 1	0				There is no direct relationship between the objective and policy.
	S13	0				There is no direct relationship between objective and policy.
	S14	0				There is no direct relationship between objective and policy.
	S15	0				There is no direct relationship between objective and policy.
	S15	0				There is no direct relationship between objective and policy.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>Option 1</i>				
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	SI1	0			There is no direct relationship between the option and the objective surrounding biodiversity issues.
		<i>SI1 Option 1</i>	0			There is no direct relationship between the option and the objective surrounding biodiversity issues.
		SI2	0			There is no direct relationship between the option and the objective surrounding biodiversity issues.
		<i>SI2 Option 1</i>	0			There is no direct relationship between the option and the objective surrounding biodiversity issues.
		SI3	0	S,M,L-T, D,R,L	OPDC area	There is no direct relationship between objective and policy.
		SI4	0	S,M,L-T, D,R,L	OPDC area	There is no direct relationship between objective and policy.
		SI5	0	S,M,L-T, D,R,L	OPDC area	There is no direct relationship between objective and policy.
		<i>SI5 Option 1</i>	0	S,M,L-T, D,R,L	OPDC area	There is no direct relationship between objective and policy.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	SI1	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	High public transport access and the co-location of facilities may minimise air, noise and light pollution through the use of more sustainable modes of transport.
		<i>SI1 Option 1</i>	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	High public transport access and the co-location of facilities may minimise air, noise and light pollution through the use of more sustainable modes of transport.
		SI2	+	S, M, L-T, D, IR, L	OPDC area	The policy seeks to increase the co-location of education services and facilities as part of developments therefore improving accessibility and mitigating impacts on the transport network in the area, which could improve pollution impacts
		<i>SI2 Option 1</i>	0	N/A	N/A	There is no direct relationship between objective and policy.
		SI3	+	S, M, L-T, D, IR, L	OPDC area	Facilities should be located in accessible locations as well as providing facilities with multiple uses, which would be easily accessible and visible for members of the public. This could help to reduce potential pollution impacts.
		SI4	+	S,M,L-T,	OPDC area	OPDC will secure a range of new high quality community facilities that are located at key destination points within the OPDC area, close to destinations of high footfall and high

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						public transport access, leading to benefits against this objective.
		SI5	0	S,M,L-T,D,R,L	OPDC area	There is no direct relationship between objective and policy.
		SI5 Option 1	0	S,M,L-T, D,R,L	OPDC area	There is no direct relationship between objective and policy.
12	To conserve and enhance the historic environment, heritage assets and their settings	SI1	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The promotion of high quality design could provide some benefits against this objective.  <i>New community uses and the provision of social infrastructure in Old Oak and Park Royal should seek to preserve any historic features and heritage assets in the area as considered in Preferred Policy Option on Heritage.</i>
		SI1 Option 1	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The promotion of high quality design could provide some benefits against this objective.
		SI2	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The promotion of high quality design could provide some benefits against this objective.
		SI2 Option 1	0			There is no direct relationship between objective and policy.
		SI3	+	S,M,L-T,I,R,M	OPDC area	The promotion of high quality design could provide some benefits against this objective.
		SI4	+	S,M,L-T,D,R,M	OPDC area	The promotion of high quality design could provide some benefits against this objective.
		SI5	++	S-T, D, R, M	London wide	OPDC considers that pubs can act as hubs for community life bringing activity to high streets and can provide heritage value. The preservation of existing and creation of new public houses in Old Oak and Park Royal should seek to preserve any historic features and heritage assets in the area <i>as considered in Preferred Policy Option on Heritage...</i>
		SI5 Option 1	+/-	S-T, D, R, M	OPDC area	This policy allows for optimisation of development of sites occupied by public houses. This may have an effect on the historic environment adjacent and surrounding the site, although design measures elsewhere in the Local Plan could seek to reduce this effect.
13	Increase community cohesion and reduce social exclusion to	SI1	++	S, M, L-T, I, R, L	West London and London wide	The policy has the potential to increase community cohesion, unite diverse groups and support the community and welfare through its approach to safeguarding existing infrastructure and creating new community facilities to meet the needs of the local residents and all members of the community and in particular the protected characteristics. Management of the construction process to reduce the impact of a

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
encourage a sense of community and welfare						potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure may have a positive effect on the community
	S11 Option 1	-	S,M,L-T, D,R,M	OPDC area		This option would not help to knit the residents, diverse groups and employees on early sites with the existing community and may leave these sites feeling isolated in early years.
	S12	++	S,M,L-T, D, R, H	OPDC area		The policy seeks to promote OPDC as a location for education whilst helping the area and the wider economy. This will have many benefits to the community, increase cohesion, bring diverse groups together and takes into account the increase in population. Physically, the policy should look to improve the quality of the public realm, open spaces and the connectivity to the development as considered in Preferred Policy Options for Design.
	S12 Option 1	0				The policy does not promote OPDC as a location for education. There is no direct relationship between objective and policy.
	S13	+	S,M,L-T, D,R,H	OPDC area		The policy seeks to secure adequate health provision. This will have many benefits to the community, increase cohesion, bring diverse groups together and takes into account the increase in population.
	S14	++	S,M,L-T, D,R,H	OPDC area		The policy seeks to ensure that development in Old Oak and Park Royal is supported by adequate community facilities to cater for all resident groups, such as libraries, places of worship, halls for hire, youth space and training and meeting space. These facilities will increase community cohesion, consider people with a protected characteristic and encourage a sense of welfare.
	S15	++	S,M,L-T, D,R,H	OPDC area		OPDC considers that pubs can act as hubs for community life. They provide a social space for entertainment purposes and promote community cohesion
	S15 Option 1	-	S,M,L-T, D,R,M	OPDC area		This option may result in the loss of pubs that provide a valued community facility.
14 Improve safety and reduce crime and the fear of crime	S11	+	M, L-T, I, R, L	London wide		The provision of social infrastructure and services (i.e. police, fire and health) may help prevent crime and create safer communities.
	S11 Option 1	+	M, L-T, I, R, L	OPDC area		The provision of community facilities and services may help prevent crime and create safer communities.
	S12	0				There is no direct relationship between objective and policy.
	S12 Option 1	0				There is no direct relationship between objective and policy.
	S13	0				There is no direct relationship between objective and policy.
	S14	0				There is no direct relationship between objective and policy.
	S15	0				There is no direct relationship between objective and policy.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>SI5 Option 1</i>	0			There is no direct relationship between objective and policy.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	SI1	++	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The future population in the OPDC area will need to be supported by adequate provision of social infrastructure to meet the requirements of the community. This will also increase the capacity of local social infrastructure. The scale of development in Old Oak and Park Royal provides substantial opportunities to upgrade existing facilities and to provide new state of the art facilities demonstrating best-practice in terms of the provision of social infrastructure. This policy could have benefits for health.
		<i>SI1 Option 1</i>	++	S, M, L-T, I, R, L	OPDC area	Closer healthcare facilities may help reduce inequalities in health and promote healthy living.
		SI2	+	S,M,L-T, D,R,M	OPDC area	Educational facilities could help the health and wellbeing of the community through increased knowledge and accessibility by sustainable modes of transport.
		<i>SI2 Option 1</i>	0			There is no direct relationship between objective and policy.
		SI3	++	S,M,L-T, D,R,L	OPDC and surrounding area.	The future population in the OPDC area will need to be supported by adequate provision of healthcare. Healthcare facilities and social care will protect the health and wellbeing of the local community. As a 'Healthy New Town' there will be an integrated approach to encouraging healthy living.
		SI4	+	S,M,L-T, D,R,M	OPDC area	The policy seeks to deliver community facilities that are collocated where feasible and encourage opportunities for buildings with a shared community use and the co-location of services. This could have benefits for health and wellbeing.
		SI5	+	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC consider that pubs can act as hubs for community life, which is important for mental health and wellbeing. As a 'Healthy New Town' OPDC proposes that the Local Plan looks to protect its public houses, subject to their continuing viability.
		<i>SI5 Option 1</i>	-	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC consider that pubs can act as hubs for community life, which is important for mental health and wellbeing. The loss of such facilities could have negative effects on health.
16	To improve the education and skills levels of all members of the population,	SI1	0			There is no direct relationship between objective and policy.
		<i>SI1 Option 1</i>	+	M, L-T, I, R, L	OPDC area	There is no direct relationship between objective and policy.
		SI2	++	S,M,L-T,	OPDC area	Closer educational facilities within the existing community may increase the availability of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	particularly vulnerable groups			D,R,H		formal education for all age groups and adults from all equality groups.
		S/2 Option 1	+	S,M,L-T, D,R,H	OPDC area	The policy option would not directly promote higher education uses, but does not preclude them so this may not improve employment and skills opportunities.
		S/3	++	S,M,L-T, D,R,H	OPDC area	The policy supports the provision of health facilities. There is no direct relationship between objective and policy.
		S/4	+	S,M,L-T, D,R,L	OPDC area	There is no direct relationship between the objective and the policy.
		S/5	0			There is no direct relationship between the objective and the policy.
		S/5 Option 1	0			There is no direct relationship between the objective and the policy.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	S/11	+	S, M, L-T, I, R, L	OPDC area, West London, London wide	Social Infrastructure may provide access to a range of high quality local employment opportunities and community services.
		S/11 Option 1	++	S, M, L-T, I, R, L	OPDC area	On-site social infrastructure may provide easier access to a range of high quality local employment opportunities and community services.
		S/12	++	S,M,L-T, D,R,H	OPDC area	The opportunity to promote OPDC as a location for new and enhanced education facilities will improve the social wellbeing of the community by providing employment and training opportunities.
		S/12 Option 1	+	S,M,L-T, D,R,L	OPDC area	The policy option would not directly promote higher education uses, but does not preclude them so this may not improve the social wellbeing of the community by providing employment and training opportunities.
		S/13	+	S,M,L-T, D,R,M	OPDC area	Any new healthcare facility will provide an opportunity for local employment during construction or operation of the development.
		S/14	+	S,M,L-T, D,R,M	OPDC area	Any new community facility will provide an opportunity for local employment during construction or operation of the development
		S/15	+	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC considers that pubs can act as hubs for community life and provide economic benefits by providing jobs.
		S/15 Option 1	-			This policy could result in the loss in viable existing businesses.
18	To encourage inward investment alongside investment	S/11	+	M, L-T, I, R, L	OPDC area, West London, London wide	An increase in social infrastructure will increase infrastructure and utilities capacity which may contribute to the community and inward investment with a greater flow of businesses moving into the area.
		S/11 Option 1	+	M, L-T, I, R, L	OPDC area	An increase in social infrastructure will increase infrastructure and utilities capacity which may contribute to the community and inward investment with a greater flow of businesses

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
within existing communities, to create sustainable economic growth						moving into the area.
	SI2	+	S,M,L-T, D,R,M	OPDC area	An education facility in the OPDC will encourage further investment as the OPDC will be seen as a desirable location for business and academia.	
	SI2 <i>Option 1</i>	+	S,M,L-T, D,R,M	OPDC area	An education facility in the OPDC will encourage further investment as the OPDC will be seen as a desirable location for business and academia.	
	SI3	+	L-T, I, IR, M	OPDC area	National and International health institutions in the OPDC area could encourage further inward investment from associated sectors.	
	SI4	++	S,M,L-T, D,R,H	OPDC area	An increase in community facilities may contribute to the community and inward investment due to their ability to provide jobs and attract footfall into an area.	
	SI5	++	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC consider that pubs can act as hubs for community life. They provide economic benefits by providing jobs, supporting local food suppliers and bring activity to high streets. Public houses must be seen as a viable business.	
	SI5 <i>Option 1</i>	-	S,M,L-T, D,R,L	OPDC area	This policy could result in the loss in viable existing businesses.	

