

OPDC
OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION



LOCAL PLAN

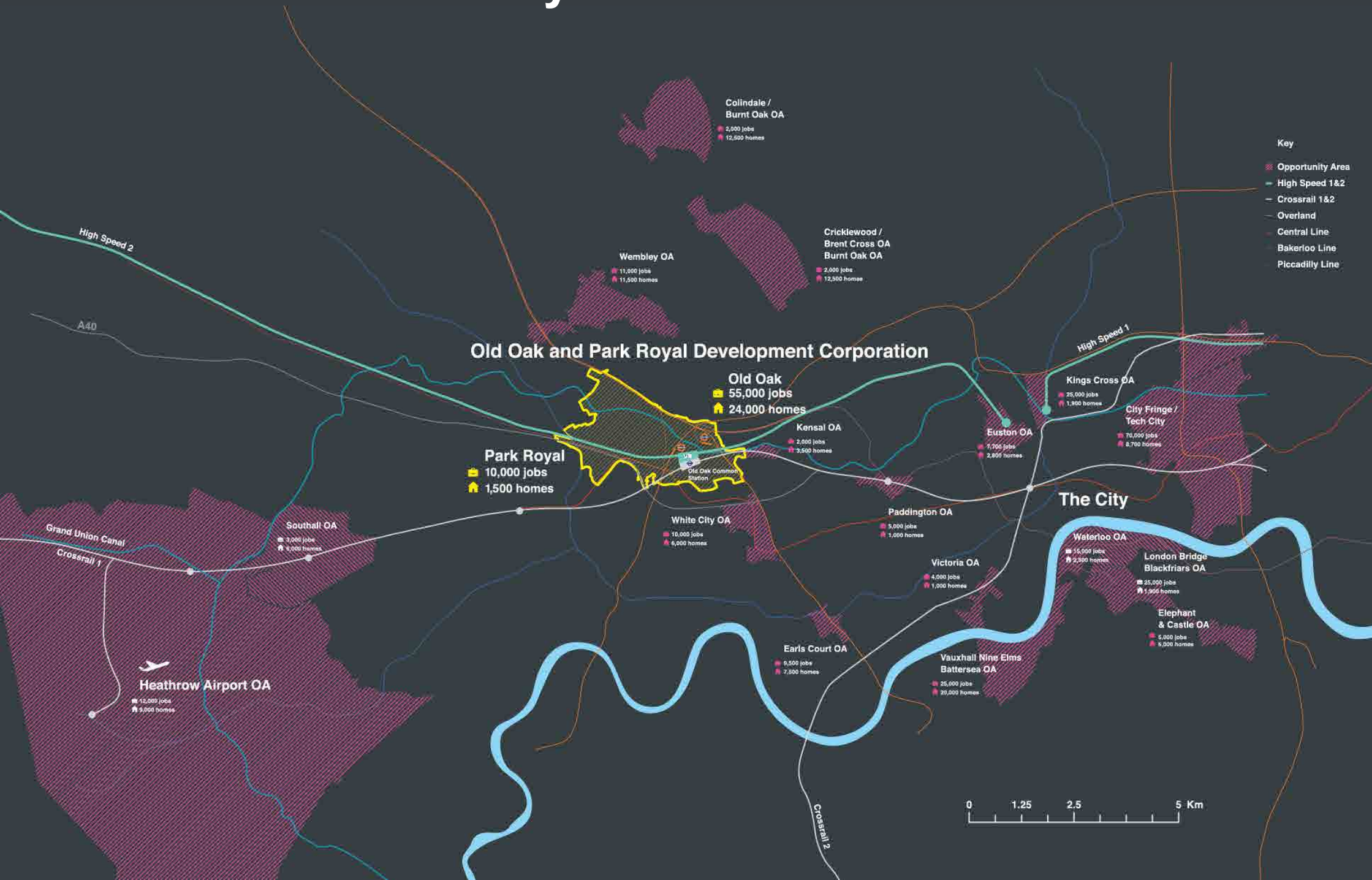
Draft for Regulation 18 Consultation
4 February 2016



MAYOR OF LONDON



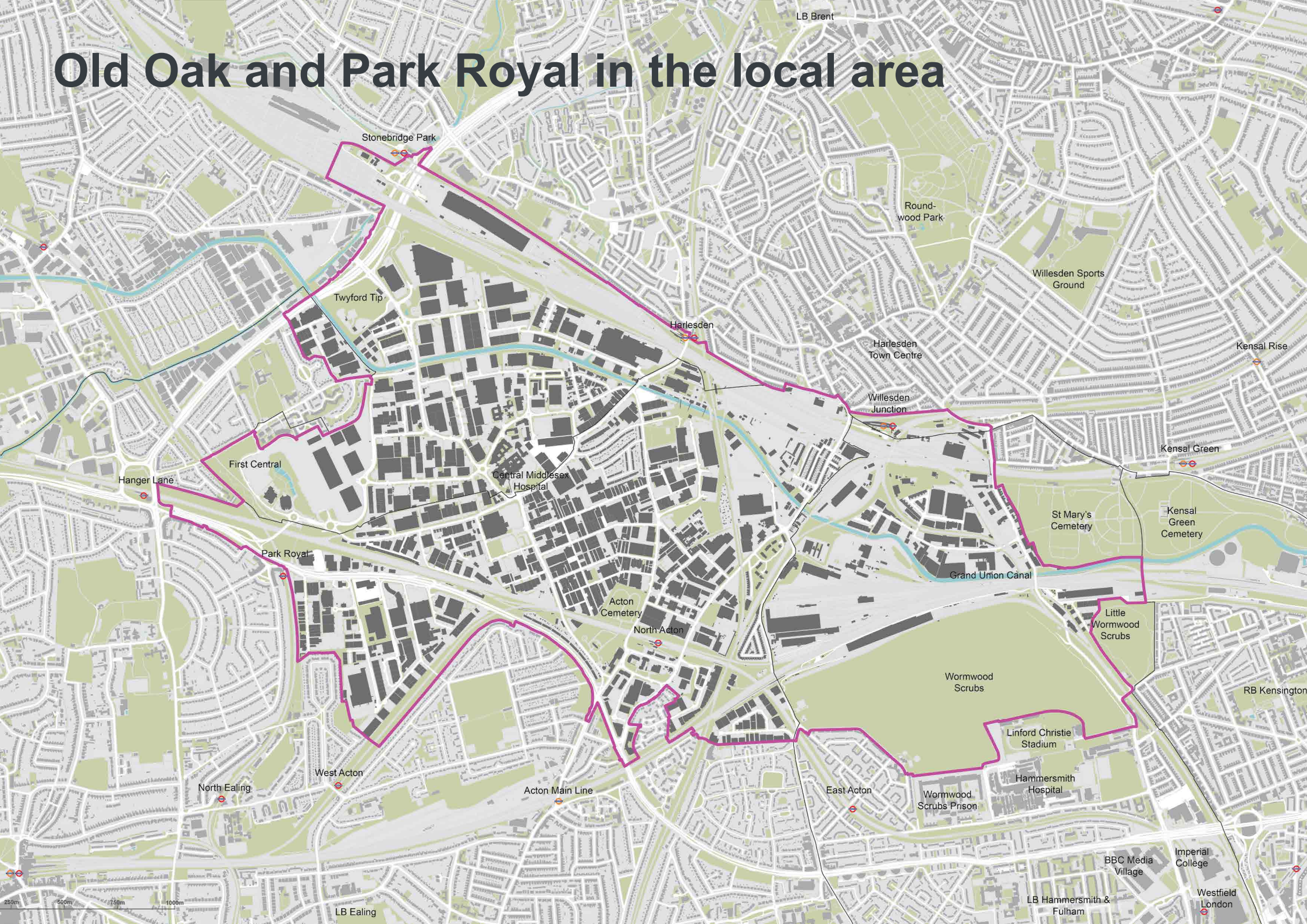
Old Oak and Park Royal in west London



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Old Oak and Park Royal in the local area



Chair's Foreword



A handwritten signature in black ink that reads "Edward Lister". The signature is written in a cursive style and is followed by a horizontal line.

Sir Edward Lister
Deputy Mayor for Planning
and Chair of the Board,
Old Oak and Park Royal
Development Corporation

Old Oak and Park Royal Development Corporation (OPDC) has been in existence for less than a year and this first draft of the Local Plan represents a huge step forward for the Corporation in beginning to shape the area.

Old Oak and Park Royal is set to become the UK's largest development project and most successful industrial location. It can provide unparalleled opportunities for the UK, London and local communities. The area is set to be transformed into one of London's key destinations, better connected than perhaps anywhere else in the UK. This transformation brings with it significant opportunities to deliver much needed homes and jobs that can support London's growth. New communities will grow up supported by a full range of infrastructure and services. However, the area needs to not only be a place to live and work, but one to visit and enjoy, time and again. These elements will be brought together to create a real sense of place with a series of high quality neighbourhoods and spaces, that locals and Londoners will be proud of and flock to.

In November 2015, the Mayor adopted the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF), which sets out a clear strategy for the redevelopment of the area around the planned Old Oak Common Station, whilst also outlining the need to protect and intensify Park Royal as a key cog in London's economy.

This first draft of the Local Plan builds on the OAPF and once adopted, will provide a clear blueprint for how this area will be regenerated to deliver a thriving new part of London. As a document for consultation, this draft Local Plan sets out a series of suggested preferred policies, policy options and alternative options for how this critical regeneration project could be planned for over the next 20 years. It provides substantially more detail than the OAPF and is supported by a vast array of studies that OPDC officers have been developing over the past few months. Guiding the development of a significant new part of London requires flexibility. The Local Plan will help to set those key parameters to allow a great new place to develop and change over time. The many pieces of work the planning team has progressed will ensure that the approach we take across Old Oak and Park Royal is the right one and that it delivers a best practice, innovative and sustainable approach.

This is your chance to help shape these policies and I am delighted to introduce this draft Local Plan and its supporting studies for public consultation.

Consultation information

OVERVIEW

OPDC's Local Plan will be the key planning policy document for the OPDC area. It will contain policies that will be used in the determination of planning applications and that will shape how the area will be developed over the next 20 years and deliver a new thriving heart of London.

This version of the Local Plan is a draft document. It has been specifically produced for public consultation and this is an opportunity for you to comment on and shape Local Plan policy for this area. This is your chance to make representations on what policies you think the Local Plan ought to contain. Throughout the document we have set out consultation questions to help stimulate responses but as a consultation document, you can comment on any element of the draft Local Plan and its supporting studies.

It would be helpful for us if when responding you could clearly set out which page number, paragraph, policy, diagram, image or question your comment relates to. Alternatively, please use the Local Plan Consultation Response Form which sets out the different elements of the document to help you to record your comments clearly against the corresponding section.

WHEN AND HOW TO RESPOND

Public consultation runs from:

4th February 2016 to 31st March 2016

Respond via the draft Local Plan engagement platform:

opdc.commonplace.is

Respond by email to:

localplan@opdc.london.gov.uk

Respond by post to:

Local Plan Consultation
Old Oak and Park Royal Development Corporation
City Hall
Queen's Walk
London SE1 2AA

HOW TO FIND OUT MORE

Visit our dedicated engagement platform

All documents can be read and downloaded

from:

opdc.commonplace.is

You can also send us your comments via our quick response online form or download the full form to email us a longer consultation response.

View a hard copy

Paper copies of this draft Local Plan and its supporting studies are available to view during normal office hours at the following locations:

- Acton Town Hall Library, High Street, W3 6NE;
- Brent Civic Centre, Engineers Way, Wembley, HA9 0AF;
- City Hall, Queens Walk, London, SE1 2AA;
- Ealing Council Offices, Perceval House, 14/16 Uxbridge Road, W5 2HL;
- Hammersmith Town Hall, King Street, W6 9JU;
- Harlesden Library, NW10 8SE;
- Old Oak Community Centre, Braybook Street, W12 0AP; and
- Shepherd's Bush Library, 6 Wood Lane, W12 7BF.

Alternatively, hard copies of this Local Plan

can be made available on request by contacting OPDC, either via email or by post (see above).

Drop-in to a public exhibition or workshop

OPDC will hold a number of drop-in sessions, as well as workshops for specific policy issues in the Old Oak and Park Royal area on the below days to enable local people to discuss proposals and provide their views in person. To find out about when these are happening please visit:

opdc.commonplace.is



Tweet questions during a Question & Answer session

Officers will be ready to take your questions on anything to do with the draft Local Plan.

To find out when the Q&A sessions are taking place, please visit:

opdc.commonplace.is

Tag your tweet #AskOPDC and the team will try to respond to as many questions as pos-

sible and record comments as consultation feedback where relevant.

WHAT HAPPENS NEXT?

Following consultation on this draft of the Local Plan, OPDC officers will produce a report that summarises the comments received as part of this consultation and provide a response to these comments. This response will explain how comments received during public consultation have been considered in the production of the next draft of the Local Plan.

The next steps are:

Autumn 16	Draft Local Plan published for second consultation
Early 17	Local Plan Examination in Public
Spring 17	Local Plan Adoption



1

INTRODUCTION



Introduction

STATUS OF THE LOCAL PLAN

Legal Status

1.1 This document will be a Development Plan Document (DPD) and is part of the Government's planning policy system introduced by the Planning and Compulsory Purchase Act 2004.

1.2 Part 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the procedure for the production of Local Plans. This version of the Local Plan constitutes the consultation required under Regulation 18.

Policy Status

1.3 Alongside the National Planning Policy Framework (NPPF), London Plan, Old Oak and Park Royal Opportunity Area Planning Framework, West London Waste Plan DPD and any Neighbourhood Plans, OPDC's Local Plan, once adopted, will be the key planning policy document against which planning applications within the OPDC area will be assessed (see figure 1).

1.4 The policies in the Local Plan must be 'consistent' with the NPPF and in 'general conformity' with the London Plan. To make

this relationship clear, each policy in this consultation draft document is supported by a 'policy context' section which sets out the relevant NPPF and Local Plan policies underpinning the draft Local Plan policy (see 'How to use this document' section below). The policies in this draft Local Plan should not repeat policies already contained in the NPPF and London Plan. This draft Local Plan should therefore be read in conjunction with these other two policy documents.

1.5 Once adopted, OPDC will be able to adopt Supplementary Planning Documents (SPDs) to this Local Plan. SPDs can provide more detailed policies and guidance to policies contained in this Local Plan and can be a helpful way of drilling into a greater detail for a policy theme or a particular location.

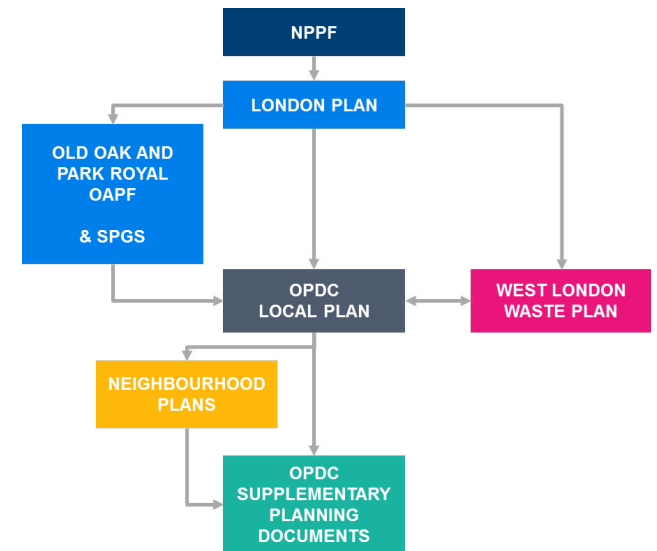


Figure 1: Policy status and relationship

Relation to Local Authority planning documents

1.6 As OPDC progresses its Local Plan, the weight of Local Authority DPDs and SPDs covering parts of the OPDC area will diminish as they are superseded by the growing material weight of OPDC's Local Plan (see figure 2). The exception to this rule is the West London Waste Plan, which was adopted by OPDC Board in July 2015 as a DPD.

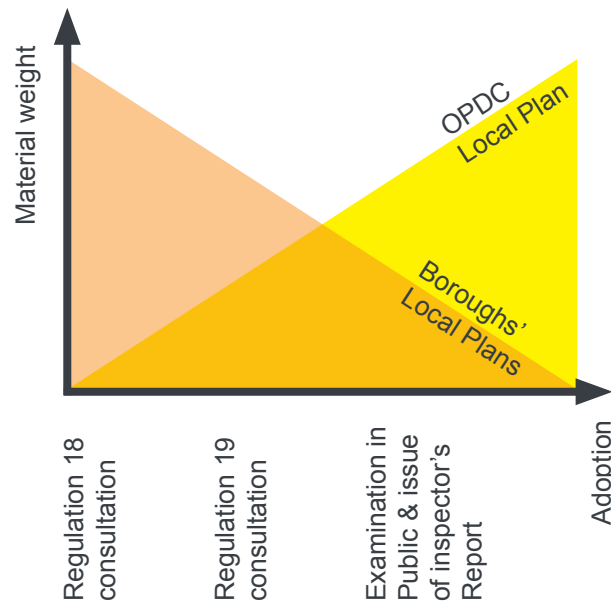
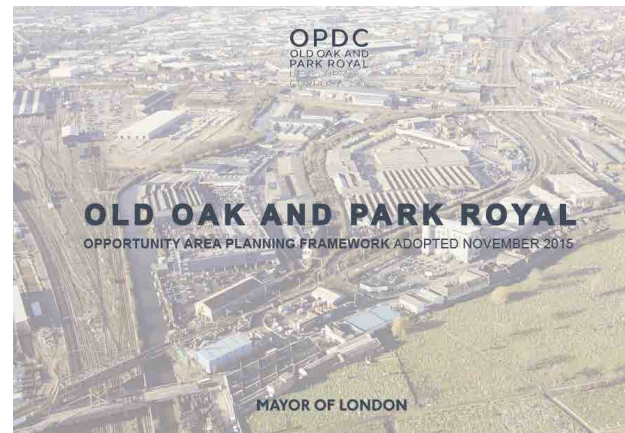


Figure 2: Change in material weight

Relationship with the Old Oak and Park Royal Opportunity Area Planning Framework

1.7 The Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) was adopted by the Mayor in November 2015 as Supplementary Planning Guidance (SPG) to the Mayor's London Plan (2015). As SPG to the London Plan, the document is a significant material consideration in the determination of planning applications in the OPDC area. This existing OAPF has helped to inform the policy themes and draft policies in this Local Plan. The OAPF should be read in conjunction with the Local Plan, but as this draft Local Plan progresses through its

various regulatory stages, its policies would accrue greater weight than the guidance and principles in the OAPF.



Relation to emerging government policy and legislation

1.8 The government is currently consulting on changes to the NPPF. The changes propose amongst other things to:

- amend the definition of affordable housing to cover other products (such as Starter Homes);
- support high density development around commuter hubs; and
- include a presumption in favour of delivering homes on brownfield land, including the release of land to allow for the development of Starter Homes.

1.9 In parallel to the consultation on the NPPF, the Draft Housing and Planning Bill is currently going through the parliamentary

process. A number of its clauses are linked to the proposed NPPF changes.

1.10 If the NPPF is revised or if the draft Housing and Planning Bill is enacted during the production of this Local Plan, necessary amendments may be made to adequately reflect any new national policy or legislation.

Duty to Cooperate

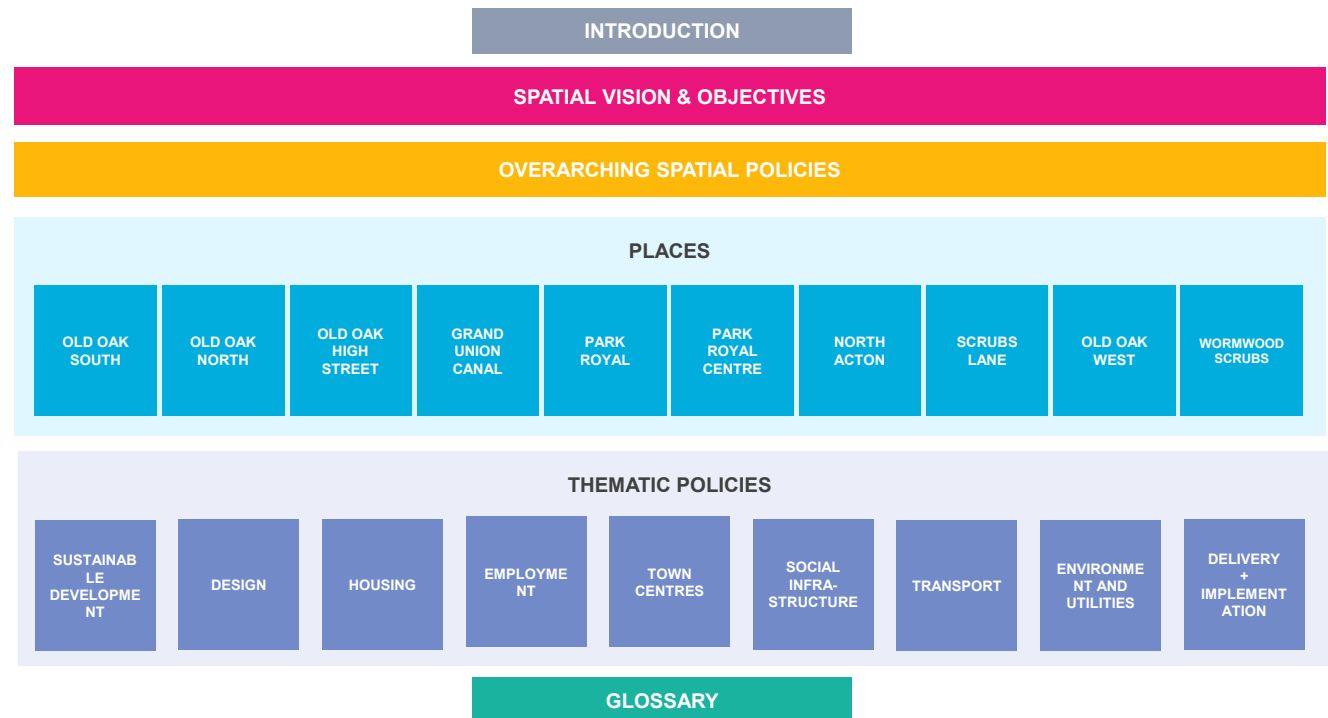
1.11 The duty to cooperate is a legal requirement set out in the Localism Act. It requires local planning authorities and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. In accordance with the Duty to Cooperate, OPDC has been working closely with these authorities and bodies in the production of this draft Local Plan and in the preparation of other planning policy and development management and infrastructure delivery matters.

HOW TO USE THE DOCUMENT

1.12 In order to keep the document spatial and succinct, the draft Local Plan does not look to re-iterate national or regional policy where this provides sufficient policy detail. This document should therefore be read in conjunction with the National Planning Policy Framework (NPPF), associated National Planning Practice Guidance (NPPG) and the Mayor's London Plan.

1.13 The document is structured around a series of policy themed chapters (shown in figure 3). At the start of each chapter, the draft Local Plan sets out the policy themes that the chapter covers and invites stakeholders to suggest additional policies that may be required to cover specific policy issues.

Figure 3: Draft Local Plan structure



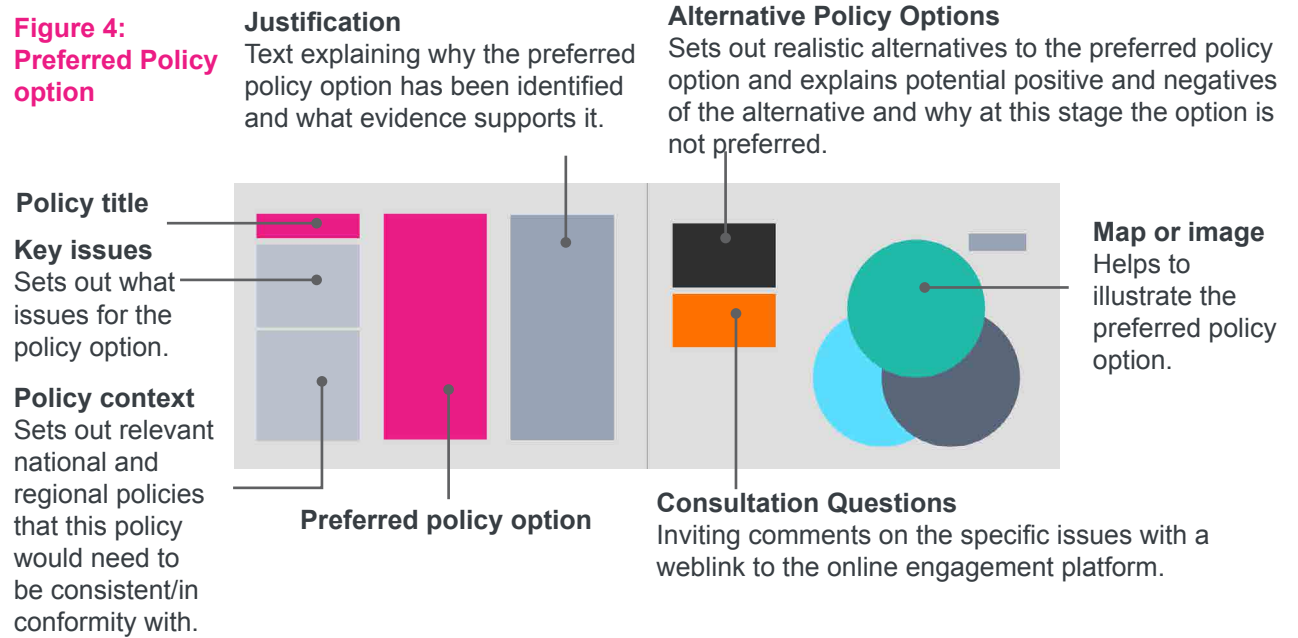
1.14 Within each chapter there are a series of policies which take two forms: 'preferred policies' or 'policy options'.

1. Preferred policies

1.15 Where there is a preferred policy this is made clear in the Local Plan. The justification and policy basis for it being a preferred option is provided.

1.16 Where there are realistic alternative approaches that could be taken to the preferred policy, these have been set out. We are inviting stakeholders' thoughts on these alternatives and suggestions of other alternatives through the consultation questions. Figure 4 presents how the preferred policies are structured.

Figure 4: Preferred Policy option

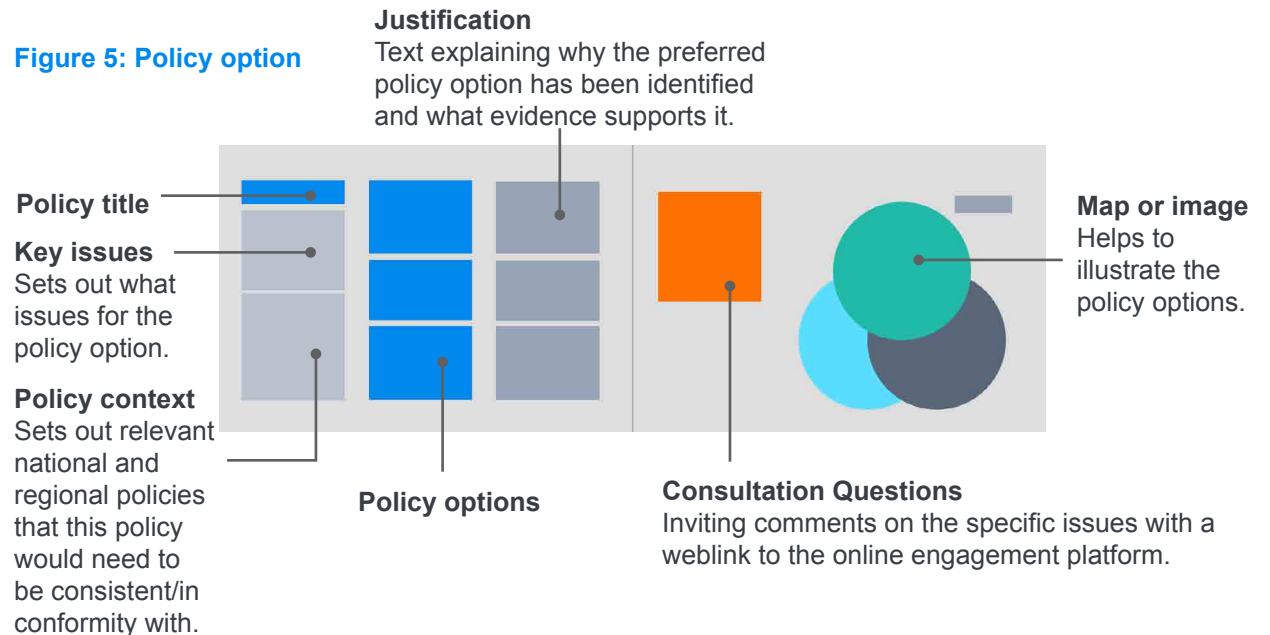


2. Policy Options

1.17 Where there is not a preferred policy then a series of options are presented and these tend to be more draft in nature. Figure 5 presents how the 'policy options' are structured.

1.18 For the next draft of the Local Plan, the 'key issues' and 'policy context' section will be removed from the policies to make the document more streamlined, but it was felt helpful to include in this draft for consultation to inform stakeholders of the issues being contended with and the national and regional policy context that the policy is working within.

Figure 5: Policy option



SUPPORTING EVIDENCE BASE DOCUMENTS

1.19 This draft Local Plan is supported by a number of supporting evidence documents. Figure 6 sets out these supporting documents and their relation to the draft Local Plan. OPDC has produced a 'Summary of Supporting Studies' document which provides an executive summary for each of the studies, including details on the studies' key outputs and recommendations. These supporting evidence documents have also been listed in the 'key evidence' sections at the start of chapters where they are of relevance. These documents are in draft and may be amended post consultation. We are therefore inviting stakeholders to provide comments on these supporting documents as part of this consultation on the Local Plan. All supporting studies are available on OPDC's online engagement platform or in hard copy at the locations identified on page 6.

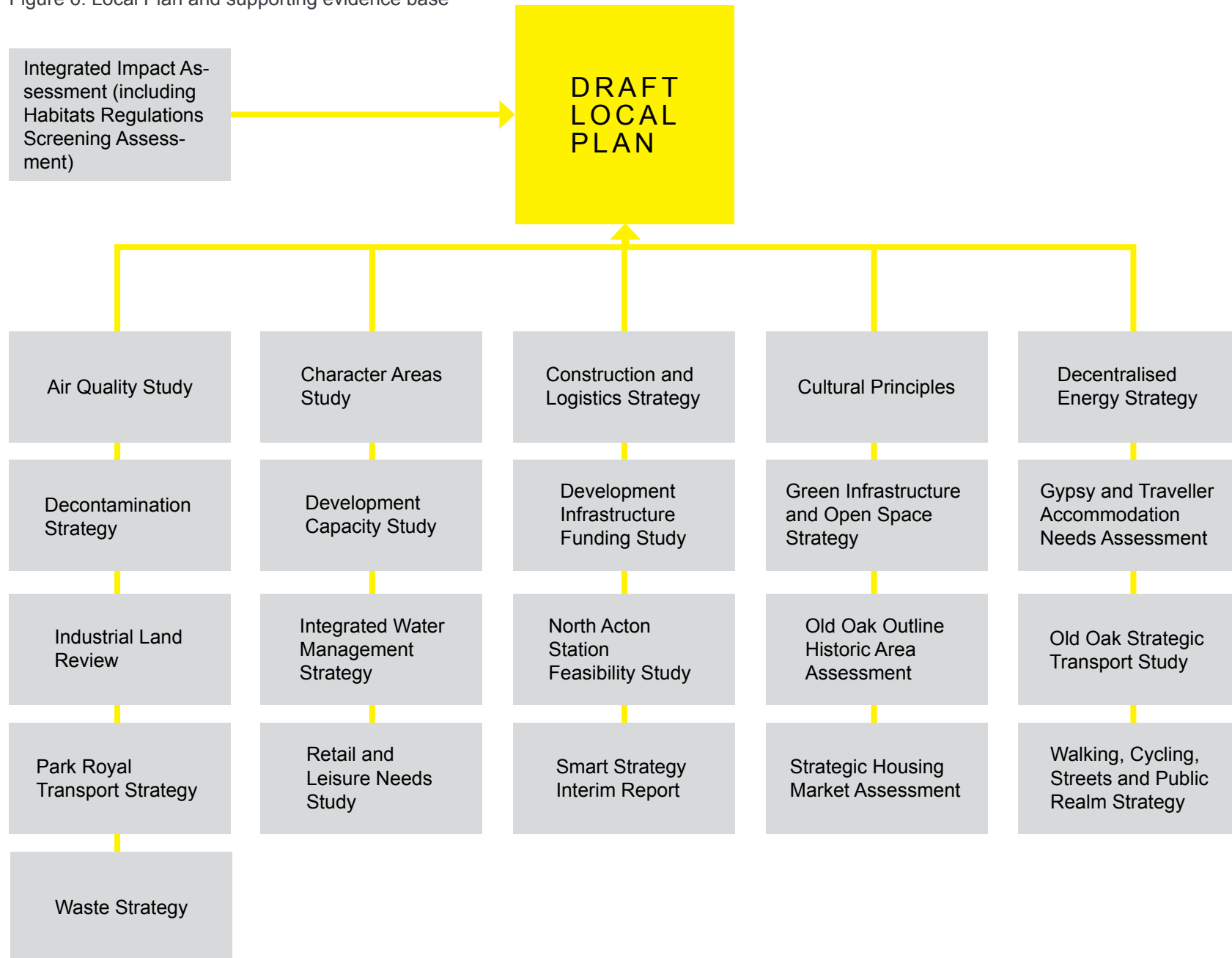
1.20 Of particular importance is the Integrated Impact Assessment (IIA). The IIA fulfils the statutory requirements for a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (in a manner that incorporates the requirements of the European Union's SEA Directive (2001/42/EU) and the transposing UK Regulations). The approach also fulfils the requirements for Health Impact Assessment, Equalities Impact Assessment and Community Safety Impact Assessment. All

draft Local Plan policy options, including the alternative policy options, have been appraised in OPDC's IIA.

1.21 A public consultation was held on the IIA Scoping Report between 4th September and 9th October 2015, in accordance with regulation 12(5) of the SEA Regulations. The Scoping Report consultation presented the suggested scope of the IIA for comment. Consultation responses have been used to amend the scope to reflect stakeholders' and the community's comments. Relevant documentation can be found on the OPDC engagement platform.

1.22 A Habitats Regulation Assessment (HRA) Screening exercise is also being carried out in accordance with European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive'). The role of this exercise is to determine whether the emerging content of the draft Local Plan will generate an adverse impact on the integrity of a 'Natura 2000' site. For the OPDC area, these sites are Richmond Park and Wimbledon Common. Relevant emerging HRA screening information accompanies this draft Local Plan as part of the IIA. A full Screening Report will be produced for the next version of the draft Local Plan.

Figure 6: Local Plan and supporting evidence base



THE OPPORTUNITY

1.23 The OPDC area covers the Old Oak Common and Park Royal Opportunity Areas in the Mayor's London Plan (2015), which together are identified as having the capacity to deliver a minimum additional 25,500 homes and indicative 65,000 jobs. The London Plan identifies Old Oak alone as having the capacity to deliver a minimum 24,000 homes and 55,000 jobs representing London and the UK's largest regeneration project. This scale of development has far reaching benefits at a national, regional, west London and local scale. Park Royal is Europe's largest industrial estate and is a vital cog in the London economy, accommodating over 1,500 businesses employing over 36,000 people. The Mayor's London Plan (2015) identifies that through redevelopment and intensification, it has the potential to deliver an indicative 10,000 jobs and a minimum of 1,500 additional homes.

For the UK

1.24 The OPDC area and particularly Old Oak is set to be transformed in 2026 with the opening of Old Oak Common Station, which will connect London Crossrail and National Rail services to the newly built High Speed 2 line in a station nearly the size of Waterloo, accommodating over 250,000 passengers a day. The creation of this new station will dramatically improve transport accessibility in the immediate area, across London and also across the entire UK. Passengers will need to change trains at Old Oak if they are travelling to and from the north and London's two largest airports - London Heathrow and London Gatwick. London Heathrow will be

just 8 minutes from Old Oak Common via London Crossrail, whilst journeys from the north to Gatwick via Old Oak Common will be 15 minutes shorter via the West London Line. The new station will also dramatically increase the nation's access to Central London and the West End, which will be just 10 minutes from Old Oak via Crossrail.

1.25 Centred on this new transport super-hub, the OPDC area constitutes the UK's largest regeneration project. This development potential could bring enormous rewards for the national economy, with the new jobs having the potential to generate billions of pounds for the UK economy. Likewise, the additional 25,000+ homes the area could deliver will contribute to combatting the nation's housing shortage as well as contributing billions of pounds to the UK through housing consumption.

For London

1.26 The scale of development in Old Oak and Park Royal will make a significant contribution to London's growing need for homes and jobs. Strategic transport infrastructure provision in the OPDC area will also help transform access across London – both within the city and to the rest of the UK.

1.27 London's population has never been higher and London-wide, the Mayor has identified the need for an additional 49,000 homes per annum to meet London's housing needs over the next 20 years. At 24,000 homes, Old Oak Common represents London's largest Opportunity Area in terms of its capacity for new homes and ability to secure a range of

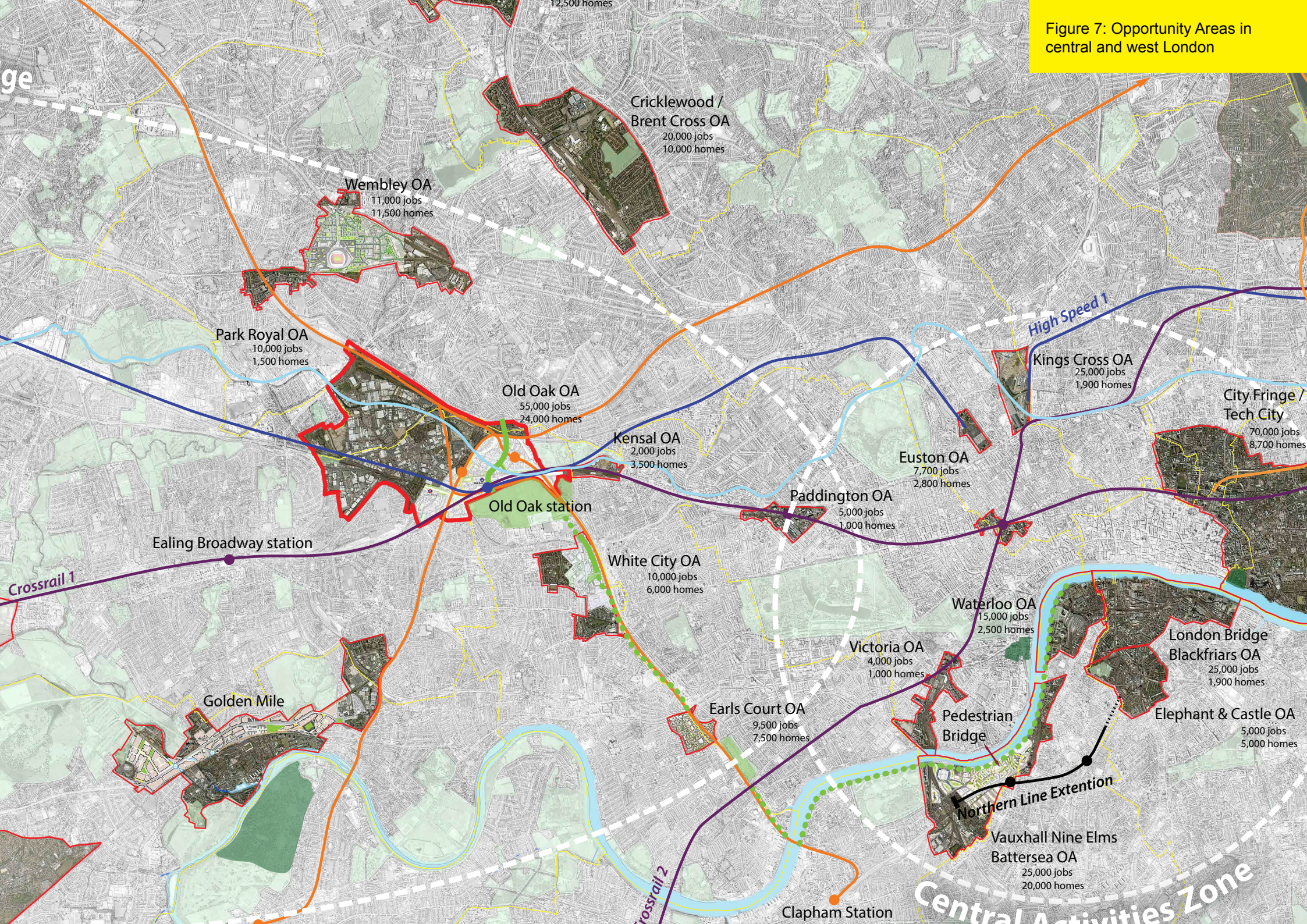
housing types and tenures.

1.28 Across the OPDC area there is the capacity to deliver an additional 65,000 jobs of which approximately 55,000 would be in Old Oak and 10,000 in Park Royal. Together, this represents the largest quantum of new jobs in London outside of the City and this could help further strengthen London's economic output and role as a world city. Millions of people will be within an hour's journey time of Old Oak, making the new office hub an attractive location for employers.

1.29 In support of these new homes and jobs, there will be opportunities for a number of supporting ancillary uses. At over 135 hectares of developable land, Old Oak provides particular opportunities for a range of supporting uses. OPDC has developed a Cultural Principles document to consider how OPDC will work to facilitate the continued growth in London's cultural offer to further cement London's position as the world's cultural capital and to embed culture within the area.

1.30 The transport improvements resulting from the provision of the Old Oak Common Station will provide London-wide benefits. Approximately one third of Londoners accessing HS2 will board trains at Old Oak. This will bring Londoners within 38 minutes of Birmingham and fast access to other UK cities, such as Leeds, Manchester, Liverpool and Newcastle. Within London itself, connectivity between London Overground and Crossrail will enhance accessibility for many residents and employees across London.

Figure 7: Opportunity Areas in central and west London



For west London

1.31 Much of west London is residential in character. The vast majority of its housing stock is made up on Victorian, Edwardian and inter-war housing. Like much of London, west London has in recent years suffered from a chronic housing shortage and particularly a shortage in affordable housing. West London's Opportunity Areas are the main locations for delivering these new homes and together, these have the capacity to deliver an additional 84,000 homes, representing over 20% of London's new homes over the next 20 years. The OPDC area is anticipated to have a significant impact on west London's housing supply providing over 30% of these new homes and within this, the opportunity for a significant amount of new affordable homes.

1.32 West London makes a significant contribution to the economy of Greater London. Its economic activity is centred on its town centres (such as Shepherds Bush, Hammersmith, Ealing and Wembley) and employment estates (such as Park Royal and the Golden Mile in Brentford). The economy of west London is to a large degree related to its position between Heathrow - London and the UK's largest airport and the West End and City – London's economic powerhouses. As with housing, West London's Opportunity Areas are likely to be the key centres for the delivery of new employment and the London Plan (2015) identifies that together, these Opportunity Areas could deliver 94,000 jobs, representing over 18% of London's new jobs

over the next 20 years. Of this over 65% of the jobs could be delivered within the OPDC area. Park Royal is already a vital cog in the economic engine of west London, currently providing over 36,000 jobs. An additional 10,000 jobs here will help with the growth of existing sectors and potential for new sectors to emerge and establish themselves. In Old Oak, the creation of a new commercial hub around Old Oak Common Station will help drive forward the economy of west London and help west London to continue to compete with other parts of the London and wider south-eastern economy.

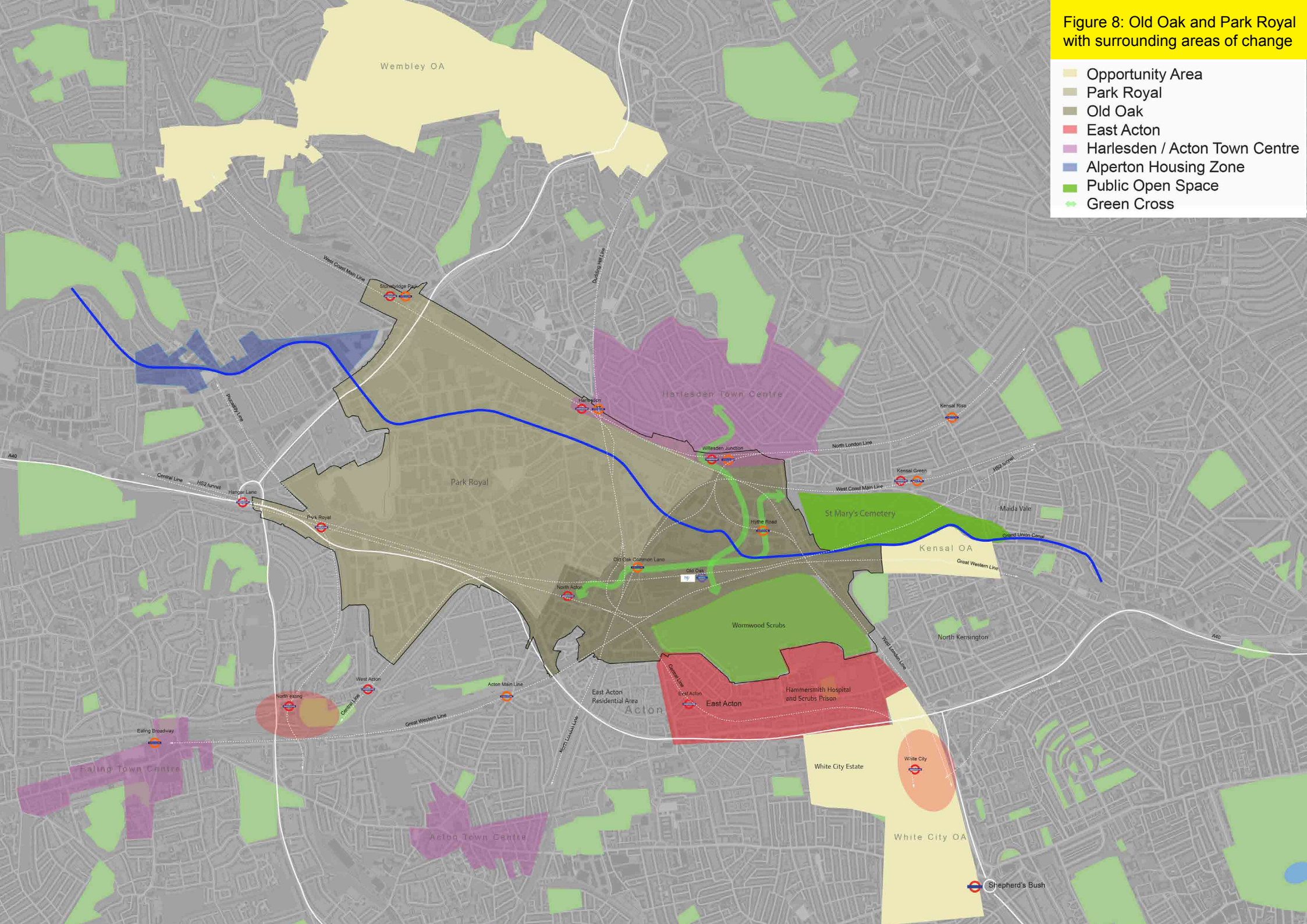
1.33 Transport infrastructure provision in Old Oak will have a significant impact on accessibility and growth across west London. The new station on the North London Line at Old Oak Common Lane will provide connections to Crossrail and HS2 for residents from locations such as Richmond and Gunnersbury (the Golden Mile) and via Willesden Junction, locations such as Wembley Opportunity Area and Harrow. On the West London Line, a new station at Hythe Road will provide connections to Crossrail and HS2 for locations such as the White City and Earl's Court and West Kensington Opportunity Areas. The OPDC area is also well connected to the wider west London area by the strategic road network. Both the A40 and A406 (North Circular) provide for direct connections to other locations in west London, although both suffer from heavy traffic congestion.

For the local area

1.34 The immediate context of the OPDC area contains some of the most deprived areas in the country. Locations such as Harlesden and Stonebridge are ranked within the top 10% most deprived wards nationally and have issues with income deprivation and health. The OPDC area and particularly infrastructure in the Old Oak area, currently separates many of the communities bordering the OPDC area. New development has the opportunity to overcome this severance and knit together this part of west London. The scale of transformation planned in the OPDC area will further spur the regeneration of these surrounding areas and help to unlock additional development and growth. OPDC is developing a Socio-Economic Regeneration Strategy which will identify mechanisms to ensure that surrounding communities benefit from employment opportunities both during and post-construction. OPDC is also working with surrounding local authorities to plan for the integration of the OPDC area into the wider hinterland. OPDC will work with the boroughs to develop 'fringe masterplans'. These masterplans will consider the potential for better connectivity and permeability between OPDC and these areas. Figure 8 shows the areas currently under consideration and these include:

- **White City Opportunity Area and north of White City.** White City is currently being transformed with the expansion of Westfield, development of Imperial College's White City Campus and

Figure 8: Old Oak and Park Royal with surrounding areas of change



- Opportunity Area
- Park Royal
- Old Oak
- East Acton
- Harlesden / Acton Town Centre
- Alperton Housing Zone
- Public Open Space
- Green Cross

redevelopment of the BBC Television Centre. Its OAPF was adopted in 2013 and development in this area is well underway. Coordinated public realm improvements could deliver better connectivity between the OPDC area and White City. Economic synergies will also be explored such as the potential for Imperial College to continue to grow its west London campus and look to Park Royal today and Old Oak in the future to provide scale-up incubator space, student and staffing accommodation and teaching facilities;

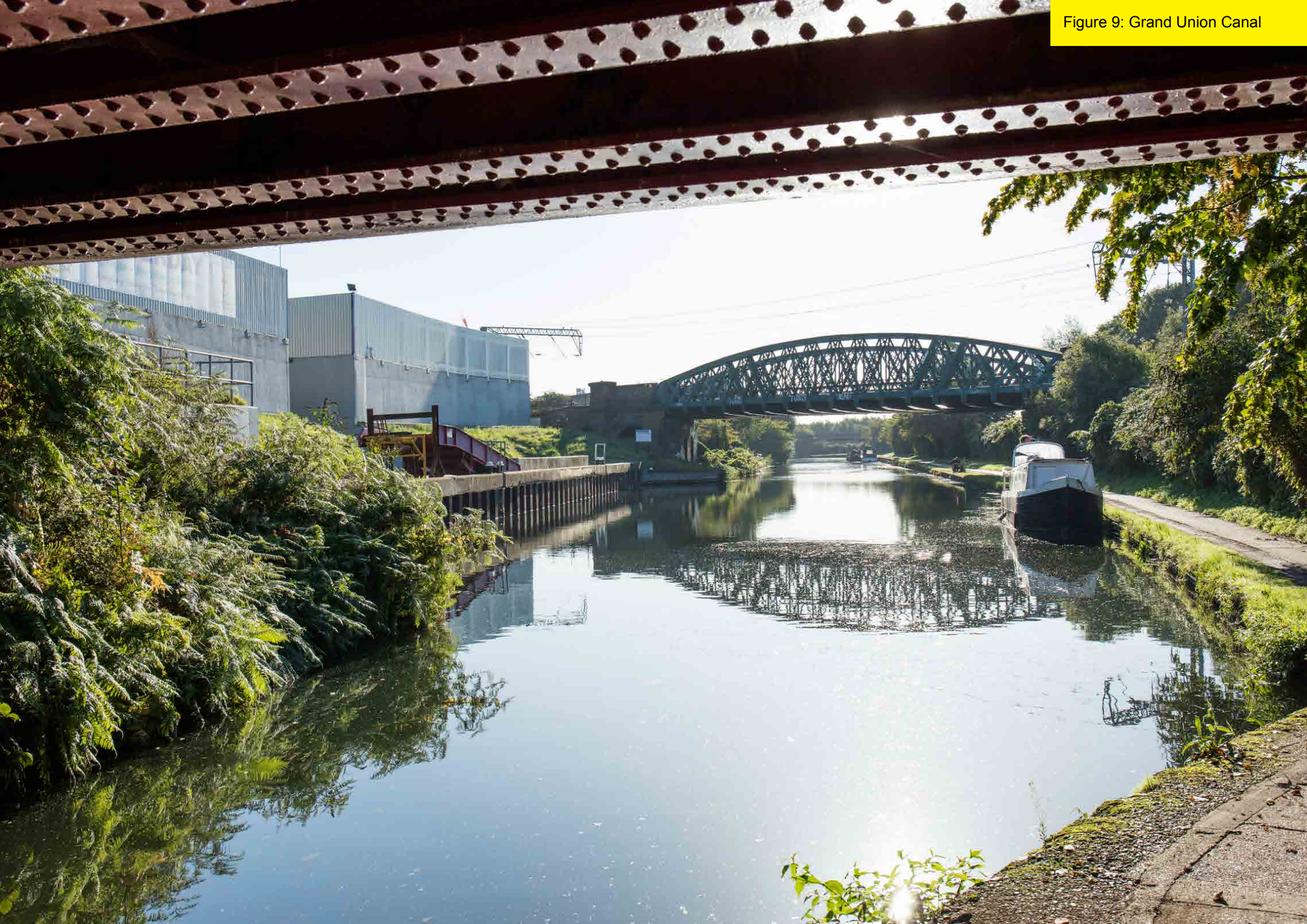
- **Harlesden Town Centre**, which currently suffers from significant economic deprivation. Improved connections between it and the OPDC area and employment and training initiatives provide significant opportunities for residents and businesses in Harlesden to benefit from regeneration. OPDC and Brent Council have established a Harlesden sub-group to coordinate projects and strategies for the area;
- **Kensal Canalside Opportunity Area**, which is immediately to the east of the OPDC area and is identified as having the capacity to deliver a 2,000 new jobs and a minimum 3,500 new homes. There will be opportunities to improve connections with Kensal Canalside and OPDC will work with the Royal Borough of Kensington and Chelsea to explore ways that this can be achieved;
- **Alperton**, to the west of the OPDC area has been identified as a 'Housing Zone' by the Mayor of London with additional

funding for the delivery of affordable housing. The Alperton housing zone is identified as having the capacity to deliver over 3,000 homes;

- **Wembley Opportunity Area**, which is less than 2 miles from the OPDC area and is west London's second largest Opportunity Area after Old Oak, has the potential to deliver 11,500 homes and 11,000 jobs. In future, Wembley could potentially be better connected to Old Oak through the provision of a spur to the West Coast Main Line, but there are also opportunities for more short-term solutions to better connect Wembley to the OPDC area;
- **Acton**, which is located to the south of the OPDC area. The area suffers from concentrations of deprivation but also huge opportunities likely to be brought about by the opening of a Crossrail station at Acton Main Line in 2018. Ealing's Core Strategy identifies that this could bring about the delivery of an additional 2,300 homes over the next 20 years. Improved connections from North Acton will provide significant opportunities for Acton to benefit from regeneration in the OPDC area; and
- **Centres in the wider area** such as Ealing, Southall, Wembley, Hammersmith and Kensington that will be influenced by the scale of development proposed at Old Oak and Park Royal. There is a need for close collaboration with the surrounding local authorities to consider what these influences might be and ensure that measures are taken to capture

opportunities and mitigate any potential impacts.