**Table G-9 Chapter 11: Transport**

- T1: Strategic Policy: Transport
- T2: Walking
- T3: Cycling
- T4: Rail
- T5: Buses
- T6: Roads
- T7: Parking
- T8: Freight, servicing and deliveries
- T9: Construction
- T10: Transport Assessments and Travel Plans

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	T1	+	S,M,L-T,I,R,M	OPDC area	The policy seeks to deliver state of the art, safe and accessible transport systems, by providing infrastructure that connects communities and helps facilitate growth and this would support accessibility and would help to encourage place making.
		<i>T1 Option 1</i>	-	S,M,L-T,I,R,L	OPDC area	The policy seeks to give priority to car travel which would result in effects to vehicle congestion, people making fewer journeys by foot and other sustainable means including cycling and public transport and this would impact upon health and wellbeing and which could negatively impact upon local amenity.
		T2	+	S,M,L-T,I,R,M	OPDC and surrounding area	Walking is the most sustainable form of transport and encouraging increased walking will have many advantages including more connected neighbourhoods. Increasing the connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks including via green infrastructure networks and the canal would all support placemaking.
		T3	+	S,M,L-T,I,R,M	OPDC and surrounding area	Placemaking would be encouraged through the provision of state of the art cycling infrastructure, improved cycle wayfinding and signage and the enhancement of existing cycle connections to ensure they are safe, convenient, direct but not detrimental to pedestrians.
		T4	+	S,M,L-T,I,R,M	OPDC and surrounding area	The policy seeks to support a number of rail improvements including the delivery of state of the art rail station at Old Oak Common and at links between stations as well as improved services on existing rail infrastructure these features would all contribute towards enhancing the built environment and improving accessibility.
		T5	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy seeks the delivery of increased bus frequencies on existing and extended bus routes; to provide bus journey time reliability and to provide clear and legible signage. This would help to encourage placemaking.
		T6	+	S,M,L-	OPDC and	The policy seeks to deliver high quality streets that integrate effectively with the wider

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				T,I,R,M	surrounding area	public realm which would help to support placemaking.
		T7	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy seeks to promote modal shift towards more sustainable modes. This would help to support the street scene, public realm and placemaking.
		T7 Option 1	-	S,M,L-T,I,R,L	OPDC area	Setting less stringent car parking standards would offer greater choice however would place unacceptable impacts on the surrounding road network and would discourage modal shift towards the use of more sustainable transport modes and would increase emissions. This would potentially lead to more congestion and would not support placemaking.
		T7 Option 2	+	S,M,L-T,I,R,L	OPDC and surrounding area	This policy, similarly to the preferred option, would enable a mode shift towards the use of sustainable transport and reduce traffic flow and congestion through limited parking which would support the street scene, public realm and placemaking.
		T8	0	N/A	N/A	The policy primarily addresses freight, servicing and deliveries and does not have a direct link to the SA Objective.
		T8 Option 1	0	N/A	N/A	The nature of the policy does not directly link with the SA Objective.
		T8 Option 2	0	N/A	N/A	The nature of the policy does not directly link with the SA Objective.
		T9	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy seeks to provide support to reduce freight and construction trips which may have an indirect effect on amenity through reduced frequency of heavy goods vehicles (HGVs) on roads.
		T9 Option 1	+	S,M,L-T,I,R,L	OPDC area	A lack of coordination over construction transport could lead to increased volumes of construction vehicles on the road network which could have an effect on amenity.
		T9 Option 2	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy seeks to move all freight moved by rail or water which could have a positive effect on amenity.
		T10	0	N/A	N/A	The policy primarily addresses transport assessments and travel plans and does not have a direct link to the SA Objective.
		T10 Option 1	0	N/A	N/A	There is no link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>T10 Option 2</i>	0	N/A	N/A	There is no link between the policy and the SA Objective.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	T1	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy primarily seeks to provide transport infrastructure and to facilitate growth and the development of state of the art infrastructure could help to optimise efficient use of land.
		<i>T1 Option 1</i>	0	N/A	N/A	The primary focus of the policy is to give priority to car travel which directly link with efficient land use.
		T2	+	S,M,L-T,I,R,L	OPDC and surrounding area	The efficient use of land would be demonstrated through the provision of high quality, safe and accessible walking networks.
		T3	+	S,M,L-T,I,R,L	OPDC and surrounding area	The provision of state of the art cycling infrastructure through this policy would contribute towards optimising efficient land use.
		T4	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T5	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T6	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T7	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		<i>T7 Option 1</i>	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		<i>T7 Option 2</i>	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T8	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy supports freight, servicing and deliveries and it seeks to identify potential sites for consolidation centres and lorry holding areas and the provision of facilities for home deliveries within residential development. The delivery of facilities for home deliveries within residential development would help to optimise the efficient use of land.
		<i>T8 Option 1</i>	0	N/A	N/A	The policy option seeks no controls over deliveries and servicing which does not have direct link to the SA Objective.
		<i>T8 Option</i>	0	N/A	N/A	The policy option seeks to ban deliveries and servicing by larger vehicles which does not have direct link to the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		2				
		T9	0	N/A	N/A	The policy focuses on reducing freight and construction trips which does not directly link with the SA Objective.
		T9 Option 1	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T9 Option 2	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T10	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T10 Option 1	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T10 Option 2	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	T1	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy primarily seeks to provide transport infrastructure and to facilitate growth and the development of state of the art infrastructure could help to optimise reuse of previously developed land.
		T1 Option 1	0			The primary focus of the option is to give priority to car travel which does not directly link with use of previously developed land.
		T2	+	S,M,L-T,I,R,L	OPDC and surrounding area	As a sustainable form of travel, walking routes and infrastructure will be more likely to be in place in previously developed areas therefore encouraging brownfield development.
		T3	+	S,M,L-T,I,R,L	OPDC and surrounding area	As a sustainable form of travel, cycle routes and infrastructure will be more likely to be in place in previously developed areas therefore encouraging brownfield development.
		T4	0			There is no direct link between the primary focus of the policy and the objective.
		T5	0			There is no direct link between the primary focus of the policy and the objective.
		T6	+	S,M,L-T,D,R,M	OPDC and surrounding area	The strategic road network, particularly the A40 and A406, is vital to the successful operation of Park Royal and will be in the future to Old Oak. Road schemes should contribute to strategic land remediation.
		T7	0			There is no direct link between the primary focus of the policy and the objective.
		T7	0			There is no direct link between the primary focus of the policy and the objective.

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>Option 1</i>			
		<i>T7 Option 2</i>	0		There is no direct link between the primary focus of the policy and the objective.
		T8	+	S,M,L-T,I,R,L	OPDC and surrounding area The policy supports freight, servicing and deliveries and it seeks to identify potential sites for consolidation centres and lorry holding areas and the provision of facilities for home deliveries within residential development. The delivery of facilities for home deliveries within residential development would help to optimise the efficient use of land.
		<i>T8 Option 1</i>	0		This option seeks no controls over deliveries and servicing which does not have direct link to the objective.
		<i>T8 Option 2</i>	0		This option seeks to ban deliveries and servicing by larger vehicles which does not have direct link to the objective.
		T9	0		The policy focuses on reducing freight and construction trips which does not directly link with the objective.
		<i>T9 Option 1</i>	0		There is no direct link between the primary focus of the policy and the objective.
		<i>T9 Option 2</i>	0		There is no direct link between the primary focus of the policy and the objective.
		T10	0		There is no direct link between the primary focus of the policy and the objective.
		<i>T10 Option 1</i>	0		There is no direct link between the primary focus of the policy and the objective.
		<i>T10 Option 2</i>	0		There is no direct link between the primary focus of the policy and the objective.
4	Minimise the need to travel, improve accessibility	T1	++	S,M,L-T, D, R, H	OPDC and surrounding area The policy seeks to deliver state of the art, safe and accessible transport systems by providing infrastructure that connects communities and facilitates growth. It also seeks to prioritise sustainable transport modes and support modal shift from private cars all of which would directly support the SA Objective.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	T1 <i>Option 1</i>	+/-	S,M,L-T,D,R,M	OPDC and surrounding area	This policy gives priority to car travel above sustainable modes which could impact upon journey times through increased vehicle congestion though the policy may benefit some businesses and residents. However, by facilitating the use of private vehicles congestion, noise and emissions would increase and fewer people would make journeys by foot, bike or public transport.	
	T2	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy seeks to support walking through the provision of high quality, safe and accessible walking networks. This would help to minimise the need to travel through improving accessibility by walking.	
	T3	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy seeks to support and encourage cycling through the provision of state of the art infrastructure and enhanced connections which would help to minimise the need to travel through improving accessibility by cycling.	
	T4	++	S,M,L-T,D,R,H	OPDC and surrounding area	The policy would deliver a new state of the art rail station at Old Oak and would provide quality links between stations as well as improving services on existing infrastructure all of which would directly serve to improve accessibility. The delivery of two new overground stations would also help to manage capacity.	
	T5	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy would deliver and contribute to the delivery of infrastructure to improve bus journey time reliability and priority measures as well as improved bus frequencies on new and extended routes which would help to improve accessibility.	
	T6	+	S,M,L-T,D,R,M	OPDC area	The policy primarily seeks to provide roads and streets that overcome severance and optimise connectivity. It also seeks to ensure that streets give priority to pedestrians, cyclists and buses which would improve accessibility.	
	T7	+	S,M,L-T,D,R,M	OPDC area	The policy primarily seeks to promote modal shift towards more sustainable modes through car parking limitations. This may contribute to minimising the need to travel and limited car parking in areas may also lead to increased use of sustainable transport modes such as public transport.	
	T7 <i>Option 1</i>	-	S,M,L-T,D,R,M	OPDC area	The policy seeks to set less stringent car parking standards which could discourage the use of more sustainable transport modes.	
	T7 <i>Option 2</i>	+	S,M,L-T,D,R,M	OPDC area	The car free approach would enable a mode shift towards the use of more sustainable transport modes which would have a positive effect on accessibility across non-motorised transportation methods.	
	T8	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy addresses freight, servicing and deliveries and does not directly link to minimising the need to travel and improving improve accessibility for all users.	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T8 Option 1	0	N/A	N/A	The primary focus of the policy does not have a direct link to the SA Objective.
		T8 Option 2	0	N/A	N/A	The primary focus of the policy does not have a direct link to the SA Objective.
		T9	+	S,M,L-T,D, I, R M	OPDC and surrounding area	The policy seeks to provide for measures to reduce freight and construction trips, make use of rail and water transportation and to coordinate and phase construction projects to enable effective mitigation of transport impacts all of which would help to mitigate impacts on the transport network.
		T9 Option 1	-	S,M,L-T,D,R,M	OPDC area	No control or coordination of construction transport would lead to high volumes of construction vehicles on the road network which would put a strain on the transport network.
		T9 Option 2	+	S,M,L-T,D, I, R M	OPDC and surrounding area	The policy would have improved impacts upon the transport network compared to Option 1.
		T10	+	S,M,L-T,D,I,R,M	OPDC and surrounding area	Transport assessments and travel plans will help to deliver sustainable transport objectives and will seek to address congestion and impacts upon bus routes and on the primary route network and will ultimately support the mitigation of impacts upon the transport network.
		T10 Option 1	+	S,M,L-T,D,I,R,M	OPDC and surrounding area	Requiring a transport assessment for all development would enable more control over cumulative impacts of developments on the transport network which would support the mitigation of impacts on the transport network.
		T10 Option 2	-	S,M,L-T,D,I,R,M	OPDC and surrounding area	Increasing the threshold for schemes that require a transport assessment could lead to a congested road network.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types	T1	?			The significant general background growth and the increase in travel demand resulting from additional homes within the development area will add to the existing travel demand, both at the strategic and local level. The policy may have an indirect effect on the range of housing types in the local area.
		T1 Option 1	?			This option support for the use of car travel may benefit the local residents.
		T2	+	S,M,L-T,D,R,L	OPDC area	Redevelopment presents an opportunity to enhance existing and provide new pedestrian environments across Old Oak and Park Royal. High quality pedestrian