Figure 9: Grand Union Canal





2

SPATIAL VISION & OBJECTIVES



Spatial Vision & Objectives

A Spatial Vision

A thriving part of London connected to the rest of the UK and internationally.

Old Oak and Park Royal will be a centre for innovation and growth that will shape west London and strengthen London's role as a global city.

A new commercial hub with cultural uses, alongside a diverse network of vibrant neighbourhoods, will help create a London destination recognised as an exemplar in large-scale housing and employment led regeneration.

Question:

QVO1: Do you agree with the Spatial Vision? If not, what might you change?

Our Mission

- Pro-actively lead the comprehensive and best practice planning of Old Oak and Park Royal that complements the wider area.
- Enable the delivery of a liveable new place for a mix of residents, employees and visitors, ensuring new development achieves the highest standards of design.
- Work positively with stakeholders to unlock and coordinate the area's regeneration potential.
- Engage with, and support the participation of, local communities during the plan making and development management processes.
- Run a responsive, customer focused planning service.

Question:

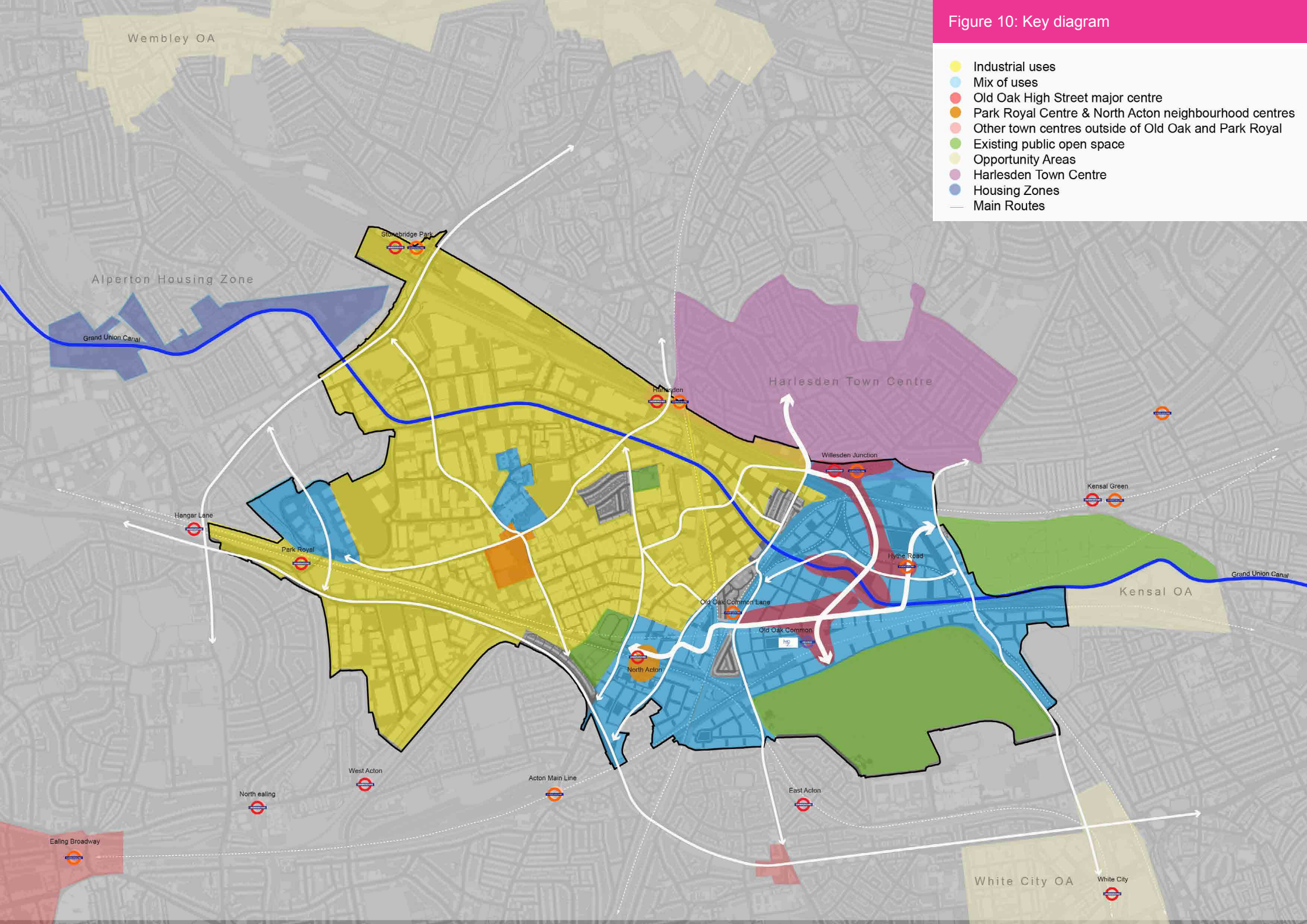
QVO2: Do you agree with the mission statement? If not, what might you change?

You can provide comments directly through:

opdc.commonplace.is

Figure 10: Key diagram

- Industrial uses
- Mix of uses
- Old Oak High Street major centre
- Park Royal Centre & North Acton neighbourhood centres
- Other town centres outside of Old Oak and Park Royal
- Existing public open space
- Opportunity Areas
- Harlesden Town Centre
- Housing Zones
- Main Routes



Objectives

Consolidating

1. Optimise a once in a lifetime opportunity created by High Speed 2 and Crossrail to secure investment that will:
 - a. deliver a thriving new centre at Old Oak with much needed homes, a mix of employment space and associated social and physical infrastructure;
 - b. protect and regenerate the Park Royal industrial area as a cornerstone of the London economy.

Connecting

2. Accessible and high quality national, regional and local transport connections, focused around a new world class station at Old Oak Common will catalyse comprehensive regeneration with well-designed streets that will fully connect into surrounding areas.

Creating

3. Deliver a varied mix of uses, including cultural and catalyst uses, that support the growth of a vibrant London destination.
4. Celebrate existing features of the Grand Union Canal, Wormwood Scrubs, Park Royal, heritage assets, and local communities to help create a unique sense of place.
5. Utilise the scale of opportunity to embed and showcase exemplar standards of design, smart technology and environmental, social and economic sustainability, during the planning, construction and operation stages.
6. Be flexible and adaptable, both to the effects of a changing climate and future changes in practices, including the circular economy and deliver an open and secure digital place.

Communities

7. Create a series of connected and inclusive lifetime neighbourhoods, designed to improve the quality of life, enhance health and well-being, deliver social and economic benefits for local communities and foster a sense of community and diversity.

Question:

QVO3: Do you agree with the Objectives? If not, what might you change?

You can provide comments directly through:

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Figure 11: Illustrative 3D masterplan



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CUSTOMERS MUST
WAIT IN
RECEPTION AREA
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3

OVERARCHING SPATIAL POLICIES



Overarching Spatial Policies

3.1 This chapter contains policies addressing the following policy themes:

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

3.2 These policies provide the key overarching policy statements for the OPDC area. They set the policy basis for the proceeding places (see chapter 4) and thematic policies (see chapters 5-12).

Questions:

QOSP_a: Are there any other overarching spatial policy themes you think OPDC's Local Plan should be addressing?

QOSP_b: Do you agree with the chapter's preferred policy options? If not, what might you change?

QOSP_c: Are there any other policy alternatives that could replace the chapter's preferred policies?

You can provide comments directly through:

opdc.commonplace.is

EVIDENCE BASE

Table 1: Overarching Spatial Policies Evidence base

Supporting study	Description	Status
OPDC Development Capacity Study	A study looking at the capacity of the OPDC area to accommodate new homes and jobs.	Draft completed
OPDC Cultural Principles	A document showing how OPDC can contribute to London's position as the world's cultural capital and how embedding culture in development can assist placemaking	Draft completed
OPDC Retail and Leisure Needs Study (RLNS)	A study looking at the need for retail and leisure space in the OPDC area, which includes examples of meanwhile/interim uses across London.	Draft completed
OPDC Walking, cycling, streets and public realm strategy	A strategy setting out recommendations for the public realm, public open space and walking and cycling infrastructure for the OPDC area.	To be developed
OPDC Green Infrastructure Strategy	A strategy reviewing existing GI assets, future GI requirements, and identifying opportunities for improving function, connectivity and integration with other infrastructure.	To be developed

OSP1: Optimising Growth

KEY ISSUES

1. London's population and economy is growing at an incredibly fast rate and there is a need for development to keep abreast of this growing need to deliver over 1 million new homes over the next ten years.
2. Brownfield land plays a critical role in meeting this need and it is important to optimise this opportunity where presented.
3. The OPDC area represents London's and the UK's largest regeneration area and can make a significant contribution towards meeting London's growth.
4. The scale of regeneration planned at Old Oak and Park Royal, if planned correctly and coordinated with growth in surrounding Opportunity Areas can help to shape west London and support London's role as a global city.

POLICY CONTEXT

National

3.3 The National Planning Policy Framework (NPPF) requires planning to be a tool to promote growth and meet the need to house people and continue the expansion of the UK's economy and the prosperity of its residents.

Regional

3.4 The London Plan identifies London's need to meet its projected population and economic growth. The London Plan recognises that Opportunity areas are the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.

PREFERRED POLICY OPTION

OPDC will work with stakeholders and partners to ensure that development:

- a) Optimises growth to deliver new homes and jobs and support the regeneration of the area; and
- b) Enables the creation of a new destination that will shape west London and supports London's role as a global city.

JUSTIFICATION

3.5 The OPDC area can play a critical role in meeting London's need for homes and jobs. In 10 years, this area will have unparalleled connectivity

with a once in a lifetime opportunity to optimise regeneration and development in the surrounding area.

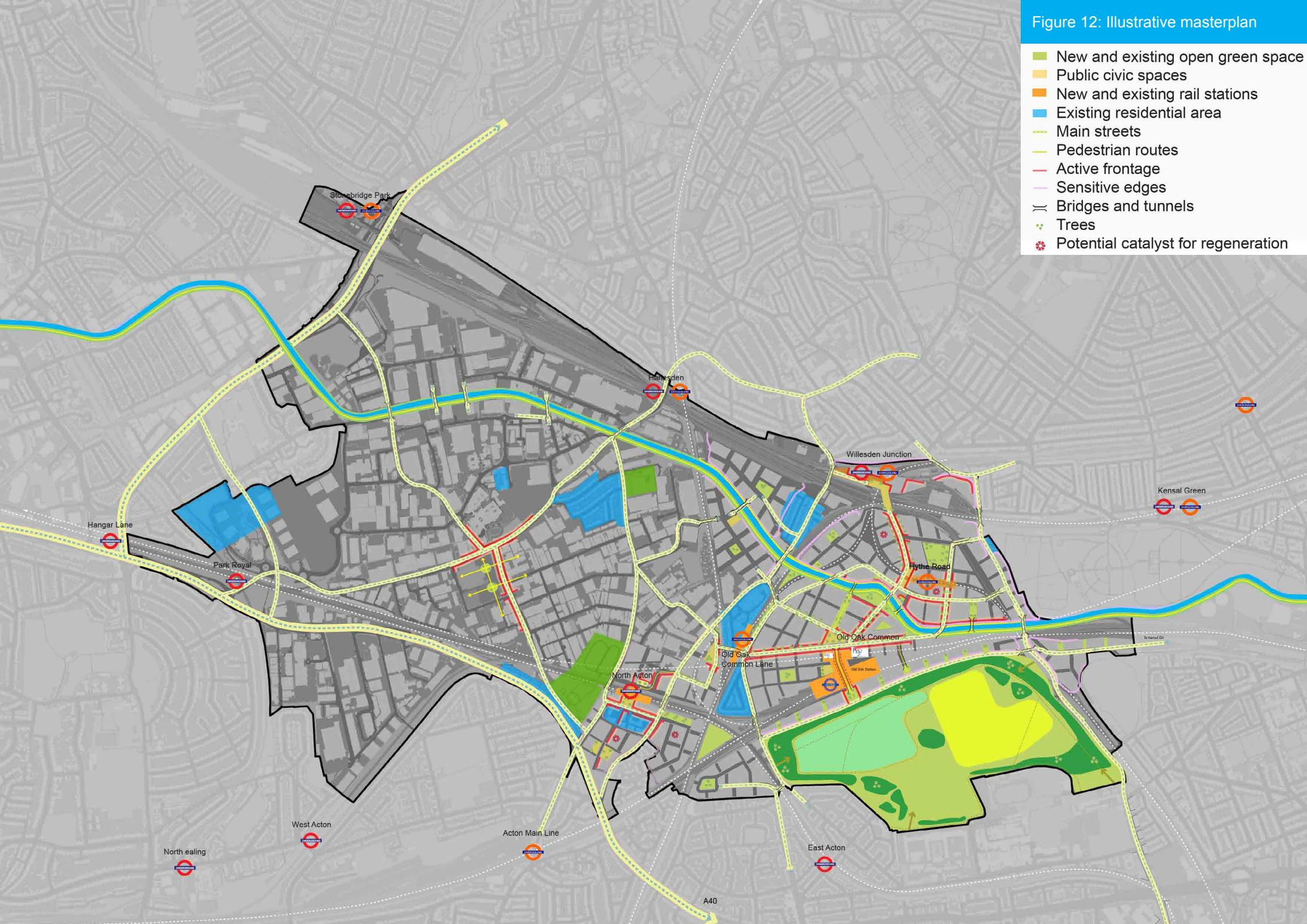
3.6 Growth in the OPDC area will have benefits both locally and across the wider area. During the 20 years of this Local Plan, the level of development envisaged, along with the planned strategic infrastructure, will fundamentally change the geography of west London. It is important that the new development in the OPDC area drives forward the economic prosperity of its local and west London residents and businesses and also that opportunities are taken to deliver development that supports and strengthens London's role as a competitive global city. This is explored in further detail in the Places (chapter 4) and Town Centre Uses (chapter 9) Chapters.

ALTERNATIVE POLICY OPTION

3.7 No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.

Figure 12: Illustrative masterplan

- New and existing open green space
- Public civic spaces
- New and existing rail stations
- Existing residential area
- Main streets
- Pedestrian routes
- Active frontage
- Sensitive edges
- Bridges and tunnels
- Trees
- Potential catalyst for regeneration



OSP2: Land use

KEY ISSUES

1. OPDC's Local Plan must be in general conformity with the London Plan, which sets a clear homes and jobs target for both the Old Oak (24,000 homes and 55,000 jobs) and Park Royal (1,500 homes and 10,000 jobs) Opportunity Areas.
2. This scale of regeneration presents opportunities to provide facilities for local, sub-regional and London-wide needs.
3. It will be important to create vibrancy by encouraging a mix of uses and this should include a mix of small to large scale catalyst uses.

POLICY CONTEXT

National

3.8 The NPPF requires that planning policies aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities, as well as delivering a wide choice of high quality homes.

Regional

3.9 Annex A of the London Plan sets housing and jobs targets for the Old Oak Common and Park Royal Opportunity Areas. The housing targets are minimum targets whilst the jobs targets are indicative.

PREFERRED POLICY OPTION

OPDC will support proposals that contribute to the creation of a new part of London by:

- a) Delivering a new thriving centre at Old Oak that seeks to accommodate 24,000 homes and 55,000 jobs;
- b) Protecting and regenerating the Park Royal industrial estate as a powerhouse of the London economy accommodating 10,000 new jobs and 1,500 new homes; and
- c) Delivering a full mix of town centre, cultural and catalyst uses and associated infrastructure within a new town centre hierarchy.

JUSTIFICATION

3.10 The OPDC area covers both Old Oak and Park Royal Opportunity Areas, two of London's most exciting opportunity areas. Together these form London and the UK's largest regeneration project.

3.11 The OPDC area can make a

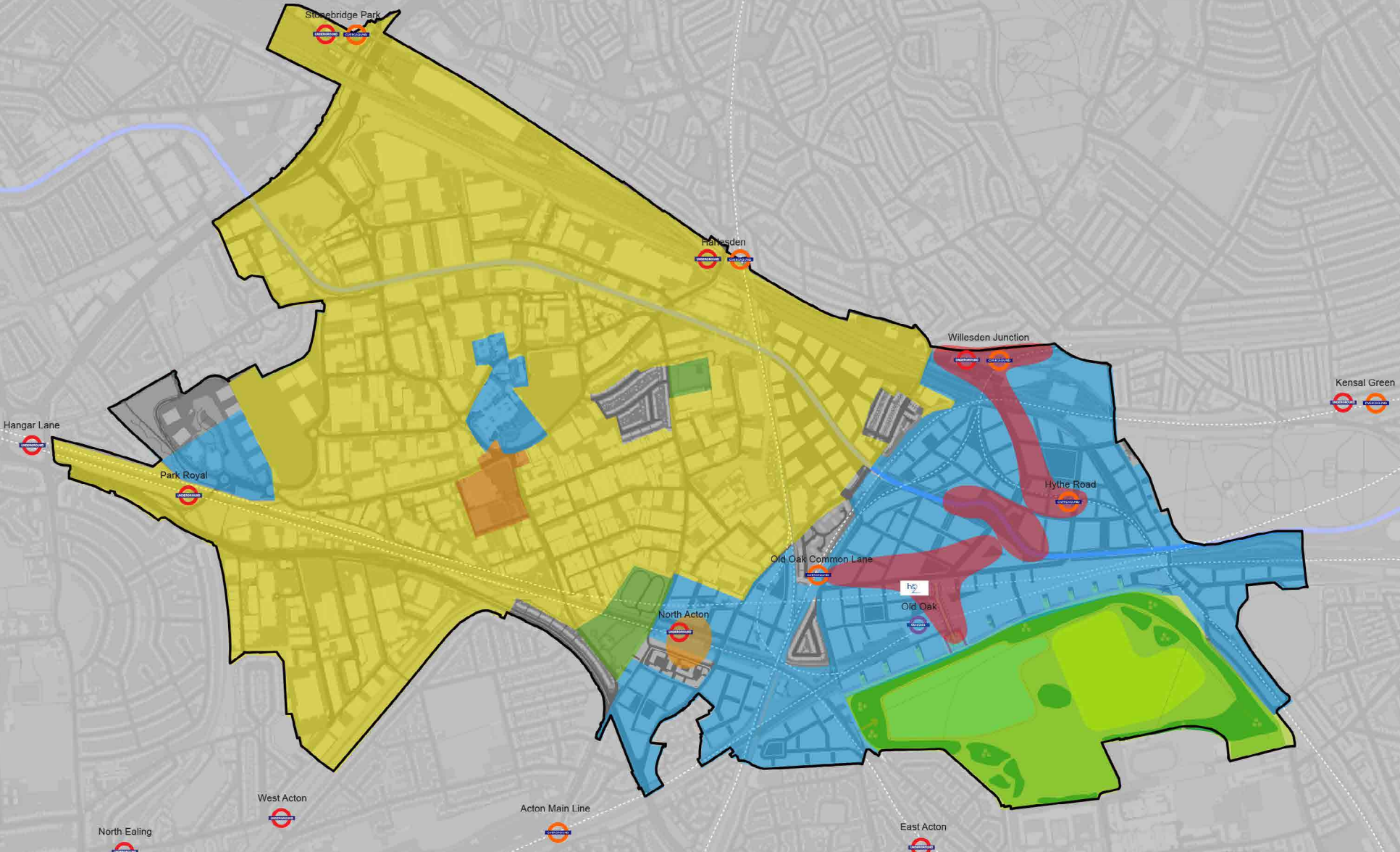
significant contribution to London's growing housing need. The London Plan sets a requirement for the Old Oak and Park Royal Opportunity Areas to deliver a combined minimum of 25,500 homes. OPDC has undertaken a Development Capacity Study (DCS), which demonstrates how the OPDC area is capable of achieving this target. OPDC will support proposals that help to deliver this target. Further details on the way this target can be achieved are contained in the Housing and Places Chapters and specifically Policy H2.

3.12 The scale of development planned in Old Oak could make a significant contribution to housing need and have a profound impact on both the London and UK economy, with early work showing how comprehensive regeneration at Old Oak could generate £7.1 billion per annum of gross value added (GVA) for the UK economy.

3.13 Park Royal is the UK's largest industrial estate, currently employing over 36,000 people across over 1,500 businesses. Protecting the estate is vital to the London economy and

Figure 13: Land use

- Industrial uses
- Mix of uses
- Old Oak High Street major centre
- Park Royal Centre & North Acton neighbourhood centres
- Existing public open space



opportunities should also be taken to intensify its use where feasible, including the provision of new homes on sites not designated as Strategic Industrial Location (SIL) (see policy E3).

3.14 The new population will need to be supported by a range of ancillary services. This will take the form of new shops, culture, sports and leisure and social infrastructure such as new schools, health centres and community space. In the first instance, these should serve the new population living in the area. These facilities should also be of benefit for communities surrounding OPDC and culture, sports and leisure uses could make a valued contribution to London (see chapter 9).

ALTERNATIVE POLICY OPTION

3.15 No reasonable alternative policy options have been identified. This Local Plan must be in general conformity with the London Plan and this sets clear homes and jobs targets for the OPDC area.

Figure 14: Local business in Park Royal



Figure 15: Local business in Park Royal



OSP3: Connections and open spaces

KEY ISSUES

1. The existing built environment creates significant severance and lacks integration with surrounding areas. This should be addressed through a series of new and improved connections and movement options.
2. Sufficient amounts of high quality open space should be provided to meet the needs of local communities and at the same time, contribute to mitigating the impacts of climate change.

POLICY CONTEXT

National

3.16 The NPPF identifies that:

- development should establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- development should deliver places which promote clear and legible pedestrian routes that encourage the active use of public areas; and
- access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

Regional

3.17 The London Plan provides guidance for

connections, public realm and open spaces including:

- delivery of secure, accessible, inclusive, connected, legible, uncluttered public realm that relates to the local context, including heritage;
- incorporating the highest quality design, landscaping, planting, street furniture and surfaces; and
- delivery of new public open space to address areas of deficiency.

3.18 The Mayor's Old Oak and Park Royal OAPF principles D1, D2, OO2 and OO3 provide guidance for delivering new and improve connections, public realm and open space within Old Oak and Park Royal.

PREFERRED POLICY OPTION

OPDC will support proposals that deliver:

- a) improvements to the existing street network, as well as a new street network that connects stations, key destinations, neighbourhoods and surrounding areas;
- b) the highest standards of design for the public realm that can positively accommodate change and

innovation over time;

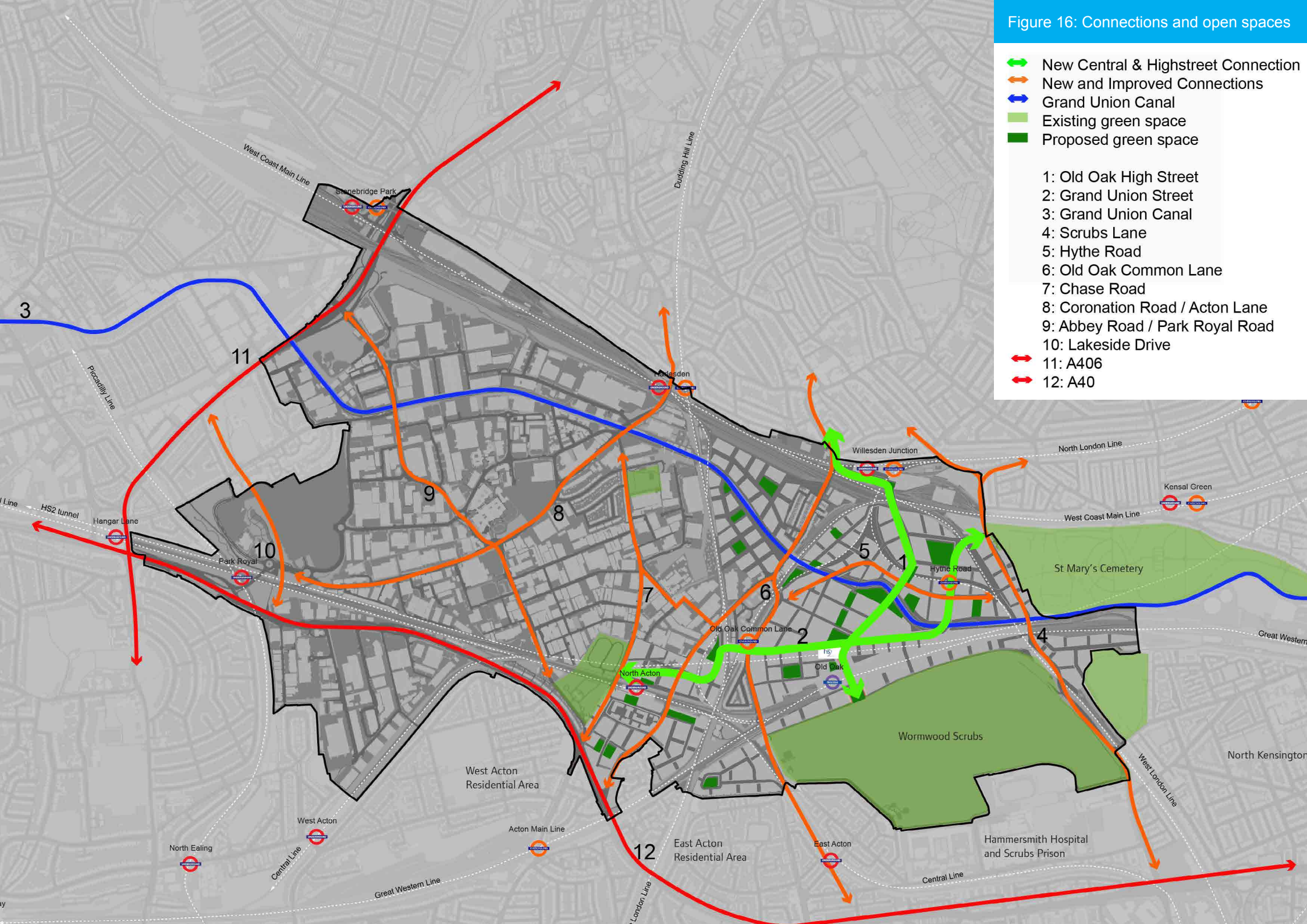
c) a well-connected and legible network of high quality and varied public, communal and private open spaces to meet all needs; and

d) development that celebrates the existing open spaces of Wormwood Scrubs, the Grand Union Canal, the canalside nature reserve, St. Mary's Cemetery, Wesley Playing Fields and Acton Cemetery.