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
and tenures, to meet identified local needs						walking routes to Old Oak Common station from all areas will be vital to ensure residents can benefit from this new transport superhub. This should improve access to housing developments through sustainable travel.
	T3	+	S,M,L-T,D,R,L	OPDC area		Private cycle parking for residents and provision for visitors should meet local needs and encourage cycling. Adequate cycle storage and infrastructure may increase the suitability of homes for potential residents.
	T4	+	S,M,L-T,I,R,L	OPDC area and London wide		High quality rail infrastructure and a frequent rail service may help meet local needs. HS2 and Crossrail could benefit the area and support sustainable travel to surrounding residential areas.
	T5	+	S,M,L-T,D,R,L	OPDC area		Increased bus services and frequencies would provide improved connections to homes in Old Oak and Park Royal reducing dependence on the private car. This policy may have an indirect effect on housing locations.
	T6	?				A high quality road network could contribute to the provision of a variety of homes in the area.
	T7	+	S,M,L-T,D,R,H	OPDC area		The policy seeks to control the level of parking. In Old Oak, limiting car parking to 0.2 spaces for residential developments, promotion of car free development close to public transport hubs and securing zero car parking for non-residential developments. In Park Royal, limiting car parking to 0.2 spaces for residential developments and allowing limited car parking for non-residential development taking into account access to public transport and operational or business needs. Limited car parking should encourage sustainable travel and provide greater flexibility in improving access and providing different types of homes.
	T7 Option 1	?				This option would offer greater choice. However, this is likely to place unacceptable impacts on the surrounding road network, discourage a mode shift towards the use of more sustainable transport modes and effect access to housing developments.
	T7 Option 2	+/-	S,M L-T,D,R,H	OPDC area		This option would enable a mode shift towards the use of more sustainable transport modes and would reduce traffic flow and congestion. This should have a positive effect on access to housing developments.
	T8	+	S,M L-T,I,R,M	OPDC area		OPDC will work collaboratively with stakeholders to ensure that freight movements are conducted in a safe, efficient and sustainable manner by encouraging the provision of facilities for home deliveries within residential developments. This will require sufficient access to housing areas.
	T8 Option	0				There is no direct link between the primary focus of the policy and the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		1				
		T8 Option 2	0			There is no direct link between the primary focus of the policy and the objective.
		T9	0			There is no direct link between the primary focus of the policy and the objective. However, a Construction Logistics Strategy will be developed by TfL and OPDC to ensure a coordinated approach which will minimise the disruption to surrounding residents.
		T9 Option 1	0			There is no direct link between the primary focus of the option and the objective.
		T9 Option 2	0			There is no direct link between the primary focus of the option and the objective.
		T10	?			Workplace and/or residential travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance. This requirement may indirectly affect housing provision, access and locations.
		T10 Option 1	0			There is no direct link between the primary focus of the policy and the objective.
		T10 Option 2	0			There is no direct link between the primary focus of the policy and the objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the	T1	+	S,M,L-T,D,I,R,M	OPDC area	The delivery of state of the art road infrastructure could include the provision for Sustainable Urban Drainage Systems (SuDS) which would contribute towards climate change adaptation and minimising flood risk.
		T1 Option 1	0	N/A	N/A	Giving priority to car travel does not directly link to minimising flood risk.
		T2	+	S,M,L-T,D,I,R,M	OPDC area	The policy primarily focuses on supporting walking networks and connectivity and the provision of SuDS within walking infrastructure could contribute towards achieving the SA Objective.
		T3	0	N/A	N/A	The policy primarily focuses on supporting and encouraging cycling which would help

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
heat island effect						to encourage more people to cycle however would not have a direct effect in achieving the SA Objective.
	T4	+	S,M,L-T,D,I,R,M	OPDC area		Climate change adaptation could be achieved through provisions including a state of the art rail links and a state of the art rail station at old common as well as future proofing station design to enable smart technology to be implemented.
	T5	0	N/A	N/A		The policy primarily focuses on delivery and contributions to bus improvements and infrastructure for buses and has no direct link to the SA Objective though it is noted that provisions for roads in connection with the policy could contribute towards achieving the SA Objective.
	T6	+	S,M,L-T,D,I,R,M	OPDC area		Climate change adaptation and flood minimisation would be supported through the provision of high quality roads with robust and coordinated materials.
	T7	+	S,M,L-T,D,I,R,M	OPDC area		The policy seeks to ensure that development is an exemplar of low carbon development and it seeks to promote a modal shift towards more sustainable modes by imposing car parking limits which will help to support climate change adaptation.
	<i>T7 Option 1</i>	0	N/A	N/A		The policy focuses setting less stringent car parking standards which does not directly link with flood risk minimisation.
	<i>T7 Option 2</i>	0	N/A	N/A		The policy encourages a shift to sustainable transport use however this does not directly link with flood risk minimisation.
	T8	0	N/A	N/A		The policy does not directly link with the SA Objective.
	<i>T8 Option 1</i>	0	N/A	N/A		The policy does not directly link with the SA Objective.
	<i>T8 Option 2</i>	0	N/A	N/A		Banning deliveries and servicing by larger vehicles would help to reduce local congestion however would have a limited effect in supporting climate change and flood risk minimisation.
	T9	0	N/A	N/A		The policy does not directly link with the SA Objective.
	<i>T9 Option 1</i>	0	N/A	N/A		The policy does not directly link with the SA Objective.
	<i>T9 Option 2</i>	0	N/A	N/A		The policy does not directly link with the SA Objective.
	T10	0	N/A	N/A		The policy does not directly link with the SA Objective.

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		<i>T10 Option 1</i>	0	N/A	N/A	The policy does not directly link with the SA Objective.
		<i>T10 Option 2</i>	0	N/A	N/A	The policy does not directly link with the SA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	T1	+	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to deliver state of the art road infrastructure and to prioritise sustainable transport modes and to support modal shift from private cars which would support adaptation to climate change.
		<i>T1 Option 1</i>	-	S,M,L-T,D,I,R,M	OPDC area	Giving priority to car travel would go against the climate change adaptation initiative and would facilitate the use of private vehicles, would increase congestion and lead to increased emissions.
		T2	+	S,M,L-T,D,I,R,M	OPDC area	The policy primarily focuses on supporting walking networks and connectivity which would help to support the increase of journeys made by non-motorised transport and would contribute towards achieving the SA Objective.
		T3	+	S,M,L-T,D,I,R,M	OPDC area	The policy primarily focuses on supporting and encouraging cycling which would help to encourage more people to cycle helping to increase non-motorised journeys and may help to reduce car reliance and emissions which would support climate change adaptation.
		T4	+	S,M,L-T,D,I,R,M	OPDC area	Climate change adaptation could be achieved through provisions including a state of the art rail links and a state of the art rail station at old common helping to increase energy efficiency. Future proofing station design would also enable smart technology to be implemented.
		T5	0	N/A	N/A	The policy primarily focuses on delivery and contributions to bus improvements and infrastructure for buses and has no direct link to the SA Objective.
		T6	+	S,M,L-T,D,I,R,M	OPDC area	Climate change adaptation would be supported through the provision of high quality roads with robust and coordinated materials. The policy also seeks to mitigate impacts of development on surrounding local and strategic road networks as well as ensuring that streets prioritise pedestrians, cyclists and buses which would help to encourage sustainable movements.
		T7	+	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to ensure that development is an exemplar of low carbon development and it seeks to promote a modal shift towards more sustainable modes by imposing car parking limits which will help to support climate change adaptation. The policy also seeks to incorporate electric charging points for electric vehicles at all new parking spaces which would help to promote and encourage the use of electric

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					cars, further supporting the SA Objective.
	T7 Option 1	-	S,M,L- T,D,I,R,M	OPDC area	The policy focuses setting less stringent car parking standards which could discourages a mode shift towards more sustainable modes and would impact upon the surrounding road network and would also lead to increased emissions.
	T7 Option 2	+	S,M,L- T,D,I,R,M	OPDC area	The policy encourages a shift to sustainable transport use which would help to reduce traffic and contribute to reducing emissions which would support climate change adaptation.
	T8	+	S,M,L- T,D,I,R,M	OPDC area	The policy seeks to identify more efficient and sustainable ways of delivering goods including the use of cargo bikes as well as seeking to ensure that operators of all freight vehicles have attained the Gold Fleet Operator Recognition Scheme (FORS) accreditation demonstrating efforts to reduce emissions all of which supports climate change adaptation.
	T8 Option 1	-	S,M,L- T,D,I,R,M	OPDC area	The policy would not place controls over deliveries and servicing which would mean that the flow of HGVs and LGVs would increase drastically, exacerbating congestion issues and resulting in negative environmental impacts including increased emissions.
	T8 Option 2	0	N/A	N/A	Banning deliveries and servicing by larger vehicles would help to reduce local congestion however would have a limited effect in supporting climate change mitigation and adaptation.
	T9	+	S,M,L- T,D,I,R,M	OPDC area	The policy seeks to reduce freight and construction trips and to make maximum use of rail and water transport for construction and freight which would help to support reducing transportation by road.
	T9 Option 1	-	S,M,L- T,D,I,R,M	OPDC area	The policy states that there would be no control or coordination of construction transport which could lead to high volumes of construction vehicles on the road network increasing congestion and contributing to increased emissions.
	T9 Option 2	+	S,M,L- T,D,I,R,M	OPDC area	The policy seeks to make transport all freight by rail or water which would reduce transportation by road and help to reduce impacts to the road network and emissions.
	T10	+	M,L- T,D,I,R,M	OPDC area	Travel plans provide a long term strategy to deliver sustainable transport objectives through an action plan and would ultimately contribute towards increasing energy efficiency, reducing congestion and emissions.
	T10 Option 1	+	M,L- T,D,I,R,M	OPDC area	Requiring a transport assessment for all development would help to reduce impacts on the road network and emissions.
	T10 Option	-	M,L- T,D,I,R,M	OPDC area	Increasing the threshold for schemes that require a transport assessment could lead to a congested road network which could lead to increased emissions.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	2				
		T1	+	M,L-T,D,I,R,M	OPDC area	The policy seeks to deliver state of the art transport systems and has no direct link to the SA Objective.
		<i>T1 Option 1</i>	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T3	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T4	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T5	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T6	?	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to deliver high quality streets with robust and coordinated materials and has the potential to partially support the SA Objective through the use of recycled materials for infrastructure.
		T7	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		<i>T7 Option 1</i>	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		<i>T7 Option 2</i>	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T8	+	S,M,L-T,D,I,R,M	OPDC area	The policy explains rail freight activity within the wider Park Royal area utilising the Great Western Main Line and West Coast Main Line routes (including at various sites around Willesden such as the Euro Freight Terminal) which handle inbound flows of aggregates and cement and outbound flows of waste and scrap metal. The policy would contribute to the SA through maximising transportation of waste by making less trips and potential segregation of waste types.
		<i>T8 Option 1</i>	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
<i>T8 Option 2</i>	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.		
T9	++	S,M,L-T,D,R,H	OPDC area	The policy addresses freight and construction transport may enable benefits through minimisation techniques. Maximum re-use and recycling of waste and construction materials within the area will reduce transport demands. For residual movements, there		



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						is potential for bulk construction materials and/or waste to be transported by rail and canal although issues of local environmental impact and commercial viability will need to be addressed.
		T9 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T9 Option 2	0	N/A	N/A	The primary focus of the policy is the movement of freight by rail or water and has no direct link to the SA Objective.
		T10	+	S,M,L- T,D,R,M	OPDC area	Transport assessments and travel plans would enable sustainable objectives which could include efficient transportation of waste materials from development sites which would partially support the SA Objective.
		T10 Option 1	+	S,M,L- T,D,R,M	OPDC area	Requiring a transport assessment for all development would enable more scrutiny over developments to ensure best practice compliance which would also likely include efficient waste transportation.
		T10 Option 2	-	S,M,L- T,D,R,M	OPDC area	Increasing the threshold for schemes requiring a transport assessment contrary to the preferred option may result in efficient transportation techniques for waste not being explored.
9	Improve the quality of the water environment	T1	+	S,M,L- T,I,R,L	OPDC area	The delivery of state of the art road infrastructure could include the provision for SuDS which would contribute towards improving the quality of the water environment.
		T1 Option 1	0	N/A	N/A	The policy seeks to give priority to car travel and has no direct link to the SA Objective.
		T2	+	S,M,L- T,I,R,L	OPDC area	The policy primarily focuses on supporting walking networks and connectivity and the provision of SuDS within walking infrastructure could contribute towards achieving the SA Objective.
		T3	0	N/A	N/A	The policy primarily focuses on supporting and encouraging cycling and has no direct link to the SA Objective.
		T4	+	M,L-T,I,R,L	OPDC area	The provision of state of the art rail links and a state of the art rail station at old common could help to support the SA Objective through incorporating SuDS into design.
		T5	0	N/A	N/A	The policy primarily focuses on delivery and contributions to bus improvements and infrastructure for buses and has no direct link to the SA Objective though it is noted that provisions for roads in connection with the policy could contribute towards achieving the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T6	+	S,M,L-T,I,R,L	OPDC area	The provision of high quality roads with robust and coordinated materials would support the SA Objective through incorporating SuDS into design.
		T7	0	N/A	N/A	The policy primarily focuses on car parking provision and has no direct link to the SA Objective.
		T7 Option 1	0	N/A	N/A	The policy focuses setting less stringent car parking standards and has no direct link to the SA Objective.
		T7 Option 2	0	N/A	N/A	The policy focuses on having residential parking and has no direct link to the SA Objective.
		T8	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T8 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T8 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T9	-	S,M,L-T,D,R,M	OPDC area	The policy seeks to make maximum use of rail and water transport for construction and freight. Transportation for construction and freight across water has the potential to result in pollution of the water environment if not adequately mitigated. <i>Appropriate pollution prevention would need to be considered where water transportation is concerned.</i>
		T9 Option 1	0	N/A	N/A	The policy states that there would be no control or coordination of construction transport which could lead to high volumes of construction vehicles on the road network however there would be no direct link to improving the water environment.
		T9 Option 2	-	S,M,L-T,D,R,M	OPDC area	The policy seeks to make transport all freight by rail or water which would have more of a potential negative effect upon the water environment than the preferred option. <i>Appropriate pollution prevention would need to be considered where water transportation is concerned.</i>
		T10	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T10 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T10 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		2				
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	T1	+	S,M,L-T,D,R,M	OPDC and London wide	The policy would not have any significant effects for the objective. Promoting sustainable transport over cars could benefit biodiversity by reducing emissions, run-off and noise. Whilst there is benefits in areas close to the LNR, in general biodiversity levels in the area are limited due to existing uses and the wider development proposals so the benefits of this may not be significant.
		<i>T1 Option 1</i>	-	S,M,L-T,D,R,M	OPDC and London wide	The option would be detrimental to biodiversity due to the encouragement of car travel and associated increase in emissions and disturbance effects.
		T2	+	S,M,L-T,D,R,M	OPDC and London wide	This policy offers opportunities to tie in walking routes with GI and improve wildlife connectivity
		T3	+	S,M,L-T,D,R,M	OPDC and London wide	This policy offers opportunities to tie in cycling routes with GI and improve wildlife connectivity
		T4	+/-	S,M,L-T,D,R,M	OPDC and London wide	Whilst the construction of new stations and infrastructure may adversely affect biodiversity present, this is unknown at this stage. New stations could include planting schemes and biodiversity enhancements.
		T5	0			The policy would not have any significant effects for the objective.
		T6	?			The value of the policy to the objective would be uncertain but new streets, if allied with suitable green infrastructure provision may act as green corridors.
		T7	0			The policy would not have any significant effects for the objective.
		<i>T7 Option 1</i>	0			The option would not have any significant effects for the objective.
		<i>T7 Option 2</i>	0			The option would not have any significant effects for the objective.
		T8	0			The policy would not have any significant effects for the objective.
		<i>T8 Option 1</i>	0			The option would not have any significant effects for the objective.
		<i>T8 Option 2</i>	0			The option would not have any significant effects for the objective.
		T9	0			The policy would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T9 Option 1	0			The option would not have any significant effects for the objective.
		T9 Option 2	0			The option would not have any significant effects for the objective.
		T10	0			The policy would not have any significant effects for the objective.
		T10 Option 1	0			The option would not have any significant effects for the objective.
		T10 Option 2	0			The option would not have any significant effects for the objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	T1	++	M,L- T,D,R,M	OPDC area and London wide	The policy explains that an uptake of low carbon vehicle technologies and fuels, lower emission buses, taxis and HGVs and infrastructure to support electric vehicles will facilitate significant reductions in CO <sub>2</sub> and NO <sub>x</sub> emissions across all modes and contribute towards a cleaner and healthier development area.
		T1 Option 1	-	M,L- T,D,R,M	OPDC area	However, by facilitating the use of private vehicles congestion, noise and emissions would increase and fewer people would make journeys by foot, bike or public transport.
		T2	+	M,L- T,D,R,M	OPDC area	The policy would benefit the minimisation of pollution as walking provides an alternative to the private car.
		T3	+	M,L- T,D,R,M	OPDC area	The policy would benefit the minimisation of pollution as cycling provides an alternative to the private car.
		T4	0			The policy would not have any significant effects for the objective.
		T5	+/-	S,M,L- T,D,R,L	OPDC area	The policy would not have any significant effects for the objective. The policy would benefit the minimisation of pollution as buses provide a sustainable alternative to the private car However, buses can cause pollution.  <i>Recommendation to encourage use of low carbon buses and work with TfL.</i>
		T6	+/-	S,M,L- T,D,R,L	OPDC area	The policy would not have any significant effects for the objective. However, new streets may bring pollution closer to residents in those areas, or it may help relieve congestion elsewhere and hence have benefits.
		T7	+	S,M,L-	OPDC area	OPDC will ensure the development area is an exemplar of low carbon development

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				T,D,R,M		and will promote a modal shift towards more sustainable modes. This will have a positive effect on pollution levels. Limiting spaces will deter people from using cars and provides charging points to encourage electric vehicles.
		T7 Option 1	-	S,M,L- T,I,R,M	OPDC and surrounding area	Less stringent car parking standards may encourage private car use therefore increasing pollution levels.
		T7 Option 2	+	S,M,L- T,I,R,M	OPDC and surrounding area	This option would enable a mode shift towards the use of more sustainable transport modes reducing traffic flow and congestion. This could have a positive effect on pollution levels.
		T8	+/-	S,M,L- T,D,R,H	OPDC and surrounding area	The significant HGV activity in the development area can have negative impacts on the environment in terms of noise and air quality and causes congestion, particularly on Scrubs Lane. However, there is an attempt to limit and control the congestion.
		T8 Option 1	--	S,M,L- T,D,R,M	London wide	If no measures are put in place to control servicing and deliveries, HGVs and LGVs flow would increase drastically, exacerbating the congestion issues in the development area, as well as having noise and environmental impacts, affecting the public realm and using up road space.
		T8 Option 2	+	S,M,L- T,I,R,M	OPDC and surrounding area	This option would ban the larger vehicles, thereby, potentially reducing congestion and pollution levels.
		T9	+/-	S,M,L- T,D,R,M	London wide	Construction traffic will increase the volume of HGVs and other construction vehicles on the local and strategic road network and may increase pollution levels. However, the freight consolidation centre described in policy T8 could be used to reduce the number of construction vehicles required and the number of construction vehicle movements on the road network. Maximum re-use and recycling of waste and construction materials within the area will reduce transport demands.
		T9 Option 1	-	S,M,L- T,D,R,M	London wide	The option to programme construction works without any coordination with other projects would lead to very high volumes of construction vehicles on the road network which would also have noise pollution implications.
		T9 Option 2	+	S,M,L- T,D,R,M	London wide	This option would reduce the impacts of construction on the road network due to the alternative use of rail or water for all freight. This would have a positive effect on minimising noise.
		T10	+	S,M,L- T,D,R,M	London wide	Transport Statement or Transport Assessment which assesses the extent to which the development will support opportunities for sustainable travel that should minimise air, noise and light pollution.
		T10	+	S,M,L-	London wide	This option would enable more scrutiny over developments to ensure they comply with

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>Option 1</i>		T,D,R,M		best practice. In addition it would enable more control over the cumulative impact of developments on the transport network. More control over development and the network should help to reduce carbon emissions and subsequently minimise pollution from private vehicles.
		<i>T10 Option 2</i>	?			If the threshold was increased developments could be planned without assessing the impact of the development on the transport system. This could have a detrimental effect on pollution levels.
12	To conserve and enhance the historic environment, heritage assets and their settings	T1	+	S,M,L-T,I,R,M	OPDC area	Fewer cars will cause less disturbance and pollution which could affect heritage assets or their settings.
		<i>T1 Option 1</i>	-	S,M,L-T,I,R,M	OPDC area	The option would cause more cars which will cause more disturbance and pollution, which in turn could affect heritage assets or their setting.
		T2	+	S,M,L-T,I,R,M	OPDC area	Fewer cars will cause less disturbance and pollution which could affect heritage assets or their settings.
		T3	+	S,M,L-T,I,R,M	OPDC area	Fewer cars will cause less disturbance and pollution which could affect heritage assets or their settings.
		T4	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy would not have any significant effects for the objective. However, a focus on really high quality design should complement any existing heritage assets.
		T5	0			The policy would not have any significant effects for the objective.
		T6	?			The policy may not have any significant effects for the objective although it depends on the relative location of heritage assets.
		T7	0			The policy would not have any significant effects for the objective.
		<i>T7 Option 1</i>	0			The option would not have any significant effects for the objective.
		<i>T7 Option 2</i>	0			The option would not have any significant effects for the objective.
		T8	?			The policy may not have any significant effects for the objective although it depends on the relative location of heritage assets.
		<i>T8 Option 1</i>	0			The option would not have any significant effects for the objective.
<i>T8</i>	0			The option would not have any significant effects for the objective.		

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>Option 2</i>				
		T9	?			Although construction work is short-term and temporary, it can affect heritage assets via direct physical disturbance and noise for example.
		<i>T9 Option 1</i>	-	S,M,L-T,I,R,L	OPDC and surrounding area	Options that place strict controls have better chance of preserving the historic environment and heritage assets.
		<i>T9 Option 2</i>	0			The option would not have any significant effects for the objective.
		T10	0			The policy would not have any significant effects for the objective.
		<i>T10 Option 1</i>	0			The option would not have any significant effects for the objective.
		<i>T10 Option 2</i>	0			The option would not have any significant effects for the objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	T1	+	S,M-T,D,R,H	OPDC and surrounding area	Measures that encourage safe, accessible transport can help community cohesion. <i>A recommendation would be to ensure that the needs to vulnerable and wider diversity groups are factored in to all places as different groups can have different needs</i>
		<i>T1 Option 1</i>	-	S,M-T,D,R,H	OPDC and surrounding area	The priority to car travel in this option will create added congestion causing community severance.
		T2	+	S,M-T,D,R,H	OPDC and surrounding area	Measures that encourage safe, accessible transport can help community cohesion. <i>A recommendation would be to ensure that the needs to vulnerable and wider diversity groups are factored in to all places as different groups can have different needs</i>
		T3	+	S,M-T,D,R,H	OPDC and surrounding area	Measures that encourage safe, accessible transport can help community cohesion. <i>A recommendation would be to ensure that the needs to vulnerable and wider diversity groups are factored in to all places as different groups can have different needs</i>
		T4	+	S,M-T,D,R,H	OPDC and surrounding	The policy promotes sustainable transport and hubs like this can benefit communities by providing a central focus, encouraging sustainable movement.

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				area	
	T5	++	S,M-T,D,R,H	OPDC area	Connections to new stations should take priority to capitalise on new transport services. There is also a need to secure improved bus connections between Old Oak and Park Royal to ensure that the existing community can take advantage of the benefits the new interchange at Old Oak Common would bring to the area.
	T6	+	S,M-T,D,R,M	OPDC and surrounding area	The policy aims to reduce severance and benefit connectivity.
	T7	0			The policy would not have any significant effects for the objective.
	<i>T7 Option 1</i>	0			The option would not have any significant effects for the objective.
	<i>T7 Option 2</i>	0			The option would not have any significant effects for the objective.
	T8	0			The policy would not have any significant effects for the objective.
	<i>T8 Option 1</i>	0			The option would not have any significant effects for the objective.
	<i>T8 Option 2</i>	0			The option would not have any significant effects for the objective.
	T9	?			Large construction projects and new development may help create a greater sense of place and build the existing community. The Construction Logistics Strategy promises to minimise disruption to surrounding residents and business should prevent unrest in the community.
	<i>T9 Option 1</i>	0			The option would not have any significant effects for the objective.
	<i>T9 Option 2</i>	0			The option would not have any significant effects for the objective.
	T10	+	S,M,L-T,I,R,L	OPDC area	Transport Assessments and Travel Plans will aim to protect the livelihood of the community through ensuring transport safety, efficiency and mitigating the impact on the existing network. This should unite the community.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>T10 Option 1</i>	+	S,M,L-T,I,R,M	OPDC area	More scrutiny over development and early pre-application engagement should help protect the community.
		<i>T10 Option 2</i>	0			The option would not have any significant effects for the objective.
14	Improve safety and reduce crime and the fear of crime	T1	+	S,M,L-T,D,R,H	OPDC area and London wide	The policy addresses the importance of safety through the delivery of accessible transport systems to facilitate the existing community and planned in these areas of London.
		<i>T1 Option 1</i>	-	S,M,L-T,D,R,H	OPDC area and London wide	The option to prioritise car travel contradicts safe, accessible transport infrastructure and may negatively impact on the safety of the community.
		T2	+	S,M-T,D,R,M	OPDC area	The existing pedestrian environment within the development area is poor. There is limited permeability and a lack of lighting and active frontages, which creates an unwelcoming streetscape, a perception of poor personal security and a fear of crime, particularly after dark. However, the policy does aim to make walking routes safer and more legible for the users to provide clear, comprehensive and consistent wayfinding information and enable pedestrians to complete more journeys on foot
		T3	+	S,M-T,D,R,H	OPDC and surrounding area	The policy seeks to promote safety and security measures for cyclists.
		T4	+	M,L-T,D,R,L	London wide	There is a range of potential smart rail innovations that could be achieved with advances in security technology.
		T5	+	S,M-T,D,R,H	OPDC and surrounding area	The policy seeks to provide clear and legible signage for bus users. Infrastructure should include bus priority measures such as priority at junctions, bus gates and bus only links as well as suitably located bus stops, stands and welfare provision for drivers <i>Improved lighting and high quality shelters should be implemented on all bus services and at all bus stops.</i>
		T6	0			The policy would not have any significant effects for the objective.
		T7	0			The policy would not have any significant effects for the objective.
		<i>T7 Option 1</i>	0			The option would not have any significant effects for the objective.
		<i>T7</i>	0			The option would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>Option 2</i>				
		T8	+	S,M,L-T,D,R	London wide	The policy explains that the volume of freight and servicing movements raises challenges in terms of maintenance and management of the road network and the safety and environment for other road users. FORS is an overarching scheme that encompasses all aspects of safety, fuel efficiency, economical operations and vehicle emissions.
		T8 <i>Option 1</i>	0			The option would not have any significant effects for the objective.
		T8 <i>Option 2</i>	0			The option would not have any significant effects for the objective.
		T9	0			The policy would not have any significant effects for the objective.
		T9 <i>Option 1</i>	0			The option would not have any significant effects for the objective.
		T9 <i>Option 2</i>	0			The option would not have any significant effects for the objective.
		T10	0			The policy would not have any significant effects for the objective.
		T10 <i>Option 1</i>	0			The option would not have any significant effects for the objective.
		T10 <i>Option 2</i>	0			The option would not have any significant effects for the objective.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote	T1	++	S,M,L-T,D,IR,H	OPDC Area and nationwide	As explained in the policy The NPPF emphasises the important role that transport policies have to play in facilitating sustainable development and in contributing to wider sustainability and health objectives, and notes that the transport system needs to be balanced in favour of sustainable transport methods that are efficient, safe and accessible and that have a low impact on the environment. Encouraging transport improvements that are both sustainable and technologically apt will deliver enormous quality of life benefits and deliver a step change in the appeal of walking and cycling as healthy, active travel options. OPDC is striving to become an