JUSTIFICATION

3.19 Connecting Old Oak and Park Royal into London, west London and its local context will be fundamental to the successful regeneration of this area. The key routes shown in Figure 16 will be key in achieving this. High quality public realm not only supports movement but plays a key role in facilitating social interaction. Along these routes, there will be locations where routes intersect that can become the focal point for new communities, such as Grand Union Square. At these focal points, uses and activities that encourage vibrancy will be supported. New connections will enable local

Figure 16: Connections and open spaces



-  New Central & Highstreet Connection
-  New and Improved Connections
-  Grand Union Canal
-  Existing green space
-  Proposed green space

- 1: Old Oak High Street
- 2: Grand Union Street
- 3: Grand Union Canal
- 4: Scrubs Lane
- 5: Hythe Road
- 6: Old Oak Common Lane
- 7: Chase Road
- 8: Coronation Road / Acton Lane
- 9: Abbey Road / Park Royal Road
- 10: Lakeside Drive
-  11: A406
-  12: A40

communities to access services in and around Old Oak and Park Royal. The public realm should be accessible to all people and respond to changing needs.

3.20 Open space plays a key role in supporting the health and well-being of local communities and is critical in delivering the green infrastructure network (see policy EU8). New development should enable delivery of new and improved open spaces that support the needs of a new community living and working across Old Oak and Park Royal. During the development of Old Oak, there will also be a need for temporary open spaces to activate the area and provide amenity for the early phases of development.

3.21 Bringing public, communal, private and temporary open space together provides an opportunity to deliver a varied and well-used green grid across the life of the development. OPDC is commissioning a Walking, Cycling, Streets and Public Realm Strategy, which will provide a framework for delivering an exemplar sustainable, accessible urban environment for Old Oak and Park Royal. The strategy will be made available as a supporting study to the next draft of the Local Plan.

ALTERNATIVE POLICY OPTION

3.22 No reasonable alternative policy options have been identified. The creation of connected places served by open spaces that meet need is underpinned by national and regional policy.

Figure 17: Grand Union Canal in Park Royal



OSP4: Densities and building heights

KEY ISSUES

1. Delivery of high density development will capitalise on the area's excellent public transport accessibility. This approach will optimise OPDC's contribution towards meeting London's housing shortage and its economic growth and competitiveness.
2. Intensification of Park Royal could support the industrial area's continued growth and role in the London economy.
3. 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.
4. Changes to public transport accessibility identified in this draft Local Plan may require changes to the spatial distribution of density set out in figure 18.

POLICY CONTEXT

National

3.23 NPPF identifies that decisions should aim to ensure that development optimises the potential of sites to accommodate development.

Regional

3.24 The London Plan provides guidance for tall buildings and residential densities. Tall buildings are promoted in Opportunity Areas and high densities are also promoted in areas of good public transport accessibility.

3.25 The Mayor's Old Oak and Park Royal OAPF principles D3 and OO4 provide guidance for building heights and densities within Old Oak and Park Royal.

PREFERRED POLICY OPTION

- a) OPDC will support proposals that deliver predominantly:
 - i. the highest density development around Old Oak Common Station;
 - ii. high density development around other rail stations and at key destinations responding to the surrounding context;
 - iii. medium densities at residential-led areas; and
 - iv. lower densities at sensitive edges.
- b) OPDC will support proposals that focus taller buildings at stations, key destinations and where they contribute to placemaking.

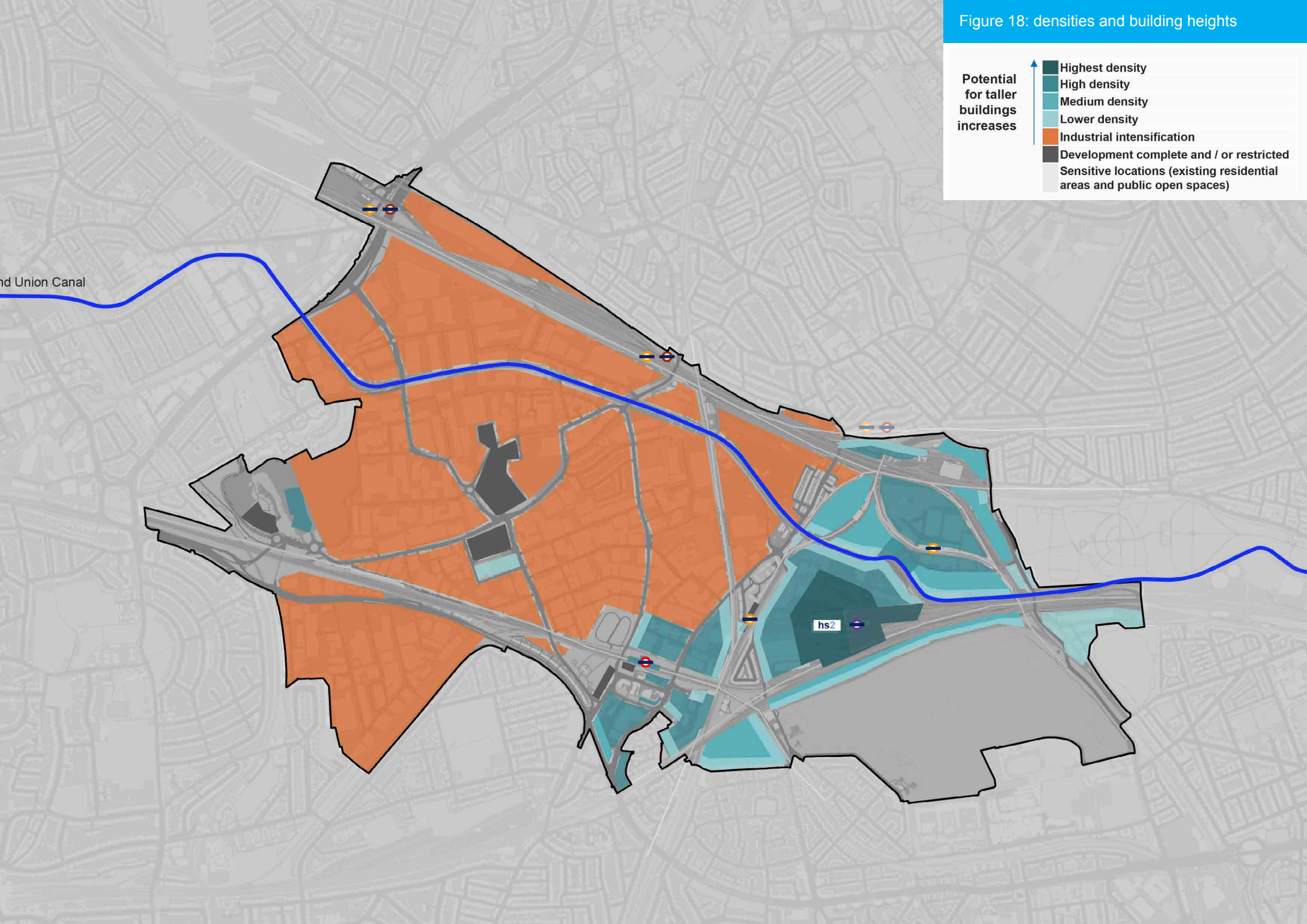
JUSTIFICATION

3.26 High density housing, retail, employment space and social infrastructure is required to help optimise the use of land in this area and to deliver both a new urban area and a high performing industrial area.

3.27 OPDC has developed a draft Development Capacity Study (DCS) for review and comment alongside this draft Local Plan. This sets out OPDC's draft housing trajectory and shows how the area could accommodate the targets set out in the London Plan. The capacity analysis in the DCS identifies areas that could accommodate different densities. Suggested density levels that may be appropriate in different locations (see Figure 18) are:

- **Highest** - Old Oak Common Station and surrounds: in the region of 600 units per hectare;
- **High** - Stations and key destinations: in the region of 550 units per hectare;
- **Medium** - Residential led areas: in the region of 405 units per hectare; and
- **Lower** - Sensitive edges: in the region of 300 units per hectare.

Figure 18: densities and building heights



3.28 The density ranges set out in this draft of the Local Plan are not predetermined densities and are specific to Old Oak and Park Royal. These ranges will be used to guide development proposals and demonstrate how the total quantum of development as required by London Plan targets could be arranged on site. It is recognised that development on particular sites may be carried out in a number of different ways and alternative proposals could be considered appropriate if they accord with relevant planning guidance.

3.29 High density development is appropriate around stations. However, to the north of Willesden Junction Station, around the proposed Old Oak Common Lane Station and to the south of proposed Old Oak Common Station there are sensitive locations. In these locations, development will need to strike a careful balance between optimising development and responding positively to the surrounding existing context while achieving the highest standards of design.

3.30 The high and highest densities identified are likely to exceed the London Plan's density matrix. However, the London Plan does note that it is not appropriate to apply the density matrix

mechanistically and that other factors should be taken into account such as local context, design and transport capacity.

3.31 This draft Local Plan supports small to large scale catalyst uses where they contribute to creating a sense of place and deliver vibrancy. The scale of catalyst uses may have an impact on the distribution and range of densities. Small or medium sized catalyst uses are assumed to be integrated as part of new mixed use development. However, large scale catalyst uses may require a significant land take and be of a form which cannot be easily integrated with housing and other commercial uses. As such, to accommodate large scale catalyst uses, the distribution of development densities may need to be adjusted and increased in locations to meet the homes and jobs targets set out in Annex A of the London Plan. Please refer to OSP5 for further information and relevant consultation questions.

3.22 High density development does not directly equate to the delivery of tall buildings and can be delivered across a range of building heights. High density development can include tall buildings. 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. Taller buildings should be focused in the highest and high density areas identified above but there may be opportunities for taller elements elsewhere where they contribute to coordinated place making and create a moment of interest.

ALTERNATIVE POLICY OPTION

3.23 No reasonable alternative policy options have been identified. Optimising densities in Opportunity Areas and in areas of good public transport is underpinned by national and regional policy.

Questions:

QOSP4a: Do you agree with the areas identified as sensitive edges/locations in Figure 18?

QOSP4b: Are there any sensitive edges that could accommodate higher densities?

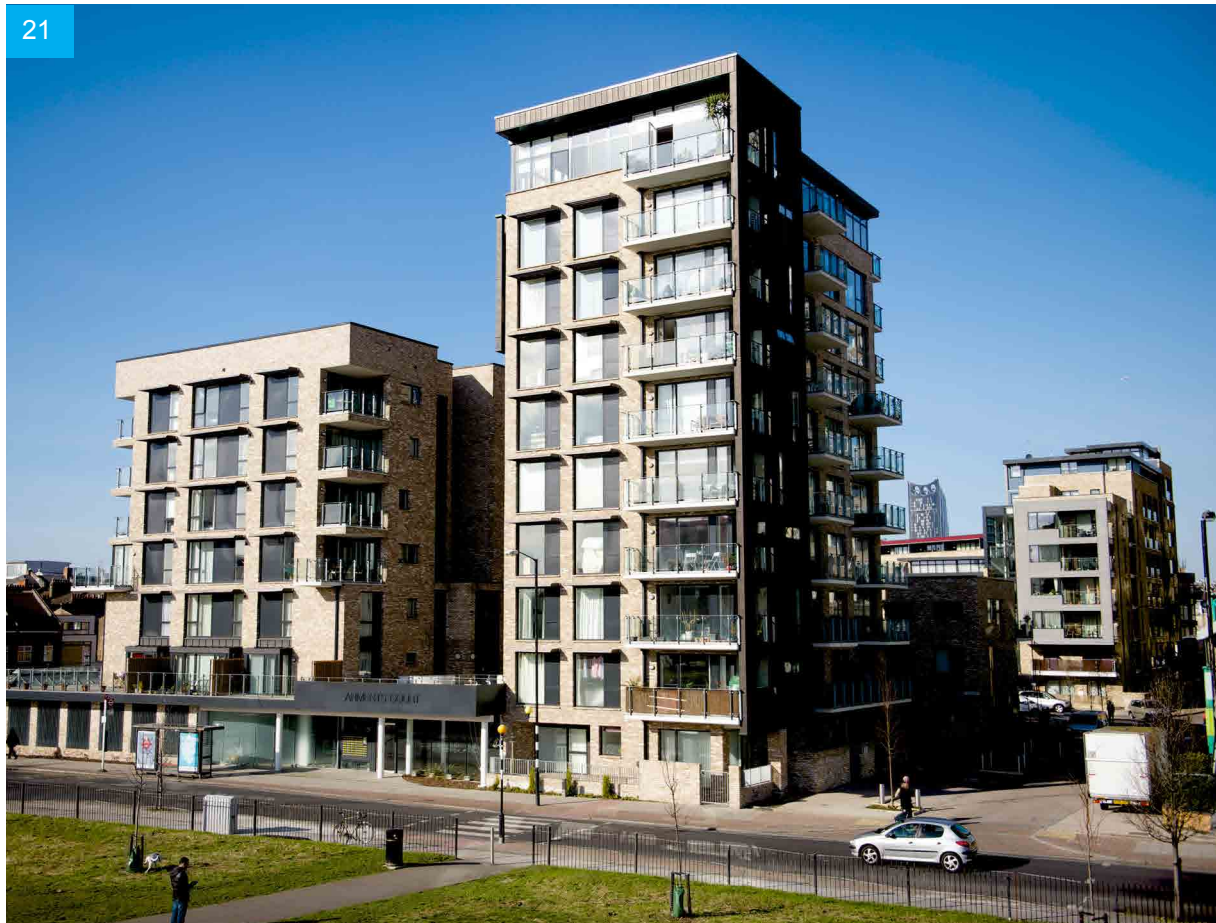
You can provide comments directly through:

opdc.commonplace.is



Figures: (examples of housing development)

- 19: Barking town centre
- 20: High Point Village, Hayes
- 21: Aylesbury Estate regeneration
- 22: Adelaide Wharf, Hackney



OSP5: Places

KEY ISSUES

1. National and regional guidance both recognise the importance of creating places in which people want live, work, play and visit.
2. The scale of development proposed across Old Oak and Park Royal will significantly alter the character of the area and will also have an impact on the character of surrounding places.
3. There is an opportunity to create a series of new lifetime neighbourhoods and connected areas that can help to overcome the areas' current severance.
4. These places can start to develop their own character and each should celebrate existing features.

POLICY CONTEXT

National

3.24 The National Planning Policy Framework (NPPF) requires that planning authorities develop policies based on an understanding and evaluation of its defining characteristics and provide guidance for establishing a strong sense of place that responds to local character and history, while not preventing or discouraging innovation.

Regional

3.25 The London Plan recognises the importance of place making. It sets out a series of comprehensive design related policies that provide comprehensive guidance for delivering Lifetime Neighbourhoods and for development to help reinforce or enhance the character, legibility, permeability, and accessibility of neighbourhoods. It also provides guidance for development to build on the positive elements of character and have regard to the form, function, structure, scale, mass and orientation of a place.

PREFERRED POLICY OPTION

OPDC will support proposals that:

- a) Create a series of attractive and locally distinctive places (see figure 23) and lifetime neighbourhoods;
- b) Celebrate existing features of the Grand Union Canal, Wormwood Scrubs, Park Royal, designated heritage assets and existing communities;
- c) Demonstrate early engagement with existing residents and businesses to inform placemaking;
- d) Provide activation projects and

meanwhile uses to help deliver early vibrant places. Proposals over a certain size will be encouraged to submit a meanwhile strategy; and
e) Deliver a mix of catalyst uses where they accord with the policies of this plan and which could include uses such as culture, sports and leisure uses, education and health institutions:

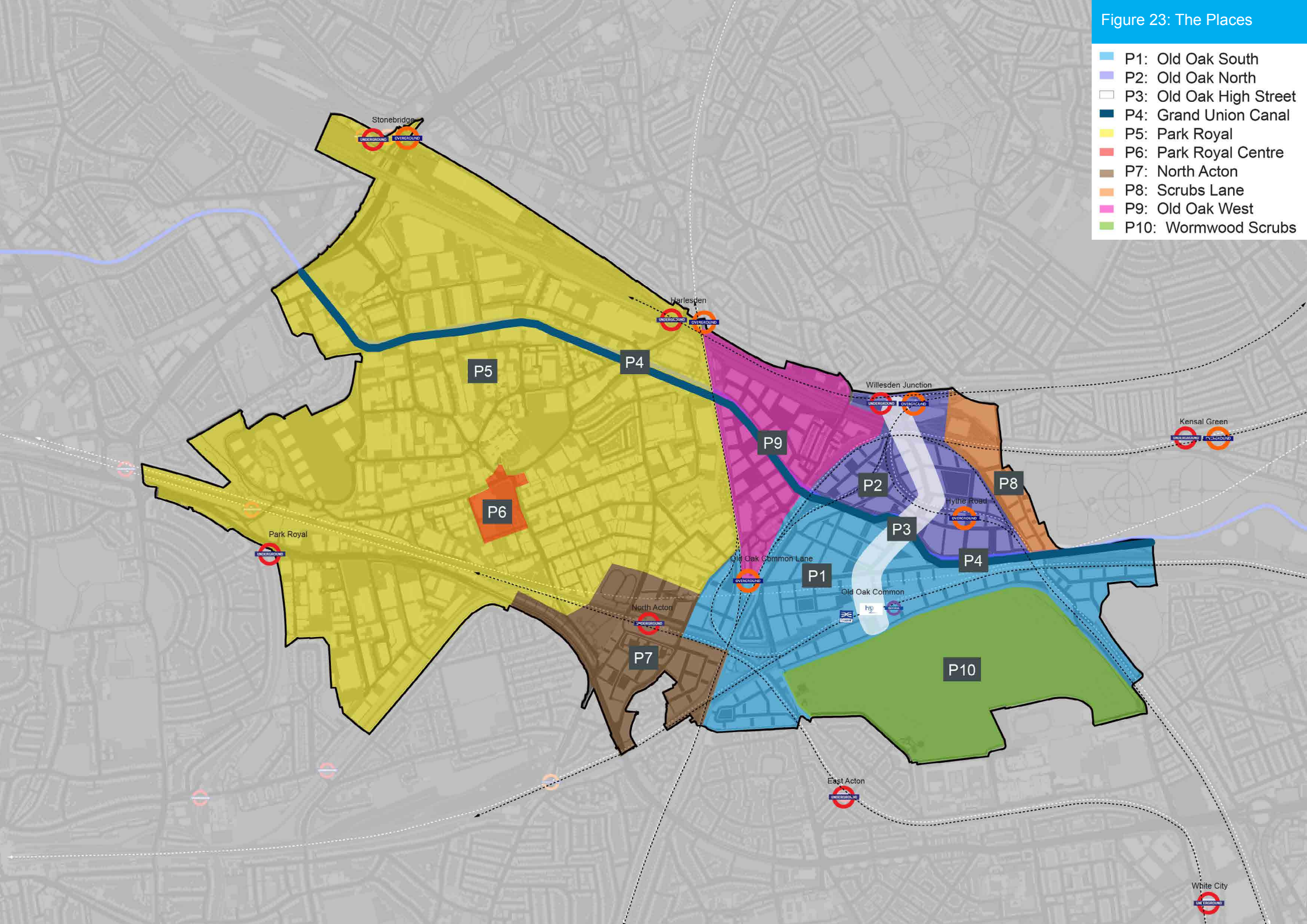
- i. Small and medium sized catalyst uses will be supported in town centre locations or areas of high activity, which are integrated as part of mixed use developments; and
- ii. Large scale catalyst uses will be supported where they generate vibrancy, and support placemaking, are compatible with surrounding development and do not compromise the delivery of homes and jobs.

JUSTIFICATION

3.26 The regeneration of Old Oak offers a once in a lifetime opportunity to deliver a new part of London. At this early

Figure 23: 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



stage it is important that initial planning policies provide flexibility to encourage and allow for changing circumstances to shape this area. As such, this draft plan seeks to establish a number of key parameters to inform development.

3.27 Improving and creating new places within Old Oak and Park Royal is critical in fostering a fine grain character. Recognising existing positive elements of the local context and local distinctiveness will help inform current and new areas and help foster and nurture a sense of place. The Places Chapter (chapter 4) sets out detailed place specific policies across the OPDC area. These policies seek to achieve a series of unique and connected places that interrelate to one another and to surrounding areas. Within Old Oak North, Old Oak South and Old Oak West, these places, or parts of these places may be designated as strategic sites to help provide more detailed strategic guidance. These suggested places are listed below. Within these places, there may also be specific areas that could be identified as strategic sites to help provide more detailed guidance (see question QOSP5h below).

- Old Oak South
- Old Oak North
- Old Oak High Street

- Grand Union Canal
- Park Royal
- Park Royal Centre
- North Acton
- Scrubs Lane
- Old Oak West
- Wormwood Scrubs

3.28 Existing communities have a wealth of knowledge and are well placed to know what currently does and does not work. This local knowledge is important to inform placemaking. To best capture this local expertise, applicants are encouraged to engage at the earliest opportunity with local communities and businesses in line with the requirements of OPDC's Statement of Community Involvement (SCI). To supplement local knowledge, OPDC has set up a Place review group, to review and comment on emerging proposals to ensure development delivers a series of high quality, attractive and liveable places.

3.29 Meanwhile or pop-up uses can play a valuable role in creating an early sense of place, by attracting innovative businesses to an area and creating a buzz. OPDC's Socio-Economic Regeneration Strategy will set out how it will support and foster workspace and meanwhile uses to enable early employment uses and entrepreneurial activity.

3.30 OPDC's Cultural Principles provides examples of how the provision of culture and art can help attract business start-ups and innovators to an area, whilst OPDC's Retail and Leisure Needs Study (RLNS) identifies recent retail and employment- led meanwhile schemes such as Boxpark Croydon, the Artworks in Elephant and Castle and Pop Brixton. To support placemaking, OPDC will require developers providing a significant proportion of homes and/ or floorspace to submit a 'meanwhile strategy' that sets out how development will deliver vibrant interim uses and spaces to help to activate schemes within early development phases.

3.31 Small to large-scale catalyst uses could act as a focus for early development. They can also act as an attraction drawing people into an area and helping it to become a recognised and successful part of London where people want to live, work, visit and play. Such uses could include culture, sports, leisure uses, education and health institutions. The provision of Central St Martins – University of Arts at King's Cross provides a recent example of how such uses can help create an early sense of place. OPDC will work with developers and providers to explore ways in which such uses could be attracted to help accelerate

development and regeneration.

3.32 The Places Chapter identifies four broad locations in which small, medium and large-scale catalyst uses may be appropriate:

- Old Oak South (P1);
- Old Oak North (P2),
- Old Oak High Street (P3); and
- North Acton (P7).

3.33 Small and medium sized catalyst uses are an integral part of town centre uses and should be focused within the town centre hierarchy or in areas of high footfall.

3.34 Large-scale catalyst uses can play a more fundamental role in placemaking, helping to create a destination and providing uses that serve a London-wide need as well as meeting local needs. Large-scale uses may have a significant land-take, with subsequent impacts on amenity and transport networks. Large-scale catalyst uses may also result in a need for greater flexibility in development densities to continue to achieve the homes and jobs targets identified for the OPDC area in the London Plan. Different large-scale catalyst uses will have different impacts on their surroundings and for such uses to be acceptable these would need to clearly demonstrate how

they have successfully mitigated these impacts. To aid decision taking, OPDC is considering developing specific tests against which the suitability of different catalyst uses would be judged, particularly for larger scale catalyst uses which are more likely to have an impact on their surroundings (please see question QOSP5g).

ALTERNATIVE POLICY OPTION

3.35 No reasonable alternative policy options have been identified. Creating high quality places is underpinned by national and regional policy. Alternatives not promoting meanwhile uses or catalyst uses are not considered reasonable as they would stifle development in the OPDC area.

You can provide comments directly through:

opdc.commonplace.is

Questions:

QOSP5a: Do you agree with the proposed places within Old Oak and Park Royal?

QOSP5b: Are there any amendments to the proposed place boundaries needed?

QOSP5c: Are there any additional places that could be added to better reflect existing character areas or respond to future development?

QOSP5d: Are the four places identified for large catalyst uses appropriate? Should other places be identified as appropriate locations for catalyst uses?

QOSP5e: Are there other catalyst uses not included in the list that would also support the delivery of the draft Local Plan spatial vision and objectives?

QOSP5f: Should OPDC support catalyst uses if they result in increased densities beyond those identified in Policy OSP4?

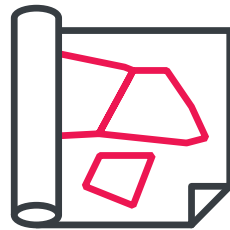
QOSP5g: What specific tests might OPDC consider applications for large-scale catalyst uses against any why?

QOSP5h: What areas could benefit from strategic site policies?



4

THE PLACES



The Places

KEY ISSUES

1. OPDC's draft Local Plan includes thematic policies. These policies will be applied to any site across the OPDC area but would not, by themselves, result in distinctive places or neighbourhoods being delivered.
2. To set clearer policies to ensure that new development delivers a strong sense of place, OPDC has identified ten places, which reflect the areas' different, yet related, character.
3. For each place, a vision has been developed alongside place specific policies that set out how development will contribute to the delivery of the vision.
4. Within each of the places there may be opportunities for a series of smaller scale neighbourhoods to emerge over time.
5. Over the life of the plan, the different places and neighbourhoods of Old Oak and Park Royal will change and evolve. It is not possible or appropriate now to categorise what the specific character of an area will be in 20 years. For now, it is important to identify the key parameters that new development should seek to deliver or enhance that will give each place the best opportunity to develop a high quality, well designed place.

POLICY CONTEXT

National

4.1 The NPPF encourages local planning authorities to allocate sites for development and set clear policies for the expected land use and planning principles for development. The NPPF also requires that Local Plans include policies that establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.

Regional

4.2 The London Plan recognises the importance of placemaking and the need to create a strong sense of place within London's new developments. London Plan Annex A includes policies for the Old Oak Common and Park Royal Opportunity Areas. These provide a high level overview of the anticipated land use and design approach to redevelopment in the OPDC area, but do not provide detailed place-specific policies for the area.

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

4.3 Indicative housing and jobs figures are identified for each place. As part of this consultation, OPDC would welcome comments on these. These capacity figures have been informed by the draft Development Capacity Study (DCS), which is available for review as part of this consultation. The total capacity for homes and jobs across Old Oak and Park Royal is 25,500 homes and 65,000 jobs. However, the comprehensive regeneration of this area is likely to take longer than the 20 years in this Local Plan period. There are sites in the core development area that are unlikely to be developed during the period of this plan due to on-site constraints and/or operational requirements. Please see the draft DCS for further details.

EVIDENCE BASE

Table 2: The Places Evidence base

Supporting study	Description	Status
OPDC Development Capacity Study	A study looking at the capacity of the OPDC area to accommodate new homes and jobs.	Draft completed
OPDC Retail and Leisure Needs Study (RLNS)	A study looking at the need for retail and leisure space in the OPDC area.	Draft completed
OPDC Old Oak Decentralised Energy Strategy	A strategy showing how a decentralised energy network could be delivered in a phased manner in Old Oak Common.	Draft completed
OPDC Walking, cycling, streets and public realm strategy	A strategy setting out recommendations for the public realm, public open space and walking and cycling infrastructure for the OPDC area.	To be developed
OPDC Green Infrastructure Strategy	A strategy reviewing existing GI assets, future GI requirements, and identifying opportunities for improving function, connectivity and integration with other infrastructure.	To be developed
OPDC Character Note	Sets out suggested character areas within and around Old Oak and Park Royal.	To be developed
HE Old Oak Outline Historic Assessment & Addendum	Assessment of the historic character and appearance of Old Oak.	Completed
OPDC Park Royal Heritage Assessment	Assessment of the historic character and appearance of Park Royal alongside identification of local views.	To be developed
OPDC Views Study	Identification of local views within and around the OPDC area.	To be developed
OPDC Cultural Principles	A document showing how OPDC can contribute to London's position as the world's cultural capital and how embedding culture in development can assist placemaking	Draft completed

ALTERNATIVE POLICY OPTION

4.4 Alternative policy options have not been provided for the preferred policy options as the Old Oak and Park Royal Opportunity Area Planning Framework sets out the principles for each of the places. Overarching consultation questions for the places can be found in Policy OSP5 (chapter 4).

P1: Old Oak South

EXISTING CHARACTER

4.5 The area is approximately 63 hectares in size. Its predominant land use is operational railway infrastructure. The area is also home to two residential communities, at Midland Terrace and Wells House Road and a designated but underused nature reserve on the southern edge of the Grand Union Canal. It includes the 'shield' site that is due to be cleared for HS2 construction works. The area is bounded by the Grand Union Canal to the north, Wormwood Scrubs to the south, Scrubs Lane to the east and Victoria Road/Old Oak Common Lane to the west.

4.6 The Grand Union Canal is a designated Conservation Area and the open space on the southern edge of the canal is an identified nature reserve.

4.7 Much of the developable area is in public sector ownership across Network Rail and the Department for Transport with long leases to Transport for London (TfL), Crossrail and a series of rail operators. High Speed 2 (HS2) will also acquire a significant amount of land across Old Oak South through the Hybrid Bill process. There are a series of large scale rail depots currently operating, or planned to operate, from the area including the Crossrail depot, the Intercity Express Programme (IEP)

Depot, First Great Western, and Heathrow Express. In the north-west corner of the site sits the derelict former British Railways Hostel, known as Oaklands House.

4.8 Walking and cycling access is very constrained across the area preventing movement to the north/south and east/west.

VISION

4.9 Old Oak South will see a new commercial hub centred around a world-class Old Oak Common Station that will act as a key catalyst for regeneration. This HS2, Crossrail and Great West Coast Main Line station, along with a new London Overground station on the West London Line, will be fully embedded into their surroundings and will provide residents, workers and visitors with easy access to west London and the wider Old Oak and Park Royal regeneration area.

4.10 Old Oak South will house a significant proportion of Old Oak's total new commercial and retail space alongside opportunities for catalyst uses, along with new high

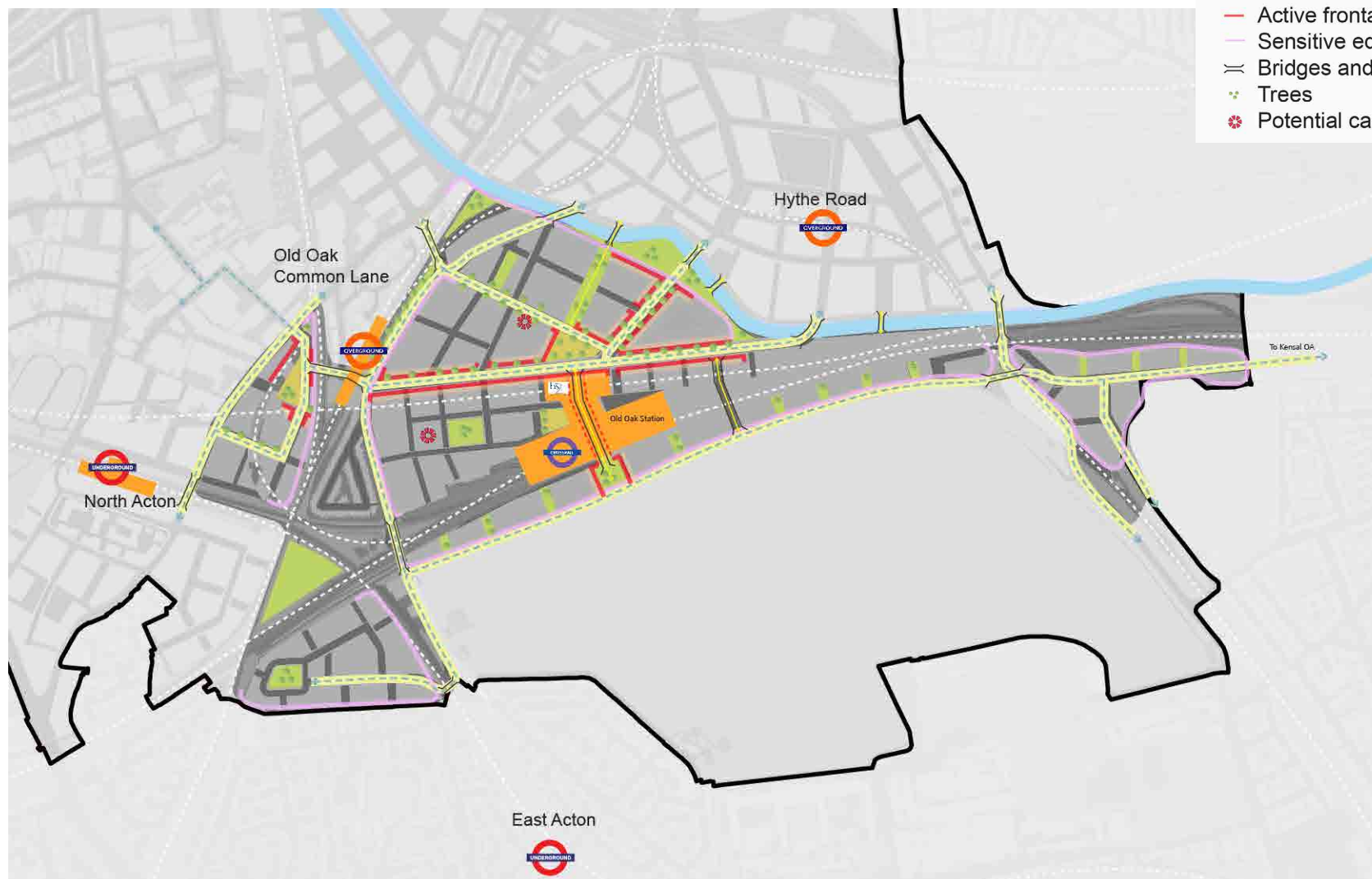
density housing all supported by a mix of open spaces and community infrastructure.

4.11 A complete new network of streets and bridges will integrate Old Oak South with its surroundings. The primary streets of Old Oak High Street and Grand Union Street will be the focus for town centre uses and wider movement, with Oaklands Street also acting as a key connecting street between north and south.

4.12 Wormwood Scrubs, the Grand Union Canal and its associated nature reserve will be celebrated features of Old Oak South and will be integral to the creation a unique sense of place.

Figure 24: Old Oak South

- New and existing amenity space
- Public civic spaces
- New and existing rail stations
- Main streets
- Pedestrian routes
- Active frontage
- Sensitive edges
- ⌋ Bridges and tunnels
- Trees
- ⊗ Potential catalyst for regeneration



PREFERRED POLICY OPTION

New development will be required to:

Land uses

- a) Demonstrate how any small, medium and / or large scale catalyst uses support placemaking and where relevant mitigates impacts on the surrounding area;
- b) Deliver a new commercial hub focused around the Old Oak Common Station;
- c) Deliver a range of flexible workspace typologies for B1(a) uses in and around Old Oak Common Station and B1 uses in other accessible locations;
- d) Provide new retail and other town centres uses, including community space, focused around Old Oak Common Station, along Old Oak High Street and along Grand Union Street;
- e) Deliver residential development across the whole of Old Oak South;
- f) Support the delivery of a network of unique and connected neighbourhoods;

Density

- g) Deliver highest densities around the new Old Oak Common Station;
- h) Deliver high densities around Old Oak Common Lane Station;
- i) Deliver a mix of densities, including high densities, at other key destinations and routes including along Grand Union Street, Old Oak High Street, Oaklands Street and at the Grand Union Canal;
- j) Be mindful of existing residential communities at Wells House Road, Midland Terrace/Shafsbury Gardens, and the

adjacent amenity and ecological open spaces of Wormwood Scrubs and Grand Union Canal;

- k) Provide a sensitive edge onto Wormwood Scrubs and the Grand Union Canal;

Delivery

- l) Support the redevelopment of all existing infrastructure, rail and industrial uses including the Crossrail depot, the Intercity Express Programme (IEP) Depot, where feasible, as well as above and around stations in particular the new Old Oak Common Station;

Transport

- m) Support delivery of a new world class High Speed 2, Crossrail and Great Western Main Line interchange station (Old Oak Common Station), a new London Overground station on the North London Line (Old Oak Common Lane Station) and provision of new bus, taxi and cycle services that are fully integrated into their surroundings;
- n) Support delivery of a new rail link between Crossrail and the West Coast Main Line;

Streets

- o) Contribute to the delivery of a new north-south Old Oak High Street, a new east-west Grand Union Street and associated bridges across the Grand Union Canal;
- p) Deliver seamless connections through Old Oak Common Station, connecting it to its surroundings in all directions and making the station an integral place making feature;
- q) Provide direct 24 hour pedestrian and cycle access to Wormwood Scrubs through Old Oak Common Station and in other locations if feasible;

Figure 25: Old Oak Common Station Square



- r) Provide a new Oaklands Street with a direct vehicle bridge over the Grand Union Canal;
- s) Improve existing streets of Old Oak Common Lane and Victoria Road ensuring existing residential and business areas are integrated with new development;
- t) Support better connections to Kensal Canalside Opportunity Area;

Social infrastructure

- u) Deliver three health centres, a community hub and two primary schools and for these to be located to ensure they become focal points of the community;

Open spaces

- v) Celebrate the unique character of Wormwood Scrubs and the Grand Union Canal and associated nature reserve and support these in becoming accessible focal points for the area;
- w) Provide a network of connected and varied open spaces for residents, workers and visitors including new arrival spaces at the entrances to both Old Oak Common Station and Old Oak Common Lane Station;
- x) Carefully mitigate impacts of existing rail uses and embankments.

Environment

- y) Overcome current surface water flooding issues experienced to the south of the Grand Union Canal and north of Wormwood Scrubs.

Figure 26: Grand Union Street



JUSTIFICATION

4.13 Old Oak South will be home to a new world class Old Oak Common Station that deserves a world class place. Accompanied by a new London Overground station at Old Oak Common Lane, these new stations will make Old Oak South one of the most accessible locations on the London transport network with direct connections to central London, Euston, the West End, Canary Wharf, Heathrow, the south east region, Birmingham and the North.

4.14 A rail connection between the West Coast Main Line and the Great West Coast Main Line would enable improved rail connections between both rail lines. This would also provide opportunities for Crossrail trains to run northbound towards Tring. At the time of writing this draft Local Plan, no feasibility work has been carried out into the benefits, business case or delivery.

4.15 The challenges associated with delivering the new London Overground Stations should not be underestimated. At the time of writing this draft Local plan, the proposed London Overground stations have only undergone initial feasibility work. Funding has now been secured to further progress the design and business case for these; however, currently there is no capital funding secured for delivery of these stations. The final arrangements for these stations will be dependent on the outcome of this work.

4.16 In accordance with London Plan policy, the high degree of transport access supports, in land use terms, a high-density, mixed-use approach to development. At and around the proposed Old Oak Common Lane Station, high densities may be appropriate reflecting the good public transport access. However, there are sensitive areas in the surroundings and

therefore development will need to strike a balance between optimising density and responding to the existing context.

4.17 New development in Old Oak South should include commercial, hotel, retail, leisure and a full mix of town centre uses focused around the new stations, Old Oak High Street and Grand Union Street. There may also be opportunities for anchor or catalyst uses that would contribute to Old Oak's role as a London destination. Policy OSP5 provides information relating to potential catalyst uses. Development on the fringes of Old Oak South, such as the Oakland's House site, the Shield site and the North Pole East depot are most likely to be residential-led, with supporting local retail and social infrastructure to meet the day-to-day needs of residents.

4.18 Providing new connections into Old Oak South will be critical to the successful regeneration of the area. The provision of Grand Union Street - an eastern highway link, bridging the gap between the HS2 interchange and Hythe Road, is the single most important highway link to provide in Old Oak, as it connects the largely residential development to the north, to the transport hub and commercial development to the south, as well as providing east-west through connections for other transport modes. During 2016, further work on the design, location and deliverability of this bridge will be carried out.

4.19 Integrating new development with existing features will be key to creating a unique sense of place. Celebrating the Grand Union Canal, Wormwood Scrubs and existing communities will be very important in achieving this sense of place and new development proposals will need to clearly demonstrate how it best achieves this. OPDC will work with key partners including; landowners, applicants, the local Councils, the Wormwood Scrubs Charitable Trust, the Canal and River

Trust, local residents and interest groups to explore how this can be achieved. The current nature reserve located on the southern edge of the canal is north-east facing; its biodiversity value could be improved and access to nature increased if it were to be reprovided and/or relocated in an alternative manner. Securing the delivery of social infrastructure is fundamental to delivering successful place making. A number of social infrastructure uses are identified to be delivered. In addition to these, Old Oak South may also be suitable for an all-through school.

4.20 The majority of Old Oak South is expected to come forward for development post-2026, when Old Oak Common Station is scheduled to open and the HS2 construction sites are vacated. Securing the comprehensive regeneration of Old Oak South, in a timely manner, will require careful coordination across the public sector. The scale and complexity in relocating and/or reconfiguring all existing infrastructure and depots cannot be underestimated. OPDC will need to work with freeholders, leaseholders and operators to secure a feasible programme that can best achieve both the Mayor's and central Government's requirements and aspirations for this area.

4.21 The indicative housing and jobs capacity for Old Oak South during the plan period is approximately 6,200 homes and 46,000 jobs. These figures include those for Old Oak High Street and Grand Union Canal places (where relevant). The figures are still in development and further work is needed to inform the quantum and phasing including:

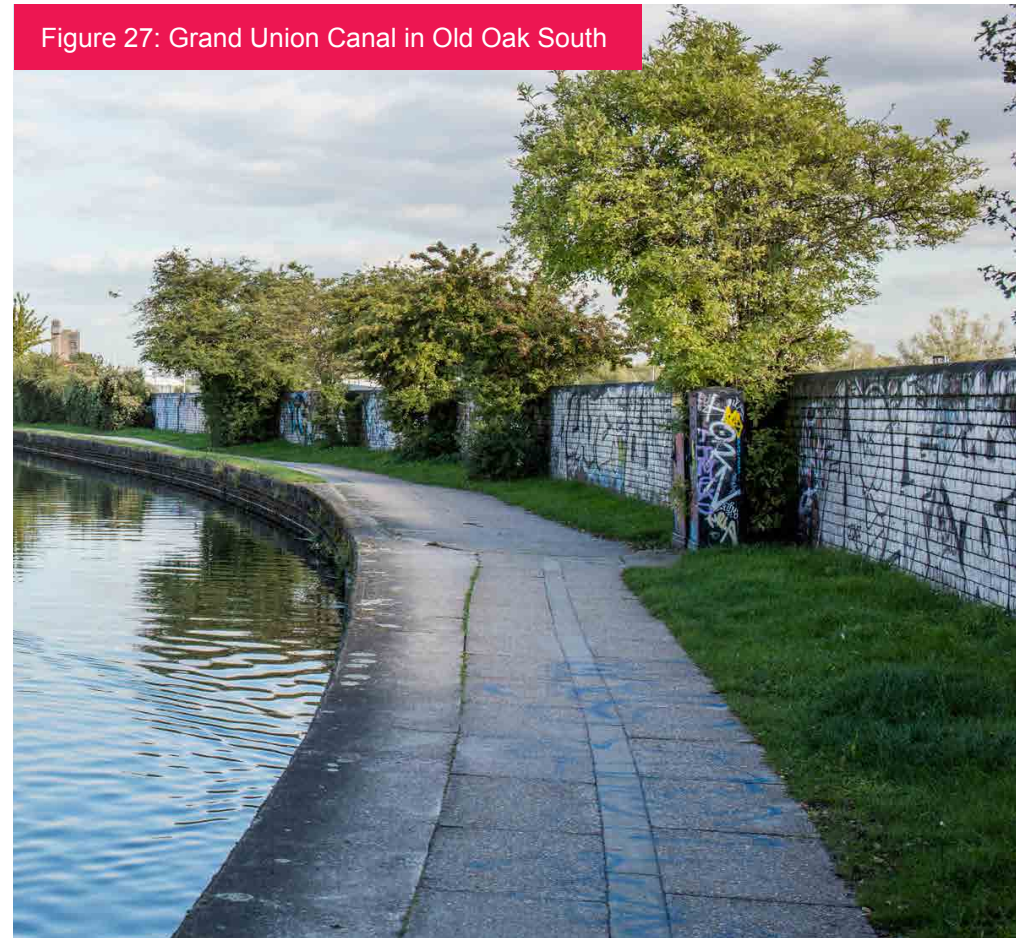
- Consideration of comments received as part of public consultation (Regulation 18 and Regulation 19);
- Transport accessibility and local connectivity analysis;
- Further consideration of environmental impacts of development in relation to amenity, micro-climates, daylight/

sunlight, building heights and scale and the design of the street network, public realm and open spaces;

- Assessing need for the amount and location of amenity and social infrastructure; and
- Development of locally distinctive places and character areas.

4.22 For the next stage of consultation on the draft Local Plan, there may be benefit from having more specific policies in Old Oak South, providing requirements for specific sites. Please see question QP1f.

Figure 27: Grand Union Canal in Old Oak South



Questions:

QP1a: Do you agree with the approach set out for this preferred policy option? If not, what might you change?

QP1b: Within Old Oak South should we identify a series of smaller scale neighbourhoods that could develop their own character?

QP1c: Are there other land uses, including catalyst uses, that could be supported in this place?

QP1d: Could the nature reserve be kept in its current location and improved, or could it be re-provided in another location or as a series of additional new spaces across Old Oak?

QP1e: Do you agree with the early indicative capacity for the net additional homes and jobs? If not, how could these be amended, while still ensuring that London Plan targets are achieved?

QP1f: Are there sites in Old Oak South that would benefit from site specific policies?

Figure 28: Illustrative view from Wormwood Scrubs



You can provide comments directly through:

opdc.commonplace.is

P2: Old Oak North

EXISTING CHARACTER

4.23 Old Oak North is approximately 43 hectares. It is home to Cargiant, the UK's largest second-hand car dealership who occupy approximately 20 hectares. There is a significant amount of rail infrastructure in the area, including the North London Line, West London Line, West Coast Main Line and a number of rail freight spurs that connect these lines together. Old Oak North is also home to Powerday and European Metal Recycling (EMR) who operate waste recycling and processing plants. Within Old Oak North there are also a substantial number of small and medium enterprises (SMEs), many of whom occupy Cargiant land. Freehold land ownership is split between Cargiant and public sector landowners including Network Rail and the London Borough of Hammersmith and Fulham.

4.24 The area is bound by the Grand Union Canal in the south, Old Oak Lane and railway lines to the west, Harlesden and railway lines to the north east and railway lines to the west with Scrubs Lane beyond.

4.25 Willesden Junction Station is situated in the northern part of Old Oak North and provides access to both the Bakerloo Line and London Overground. However, access from this station to the core development area is poor - limited to a lightweight and narrow pedestrian bridge over the West Coast Main

Line. Harlesden Town Centre is immediately to the north. Within the core development area there are no through east-west vehicular links. The pedestrian environment is particularly hostile, with existing routes isolated from surrounding uses and suffering from a lack of natural surveillance.

VISION

4.26 Old Oak North will be redeveloped in the earlier phases of the area's comprehensive regeneration and will set the benchmark for what is to come in Old Oak South. The area will be residential-led along with a mix of town centres and catalyst uses that will support a future residential population.

4.27 New and improved connections into and out of Old Oak North, coupled with an enhanced Willesden Junction Station and new London Overground station at Hythe Road, will dramatically improve accessibility, permeability and legibility allowing Old Oak North to be redeveloped to provide a series of new high quality connected lifetime neighbourhoods.

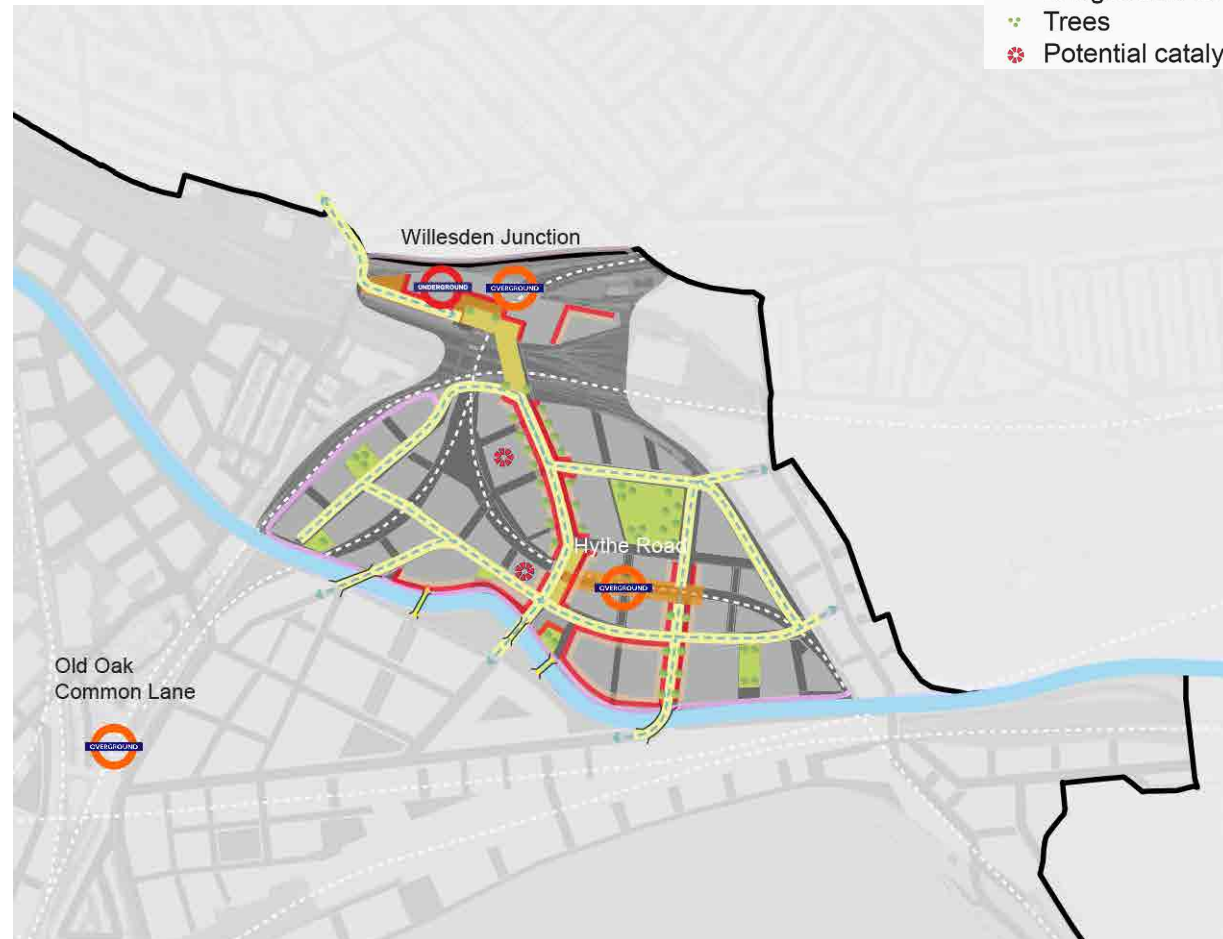
4.28 Old Oak North will make a significant contribution to the area's

housing need. The future population will benefit from a new network of streets, open spaces and associated community infrastructure embedded into new buildings in accessible locations. Town centre uses will be focused primarily along Old Oak High Street, Willesden Junction Station and around Hythe Road Station. New employment space will cater mainly for SME and micro-businesses as part of new mixed-use buildings. Early phases will be supported by a range of uses that activate the area including meanwhile uses and employment space for SMEs that help support placemaking, deliver a mixed use place and act as a catalyst for wider regeneration. This type of workspace will also provide a different offer from the large commercial spaces in Old Oak South.

4.29 Densities in Old Oak North will vary. Sensitive areas such as along the canal will accommodate a range of densities whilst in areas of good public transport access as well as key destinations and focal points, there will be opportunities for higher densities.