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
healthy living						exemplar NHS Healthy Town and to gain WHO Healthy City status. Provision of healthy street environments and that encourage walking, cycling and public transport use must be sought.
	T1 Option 1	-	S,M,L- T,D,IR,H	OPDC Area and nationwide		This option would support proposals which prioritise cars above more sustainable modes would increase congestion, noise and emissions and fewer people would make journeys by foot, bike or public transport impacting on health and well-being.
	T2	++	S,M,L T,D,IR,M	OPDC area and London wide		Providing a street network that is safe, attractive and easy to navigate, people will be encouraged to walk more, which will have social, economic, environmental and health benefits and support the viability of the development area.
	T3	+	S,M,L- T,D,IR,M	OPDC area, London and Nationwide		As explained in the policy ' <i>the expected growth of cycling up to 2026 is estimated to deliver £250m in economic health benefits annually.</i> ' Providing a street network that is safe, attractive and easy to navigate, people will be encouraged to cycle more, which will have social, economic, environmental and health benefits and support the viability of the development area.
	T4	+	S,M,L- T,D,R,H	OPDC area, London and Nationwide		Increased rail use can encourage more walking/cycling and reduce the use of a private car. This would reduce the levels of carbons emissions and therefore benefit the objective.
	T5	+	S,M,L- T,D,R,H	OPDC area, London and Nationwide		Increased rail use can encourage more walking/cycling and reduce the use of a private car. This would reduce the levels of carbons emissions and therefore benefit the objective.
	T6	+	S,M,L- T,D,R,M	OPDC area		If new streets are well designed with green infrastructure and improved connectivity they may benefit the objective and help to avoid social exclusion and mental health issues.  <i>We recommend that new streets should give consideration to connecting more isolated areas and seek to reduce social exclusion.</i>
	T7	+	S,M,L- T,I,R,M	OPDC area		Low levels of car parking will be essential to ensure that traffic congestion does not reach unacceptable levels. This indirectly bring health benefits to the community.
	T7 Option 1	-	S,M,L- T,I,R,M	OPDC area		Less stringent car parking standards may encourage private car use therefore increasing pollution level and potentially harming the health of the local community.
	T7	+	S,M,L-	OPDC area		The use of more sustainable transport due to limited car parking would have a positive

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>Option 2</i>		T,I,R,M		effect on the health of the local community.
		T8	+/-	S,M,L-T,I,R,M	OPDC and surrounding areas	The significant HGV activity in the development area can have negative impacts on the health and well-being of the community. However, coordination of HGV activity and the provision of facilities for home deliveries within residential developments may help maintain the health of the local community.
		<i>T8 Option 1</i>	0			The option would not have any significant effects for the objective.
		<i>T8 Option 2</i>	0			The option would not have any significant effects for the objective.
		T9	+/-	S,M,L-T,I,R,M	OPDC area	The policy highlights that construction traffic will increase the volume of HGVs and other construction vehicles on the local and strategic road network. This will need careful planning, coordination and management to minimise its traffic and environmental impacts to minimise health risk.
		<i>T9 Option 1</i>	-	S,M,L-T,D,R,M	London wide	The option to programme construction works without any coordination with other projects would lead to very high volumes of construction vehicles on the road network which would also have environmental and health disbenefits.
		<i>T9 Option 2</i>	+	S,M,L-T,D,R,M	London wide	This option would reduce the impacts of construction on the road network due to the alternative use of rail or water for all freight. The reduced levels of pollution would have a positive effect on the health of the local residents and the environment.
		T10	+	S,M,L-T,I,R,M	OPDC area	All development proposals will be assessed for their contribution to traffic generation and their impact on congestion, particularly on bus routes and on the primary route network, and against the existing and potential availability of public transport, and its capacity to meet increased demand. More public transport and sustainable travel availability should contribute to healthier living.
		<i>T10 Option 1</i>	?			More control over development proposals against the impact on the transport network should make it easier to address the health implications for the local community.
		<i>T10 Option 2</i>	-	S,M,L-T,I,R,M	OPDC area	Increased development without sufficient public transport infrastructure could have a negative effect on the use of sustainable travel and the health of the local community.
16	To improve	T1	+	S,M,L-T,	OPDC area	The policy benefits connectivity and may help improve access to schools and higher

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
the education and skills levels of all members of the population, particularly vulnerable groups				D,R,M		education.  <i>We recommend that consideration is given to connecting all residential areas, especially the most deprived to a range of essential services such as schools.</i>
	T1 Option 1	0				The option would not have any significant effects for the objective.
	T2	+		S,M,L-T, D,R,M	OPDC area	The policy benefits walking routes which provide access to schools and higher education.  <i>We recommend that consideration is given to connecting all residential areas, especially the most deprived to a range of essential services such as schools.</i>
	T3	+		S,M,L-T, D,R,M	OPDC area	The policy benefits walking routes which provide access to schools and higher education.  <i>We recommend that consideration is given to connecting all residential areas, especially the most deprived to a range of essential services such as schools.</i>
	T4	+		S,M,L-T, D,R,M	OPDC area	The policy benefits connectivity through rail use which will help improve access to schools and higher education.  <i>We recommend that consideration is given to connecting all residential areas, especially the most deprived to a range of essential services such as schools.</i>
	T5	++		S,M,L-T, D,R,M	OPDC area	The policy benefits connectivity through bus travel which will help improve access to schools and higher education.  <i>We recommend that consideration is given to connecting all residential areas, especially the most deprived to a range of essential services such as schools.</i>
	T6	0				The policy would not have any significant effects for the objective.
	T7	0				The policy would not have any significant effects for the objective.
	T7 Option 1	0				The option would not have any significant effects for the objective.
	T7 Option 2	0				The option would not have any significant effects for the objective.
	T8	0				The policy would not have any significant effects for the objective.
	T8	0				The option would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		<i>Option 1</i>				
		<i>T8 Option 2</i>	0			The option would not have any significant effects for the objective.
		T9	0			The policy would not have any significant effects for the objective.
		<i>T9 Option 1</i>	0			The option would not have any significant effects for the objective.
		<i>T9 Option 2</i>	0			The option would not have any significant effects for the objective.
		T10	+	S,M,L-T,D,R,M	OPDC area and London wide	All proposals for new or significantly expanded schools or other education or institutional uses should be accompanied by a Travel Plan. The Travel Plan could help improve levels of access to schools from a range of different areas.
		<i>T10 Option 1</i>	0			The option would not have any significant effects for the objective.
		<i>T10 Option 2</i>	0			The option would not have any significant effects for the objective.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	T1	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy seeks to improve sustainable access as a consequence of the HS2 and Crossrail projects. Access in this area will be transformed to cater for the additional homes and jobs.
		<i>T1 Option 1</i>	+			The option would benefit from the improved access in the area
		T2	+	S,M,L-T,D,R,M	OPDC area and London wide	Redevelopment presents an opportunity to enhance existing and provide new pedestrian environments across Old Oak and Park Royal. High quality pedestrian walking routes to Old Oak Common station from all areas will be vital to ensure residents, employees and business can benefit from this new transport superhub.
		T3	++	S,M,L-T,D,R,M	OPDC area	The policy will benefit the objective by OPDC working with businesses in Park Royal to develop training and guidance and improve awareness of the benefits of cycling to employees to encourage more cycling. In Old Oak, redevelopment provides an opportunity to push the boundary and provide state of the art cycling infrastructure that

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					can benefit everyone who lives and works in the area.
	T4	++	S,M,L-T,D,R,H	OPDC area and London wide	The policy explains that the new HS2, Crossrail and Great West Mainline station at Old Oak Common will be a key driver for regeneration in the area. When built out the core area at Old Oak will be served by approximately ten different rail services and over 200 trains per hour at peak times. This will benefit the social and economic wellbeing of the local people and provide sufficient access to key employment and training areas.
	T5	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy states that increased bus services and frequencies would provide improved connections to homes, office and retail destinations in Old Oak and Park Royal reducing dependence on the private car. This is of particular relevance for existing business in Park Royal whereby a high percentage of people live within 5-8km of the area and therefore making a reliable and frequent bus service a viable option for travelling to work.
	T6	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy seeks to enhance existing streets and junctions to mitigate the impacts of development on the surrounding local and strategic road network. A better road network in the OPDC area would better serve local communities and improve employment provision.
	T7	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy promotes car free development close to public transport hubs and zero car parking for non-residential developments in Old Oak. Despite benefitting the environmental wellbeing of the community this may hinder accessibility to employment due to dependence on public transport. There is likely to be a strong demand for taxis and private hire vehicles (PHVs) generated by the HS2/ Crossrail/ National Rail interchange.
	T7 Option 1	+/-	S,M,L-T,D,R,M	OPDC area	The less stringent car parking standards in this option would place unacceptable impacts on the surrounding road network which may discourage sustainable travel but maintain sufficient access to employment.
	T7 Option 2	-	S,M,L-T,D,R,M	OPDC area	A car free policy option would also negatively impact businesses that rely on private vehicles, particularly in Park Royal.
	T8	0			The policy would not have any significant effects for the objective.
	T8 Option 1	0			The option would not have any significant effects for the objective.
	T8 Option 2	0			The option would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T9	+	S,M,L-T,D,R,M	OPDC area	More construction work would provide an employment source for the local community.
		T9 Option 1	0			The option would not have any significant effects for the objective.
		T9 Option 2	0			The option would not have any significant effects for the objective.
		T10	?			Transport Assessments and Travel Plans will address any access issues to key services such as employment hubs.
		T10 Option 1	0			The option would not have any significant effects for the objective.
		T10 Option 2	-	S,M,L-T,I,R,L	OPDC and surrounding area	This option could lead to access issues, a congested road network and insufficient public transport infrastructure. This may result in problems accessing employment and training facilities.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	T1	+	S,M,L-T,I,R,M	OPDC area and London wide	The policy states that, as a consequence of the HS2 and Crossrail projects, there be greater investment in the area.
		T1 Option 1	++	S,M,L-T,D,R,M	OPDC and surrounding boroughs	This option would benefit the objective with support for proposals which prioritise cars above more sustainable modes which may benefit some businesses and residents.
		T2	++	S,M,L-T,D,R,H	OPDC area	Walking as a sustainable form of transport can bring economic benefits. Through an increase in footfall, the vitality of an area is likely to increase and subsequently bring benefits to local businesses. Redevelopment presents an opportunity to enhance the existing pedestrian environment and deliver a high quality pedestrian environment in Old Oak and Park Royal. High quality pedestrian walking routes to Old Oak Common station from all areas will be vital to ensure residents, employees and business can benefit from the new transport superhub.
		T3	++	S,M,L-T,D,R,M	OPDC area and London wide	Investments in "end-of-journey" cycle facilities in the form of secure cycle parking, lockers and showers are also vital across Old Oak and Park Royal. Major employers, businesses and landowners should invest in this infrastructure, recognising its value and importance to their businesses, tenants and employees.
		T4	++	S,M,L-	OPDC area	The policy explains that the new HS2, Crossrail and Great West Mainline station at Old



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				T,I,R,H	and London wide	Oak Common will be a key driver for regeneration in the area. This should attract investment and benefit local businesses to improve the local economy.
		T5	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy promotes sustainable bus travel. Increased bus frequencies, better journey time reliability, new and improved bus stops and a more efficient service should encourage inward investment and attract businesses to the area. This will have a positive effect on the local economy.
		T6	+/-	S,M,L-T,D,R,M	OPDC area and London wide	The policy states that congestion at key junctions and on links providing access to strategic routes is a barrier to business growth. However, In Park Royal, the road network will need to prioritise the movement of freight to facilitate business growth. This will need to be carefully planned alongside the need to improve bus movements, pedestrians and cyclists and deliver a healthy street environment.
		T7	++	S,M,L-T,D,R,M	OPDC area and London wide	Sufficient car parking will need to be provided to meet the essential needs of developments, particularly ensuring that there are suitable places for disabled people, car clubs and electric cars and facilitating the successful operation of the Park Royal industrial estate. This approach is justified by the very high level of public transport accessibility resulting from the planned and proposed investment. The need for access to a car can be met in part by dedicated car club spaces together with parking for disabled people.
		<i>T7 Option 1</i>	0			The option would not have any significant effects for the objective.
		<i>T7 Option 2</i>	-	S,M,L-T,D,R,M	OPDC area	A car free policy option would also negatively impact businesses that rely on private vehicles, particularly in Park Royal.
		T8	0			The policy would not have any significant effects for the objective.
		<i>T8 Option 1</i>	+/-	S,M,L-T,D,R,M	London wide	This option may have some attraction for businesses. However, if no measures were put in place to control servicing and deliveries, HGVs and LGVs flow would increase drastically, exacerbating the congestion issues in the development area, as well as having noise and environmental impacts, affecting the public realm and using up road space.
		<i>T8 Option 2</i>	-	S,M,L-T,D,R,M	OPDC and surrounding area.	This option explains that banning larger vehicles completely would negatively impact businesses. This could detract certain types of industries moving into the area.
		T9	+	S,M,L-	OPDC and	The nearby delivery of HS2 and Crossrail may encourage other businesses and

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				T,D,R,M	surrounding area.	investment to move into the area. For existing businesses the construction disruptions will be minimised by the Construction Logistics Strategy.
		T9 Option 1	0			The option would not have any significant effects for the objective.
		T9 Option 2	0			The option would not have any significant effects for the objective.
		T10	0			The policy would not have any significant effects for the objective.
		T10 Option 1	0			The option would not have any significant effects for the objective.
		T10 Option 2	0			The option would not have any significant effects for the objective.

**Table G-10 Chapter 12: Environment and Utilities**

- EU1: Strategic Policy: environment and utilities
- EU2: Smart
- EU3: Water
- EU4 Waste management
- EU5: Circular economy and resource efficiency
- EU6: Decentralised Energy
- EU7: Digital communications infrastructure
- EU8: Green infrastructure and biodiversity
- EU9: Extraction of Minerals
- EU10: Air quality
- EU11: Noise
- EU12: Land contamination

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	EU1	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to work with developers to promote sustainable development that utilises high standards of design, innovation, planning etc, this would therefore optimise opportunities to encourage 'place making' at the start of the planning process. Utilising high standards of design may also contribute to enhancing local character and distinctiveness.
		EU2	+	S, M and L-T, D, R, M	OPDC area	Promoting the area as a global leading location for the exploration and implementation of smart city technology, concepts and systems would benefit this SA Objective as it actively encourages the use of contemporary technology – although the policy does not explicitly state this would be within the public realm a positive score has been noted.
		Alternative Policy Option 1	0			A neutral score has been recorded against the SA Objective as not specifically supporting inter-operable and open data would not detract nor benefit the SA Objective.
		EU3	+	M and L-T, I, R, L	OPDC area	The policy would ensure public areas are accessible in the medium to long term through managing surface water runoff and implementing flood risk management solutions. In addition, it would also indirectly contribute to ensuring new buildings are appropriately designed i.e. through ensuring they do not lead to inappropriate run off or lead to an unacceptable demand on water resources.
		EU4	?			The relocation of waste and recycling sites (depending upon the final design) may lead to a detrimental effect on landscape character. <i>Due to this uncertainty it is recommended that the policy is strengthened to include a statement to say that sites would only be permitted where it can be demonstrated they would not significantly affect the character of the local area.</i> Although it is noted that plan should be read as a whole and this is covered elsewhere.
		EU4 Option 1	-	M and L-T, I, R, L	OPDC area	Safeguarding 'all' sites in Old Oak may lead to more waste sites in the area and less homes, this would therefore go against 'the principles of 'place making' and why a negative score has been noted.
		EU5	0			There is no direct link between the policy and the SA Objective.
		EU6	?			Seeking to support and facilitate the provision of infrastructure to deliver a decentralised energy network within major new development may affect the character and quality of the built environment of the OPDC area depending on its visual

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						appearance. <i>Due to this uncertainty it is recommended that the policy is strengthened to include a statement to say that energy development would only be permitted where it can be demonstrated it would not significantly affect the character of the local area. Although it is noted that plan should be read as a whole and this is covered elsewhere.</i>
		EU6 Option 1	?			Although the alternative policy option would bring about more uncertainty as it would apply to all new development rather than just major development.
		EU7	+	S, M and L-T, D, R, M	OPDC area	Seeking to integrate technology and seeking to accommodate future technologies would benefit this SA Objective as it actively encourages the use of contemporary technology (part of the sub-objectives) – although the policy does not explicitly state this would be within the public realm a positive score has been noted.
		EU7 Option 1	0			A neutral score has been recorded against the SA Objective as not specifically seeking to integrate contemporary technology and accommodate future technologies to address challenges and create opportunities.
		EU8	++	S, M and L-T, D, R, M	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening would lead to a positive effect on the SA Objective as it would directly enhance the built environment and encourage ‘place making’. For this reason a major positive score has been recorded.
		EU8 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would lead to a minor positive effect as deleting the policy reference to ‘all’ development, so that the policy requirements apply to ‘major’ development only would not be as positive.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy’s commitment to ensuring the design of oil / gas development is sensitive to the character of the urban landscape and to features of national, London, and local importance would benefit this SA Objective.
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU11	+	S, M and L-T, I, R, L	OPDC area	Guarding against inappropriate increases in noise levels from major development would indirectly contribute to the creation of safe and welcoming spaces.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU12	0			There is no direct link between the policy and the SA Objective.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	EU1	0			There is no clear link between the policy and the SA Objective.
		EU2	0			There is no direct link between the policy and the SA Objective.
		EU2 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU3	0			There is no direct link between the policy and the SA Objective.
		EU4	0			There is no direct link between the policy and the SA Objective.
		EU4 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU5	0			There is no direct link between the policy and the SA Objective.
		EU6	0			There is no direct link between the policy and the SA Objective.
		Alternative Policy Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU8	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU8 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU9	0			There is no clear link between the policy and the SA Objective.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	0			There is no direct link between the policy and the SA Objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	EU1	+			The policy states that OPDC supports proposals that maximise their contribution to a healthy and safe environment for people and for nature.
		EU2	0			There is no direct link between the policy and the SA Objective.
		EU2 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU3	0			There is no direct link between the policy and the SA Objective.
		EU4	+	S, M and L-T, D, R, M	OPDC area and wider area	The policy seeks to safeguard waste and recycling sites within the OPDC area which would maintain current accessibility to waste facilities at those identified sites. The policy also states that OPDC will work with other waste operators to relocate some sites to suitable areas. This could be strengthened to state that ' <i>it would be ensured sites would be relocated to sites that are highly accessible by a variety of transport modes</i> '.
		EU4 Option 1	+	S, M and L-T, D, R, M	OPDC area and wider area	The alternative policy option would result in a change to criterion b). The change provides for 'safeguarding 'all' sites in Old Oak rather than just one site. Therefore as above this would maintain current accessibility to waste facilities as per the preferred policy. The remainder of the policy and scores recorded would remain as per the

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
					preferred option.	
		EU5	+	S, M and L-T, D, R, M	OPDC area and wider area	The policy would result in ensuring new development provides adequate provision for convenient domestic and commercial waste storage – this would therefore contribute to increasing accessibility to household and commercial waste management facilities.
		EU6	0			There is no direct link between the policy and the SA Objective.
		EU6 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU8	0			There is no direct link between the policy and the SA Objective.
		EU8 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU9	0			There is no direct link between the policy and the SA Objective.
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU12	++	L-T, D, R, M	OPDC area	The policy ensures that development would not be permitted until effective measures are taken to manage the risk of contaminated land through treating, containing or controlling. This would therefore fulfil this SA Objective as it would contribute to a scheme of land remediation and improve soil quality over the long term.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	EU1	?			The policy seeks to ensure that new developments minimise carbon dioxide emissions. However there is no specific reference to how this would be achieved. This could be defined in supporting evidence.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage sustainable transport modes.
		EU2 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU3	+	M and L-T, D, R, L	OPDC area	The policy would maintain accessibility within the OPDC area in the medium to long term through managing surface water runoff and implementing flood risk management solutions.
		EU4	0			Although a neutral score has been recorded, <i>it is recommended that the relocation of any waste operators are directed to areas that are readily accessible via a number of modes of transport.</i>
		EU4 Option 1	0			There is no direct link between the alternative policy and the SA Objective i.e. safeguarding 'all' sites in Old Oak would not affect the SA Objective.
		EU5	+	S, M and L-T, D, R, L	OPDC area	The policy seeks to investigate the movement of waste through by sustainable means of transport, including by rail and by the Grand Union Canal which may mitigate impacts on the transport network. It also seeks to design out waste from construction which may also mitigate impacts on the transport network.
		EU6	0			There is no direct link between the policy and the SA Objective.
		EU6 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU7	+	M and L-T, D, R, L	OPDC area	The policy may over the medium to long term contribute to encouraging video conferencing and home working in addition to home shopping therefore reduce the need to travel.
		EU7 Option 1	0			Benefits recorded above would not be realised under the alternative option.
		EU8	+	S, M and L-T, I/D, R, L	OPDC area	The policy seeks to ensure that all development proposals protect, enhance, and create a network of multi-functional green and water spaces connected by street greening. It is considered that this may contribute to the SA Objective through increasing the connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks.
		EU8 Option 1	+	S, M and L-T, I/D, R, L	OPDC area	Removing the requirement within the policy to require that only 'major' new development proposals protect, enhance, and create a network of multi-functional green and water spaces connected by street greening rather than requiring 'all' new development would water down the positive score recorded for the preferred option.
		EU9	0			The policy ensures that any proposals for development associated with the exploration, appraisal and operation of unconventional oil and gas resources would be acceptable in terms of site access, traffic generation and the routing of heavy vehicles along with the effects on public rights of way, open spaces or outdoor recreation. Effects have been recorded as neutral as the policy would ensure the continuation of the existing baseline.
		EU10	+	S, M and L-T, D, R, M	OPDC area	Ensuring air quality assessments are undertaken for all major development within the OPDC area would ensure that the impact of construction traffic (mitigating the impact of construction traffic is listed as a sub-objective) is minimised as the assessment would also outline mitigation measures to reduce any identified impacts. For this reasons a positive score has been recorded over the short to long term.
		EU10 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would perform in a similar way to the preferred option as it would only involve the removal 'major development' so that all development would require an air quality assessment.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	EU1	0			There is no direct link between the policy and the SA Objective.
		EU2	0			There is no direct link between the policy and the SA Objective.
		EU2 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU3	+	S, M and L-T, I, R, M	OPDC area	The policy would indirectly contribute to ensuring new homes are appropriately designed and located through ensuring they do not lead to inappropriate run off, flood risk or unacceptable water demand.
		EU4	0			There is no direct link between the policy and the SA Objective.
		EU4 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU5	0			There is no direct link between the policy and the SA Objective.
		EU6	0			There is no direct link between the policy and the SA Objective.
		EU6 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU8	0			There is no direct link between the policy and the SA Objective.
		EU8 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU9	0			There is no direct link between the policy and the SA Objective.
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	0			There is no direct link between the policy and the SA Objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	EU1	++	S, M and L-T, D, R, M	Old Oak and Park Royal	The policy commits to promoting Old Oak and Park Royal as a best practice demonstrators for environmental sustainability. OPDC aim to achieve this through the identification and definition of environmental sustainability targets and indicators for the area. The policy seeks to increase the area's resilience to the effects of a changing climate, and seeks to minimise carbon dioxide emissions. Draft targets are provided, of which one states <i>'Use SuDs to achieve run-off rate equivalent to a greenfield site'</i> . This holistic and evolving approach will support the delivery of the Objective.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative climate change adaptation and mitigation measures.
		EU2 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU3	++	S, M and L-T, D, R, M	OPDC area and wider area	The policy positively fulfils the SA Objective through promoting the use of sustainable drainage techniques within new development along with implementing flood risk management solutions identified in the relevant borough's Surface Water Management Plans.
		EU4	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU4 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU5	++	S, M and L-T, D, R, M	OPDC area and wider area	The policy seeks to promote a circular economy which will ultimately help to mitigate climate change.
		EU6	++	S, M and L-T, D, R, M	OPDC area and wider area	The policy is principally focused on ensuring new major development is able to accommodate energy demand through a decentralised energy network which will help to mitigate climate change and provide a resilient energy supply.
		EU6 Option 1	?			The alternative policy option would perform as per the preferred option. However, the recommendation would not just apply to energy development associated with 'major' new development, it would apply to 'all' development.
		EU7	0			There is no clear link between the policy and the SA Objective.
		EU7 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU8	++	S, M and L-T, D, R, M	OPDC area and wider area	The policy will play a leading role to ensure development helps to mitigate and address climate change by delivering a multifunctional network of green infrastructure.
		EU8 Option 1	+	S, M and L-T, D, R, M	OPDC area and wider area	This option would limit the delivery of green infrastructure to major development thereby having less of a positive impact on the objective.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure that applications for the exploration, appraisal and operation of unconventional oil and gas resources will be permitted subject to series of criteria to manage a range of impacts. Therefore a positive score has been recorded against this SA Objective.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option	0			There is no clear link between the alternative policy option and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		1				
		EU11	0			There is no clear link between the policy and the SA Objective.
		EU12	0			There is no clear link between the policy and the SA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	EU1	+	S, M and L-T, D, R, M	Old Oak and Park Royal	The policy commits to promoting Old Oak and Park Royal as a best practice demonstrators for environmental sustainability. OPDC aim to achieve this through the identification and definition of environmental sustainability targets and indicators for the area. Draft targets are provided, of which one states ' <i>Generate 25% of London's energy locally</i> '. This would therefore contribute to encouraging development within the area to be to be more self-sufficient in terms of energy generation and is why a positive score has been noted.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative energy generation, distribution and storage.
		EU2 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU3	0			There is no direct link between the policy and the SA Objective.
		EU4	0			There is no direct link between the policy and the SA Objective.
		EU4 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU5	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to reduce waste generated by new development through using waste as a resource e.g. through maximising the use of secondary materials and the opportunities for reuse or recycling of materials remaining from construction and investigating the potential for on-site energy recovery from waste. This would benefit the SA Objective as it would contribute to minimising the resource requirements and outputs for new development.
		EU6	++	M and L-T, D, R, M	OPDC area	The policy supports and seeks to facilitate the provision of infrastructure to deliver a decentralised energy network as part of new major development. This would positively benefit the SA Objective as would encourage new major development to be more self-