Figure 29: Old Oak North

- New and existing amenity space
- Public civic spaces
- New and existing rail stations
- Main streets
- Pedestrian routes
- Active frontage
- Sensitive edges
- Bridges and tunnels
- Trees
- Potential catalyst for regeneration



PREFERRED POLICY OPTION

New development will be required to:

Land uses

- a) Demonstrate how any small, medium and / or large scale catalyst uses support placemaking and where relevant mitigate impacts on the surrounding area;
- b) Deliver high quality, residential-led development;
- c) Provide a range of flexible workspace typologies for B1 uses;
- d) Provide B1(b) and B1(c) uses at locations adjacent to transport and / or utilities infrastructure;
- e) Provide for 'meanwhile' and flexible 'open' workspace that can help with early placemaking;
- f) Deliver town centre uses focused along Old Oak High Street, the Grand Union Canal and around Hythe Road Station and Willesden Junction Station;

Density

- g) Deliver high density development to the south of Willesden Junction Station and around the new Hythe Road Overground station
- h) Deliver a mix of densities, including high density, at other key destinations and routes including along Grand Union Street, Old Oak High Street and the Grand Union Canal;
- i) Be mindful of existing residential communities;
- j) Be mindful of existing heritage and ecological spaces such as the Grand Union Canal, St. Mary's Cemetery and Kensal Cemetery, and residential communities at Old Oak Lane, Scrubs Lane and Tubbs Road;
- k) Support the delivery of a network of unique and connected neighbourhoods;

Delivery

- l) Support the early redevelopment of the area;
- m) Safeguard the Powerday waste site (see policy EU4);

Transport

- n) Facilitate delivery of an enhanced Willesden Junction Station;
- o) Facilitate delivery of a new Overground station on the West London Line;

Streets

- p) Provide continuous access to the northern edge of the Grand Union Canal;
- q) Contribute to the delivery of Old Oak High Street;
- r) Provide better connections into Harlesden Town Centre;
- s) Deliver a new bridge over the West Coast Main Line connecting Willesden Junction to the core development area;
- t) Provide a new connection into Old Oak North from Scrubs Lane and enhance the existing Hythe Road entrance;
- u) Provide new and enhance existing connections over and/or under the North London Line, West London Line and Grand Union Canal;

Social infrastructure

- v) Deliver a health centre, community hub and a primary school and for these to be located to ensure they become focal points of the community;

Figure 30: Old Oak Park



Open spaces

- w) Celebrate the unique ecological and historic character of Grand Union Canal and associated nature reserve, and support it in becoming an accessible focal point for the area with appropriate cultural uses;
- x) Provide a fine grain form of development around the Canal in particular and a network of connected and varied open spaces, including spaces along the northern edge of the canal, arrival spaces outside of Willesden Junction and Hythe Road Stations as well as a good sized new residential park or parks;

Environment

- y) Overcome current surface water flooding issues experienced to the north of the West London Line;
- z) Facilitate the delivery of an energy centre;
 - aa) Carefully mitigate impacts of waste facilities on new and existing residential development; and
 - bb) Carefully mitigate impacts of existing rail uses.

JUSTIFICATION

4.30 Development proposals within Old Oak North will be expected to be residential-led contributing to the area's housing supply. Old Oak North is anticipated to form one of the earlier phases of development and the quality of place created here will play an important role in shaping the wider Old Oak area.

4.31 There is an opportunity to secure a range of catalyst uses including small, medium and large scale catalyst uses that would play a role in creating a vibrant place that attracts people to the area. Policy OSP5 (chapter 3) provides information relating to potential catalyst uses and could include cultural, sports, leisure, health and education uses.

4.32 Town centre uses should be focused along Old Oak High Street, Hythe Road Station, Willesden Junction Station and along the northern edge of the Grand Union Canal (see Old Oak High Street place).

4.33 OPDC will support proposals that deliver early 'meanwhile' uses and low-cost SME open workspaces that help businesses establish in the area quickly and will help to create a buzz. This has been done successfully in other big regeneration projects such as at Elephant and Castle and at the Olympics site.

4.34 Densities should be optimised close to the areas of highest transport access at Willesden Junction and the new London Overground station at Hythe Road. Densities should be lower and more sensitive in terms of their architectural treatment close to heritage assets and existing residential areas. At and around the Willesden Junction Station, high densities may be appropriate reflecting the good public transport access. However, there are sensitive areas in the surroundings and

therefore development will need to strike a balance between both of these contextual elements that achieves the highest standards of design and seeks to enhance relationships with the existing and new built environment.

4.35 The Grand Union Canal is a particularly sensitive location in the Old Oak North area. There may be opportunities for exceptionally designed taller elements at key destinations and focal points on the canal where these create visual interest. Development should be informed by the area's ecological and heritage qualities and special consideration must be given to the scale of new buildings and the use of materials along the canal edge.

4.36 There are not a significant amount of heritage buildings within the Old Oak North area; however, there may be some, such as the old Rolls Royce building, which is currently occupied by Cargiant as their head office. We would welcome stakeholders' input on whether or not any existing buildings should be retained, as part of a heritage led approach to regeneration (see Question QP2h below).

4.37 The challenges associated with delivering the new London Overground Stations should not be underestimated. At the time of writing this draft Local Plan, the proposed London Overground stations have only undergone initial feasibility work. Funding has now been secured to further progress the design and business case for these; however, currently there is no capital funding secured for the delivery of these stations. The final arrangements for these stations will be dependent on the outcome of this work.

4.38 New development provides opportunities to overcome the area's severance and connect Old Oak North into its surroundings. Delivering better connections to Harlesden Town

Centre will be particularly critical, so that this part of London can share in the benefits that the regeneration of the OPDC area will bring. The delivery of a new bridge over the West Coast Mainline, linking Old Oak North to Willesden Junction Station will be necessary, to unlock the full development potential of the area. There is an aspiration for this bridge to be vehicular, so as to improve connectivity and public transport access into the site from the surroundings. Creating a bus link between the heart of Old Oak and Willesden Junction would provide benefits in terms of bus accessibility, journey times and operational efficiency. However, it is recognised that a vehicular bridge could be challenging and further feasibility work should be undertaken to understand this further. At a minimum, this bridge would be a high quality pedestrian and cycle bridge.

4.39 Willesden Junction is a major interchange for north and west London providing Bakerloo line and London Overground services. Significant improvements to the station will be required to cater for development related trips generated by the Old Oak development and to act as a focus for development around Old Oak North. The station will need to offer improved interchange, improved accessibility, better connections with buses and high quality pedestrian and cycle links to the surrounding streets. Any proposed work in and around the station including links over rail lines will require liaison with the Network Rail Delivery and Operations team.

4.40 Development in Old Oak North should be supported by adequate open space. This should include a new park, which could be formed of one larger space or a series of good sized but smaller spaces across the area. With either approach, this space or spaces should provide for a range of leisure and recreation activities to meet the needs of a varied population. There should also be a series of new open spaces provided

along the Grand Union Canal. These could be a mix of hard and soft spaces and should help celebrate the canal as a focal point in Old Oak. New arrival spaces will also be required at both Willesden Junction and Hythe Road within Old Oak North the High Street will also play an upfront role in providing key open space and a focal point of social interaction. Further information is provided in policy P3.

4.41 Securing the delivery of social infrastructure is fundamental to delivering successful place making. A number of social infrastructure uses are identified to be delivered. In addition to these, Old Oak North may also be suitable for an all-through school.

4.42 There are significant surface water flooding issues to the north of the West London Line and development proposals in this area will need to identify ways to address this. Consideration should be given first and foremost to the utilisation of SuDS to minimise pooling.

4.43 OPDC's Decentralised Energy Strategy identifies the need for an energy centre in Old Oak North, to serve the needs of the earlier phases of development. This could be linked to the Powerday waste facility to generate energy from waste. As development phases come forward, this facility could subsequently be expanded to meet wider needs. Further work on energy supply will be carried out during 2016 and they will better inform the approach that should be taken onsite. More information is available on this approach in the Environment and Utilities Chapter.

4.44 Air quality and noise issues are generated by Powerday and from rail uses. New development will need to clearly demonstrate how design has successfully mitigated these issues. This will be critical in ensuring a high quality residential environment.

4.45 The indicative housing and jobs capacity for Old Oak South during the plan period is approximately 7,200 homes and 6,500 jobs. These figures include those for Old Oak High Street and Grand Union Canal places (where relevant). The figures are still in development and further work is needed to inform the quantum and phasing including:

- Consideration of comments received as part of public consultation (Regulation 18 and Regulation 19);
- Transport accessibility and local connectivity analysis;
- Further consideration of environmental impacts of development in relation to amenity, micro-climates, daylight/sunlight, building heights and scale and the design of the street network, public realm and open spaces;
- Assessing need for the amount and location of amenity and social infrastructure; and
- Development of locally distinctive places and character areas.

4.46 For the next stage of consultation on the draft Local Plan, there may be benefit from having more specific policies in Old Oak South, providing requirements for specific sites. Please see question QP2g.

Questions:

QP2a: Do you agree with the approach set out for this preferred policy option? If not, what might you change?

QP2b: Within Old Oak North should we identify a series of smaller scale neighbourhoods that could develop their own character?

QP2c: Are there other land uses, including catalyst uses, that could be supported in this place?

QP2d: Should the new park be provided as one large space or as a series of linked new spaces across Old Oak North?

QP2e: Should development provide a continuous walking and cycling route along the northern edge of the canal?

QP2f: Do you agree with the early indicative capacity for the net additional homes and jobs? If not, how could these be amended, while still ensuring that London Plan targets are achieved?

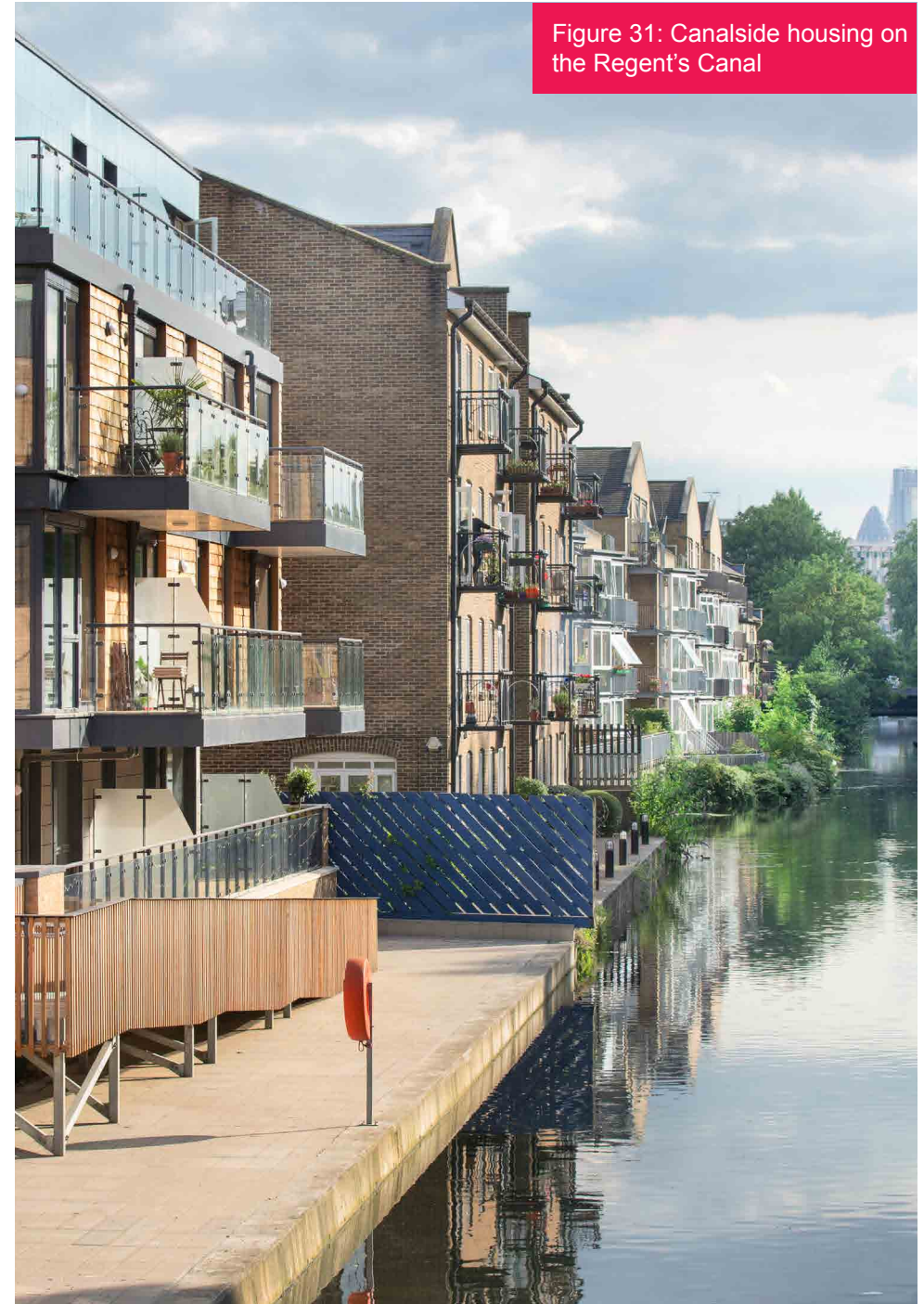
QP2g: Are there sites in Old Oak North that would benefit from site specific policies?

QP2h: Should any buildings in Old Oak North be retained as part of a heritage led approach to regeneration?

You can provide comments directly through:

opdc.commonplace.is

Figure 31: Canalside housing on the Regent's Canal



P3: Old Oak High Street

EXISTING CHARACTER

4.47 The proposed Old Oak High Street is approximately 1 km in length and runs across Old Oak North and Old Oak South. Starting at Old Oak Lane, existing land uses and infrastructure along its length include Willesden Junction Station, the West Coast Main Line, the European Metal Recycling (EMR) plant, light industrial units, railway lines servicing the London Overground, Cargiant, the Grand Union Canal, the canalside nature reserve, a Crossrail depot, railway operational land, Great Western Main Line and the Intercity Express Programme (IEP) Depot before meeting Wormwood Scrubs in the south.

4.48 The route of the High Street covers private sector and public sector land ownership and varies significantly in terms of its topography, starting at approximately 40 metres above ordnance datum (AOD) at Willesden Junction and falling to 20 metres AOD at Wormwood Scrubs.

VISION

4.49 The new high street will be a destination for residents, workers and visitors; a focal point for both existing and future communities and a place where Londoners will want to visit and spend time. The high street will provide a new artery through the heart of Old Oak, linking Harlesden in the north to Old Oak Common Station, Wormwood Scrubs and beyond to the south.

4.50 The high street and Old Oak Common Station will be designated as a new major town centre, providing a wide variety of town centre uses and supporting services. The High Street and around the station will host a wide variety of attractions and town centre uses that will draw people to the OPDC area from afar and will make the high street a key destination within this new part of London.

4.51 The character of the high street will change along its length. It will be commercially focused in Old Oak South, providing services for

the large number of employees, and will provide a mix of uses, including catalyst uses, and spaces in Old Oak North to support the area's future residential population.

4.52 The high street will be designed to the highest quality, with an exceptional public realm, incorporating the highest quality materials and green infrastructure. Whilst the character of the High Street may change along its length, but buildings fronting the High Street will be of an exemplary architectural quality and will celebrate key features and destinations along its length. The variation 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.

Figure 32: Old Oak High Street

- New and existing open green space
- Public civic spaces
- New and existing rail stations
- Existing residential area
- Main streets
- Pedestrian routes
- Active frontage
- Sensitive edges
- ⌘ Bridges and tunnels
- Trees
- ✿ Potential catalyst for regeneration



PREFERRED POLICY OPTION

New development will be required to:

Land uses

- a) Provide a significant quantum of A-class uses as well as a range of catalyst uses including culture, sports, leisure, health and education uses, visitor accommodation and social infrastructure;
- b) Focus primary frontages along the High Street and around public transport hubs;
- c) Focus secondary frontages along Grand Union Street and the northern edge of the Grand Union Canal;
- d) Demonstrate how any small, medium and / or large scale catalyst uses support placemaking and where relevant mitigates impacts on surrounding area;
- e) Deliver uses that support three distinct character areas:
 - i. Old Oak Common Station and surroundings – where the focus should be on providing a mix of catalyst uses, comparison retail, larger format retail and uses to support those working in Old Oak South and interchanging in the station;
 - ii. The Grand Union Canal – where the focus should be on providing sports, culture and leisure uses and eating and drinking establishments; and
 - iii. North of the canal – where the focus should be on providing a mix of catalyst uses and typical high street uses such as convenience retail and social and community facilities.
- f) Provide residential uses on upper floors;

Density

- g) Recognise the High Street as a key destination with opportunities for high densities along its route, responding

to sensitive locations;

Delivery

- h) Support early delivery of the High Street;

Streets

- i) Provide legible connections to and from transport interchanges;
- j) Incorporate generous street widths that provides a high quality public realm, that is attractive for pedestrians and cyclists along its entire length;
- k) Create interest from the change in levels;
- l) Provide exemplary architecture that marks key destinations;

Open spaces

- m) Support the delivery of green infrastructure along its entire length;
- n) Support delivery of public open spaces at public transport hubs, by the canal, at Wormwood Scrubs, at other key destination points and integrated along its full length.

Figure 33: Old Oak High Street



JUSTIFICATION

4.53 Old Oak High Street will be a key artery within Old Oak, providing direct and legible connections between key transport and other destinations. It will join north to south. It will be a community focal point. As a consequence, the high street is anticipated to have a high footfall and is considered to be the most appropriate location to focus town centre uses. In recognition this, the draft Local Plan proposes that the High Street is designated as a potential new 'major' town centre (see policy TC2). At over 1km, the high street is long and in recognition of this and the changing character along its length, there will be opportunities for the predominant land use to change in response to this.

4.54 New development should achieve the highest quality design that will contribute to delivering an excellent and accessible public realm. The High Street should be, at a minimum, a through connection for pedestrians and cyclists with exemplar public realm to promote its use by these two modes. It may also be necessary for all, or parts, of the street to be vehicular, including public transport, servicing and private vehicle use. However, further transport and design work is needed to assess this in more detail. This would be encouraged where it would add to the street's sense of activity and does not detract from the environment for pedestrians and cyclists.

4.55 The High Street forms part of the 'green grid'. It is therefore expected that street widths are generous and incorporate the highest standards of design for the public realm. Along its length, open spaces and public squares should be provided to contribute to the open space network. It may also be feasible for open and civic spaces to be provided contiguously or continuously along its entire length to support the incorporation of green infrastructure including Sustainable

Drainage Systems (SuDS).

4.56 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.

4.57 The indicative housing and jobs capacity for Old Oak High Street is included within figures for Old Oak South and Old Oak North given the place's linear nature.

Questions:

QP3a: Do you agree with the approach set out for this preferred policy option? If not, what might you change?

QP3b: Are the three distinct characters we have identified for Old Oak High Street appropriate?

QP3c: Are there any other land uses we should be identifying as appropriate for Old Oak High Street?

You can provide comments directly through:

opdc.commonplace.is

Figure 34: Old Oak High Street from Willesden Junction Station



P4: Grand Union Canal

EXISTING CHARACTER

4.58 The Grand Union Canal within Old Oak and Park Royal is approximately 4.3 km long with a continuous tow path along its southern edge. It currently provides the only consistent east - west walking and cycling route through the area and provides a direct connection to central London. It is designated as a cycle Quietway, a site of Metropolitan Importance for Nature Conservation and a Conservation Area within Hammersmith and Fulham.

4.59 Today, the uses fronting onto the canal are industrial in nature providing limited passive surveillance on to the canal and limited access points. These elements have a negative impact on its use for walking, cycling and recreation.

4.60 The canal itself is home to a community of residential moorings and is currently not extensively used for transport or freight movement. Landownership falls within the public and private sectors with the Canal and River Trust owning a substantial portion of the existing tow path.

VISION

4.61 The Grand Union Canal will be one of the defining features of both Old Oak and Park Royal and will be a key place where people will visit, play and spend time.

4.62 The Grand Union Canal will be central to creating a new part of London in Old Oak and enhancing Park Royal as a thriving industrial area. Within Old Oak, new development along the canal will transform the character of the area. New development will reflect the area's heritage and help to create a fine grain built environment. High densities will be provided in certain locations such as key destinations and focal points, specifically at the junction with Old Oak High Street.

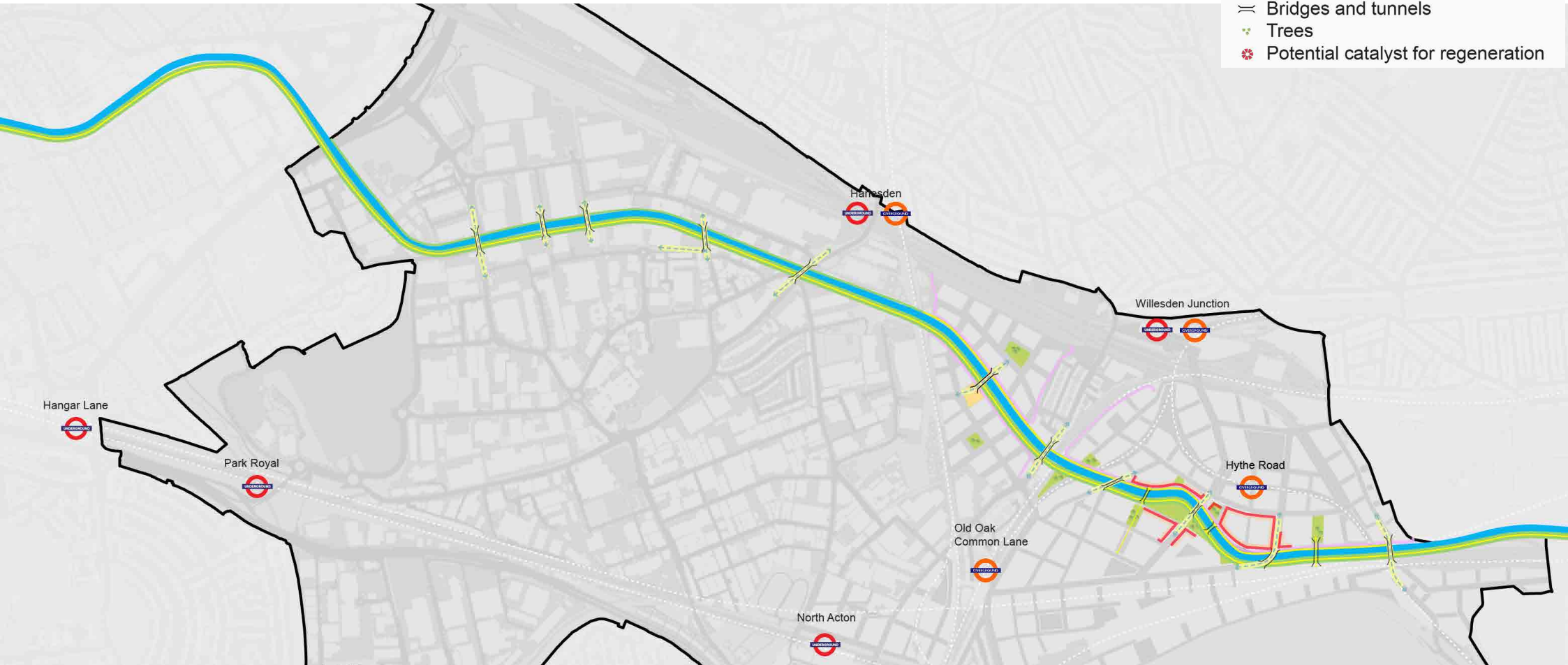
4.63 There will be a continuous walking and cycling routes on both sides in Old Oak and on the southern side in Park Royal. It will provide a safe and convenient walking and cycling route enabling people to access the length of Old Oak, Park Royal and beyond.

4.64 Development adjacent to the canal will provide high quality active frontages alongside providing level changes to deliver views and access points to the canal along both the north and south edges. 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.

4.65 Sitting beside the Grand Union Canal, a string of waterside spaces will complement the canal's historic character providing a mix of spaces for events, relaxation, socialising and the night time economy along busier stretches. Its ecological role will be enhanced and used to support the delivery of the green infrastructure network.

Figure 35: Grand Union Canal

- New and existing amenity space
- Public civic spaces
- New and existing rail stations
- Main streets
- Pedestrian routes
- Active frontage
- Sensitive edges
- ⌘ Bridges and tunnels
- 🌳 Trees
- 🌸 Potential catalyst for regeneration



PREFERRED POLICY OPTION

New development will be required to:

Land uses

- a) deliver a mix of town centre uses with active frontages and activities at ground floor level within the Old Oak town centre. This should include a mix of cultural, sports, leisure, creative, eating and drinking uses;
- b) deliver commercial uses, and where possible residential with front doors on to the canal, providing good overlooking and passive surveillance at other locations;
- c) deliver housing, and employment uses in accessible locations, at ground floor level elsewhere along its length in Old Oak;
- d) deliver industrial uses and ancillary uses with good overlooking and passive surveillance at ground floor level in Park Royal;
- e) support the delivery of residential and visitor moorings in appropriate locations that do not adversely impact on the regeneration of the wider area or the navigational function of the canal;

Density

- f) recognise the Grand Union Canal's designation as a Conservation Area and an important ecological asset, and as such as a sensitive location. A mix of densities will be appropriate along the canal including lower and medium densities but with opportunities for some taller elements at key destinations where they generate a moment of interest;
- g) deliver a fine grain development along the canal edge,
- h) explore the potential to create a variety of character along the canal edge;

Heritage

- i) conserve and / or enhance the Grand Union Canal and its setting as a Conservation Area;

Transport

- j) support the delivery of new passenger and freight transport facilities in appropriate locations;
- k) utilise the Grand Union Canal for passenger and freight transport and leisure uses, taking into account any impact on biodiversity and drainage functions;

Streets

- l) contribute to the retention and improvement of the towpath on the southern side of the canal as a walking route and cycling QuietWay;
- m) contribute to and / or deliver a continuous new walking and cycling route along the northern canal edge within Old Oak;
- n) support the delivery of towpath lighting which doesn't negatively impact on local biodiversity;
- o) support the delivery of new bridges over the canal;
- p) ensure that existing communities within Park Royal can access and use the canal to connect into Old Oak;

Open spaces

- q) deliver and / or contribute to the delivery of new and improved canalside public open spaces including Grand Union Square;
- r) support the use of canal side spaces for events and activities;
- s) explore the opportunity to deliver new waterspaces including basins within Old Oak;

Figure 36: Grand Union Square



t) improve the design, treatment and access to the nature reserve within Old Oak;

Environment

u) deliver new and enhanced existing green and civic spaces that help to improve this important green infrastructure corridor;

v) overcome current surface water flooding issues experienced along the canal's length.

Figure 37: Granary Square, Kings Cross



JUSTIFICATION

4.66 The Grand Union Canal is one of the defining features of Old Oak and Park Royal and provides significant opportunities to shape the regeneration of Old Oak and the enhancement of Park Royal. Its role and function will change along its length, reflecting the diverse range of uses and activities from the mixed use character of Old Oak to the industrial character of Park Royal. Drawing from examples at Battlebridge Basin (LB Islington), Brindleyplace (Birmingham), Kings Cross (LB Camden) and Hackney Wick (LB Hackney) these functions will help inform the development and improvement of character areas along its length. Moorings can also provide a role in activating the area and providing elements of low cost housing.

4.67 The Grand Union Canal is recognised as a sensitive location reflecting its designation as a Conservation Area within Old Oak. In light of this, the scale and density of development will be expected to more restrained than elsewhere, although there will be opportunities for taller elements at key destinations such as Grand Union Square where they help to create moments of interest.

4.68 To support greater use of the canal, active frontages should be focused around key destinations on the canal edge, particularly along its northern edge, with town centre uses at key destinations to provide passive surveillance. Improved walking and cycling infrastructure along both sides of the canal will create a more inviting linear route linking new public open spaces and water based activities. To support access to the canal and north and south movement, development will need to coordinate the delivery of new routes and support the delivery of new bridge crossings. In delivering these elements engagement with stakeholders including the Canal and River Trust should be undertaken.