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
					sufficient over the medium to long term.	
		EU6 Option 1	++	M and L-T, D, R, M	OPDC area	The alternative policy option would perform as per the preferred option. However, the recommendation would not just apply to energy development associated with 'major' new development, it would apply to 'all' development.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU8	0			There is no direct link between the policy and the SA Objective.
		EU8 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy's commitment to ensuring the design of oil / gas development controls and mitigations greenhouse gas emissions and dust during construction and operation would benefit this SA Objective.
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	0			There is no direct link between the policy and the SA Objective.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for	EU1	++	M and L-T, D, R, M	OPDC area and wider area	The policy commits to promoting Old Oak and Park Royal as a best practice demonstrators for environmental sustainability. OPDC aim to achieve this through the identification and definition of environmental sustainability targets and indicators for the area. Draft targets are provided, of which the draft waste targets include: ' <i>Working towards zero biodegradable / recyclable waste to landfill by 2026</i> ' and ' <i>90% re-cycling / re-purposing of construction materials</i> '. This would therefore contribute to increasing the amount of recycled materials for the construction of buildings and addressing the displacement of waste. For these reasons a major positive score has been recorded.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative waste collection.	
	EU2 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.	
	EU3	0			There is no direct link between the policy and the SA Objective.	
	EU4	+	S, M and L-T, D, R, M	OPDC area and wider area	The policy seeks to safeguard waste and recycling sites within the OPDC area which would maintain current accessibility to waste facilities at those identified sites. The policy also states that OPDC will work with other waste operators to relocate some sites to suitable areas. This could be strengthened to state that <i>'it would be ensured sites would be relocated to sites that are highly accessible by a variety of transport modes'</i> .	
	EU4 Option 1	0			There is no clear link between the alternative policy and the SA Objective i.e. safeguarding 'all' sites in Old Oak would not affect the SA Objective.	
	EU5	++	S, M and L-T, D, R, M	OPDC area	The policy seeks to reduce waste and use it as a resource particularly on building sites. It also commits to investigating the potential for the movement of waste and recyclable materials during construction by sustainable means of transport, including by rail, and by the Grand Union Canal. All of which would promote the circular economy for the production of waste, increase the use of recycled materials in construction and maximises the use of innovative waste collection. As the policy largely fulfils their SA Objective and its sub-objective a major positive score has been recorded.	
	EU6	0			There is no direct link between the policy and the SA Objective.	
	EU6 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.	
	EU7	0			There is no direct link between the policy and the SA Objective.	
	EU7 Option 1	0			There is no direct link between the policy and the SA Objective.	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU8	0			There is no direct link between the policy and the SA Objective.
		EU8 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU9	+	M and L-T, D, R, M	OPDC area	The policy stipulates that applications for the exploration, appraisal and operation of unconventional oil and gas resources will be permitted where they demonstrate the efficient use of resources such as construction materials. This would therefore contribute albeit slightly to supporting the SA Objective.
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to remediate contaminated land. This would therefore partially fulfil the SA Objective through contributing to the sustainable management of contaminated soils.
9	Improve the quality of the water environment	EU1	++	S, M and L-T, D, R, M	OPDC area	The policy commits to promoting Old Oak and Park Royal as a best practice demonstrators for environmental sustainability. OPDC aim to achieve this through the identification and definition of environmental sustainability targets and indicators for the area. Draft targets are provided and water related targets include ' <i>minimising use of mains water</i> ' and ' <i>water efficiency of 105 lphpd to match higher requirements of Building Regulations</i> '. This would therefore promote improved efficiency in the use of water domestically and commercially.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to manage and monitor water quality.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU2 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU3	++	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure new development proposals promote integrated water management, through addressing surface and waste-water disposal capacity issues, sustainably managing water supply and minimising water consumption. All of which promotes efficiency in the use of water. In addition the policy also seeks to ensure new development protects and improve the water environment of the Grand Union Canal and other watercourses. This would contribute to the protection of local water courses.
		EU4	0			There is no direct link between the policy and the SA Objective.
		EU4 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU5	0			There is no direct link between the policy and the SA Objective.
		EU6	0			Seeking to support and facilitate the provision of infrastructure to deliver a decentralised energy network within major new development may pose a risk to the water environment through contaminated run-off.
		EU6 Option 1	?			As above. Although the alternative policy option would bring about more uncertainty as it would apply to all new development rather than just major development.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to maximise opportunities to protect and / or enhance biodiversity in the Grand Union Canal and protect, enhance, and creates a network of multi-functional water spaces. This would therefore help to meet the SA sub-objectives, more specifically <i>'to promote the quality of local watercourses'</i> .
		EU8 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would perform in a similar way to the preferred option, albeit to a lesser extent as the policy would apply to 'major' development only and not 'all' development.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU9	+			The policy seeks to ensure that oil and gas development incorporates the efficient use of resources such as water which could lead to some benefits against this objective. However, the policy does not specifically state that oil and gas development should seek to ensure the quality of the water environment is protected. This will be covered by other Local Plan and London Plan policies. The policy also states that a careful balance should be struck between any potential impact on the environment on our communities and businesses. This should restrict the potential for negative effects.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU11	0			There is no clear link between the policy and the SA Objective.
		EU12	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure that the remediation of contaminated land for new development does not lead to the contamination of any watercourse, water body or aquifer. As the policy directly seeks to prevent the risk posed to the water environment from the run-off of contaminants a positive score has been recorded.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	EU1	+	S, M and L-T, D, R, M	OPDC area	The policy commits to promoting Old Oak and Park Royal as a best practice demonstrators for environmental sustainability. OPDC aim to achieve this through the identification and definition of environmental sustainability targets and indicators for the area. Draft targets are provided and those relevant include ' <i>no net loss of biodiversity</i> ' and ' <i>increase tree cover by at least 10%</i> '. This would therefore contribute to conserving biodiversity. The policy also commits to promoting ecological enhancement. <i>To improve the sustainability performance of the policy it is recommended that the draft target seeking to ensure there is no net loss of biodiversity is amended in line with the NPPF to state new development should 'achieve net gains for nature'.</i>
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to manage and monitor biodiversity.
		EU2 Option	0			There is no direct link between the alternative policy option and the SA Objective.

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	1				
	EU3	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure development proposals within Park Royal and Old Oak include measures to protect and improve the ecological value of the Grand Union Canal and other watercourses. This may contribute to improving the existing poor biological quality Grand Union Canal and conserving overall biodiversity across the plan area.
	EU4	0			The relocation of waste and recycling sites (depending upon the location) may lead to a detrimental effect on biodiversity.
	EU4 Option 1	0			There is no direct link between the alternative policy and the SA Objective i.e. safeguarding 'all' sites in Old Oak would not affect the SA Objective.
	EU5	0			There is no direct link between the policy and the SA Objective.
	EU6	?			Seeking to support and facilitate the provision of infrastructure to deliver a decentralised energy network within major new development may lead to a loss in biodiversity resources.
	EU6 Option 1	?			As above. Although the alternative policy option would bring about more uncertainty as it would apply to all new development rather than just major development.
	EU7	0			There is no clear link between the policy and the SA Objective.
	EU7 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
	EU8	++	S, M and L-T, D, R, M	OPDC area	A major positive score has been recorded against the SA Objective as the policy seeks to ensure all new development conserves / enhances existing biodiversity, increases connectivity of habitats through the provision of green infrastructure and protecting designated sites.
	EU8 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would perform in a similar way to the preferred option, albeit to a lesser extent as the policy would apply to 'major' development only and not 'all' development.
	EU9	?			Effects are recorded as uncertain as extraction of minerals could adversely affect biodiversity. <i>It is therefore recommended that an additional criterion is added to the policy to ensure that any applications for the exploration, appraisal and operation of</i>

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						<i>unconventional oil and gas resources safeguard existing biodiversity across the plan area.</i>
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	+	S, M and L-T, D, R, L	OPDC area	Seeking to remediate contaminated land within the OPDC area and guarding against the risk of contaminated run off to watercourses would benefit the SA Objective and may increase biodiversity resources on brownfield sites. However, this would be dependent upon the final development on the site. A low certainty has therefore been recorded.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	EU1	+	S, M and L-T, D, R, M	OPDC area	The policy commits to promoting Old Oak and Park Royal as a best practice demonstrators for environmental sustainability. OPDC aim to achieve this through the identification and definition of environmental sustainability targets and indicators for the area. Draft targets are provided, those relevant include ' <i>the best air quality of any major world city by 2020</i> ' and ' <i>guidelines produced under the auspices of the World Health Organisation</i> '. This would therefore contribute to minimising air and noise pollution for communities and is why a positive score has been noted.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to manage and monitor air, noise and light pollution.
		EU2 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU3	0			There is no direct link between the policy and the SA Objective.
		EU4	+	M and L-T, D, R, L	OPDC area	The relocation of waste and recycling sites (depending upon the location) may negatively impact on sensitive uses including existing and future homes and building occupants.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU4 Option 1	0			There is no clear link between the alternative policy and the SA Objective i.e. safeguarding 'all' sites in Old Oak would not affect the SA Objective.
		EU5	+	M and L-T, I, R, L	OPDC area	The policy commits to designing out waste from construction sites and maximising waste generated for re use in construction – over the medium to long term this may lead to a reduction in required traffic movements which in turn may contribute to minimising air pollution.
		EU6	+	M and L-T, D, R, L	OPDC area	The policy commits to supporting the provision of a decentralised energy network within major new development. With this there is the potential for noise, light and air pollution to be generated during the construction and operational phases.
		EU6 Option 1	?			As above. Although the alternative policy option would bring about more uncertainty as it would apply to all new development rather than just major development.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the policy and the SA Objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to protect, enhance, and create a network of multi-functional green and water spaces connected by street greening which will help to mitigate against air and noise pollution.
		EU8 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure that any applications for the exploration, appraisal and operation of unconventional oil and gas protects nearby residents and businesses from the effects of the operations including effects from dust. This would therefore benefit the SA Objective.
		EU10	+	L-T, D, R, M	OPDC area	The policy states that that OPDC will seek to improve air quality and minimise air pollution impacts on health the natural and built environment and on amenity. It also outlines that they require new major development to be accompanied by an air quality assessment. This would ensure that new major development provides adequate mitigation measures to reduce any predicted adverse effects. This may over the long

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						term contribute to the removal of the designated AQMA within the area. For the reasons outline above effects are recorded as positive.
		EU10 Option 1	+	L-T, D, R, M	OPDC area	The alternative policy option would perform better against the SA Objective than the preferred option as it would require 'all' developments to require assessment for their impacts on air quality rather than just 'major' development.
		EU11	+	S, M and L-T, D, R, M	OPDC area	The principle focus of the policy is to ensure that new development does not lead to unacceptable increases in noise. The policy aims to achieve this through requiring new development applications to be accompanied by a noise assessment. Therefore effects have been recoded as positive.
		EU12	0			There is no clear link between the policy and the SA Objective.
12	To conserve and enhance the historic environment, heritage assets and their settings	EU1	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to work with developers to promote sustainable development that utilises high standards of design, innovation, planning etc., this would therefore optimise opportunities to ensure the setting of heritage assets are protected at the start of the planning process. Utilising high standards of design may also contribute to enhancing local views and landscapes.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to conserve and enhance the historic environment.
		EU2 Option 1	0			A neutral score has been recorded against the SA Objective as not specifically supporting inter-operable and open data would not detract nor benefit the SA Objective.
		EU3	+	M and L-T, I, R, M	OPDC area	The policy would ensure surface water runoff is managed and flood risk management solutions are implemented as part of new development. This would protect heritage assets over the medium to long term from flood damage.
		EU4	+			The relocation of waste and recycling sites (depending upon the final design) may lead to a detrimental effect on the setting of heritage assets and potential unknown archaeological remains.
		EU4 Option 1	0			There is no clear link between the alternative policy and the SA Objective i.e. safeguarding 'all' sites in Old Oak would not affect the SA Objective.
		EU5	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU6	+			Seeking to support and facilitate the provision of infrastructure to deliver a decentralised energy network within major new development may affect the setting of historic assets within the OPDC area depending on its visual appearance.
		EU6 Option 1	0			As above. Although the alternative policy option would bring about more uncertainty as it would apply to all new development rather than just major development.
		EU7	0			There is no clear link between the policy and the SA Objective.
		EU7 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU8	++	S, M and L-T, D, R, M	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening would lead to a positive effect on the SA Objective as it would contribute to promoting the historical interpretation of heritage assets, including the canal through the use of multifunctional green infrastructure. In addition, green infrastructure would also contribute to enhancing local views and landscapes. For this reason a major positive score has been recorded.
		EU8 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would lead to a minor positive effect as deleting the policy reference to 'all' development, so that the policy requirements apply to 'major' development only would not be as positive.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy's commitment to ensuring the design of oil / gas development is sensitive to the character of the urban landscape and to features of national, London, and local importance would only benefit this SA Objective. <i>However, this could be strengthened to state '...urban landscapes, heritage assets and features of ...'</i>
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	EU1	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to work with developers to promote sustainable development that utilises high standards of design, innovation, planning etc., this would therefore optimise opportunities to incorporate green infrastructure and the provision of open space / play spaces at the start of the planning process.
		EU2	0			There is no direct link between the policy and the SA Objective.
		EU2 Option 1	0			There is no direct link between the policy and the SA Objective.
		EU3	+	M and L-T, D, R, L	OPDC area	The policy would maintain accessibility within the OPDC area in the medium to long term through managing surface water runoff and implementing flood risk management solutions.
		EU4	0			There is no clear link between the policy and the SA Objective.
		EU4 Option 1	0			There is no clear link between the policy and the SA Objective.
		EU5	0			There is no direct link between the policy and the SA Objective.
		EU6	0			There is no direct link between the policy and the SA Objective.
		EU6 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU7	+	L-T, D, R, L	OPDC area	Seeking to integrate technology and seeking to accommodate future technologies would benefit this SA Objective as may help to reduce social exclusion over the long term.
		EU7 Option 1	0			A neutral score has been recorded against the SA Objective as not specifically seeking to integrate contemporary technology and accommodate future technologies to address challenges and create opportunities would significantly affect the SA Objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening would lead to



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						a positive effect on the SA Objective as it would directly increase connectivity and may help to create social linkages wit surrounding communities. It also seeks to ensure that development helps to balance the built and natural environment through a strategic and co-ordinated approach. For these reasons effects have been recorded as beneficial.
		EU8 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would lead to a lesser positive effect as deleting the reference to 'all' development, so that the policy requirements apply to 'major' development only would not be as positive.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure that any applications for the exploration, appraisal and operation of unconventional oil and gas protects nearby residents from the effects of the operations. It also goes further to say that applications will be assessed against the effects on public rights of way, open spaces and outdoor recreation. As this would help to maintain access to walking routes and recreation effects have been assessed as positive against the SA Objective.
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU11	+	S, M and L-T, I, R, L	OPDC area	Guarding against inappropriate increases in noise levels from major development would indirectly contribute to maintaining / or potentially improving the quality of the public realm, recreation and play spaces which would benefit the SA Objective.
		EU12	0			There is no direct link between the policy and the SA Objective.
14	Improve safety and reduce crime and the fear of crime	EU1	0			There is no direct link between the policy and the SA Objective.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to help improve safety.
		EU2 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU3	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU4	0			There is no direct link between the policy and the SA Objective.
		EU4 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU5	0			There is no direct link between the policy and the SA Objective.
		EU6	0			There is no direct link between the policy and the SA Objective.
		EU6 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU8	?			There is no direct link between the policy and the SA Objective.
		EU8 Option 1	?			Deleting the reference to 'all' development, so that the policy requirements apply to 'major' development only would result in similar uncertainties.
		EU9	0			There is no clear link between the policy and the SA Objective.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU11	0			There is no clear link between the policy and the SA Objective.
		EU12	0			There is no clear link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	EU1	++	S, M and L-T, D, R, M	OPDC area	The policy seeks to promote healthy communities through a set of draft sustainability targets set by OPDC for new development to meet. Targets include; reducing carbon emissions; achieving the best air quality of any major world city by 2020; meeting noise guidelines produced under the auspices of the World Health Organisation; and providing urban greening.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to support health and wellbeing.
		EU2 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU3	0			There is no clear link between the policy and the SA Objective.
		EU4	0			There is no clear link between the policy and the SA Objective.
		EU4 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU5	0			There is no clear link between the policy and the SA Objective.
		EU6	0			There is no clear link between the policy and the SA Objective.
		EU6 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU7	0			There is no clear link between the policy and the SA Objective.
		EU7 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU8	+	S, M and L-T, D, R, L	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening may lead to a positive effect on the SA Objective as may increase accessibility to social infrastructure and encourage more active lifestyles. For these reasons effects have been recorded as

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						positive.
		EU8 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would lead to a lesser positive effect as deleting the reference to 'all' development, so that the policy applies to 'major' development only would not be as positive.
		EU9	0			There is no clear link between the policy and the SA Objective.
		EU10	+	M and L-T, D, R, M	OPDC area	The policy states that OPDC will seek to improve air quality and minimise air pollution impacts on health through requiring new major development proposals to meet a set criteria. For this reason effects have been recorded as positive.
		EU10 Option 1	+	M and L-T, D, R, M	OPDC area	The alternative policy option would perform better against the SA Objective than the preferred option as it would require 'all' developments to require assessment for their impacts on air quality rather than just 'major' development.
		EU11	+	S, M and L-T, D, R, M	OPDC area	The principle focus of the policy is to ensure that new development does not lead to unacceptable increases in noise. The policy aims to achieve this through requiring new development applications to be accompanied by a noise assessment, which would include mitigation measures that would guard against any effects on health and quality of life. Therefore effects have been recoded as positive.
		EU12	+	M and L-T, D, R, H	OPDC area	The policy <i>'requires developers to complete the implementation of agreed measures to assess and abate any risks to human health'</i> for this reason effects have been assessed as positive
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	EU1	0			There is no clear link between the policy and the SA Objective.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to help provide access to education and skills training.
		EU2 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU3	0			There is no clear link between the policy and the SA Objective.
		EU4	0			There is no clear link between the policy and the SA Objective.
		EU4 Option	0			There is no clear link between the alternative policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		1				
		EU5	0			There is no clear link between the policy and the SA Objective.
		EU6	0			There is no clear link between the policy and the SA Objective.
		EU6 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU7	0			There is no clear link between the policy and the SA Objective.
		EU7 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU8	0			There is no clear link between the policy and the SA Objective.
		EU8 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU9	0			There is no clear link between the policy and the SA Objective.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU11	0			There is no clear link between the policy and the SA Objective.
		EU12	0			There is no clear link between the policy and the SA Objective.
17	Maximise the social and economic	EU1	++	S, M and L-T, D, R, M	OPDC area	The policy seeks to promote healthy communities through a set of draft sustainability targets set by OPDC for new development to meet. Targets include; meeting noise guidelines produced under the auspices of the World Health Organisation; and providing urban greening – these would all contribute to improving wellbeing of the

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
wellbeing of the local and regional population and improve access to employment and training						local population.
	EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to help support the social and economic wellbeing of local people.	
	EU2 Option 1	0			There is no clear link between the alternative policy and the SA Objective.	
	EU3	0			There is no clear link between the policy and the SA Objective.	
	EU4	0			There is no clear link between the policy and the SA Objective.	
	EU4 Option 1	0			There is no clear link between the alternative policy and the SA Objective.	
	EU5	0			There is no clear link between the policy and the SA Objective.	
	EU6	0			There is no clear link between the policy and the SA Objective.	
	EU6 Option 1	0			There is no clear link between the alternative policy and the SA Objective.	
	EU7	0			There is no clear link between the policy and the SA Objective.	
	EU7 Option 1	0			There is no clear link between the alternative policy and the SA Objective.	
	EU8	+	S, M and L-T, D, R, L	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening may lead to a positive effect on the SA Objective as may increase accessibility to employment and training and improve wellbeing. For these reasons effects have been recorded as positive.	
	EU8 Option 1	+	S, M and L-	OPDC area	The alternative policy option would lead to a lesser positive effect as deleting the reference to 'all' development, so that the policy applies to 'major' development only would not be as positive.	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				T, D, R, M		
		EU9	0			There is no clear link between the policy and the SA Objective.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU11	+	S, M and L-T, D, R, M	OPDC area	The principle focus of the policy is to ensure that new development does not lead to unacceptable increases in noise. The policy aims to achieve this through requiring new development applications to be accompanied by a noise assessment, which would include mitigation measures that would guard against any adverse on wellbeing. Therefore effects have been recoded as positive.
		EU12	0			There is no clear link between the policy and the SA Objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	EU1	0			There is no clear link between the policy and the SA Objective.
		EU2	+	M and L-T, D, R, M	OPDC area	The policy may encourage inward investment through its aspiration to become a global leading location for the exploration, exploitation and implementation of smart city technology, approaches and systems. For this reason effects have been recorded as positive.
		EU2 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU3	0			There is no clear link between the policy and the SA Objective.
		EU4	0			There is no clear link between the policy and the SA Objective.
		EU4 Option 1	0			There is no clear link between the alternative policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU5	0			There is no clear link between the policy and the SA Objective.
		EU6	0			There is no clear link between the policy and the SA Objective.
		EU6 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU7	+	M and L-T, D, R, M	OPDC area	The policy seeks to deliver exemplar digital communication infrastructure. This may encourage inward investment through ensuring workspaces meet the needs of new and emerging businesses and increasing infrastructure capacity including broadband connections.
		EU7 Option 1	0			A neutral score has been recorded against the SA Objective as not specifically seeking to integrate contemporary technology and accommodate future technologies to address challenges and create opportunities.
		EU8	0			There is no clear link between the policy and the SA Objective.
		EU8 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU9	0			There is no clear link between the policy and the SA Objective.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU11	0			There is no clear link between the policy and the SA Objective.
		EU12	0			There is no clear link between the policy and the SA Objective.



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