4.69 The canal is also a vital asset in securing sustainable transport patterns for construction, waste and passenger transport. The expansion and intensification of Park Royal will contribute to increasing the potential for water transport that will require new and improved wharf facilities and therefore working with Transport for London and water freight companies to maximise these potential opportunities will be important.

4.70 Development sites close to the canalside provide excellent opportunities for a range of canalside public open spaces. These spaces provide opportunities for social interaction, relaxation, event space and informal sports. These spaces provide a key element in the green grid. If deliverable, new waterspaces could also be incorporated within new development to strengthen the character of the canal and further bring elements of water into the regeneration area.

4.71 The designation of the canal as a Nature Conservation Area will also require development to deliver new green infrastructure to this important green corridor that forms an integral part of OPDC's green infrastructure network.

4.72 The indicative housing and jobs capacity for the Grand Union Canal is included within figures for Old Oak South and Old Oak North given the place's linear nature.

Questions:

QP4a: Do you agree with the approach set out for this preferred policy option? If not, what might you change?

QP4b: Along the Grand Union Canal should the Local Plan identify a series of smaller scale neighbourhoods that could develop their own character?

QP4c: Are there other land uses that should be supported in this place?

QP4d: Could development along the canal edge achieve higher densities than suggested in the policy whilst still being designed to protect and / or enhance the area's conservation area designation?

You can provide comments directly through:

opdc.commonplace.is

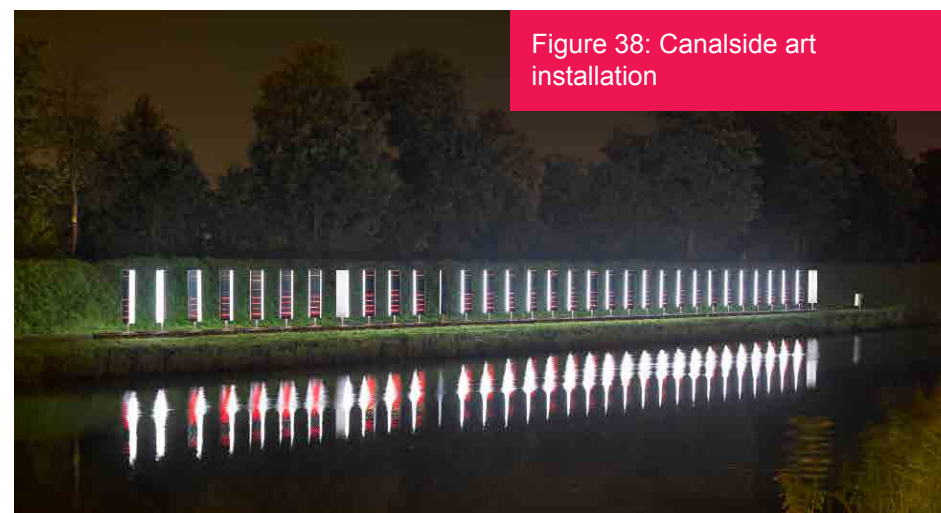


Figure 38: Canalside art installation

P5: Park Royal

EXISTING CHARACTER

4.73 Park Royal is one of Europe's largest and most successful industrial estates providing vital services for the capital and further afield. The industrial estate is comprised of a variety of industrial and warehousing typologies and is protected by the London Plan Strategic Industrial Location (SIL) designation. There are approximately 1,500 business units employing an estimated 36,000 people.

4.74 A Gypsies and Travellers site is located in the east of the area. At the western edge, the former Twyford Tip site benefits from an implemented planning permission. Park Royal also includes the following locations outside of the SIL designation:

- First Central – office, housing and public open space located in the north west of Park Royal;
- Wesley Estate and playing fields – existing housing and public open space located in the east of Park Royal;
- Acton cemetery – public open space; and
- Park Royal neighbourhood centre – Central Middlesex Hospital, specialist housing, town centre uses and non-industrial employment uses located in the centre of Park Royal.

4.75 The area is structured on a street network that reflects its varied and continually evolving pattern of growth and redevelopment. It suffers from high levels of road congestion generated by the area's industrial functions, movement network and reliance on private vehicular transport to get to work. The public realm is dominated in many places by parking and poor quality public realm with limited active frontages.

4.76 There are existing issues relating to utilities infrastructure that will continue to impact on the functioning of the area if not addressed in the short-term.

4.77 Land ownership is complex and largely in private ownership with the exception of Central Middlesex Hospital which is owned by the London North West Healthcare NHS Trust.

VISION

4.78 Park Royal will continue to grow, evolve and intensify to accommodate 10,000 additional jobs and to strengthen its position as a global leading location for industrial and economic innovation that actively supports London's economy.

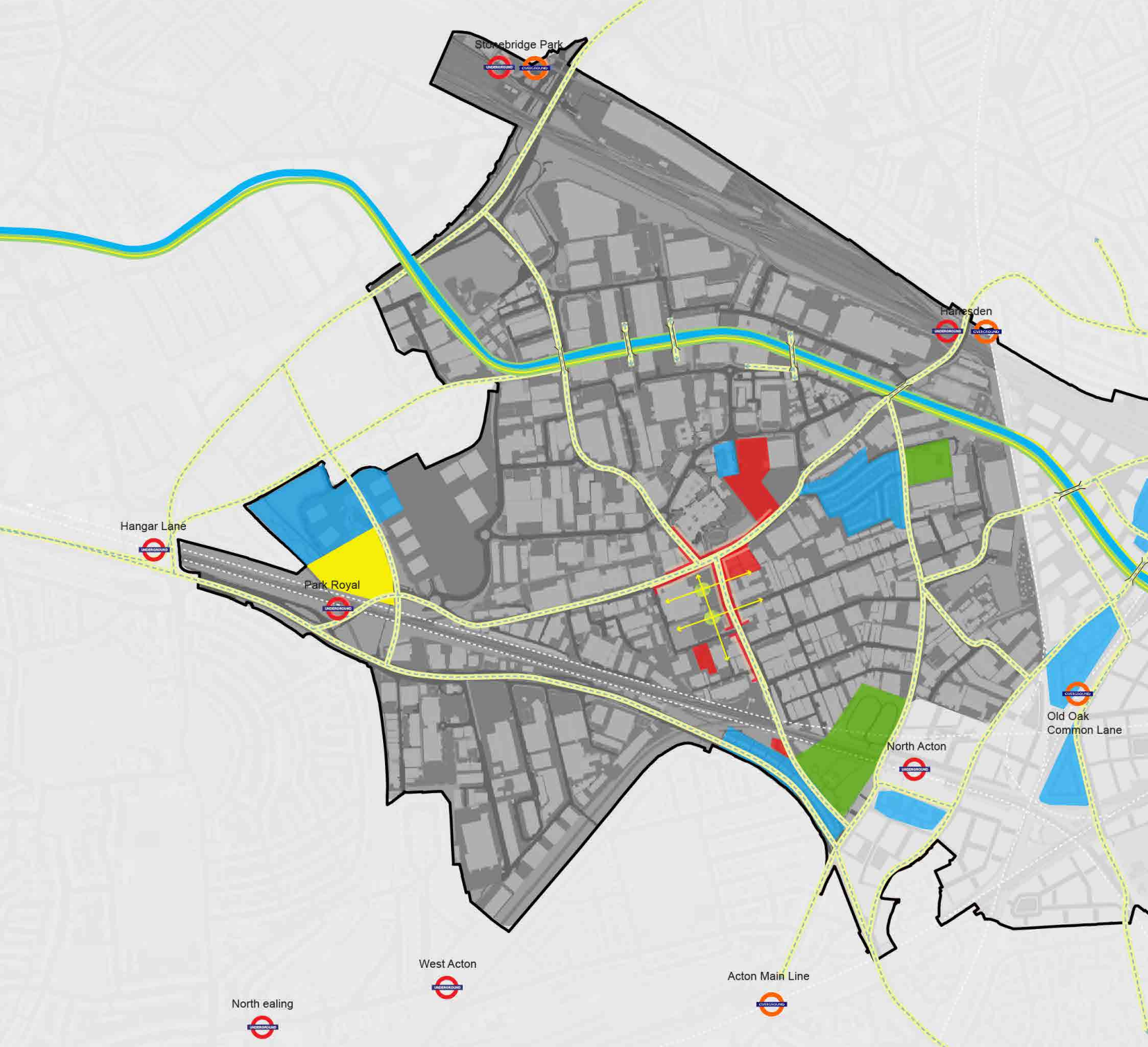
4.79 Supported by resilient and innovative physical and green infrastructure, the area will continue to be home to an array of diverse industries and a strong business community, where innovation and start-up businesses can develop and thrive.

4.80 Transport improvements and the use of emerging transport modes, will support businesses in efficiently delivering services and goods while new and improved business services will support the functioning of the area.

4.81 The design of industrial buildings will likely have changed, responding to the need for making optimum use of existing land, as values rise and new technologies support structural change.

4.82 The 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 range of new services available in Old Oak.

Figure 39: Park Royal



- New and existing open green space
- Public civic spaces
- Existing residential area
- Possible SIL extension
- Mixed use site
- Main streets
- Pedestrian routes
- Active frontage
- Sensitive edges

PREFERRED POLICY OPTION

New development will be required to:

Land uses

- a) deliver broad industrial type uses and within SIL;
- b) support shared business facilities and services;
- c) support the relocation of existing businesses from Old Oak;
- d) deliver workspace for small and micro businesses that require relatively lower amounts of floorspace near to stations;
- e) deliver mixed use development on the First Central site including non-industrial employment and housing that provides walking, cycling and public transport access to Park Royal London Underground Station;

Density

- f) intensify the use of sites within 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;
- g) deliver housing densities on the First Central site that are mindful of the surrounding context;

Heritage

- h) conserve and / or enhance the Brent Viaduct and any proposed designated heritage assets and their settings;

Delivery

- i) safeguard the Twyford Waste Transfer Station site (see policy EU4);

- j) contribute to addressing utilities infrastructure issues;

Transport

- k) support improved frequency, capacity and connectivity in the local bus network to stations, Old Oak, the Park Royal Centre and across the area to reduce the reliance on commuting by private vehicles;
- l) Support improvements to the highway network to address congestion on local and strategic roads;
- m) Encourage the use of the canal for transport and freight movement;
- n) Support the important role that servicing, freight and delivery vehicles play for local businesses;

Streets

- o) support the delivery of cycling and walking infrastructure, including parking and improved routes to Old Oak, the Grand Union Canal, stations and other key destinations outside of Park Royal;
- p) deliver improved walking and cycling routes from the Wesley Estate to the Grand Union Canal and beyond to Old Oak;
- q) contribute to addressing traffic congestion generated by on-street parking and freight movement;
- r) contribute to addressing severance caused by the A40 and A406;
- s) contribute to improving the public realm and street greening to support industrial functions and the character of the Wesley Estate;
- t) utilise a coordinated palette of high quality durable materials and street furniture within the public realm;

Figure 40: An enhanced Park Royal



Open spaces

- u) celebrate the unique character of the Grand Union Canal and the towpath to support it in becoming an accessible focal point for the area;
- v) Provide a network of new and improved connected and varied public open spaces, including spaces along the canal, Wesley Play Fields, First Central and across the industrial area;

Environment

- w) 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;
- x) Overcome current surface water flooding issues experienced across Park Royal and specifically within areas adjacent to the A406.



Figure 41: Local business in Park Royal



Figure 42: Employees in Park Royal

JUSTIFICATION

4.83 To support the functioning of the industrial areas of Park Royal, only uses defined as broad industrial type uses will be supported within SIL. These are defined in the London Plan.

4.84 Policies for employment uses for both Park Royal and the Park Royal Centre are provided in the Employment Chapter. These provides guidance for:

- supporting the delivery of affordable, temporary and open workspaces;
- protecting and expanding the Park Royal Strategic Industrial Location designation; and
- intensifying the use of land to deliver more workspace.

4.85 Proposed new sites to be included in SIL are shown in figure 88.

4.86 Park Royal has a rich industrial heritage which should also be reflected in the character of development. OPDC is developing a Heritage and Views Study for Old Oak and Park Royal to inform the designation of locally significant heritage assets specifically within Park Royal. OPDC will work with Historic England in implementing the outputs of the Study to inform the next version of the draft Local Plan.

4.87 The West London Waste Plan allocates Twyford Waste Transfer Station as a waste transfer station and having the potential for redevelopment. Policy EU4 continues to safeguard the site in accordance with the West London Waste Plan.

4.88 Park Royal currently experiences capacity and delivery issues in relation to utilities and digital communications infrastructure. To support OPDC's aspirations to address these issues, proposals will be supported where they seek to

address existing and future capacity issues and where they demonstrate positive engagement with utilities providers and stakeholders.

4.89 First Central's location near to Park Royal London Underground Station and outside of the SIL designation enables it to include housing subject to the mitigation of any impact on the functioning of the SIL. Housing will be supported where it enables the delivery of significant access to public transport, provides spaces for small and micro businesses and supports improved connections to Park Royal Centre. As part of this draft Local Plan, OPDC are also seeking the views on whether there are other sites that could also be identified for housing and contribute to OPDC's homes targets (please see Question QH2d).

4.90 The public realm of industrial areas should support its functioning through the use of durable and robust materials while reflecting the character to support the creation of a sense of place. Improvements to the public realm should seek to improve safety and the perception of safety alongside well-being, cycling and public transport with the aim of reducing the over reliance on private vehicles for commuting. This will help to release space across the area to accommodate the growing servicing needs of businesses in the area The Wesley Playing Fields offer a valuable green space within the north of Park Royal and should be improved where appropriate. Specifically, the creation of an improved walking and cycling route to the Grand Union Canal should be explored to improve local accessibility. Development should also contribute to the delivery of smaller public open spaces across the industrial area to provide locations for residents and employees to deliver a high quality environment.

4.91 Park Royal currently suffers from traffic congestion

caused by a range of factors including use of private vehicles for personal transport, on-street parking and highways design. The A40 and A406 strategic roads also create barriers that prevent easy north and south movement for walking and cycling which need to be addressed to help connect adjacent communities and enable access to services and employment.

4.92 It is envisaged that further detailed guidance for Park Royal will be provided within a Park Royal Supplementary Planning Document.

4.93 The combined indicative housing and jobs capacity for Park Royal and Park Royal Centre during the plan period is approximately 1,500 homes and 4,500 jobs. These figures do not include those for High Speed 2 construction sites in Old Oak West when considered in relation to the London Plan indicative 10,000 jobs employment capacity figure for Park Royal. The figures are still in development and further work is needed to inform the quantum and phasing including:

- Consideration of comments received as part of public consultation (Regulation 18 and Regulation 19);
- Transport accessibility and local connectivity analysis;
- Further consideration of environmental impacts of development in relation to amenity, micro-climates, daylight/sunlight, building heights and scale and the design of the street network, public realm and open spaces;
- Assessing need for the amount and location of amenity and social infrastructure; and
- Development of locally distinctive places and character areas.

Questions:

QP5a: Do you agree with the approach set out for this preferred policy option? If not, what might you change?

QP5b: Within Park Royal should the Local Plan identify a series of smaller scale places that could develop their own character? If so, where might there be areas within Park Royal that have their own character?

QP5c: Are there particular SIL compliant land uses that should be promoted in this place?

QP5d: Do you agree with the proposed modifications to the SIL within Park Royal?

QP5e: Do you agree with the early indicative capacity for the net additional homes and jobs? If not, how should these be amended, while still ensuring that London Plan targets are achieved?

You can provide comments directly through:

opdc.commonplace.is

Figure 43: Prop warehousing



P6: Park Royal Centre

EXISTING CHARACTER

4.94 Park Royal Centre sits at the heart of Park Royal and is surrounded by the Strategic Industrial Location (SIL) designation. The southern portion is currently designated as a neighbourhood centre by the London Borough of Ealing. The area currently lacks a defined character and its environment is dominated by the road network focused on the junction, which suffers from traffic congestion.

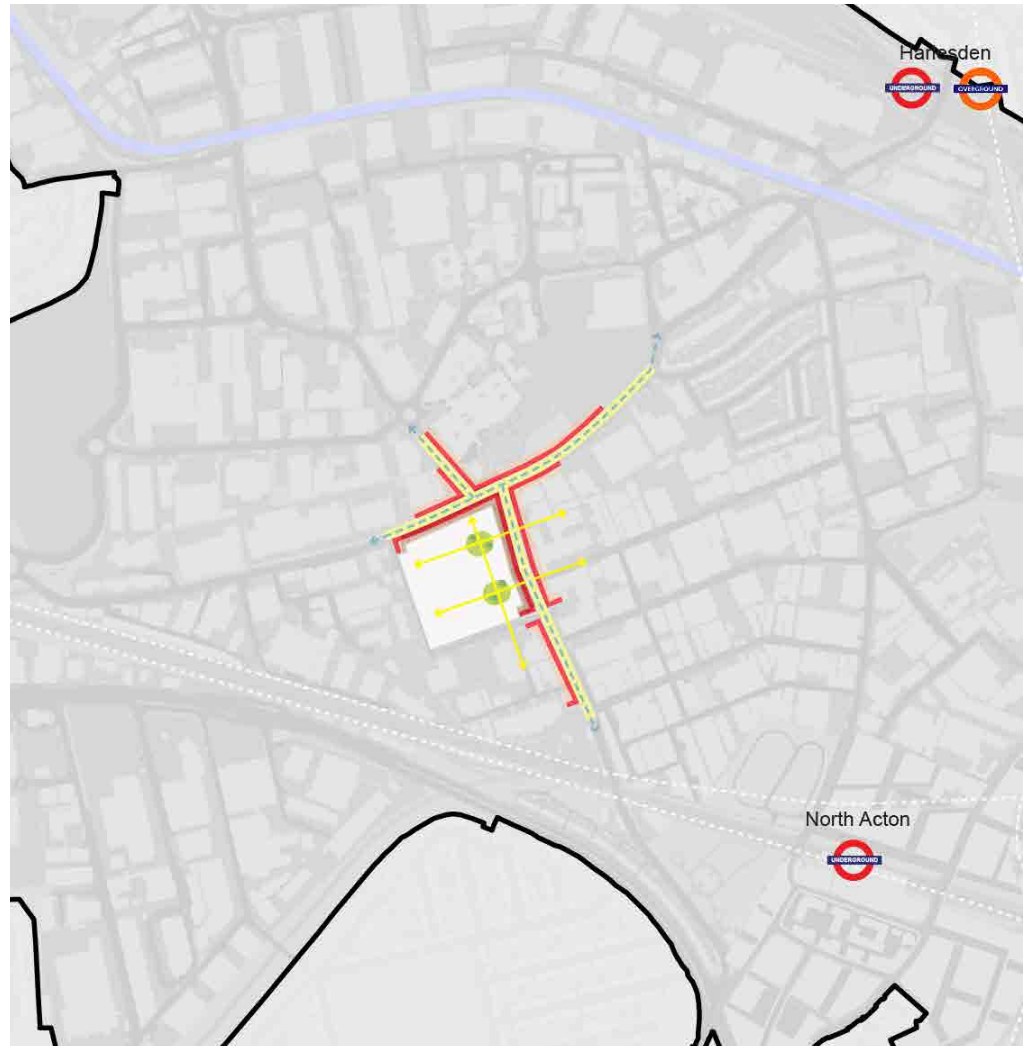
4.95 These streets are framed by a range of inactive building frontages and parking that creates a poor quality public realm. The existing services are dispersed within the area which weakens its role as a centre for business services. The majority of the area comprises the ASDA supermarket and the Central Middlesex Hospital. There are a range of local services that provides a much needed facilities for local residents and businesses.

VISION

4.96 Park Royal Centre will be enhanced to provide a range of local services and amenities to support the Park Royal area, including shops, hotels and other business services. There is an opportunity for it to be an identifiable centre and a focal point for local businesses that offers local services for businesses and employees. The public realm will be improved and benefit from new public open spaces alongside active street frontages.

Figure 44: Park Royal Centre

- New and existing amenity space
- Public civic spaces
- Main streets
- Pedestrian routes
- Active frontage
- Sensitive edges
- ≡ Bridges and tunnels
- Trees



PREFERRED POLICY OPTION

New development will be required to:

Land uses

- a) deliver broad industrial type uses within existing SIL;
- b) deliver affordable 'open workspaces' for micro, small and medium businesses;
- c) deliver shared services that support business functions of wider Park Royal;
- d) contribute to the delivery of approximately 5,000 sqm of A class uses that are focused on convenience retail and services in a range of sizes that support the local business and existing residential and medical communities;
- e) deliver small scale 'walk-to' edge of centre uses along Acton Lane, Park Royal Road, Abbey Road and Coronation Road;
- f) support the functioning of the Central Middlesex Hospital;

Density

- g) intensify the use of sites by requiring proposals to demonstrate how they are optimising the use of sites with appropriate land uses to support greater employment densities and delivery of town centre uses;
- h) improve legibility to the surrounding businesses and destinations including stations, the Grand Union Canal and public open spaces;

Transport

- i) support improved frequency, capacity and connectivity in the local bus network to stations, Old Oak and the wider area;
- j) support improvements to the highway network to address

congestion on Acton Lane, Park Royal Road, Abbey Road and Coronation Road;

Streets

- k) Create a sense of place with improved walking and cycling usage with well-defined streets and spaces;
- l) deliver active frontages;
- m) contribute to and / or deliver high quality durable public realm;

Open spaces

- n) contribute to and / or deliver new public open spaces near to the junction of the four main streets;

Environment

- o) Overcome current surface water flooding issues experienced along Acton Lane, Abbey Road and Coronation Road.

JUSTIFICATION

4.97 Park Royal Centre is surrounded by, and includes portions of, sites designated as Strategic Industrial Location.

4.98 Policies for employment uses for both Park Royal and the Park Royal Centre are provided in the Employment Chapter. These provides guidance for:

- supporting the delivery of affordable, temporary and open workspaces;
- protecting and expanding the Park Royal Strategic Industrial Location designation; and
- intensifying the use of land for delivering more workspace.

4.99 Proposed new sites to be included in SIL are shown in figure 88.

4.100 OPDC is amending the designation of the neighbourhood centre to define the role and function of the centre in light the wider regeneration of Old Oak and Park Royal.

4.101 The Park Royal Centre should provide facilities to support the wider Park Royal. This is likely to result in a quantitative need for an additional gross 5,000sqm of A-class floorspace in Park Royal Centre. Currently, the centre includes a large ASDA superstore and a number of smaller services including banks, sandwich shops and cafes. Within the designated centre, proposals will be supported that further enhance the range of services provided that supports those living and working in Park Royal. Specifically for the business community this may include elements of the evening and night time economy. A range of town centre uses will be supported in the centre, including hotels and business services where a demand is demonstrated. Edge of centre uses will be supported where there is an identified need and should be focused along the

main thoroughfares into the centre - Acton Lane, Park Royal Road and Abbey Road. Proposals that have a negative impact on the functioning of the SIL will be resisted.

4.102 Intensification may include increasing building height and massing that will help to improve legibility within Park Royal.

4.103 There is likely to be a growing demand for flexible, affordable 'open workspaces' designed to support SME and micro businesses which will help to bring more people to the centre and drive the demand for additional business services. Alongside these non-traditional types of workspace, there will be an opportunity for the centre to deliver shared business support facilities such as meeting spaces, conference facilities and business orientated eating and drinking uses.

4.104 Park Royal Centre currently lacks a defined character. Its environment is dominated by the road network and framed by a range of inactive building frontages and parking that creates a poor quality public realm. Proposals that better frame the centre, provide active frontages and enhance the public realm will be supported.

4.105 In seeking to improve and create a sense of place in the centre, there is an opportunity to deliver new public open space that is well integrated within the wider public realm and whose functions responds to the surrounding character.

4.106 The four mains streets that meet in the centre suffer from traffic congestion. As such, uses that do not generate high levels of private vehicle commuting will be supported. To support this, OPDC will work with stakeholders to deliver new bus and emerging transport mode services. Through new development and improvements to the highway network, these

bus network in conjunction with highway improvements across Park Royal.

4.107 The combined indicative housing and jobs capacity for Park Royal and Park Royal Centre during the plan period is approximately 1,500 homes and 4,500 jobs. These figures do not include those for High Speed 2 construction sites in Old Oak West when considered in relation to the London Plan indicative 10,000 jobs employment capacity figure for Park Royal. The figures are still in development and further work is needed to inform the quantum and phasing including:

- Consideration of comments received as part of public consultation (Regulation 18 and Regulation 19);
- Transport accessibility and local connectivity analysis;
- Further consideration of environmental impacts of development in relation to amenity, micro-climates, daylight/sunlight, building heights and scale and the design of the street network, public realm and open spaces;
- Assessing need for the amount and location of amenity and social infrastructure; and
- Development of locally distinctive places and character areas.

Questions:

QP6a: Do you agree with the approach set out for this preferred policy option? If not, what might you change?

QP6b: Park Royal Centre may not be an appropriate location for new housing given the surrounding SIL designation and the potential impact new housing could have on the functioning of the SIL. Should the Local Plan be specific in prohibiting new housing within this area?

QP6c: Are there other land uses that should be supported in this place?

QP6d: Do you agree with the proposed modifications to the SIL within the Park Royal Centre?

QP6e: Do you agree with the early indicative capacity for the net additional homes and jobs? If not, how should these be amended, while still ensuring that London Plan targets are achieved?

You can provide comments directly through:

opdc.commonplace.is

Figure 45: ASDA in Park Royal Centre



P7: North Acton

EXISTING CHARACTER

4.108 The area is approximately 33 hectares in size and includes areas south of North Acton Central Line Station and the site immediately north of the Central Line, the referred to as the 'sword site'. The sword site currently has a mix of industrial and warehousing uses and is due to be cleared as part of High Speed 2 construction works.

4.109 North Acton Cemetery is immediately to the west with access provided from Chase Road and Park Royal Road. The A40 bounds the area to the south with busy road junctions at Savoy Circus and where the A40 meets Victoria Road and Wales Farm Road. Beyond this is West Acton, an established residential area comprised of interwar housing. To the east is a collection of interwar and late twentieth century housing.

4.110 The regeneration of this area is already underway with the London Borough of Ealing having led this regeneration for the past ten years. Existing and planned developments include residential, significant amounts of student housing and retail uses which are expected to be joined by the development of employment uses and hotels either side of Portal Way. A new public square is currently being delivered by the London Borough of

Ealing immediately south of North Acton station.

4.111 The design and layout of the existing road gyratory and public realm are currently uncoordinated and does not support deliver a high quality walking and cycling movement network.

4.112 West of Victoria Road is the Victoria Industrial Estate and Perfume Factory site. The latter is expected to be redeveloped as a residential-led mixed use development in the near future.

VISION

4.113 Future development at North Acton will continue to progress in a comparable manner to the recent regeneration in this area, providing substantial numbers of new homes and jobs and reinforcing North Acton's new designation as a neighbourhood town centre.

4.114 New and improved connections to Old Oak Common Station and the core development area will ensure that North Acton is integrated into the wider regeneration area. New development will deliver a mixture of new public and private open spaces. North Acton station will be upgraded to increase its capacity and access arrangements.

Figure 46: North Acton

- New and existing amenity space
- Public civic spaces
- New and existing rail stations
- Main streets
- Pedestrian routes
- Active frontage
- Sensitive edges
- ≡ Bridges and tunnels
- 🌳 Trees
- 🌸 Potential catalyst for regeneration



PREFERRED POLICY OPTION

New development will be required to:

Land uses

- a) Demonstrate how any small, medium and / or large scale catalyst uses support placemaking and where relevant mitigates impacts on surrounding area;
- b) provide a mix of small-scale retail, leisure, community uses and eating and drinking establishments to serve local needs, focused close to North Acton station;
- c) deliver residential uses;
- d) deliver employment workspace for a range of businesses including flexible and affordable 'open workspaces' for SME and micro businesses;
- e) support the delivery of new education uses and community infrastructure;
- f) provide visitor accommodation close to North Acton station;

Density

- g) be high density in areas of high public transport access; such as close to North Acton station and on the 'sword' site; and
- h) be lower density in more sensitive locations close to existing residential areas and areas of open space;

Delivery

- i) bring forward the early development of the area;

Transport

- j) seek to address issues created by the existing gyratory;

- k) provide significant contributions towards and facilitates the delivery of improvements to North Acton station;
- l) provide improvements to the public realm and walking and cycling network, and in particular on the one-way system along Victoria Road and Wales Farm Road;

Streets

- m) provide active frontages in areas close to North Acton Station and along main streets;
- n) facilitate new and / or improved walking and cycling connections across the A40 to West Acton;
- o) support the delivery of Grand Union Street, connecting North Acton to the Old Oak area;

Social infrastructure

- p) Contribute to the delivery of a health centre;

Open spaces

- q) Contribute to and / or deliver a new public civic square to the north and south of North Acton station;
- r) support the delivery of new high quality public, communal and private open space.

JUSTIFICATION

4.115 North Acton has experienced major redevelopment in recent years and current indications show that this pace of regeneration and renewal is likely to continue with opportunities for growth across the wider area.

4.116 In the last 5 years an additional 2,000 homes and 1,200 student homes have been built in the area and these proposals have been supported by ancillary town centre uses including convenience retail, eating and drinking establishments and leisure facilities. North Acton will see continued growth during the Local Plan period. OPDC is developing evidence base to further explore what the capacity of North Acton to accommodate new homes and jobs might be.

4.117 It is proposed to designate North Acton as a Neighbourhood Centre to provide a range of town centre uses to meet local need. Town centre uses should be focused on serving the local needs of the population in North Acton, providing convenience retail, eating and drinking establishments and catalyst culture, sports and leisure facilities. Further information relating to catalyst uses is found in OSP5 (chapter 3). Views are sought on the proposed boundary for this new centre (see Question



Figure 47: Cycling & walking tunnel in Amsterdam

QP7e below).

4.118 As North Acton's population grows, so will the level of ancillary services and town centre uses it requires. The existing and future population is likely to give rise to a quantitative need for approximately 5,000sqm of gross A-class floorspace. North Acton Neighbourhood Centre will be capable of accommodating some of this growth but it will be necessary for new edge of centre sites to bring forward town centre uses once the capacity of sites in the existing centre have been exhausted. Edge of centre town centre uses should be focused in areas anticipating high levels of footfall, in particular, along routes connecting North Acton to the Old Oak area.

4.119 North Acton has two existing hotels and is a popular location for visitors to stay. Proposals for additional visitor accommodation will be supported in areas of high public transport accessibility and where the proposals do not result in increased pressure on the highway network (see policies TC6 and T6). Residential uses on upper floors will also be supported in the centre to add vibrancy and vitality to the centre.

4.120 North Acton currently suffers from a poor quality public realm. New eating and drinking establishments from recent schemes in North Acton have started to improve the public realm and add more vibrancy and vitality to the area's streets. Proposals for town centre uses should continue to improve this vitality and vibrancy, by providing active uses at ground floor levels and where feasible, providing outdoor activities that activate the public realm. New and improved walking and cycling connections to West Acton are needed to help integrate development with the wider area.

4.121 Proposals should provide a range of flexible workspace typologies in North Acton for B1 uses which do not negatively impact on residential amenity and deliver active frontages. North Acton has the potential to deliver new flexible and affordable workspace for a range of employment uses to support the creation of new jobs and to contribute to the sense of place and activation in the local area.

4.122 North Acton station improvements should include step free access, a new access from the north, improved entrances and ticket hall, a new footbridge, new stairs and lift access to accommodate the predicted increase in passenger numbers. A study is underway looking into potential options for improvement and the potential for over station development. This study can be found as a supporting evidence document to this draft Local Plan.

4.123 North Acton currently lacks public open space. A new civic square is currently being delivered south of North Acton Station and there is an expectation that this may be amended in light of improvements to the station alongside delivering an additional square to the north. New development will need to deliver high quality new public, communal and private open space and will also need to demonstrate how it is contributing to a joined up network of public open spaces.

4.124 Securing the delivery of social infrastructure is fundamental to delivering successful place making. A health centre is identified to be delivered. In addition to this, North Acton may also be suitable for an all-through school.

4.125 In recent years there has been significant amounts of new student accommodation built and/or permitted with additional proposals currently in the process. Within North Acton, it will be important to secure a broader mix of residential types.

Given the amounts of student accommodation delivered, this may represent an over concentration.

4.126 The indicative housing and jobs capacity for North Acton during the plan period is approximately 4,300 homes and 4,000 jobs. These figures are still in development and further work is needed to inform the quantum and phasing including:

- Consideration of comments received as part of public consultation (Regulation 18 and Regulation 19);
- Transport accessibility and local connectivity analysis;
- Further consideration of environmental impacts of development in relation to amenity, micro-climates, daylight/sunlight, building heights and scale and the design of the street network, public realm and open spaces;
- Assessing need for the amount and location of amenity and social infrastructure; and
- Development of locally distinctive places and character areas.

Questions:

QP7a: Do you agree with the approach set out for this preferred policy option? If not, what might you change?

QP7b: Are there other land uses that should be supported in this place?

QP7c: Policy H10a)v in the Housing Chapter states that proposals for student accommodation will not be supported where it would result in an over concentration. Do you consider that North Acton currently has an over concentration of student accommodation? Could there be benefits in restricting additional student accommodation here to deliver a mixed and balanced community?

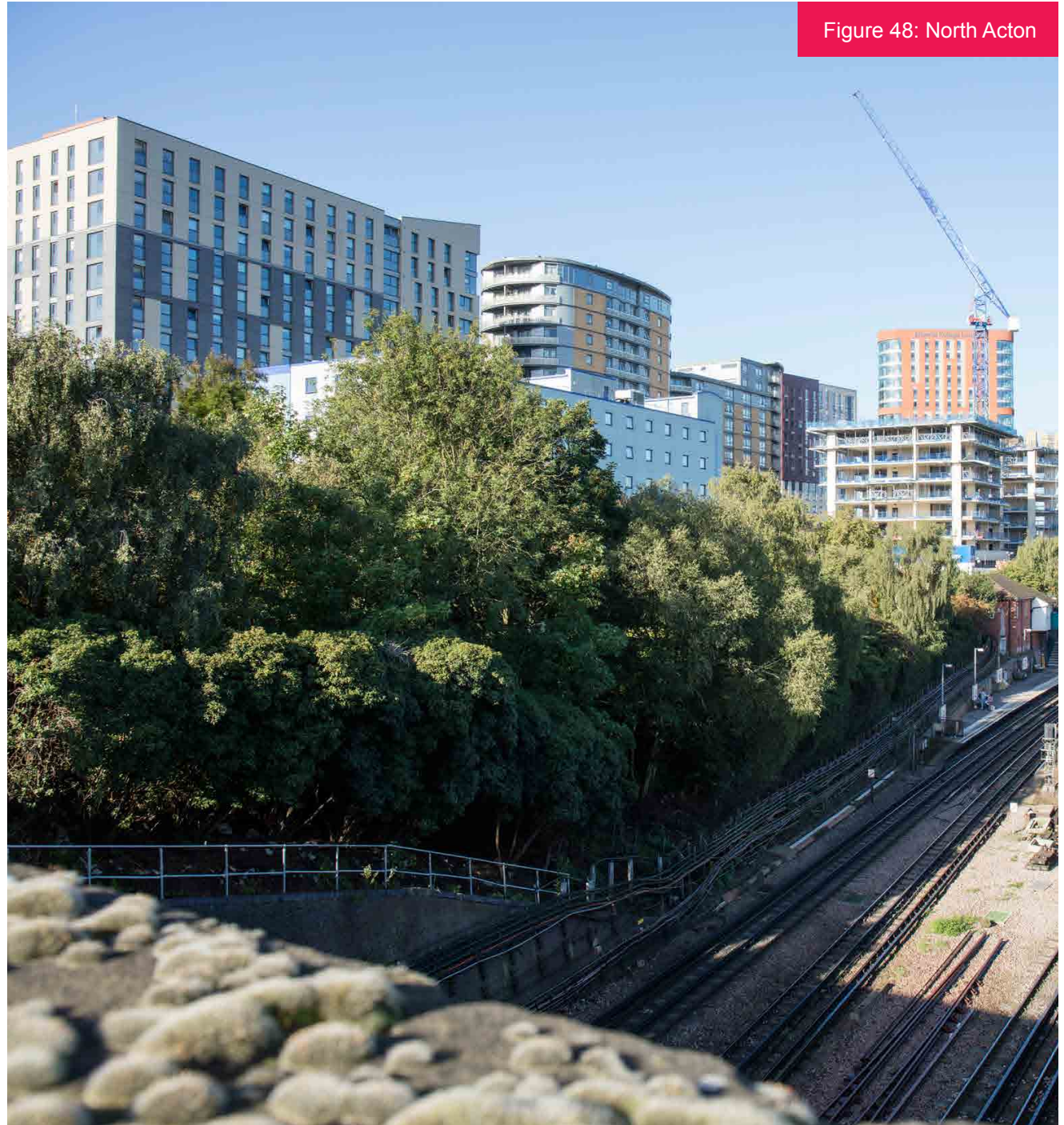
QP7d: Do you agree with the early indicative capacity for the net additional homes and jobs? If not, how should these be amended, while still ensuring that London Plan targets are achieved?

QP7e: What might the boundary be for the newly designated North Acton Neighbourhood Centre?

You can provide comments directly through:

opdc.commonplace.is

Figure 48: North Acton



P8: Scrubs Lane

EXISTING CHARACTER

4.127 Scrubs Lane is approximately 1.6km long. It crosses from north to south the West Coast Main Line, the Grand Union Canal and the Great Western Main Line. It is a key connector road between Harlesden and White City. Heavily used by vehicles, the street provides a poor walking and cycling experience.

4.128 To the north of the canal, Scrubs Lane is fronted by employment uses and car parking with the former Cumberland Park Factory (currently proposed to be a Conservation Area in light of the buildings' special historic interest) leading onto residential Victorian terraces. The former Cumberland Park Factory provides the opportunity to inform new development's character on Scrubs Lane. To the south, there are a mix of heavier industrial uses, including a waste management facility and a tyre factory on the north edge of the Grand Union Canal with industrial and rail sheds immediately to the south.

4.129 The sole eastern access point into Old Oak North is located opposite the former Cumberland Park Factory.

4.130 The area north of the canal is bounded

by St. Mary's Cemetery and Conservation Area to the east, railway lines servicing the London Overground to the west and the Grand Union Canal Conservation Area to the south.

4.131 To the south of the canal, the North Pole Depot, Mitre Bridge Industrial Park and Little Wormwood Scrubs sit to the east of the road with Wormwood Scrubs on the western side for the remainder of the road.

VISION

4.132 Scrubs Lane will be transformed into a pleasant street, respectful of surrounding heritage assets with a high quality public realm. New residential-led development, sitting alongside the retained heritage buildings of the former Cumberland Park Factory will offer a mix of employment and community spaces to provide workspaces for current and future businesses. New development will provide high levels of overlooking onto the street with passive surveillance and active frontages at lower levels. This will include commercial space, access to residential and small amounts of

retail and community use.

4.133 New and improved connections into Old Oak North, Wormwood Scrubs, Little Wormwood Scrubs, St. Mary's Cemetery to Grand Union Canal and Kensal Canalside will improve the area's connectivity and accessibility.

4.134 Development will be designed to respond to heritage assets, their setting and existing residential communities. New buildings on the eastern edge of Scrubs Lane will be mindful for the surrounding heritage context, responding sensitively in their design and management.

Figure 49: Scrubs Lane



- New and existing amenity space
- Main streets
- Pedestrian routes
- Active frontage
- Sensitive edges
- ⌋ Bridges and tunnels
- Trees

PREFERRED POLICY OPTION

New development will be required to:

Land uses

- a) deliver a range of flexible workspace typologies for:
 - i. B1 uses as part of new mixed use developments with housing on upper floors;
 - ii. B1 uses within the Cumberland Park Factory for micro and SMEs; and
 - iii. B1(b) and B1(c) uses with housing on upper floors at locations adjacent to railways servicing the London Overground and the West Coast Main Line.
- b) deliver a mix of housing including well designed access to residential above ground floors;
- c) deliver small amounts of local convenience retail and community uses;

Density

- d) recognise the areas adjacent to St. Mary's Conservation Area, Wormwood Scrubs, Little Wormwood Scrubs and the Grand Union Canal Conservation Area as sensitive locations suitable for lower and medium densities;
- e) recognise the areas north of the canal and on the western side of Scrubs Lane as having opportunities for high and medium densities;
- f) recognise that there will be opportunities for taller elements on Scrubs Lane where they achieve highest standards of design, are mindful of the surrounding context and deliver a coordinated approach to placemaking;

Heritage

- g) conserve and / or enhance the proposed Cumberland Park Factory and existing St. Mary's Cemetery, Kensal Green Cemetery and Grand Union Canal Conservation Areas and their setting;

Streets

- h) contribute to and / or deliver new and improved walking and cycling routes to the Grand Union Canal, St. Mary's Cemetery, Wormwood Scrubs, Little Wormwood Scrubs and the North Pole depot;
- i) contribute to and / or deliver two new vehicular routes into Old Oak North;
- j) contribute to and / or deliver new and improved high quality coordinated public realm and street greening;
- k) support highways improvements,
- l) deliver a continuous cycle route along the length of Scrubs Lane;
- m) support any required improvements to the Mitre Bridge and West London Line Bridge;
- n) improve access to Wormwood Scrubs and Little Wormwood Scrubs from Scrubs Lane;

Environment

- o) Overcome current surface water flooding issues experienced to the north of the Grand Union Canal.

JUSTIFICATION

4.135 Development along Scrubs Lane should contribute to the creation a mixed-used area informed by surrounding heritage assets. The continued use of Cumberland Park Factory for micro, small and medium enterprises (SME) will be supported. Other locations along Scrubs Lane will be suitable for a mix of employment, housing and other uses including small amounts of retail and community uses. For locations adjacent to railway infrastructure, research and development and light industry uses could provide a useful buffer to mitigate impacts on residential amenity. Opportunities for delivering affordable open workspace for innovative SMEs, with stakeholders such as Imperial College, will be supported and will play a role in informing the sense of place. In the early years, lower level units may need to be flexibly designed to mitigate the existing environment.

4.136 Scrubs Lane is within the setting of St. Mary's Conservation Area and other designated heritage assets within Kensal Green Cemetery and includes an element of the Grand Union Canal Conservation Area. Alongside this draft Local Plan, OPDC is consulting on the proposed designation of a Conservation Area for the former Cumberland Park Factory (69 to 91 Scrubs Lane). These properties are currently used for a range of employment uses and have the potential to continue to provide employment floorspace in buildings that positively contribute to local placemaking through their heritage value. In light of these existing and proposed heritage assets and their setting, development should respond sensitively in scale and density while recognising that sites west of Scrubs Lane should also respond to the changing scale and context within Old Oak to the west. Public realm improvements should also reflect the historic character and special interest of these assets.

4.137 Scrubs Lane is currently a harsh environment generated by traffic and a lack of enclosure created by incomplete street frontages. A significant amount of traffic is generated by the waste sites located on Scrubs Lane and in Old Oak North. Following the regeneration of Old Oak, these activities will no longer negatively impact on the area's environment. To support the delivery of active frontages, development should deliver front doors for housing facing onto streets.

4.138 Securing a high quality street that provides legible and well-designed public realm needs to be coordinated with the White City Forum to ensure improvements to Scrubs Lane will link effectively with emerging proposals for Wood Lane to the south of the A40. Securing this as a well-designed connection with additional bus capacity will help to connect both Opportunity Areas.

4.139 To the south of Grand Union Canal, new development should provide a new or improved access to North Pole East that should also enable a connection to Kensal Canalside Opportunity Area alongside improved access for pedestrians and cyclists into both Wormwood Scrubs and Little Wormwood Scrubs.

4.140 The indicative housing and jobs capacity for Scrubs Lane during the plan period is approximately 2,600 net additional homes and 2,000 net additional jobs. These figures are still in development and further work is needed to inform the quantum and phasing including:

- Consideration of comments received as part of public consultation (Regulation 18 and Regulation 19);
- Transport accessibility and local connectivity analysis;
- Further consideration of environmental impacts of development in relation to amenity, micro-climates, daylight/

sunlight, building heights and scale and the design of the street network, public realm and open spaces;

- Assessing need for the amount and location of amenity and social infrastructure; and
- Development of locally distinctive places and character areas.

Questions:

QP8a: Do you agree with the approach set out for this preferred policy option? If not, what might you change?

QP8b: Within Scrubs Lane should the Local Plan identify a series of smaller scale neighbourhoods that could develop their own character?

QP8c: Are there other land uses that should be supported in this place?

QP8d: Do you agree with the early indicative capacity for the net additional homes and jobs? If not, how should these be amended, while still ensuring that London Plan targets are achieved?

You can provide comments directly through:

opdc.commonplace.is



P9: Old Oak West

EXISTING CHARACTER

4.141 Old Oak West comprises areas along Old Oak Lane, Victoria Road and industrial areas to the west, to the north and south of the Grand Union Canal. It is approximately 23 hectares comprised of industrial uses, student housing and established residential areas of the Old Oak Lane Conservation Area, Midland Terrace and Shaftesbury Gardens. The industrial areas north and south of the canal are due to be cleared for High Speed 2 construction works. Access to the canal is restricted, with improvements delivered through the recent student housing development.

4.142 The area is bounded by the West Coast Main Line to the north, with railways serving the London Overground to the east and Park Royal industrial estate to the west.

4.143 The current public realm along Old Oak Lane is dominated by vehicular transport providing a poor walking and cycling experience. High Speed 2 works are likely to result in large numbers of HGV movement that needs to be carefully planned and where possible improved upon. Land is in a mix of private and public ownership.

VISION

4.144 Old Oak West will be a diverse area reflecting its location between Old Oak and Park Royal. This place will be centred on an improved and busy street environment of Old Oak Lane and Victoria Road. A new industrial innovation area located on the HS2 work sites adjacent to the Grand Union Canal could act as a buffer between existing residential areas in the Island Triangle, as well as future mixed use development at Old Oak and with the heavier existing industrial uses within Park Royal.

4.145 Existing residential areas will benefit from improved access to the wider area, public realm improvements and improvements to amenity. The HS2 construction sites will provide a space for industrial innovation that integrates with Old Oak and Harlesden. Other locations will provide opportunities for new housing development. New and improved connections to Old Oak and the Grand Union Canal will be provided.

Figure 51: Old Oak West

- New and existing amenity space
- Public civic spaces
- Main streets
- Pedestrian routes
- Sensitive edges
- ≡ Bridges and tunnels
- Trees



PREFERRED POLICY OPTION

New development would be required to:

Land use

- a) deliver broad industrial type uses on the HS2 construction sites appropriate for SIL, such as an Industrial Business Park, once no longer required for HS2 construction;
- b) deliver employment and commercial uses with active frontages outside of existing residential areas along Victoria Road and Old Oak Lane;
- c) not have adverse negative impacts on the amenity of existing residential communities;
- d) support residential uses in areas outside of the SIL designation where it supports the functioning of industrial uses within the SIL;

Density

- e) intensify the use of sites within 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;
- f) deliver housing densities that are mindful of their surrounding context;

Heritage

- g) conserve and / or enhance Old Oak Lane and the Grand Union Canal Conservation Areas and their settings;

Transport

- h) seek to minimise impacts of construction traffic on the street network for existing residents and businesses;
- i) support the potential to use the High Speed 2 works sites as temporary consolidation centre to support the construction of Old Oak;
- j) explore the potential to deliver a longer term consolidation centre on the HS2 construction sites to assist with the transportation of construction materials and waste for the wider area;

Streets

- k) support Old Oak Lane's function as an important north-south connection connecting Harlesden and North Acton;
- l) contribute to and /or deliver a vehicular bridge over the Grand Union Canal to link the HS2 construction sites;
- m) contribute to and / or deliver public realm and highways improvements, specifically along Old Oak Lane and Victoria Road and to Willesden Junction Station;
- n) support the delivery of new vehicle connections to Old Oak, Park Royal and Harlesden;
- o) support the delivery of new walking and cycling routes to the Grand Union Canal and Old Oak;

Environment

- p) enhance existing biodiversity assets along the Grand Union Canal;
- q) address risk of potential surface water flooding on Old Oak Lane, Goodhall Street, Channel Gate Road and Stephenson Street.

Figure 52: Homes in Old Oak West



JUSTIFICATION

4.146 The location of Old Oak West will enable it to develop a diverse range of complementary uses that help to integrate Old Oak, Park Royal, North Acton and Harlesden.

4.147 The High Speed 2 (HS2) construction sites are designated as a Strategic Industrial Location (SIL) with uses currently considered to accord with the Preferred Industrial Location (PIL) SIL sub-category. The pressing demand today for industrial land in Park Royal suggests that the HS2 construction sites adjacent to the canal should remain as SIL and be designated as Preferred Industrial Land (PIL). However, given the timeframes, a more intensive form of SIL development, in line with Industrial Business Park sub-category (IBP) to support the 'Innovation Economy' could be considered in how these sites become available in the run up to 2026 to reflect the opportunities generated by the development of Old Oak. This would also help create a buffer between mixed use regeneration in Old Oak and the PIL uses in Park Royal. The Innovation Economy refers to the economic sectors associated with entrepreneurship and innovation. This work should take place in future versions of the Local Plan.

4.148 A west London example of IBP SIL is Chiswick Park. IBP uses will help to support the economic growth of both Old Oak and Park Royal while benefiting the amenity of adjacent existing residential areas.

4.149 Any proposals within and adjacent to existing Conservation Areas will need to be sensitive in scale and respond in their character to these heritage assets and their settings.

4.150 In developing the HS2 construction sites as IBP SIL, new north-south routes across the canal should be required

to improve local accessibility and help to manage traffic congestion within the wider area.

4.151 To further help address existing and potential future congestion, the potential for delivering consolidation centres for coordinating transport of construction material and waste will be an important element to minimise impacts on the road network and amenity of existing communities. The location of the north construction site adjacent to the West Coast Main Line provides a key long-term opportunity for sustainable freight and/or waste transport by rail.

4.152 Old Oak Lane and Victoria Road will continue to be a key north-south route for the wider area, connecting Harlesden, Old Oak, Park Royal, North Acton and the A40 in the south. To support improvements to the public realm and built environment along these streets, active frontages alongside street greening will be supported. At Willesden Junction, there will be substantial improvements to connectivity allowing for better access from Old Oak Lane.

4.153 To the south of the West Coast Main Line, development of the Savoir Beds site may provide opportunities to provide pedestrian/cycle and vehicular access into Old Oak through the Powerday site, although there are substantial levels to overcome in order to achieve this.

4.154 OPDC will continue to work with Historic England to identify any additional heritage assets along this route.

4.155 The indicative housing and jobs capacity for Old Oak West during the plan period is approximately 50 net additional homes and 7,500 net additional jobs. This is based on the assumption that employment space is represented as Industrial Business Park (IBP) space, which is a SIL compliant

use. However, if the land is reused as Preferred Industrial Location (PIL) land, the employment densities are likely to be lower. The final arrangement could also be a mix of PIL and IBP. As with the other places figures, these figures are still in development and further work is needed to inform the quantum and phasing including:

- Consideration of comments received as part of public consultation (Regulation 18 and Regulation 19);
- Transport accessibility and local connectivity analysis;
- Further consideration of environmental impacts of development in relation to amenity, micro-climates, daylight/sunlight, building heights and scale and the design of the street network, public realm and open spaces;
- Assessing need for the amount and location of amenity and social infrastructure; and
- Development of locally distinctive places and character areas.

4.156 For the next stage of consultation on the draft Local Plan, there may be benefit from having more specific policies in Old Oak South, providing requirements for specific sites. Please see question QP9g.

Questions:

QP9a: Do you agree with the approach set out for this preferred policy option? If not, what might you change?

QP9b: Within Old Oak West should the Local Plan identify a series of smaller scale neighbourhoods that could develop their own character?

QP9c: Are there other land uses that should be supported in this place?

QP9d: Should the Local Plan promote industrial business park (IBP) uses on the HS2 construction sites?

QP9e: Would the HS2 work sites be a suitable location for a construction and freight consolidation centre?

QP9f: Do you agree with the early indicative capacity for the net additional homes and jobs? If not, how should these be amended, while still ensuring that London Plan targets are achieved?

QP9g: Are there sites in Old Oak West that would benefit from site specific policies?

You can provide comments directly through:

opdc.commonplace.is

P10: Wormwood Scrubs

EXISTING CHARACTER

4.157 Covering almost 68 hectares, Wormwood Scrubs is the largest open space in the London Borough of Hammersmith & Fulham and is a green lung that provides people and wildlife with the opportunity to enjoy green open space. The Wormwood Scrubs open space is managed by the Wormwood Scrubs Charitable Trust. It is protected by the Wormwood Scrubs Act 1879, the Commons Act 2006 and as Metropolitan Open Land in the London Plan, which affords the Scrubs the same level of protection as Metropolitan Green Belt. This protection will continue. The Ministry of Defence also have rights to access and use the Scrubs.

4.158 The area's north boundary is the IEP depot with the Old Oak core development area to the north. The Linford Christie Stadium, HM Prison Wormwood Scrubs and Hammersmith Hospital bound the area to the south with White City and Shepherds Bush both to the south of these.

4.159 Portions of Wormwood Scrubs are designated as Local Nature Reserves and Sites of Borough Importance within the Sites of Importance for Nature Conservation hierarchy. Over half of the Scrubs comprises a mix of young and established woodland,

scrub, grassland and tall herbaceous vegetation, which gives the Scrubs a sense of wildness that is a unique characteristic, in particular given its proximity to central London. There is a combination of diverse habitats across Wormwood Scrubs that support a diverse range of native plants, breeding birds and insects, including species not usually found in more formal parks and open spaces. The site also supports a large population of common lizards and attracts a wide variety of migrant birds in spring and autumn. There are a number of legally protected animals, plants and fungi resident on the Scrubs.

VISION

4.160 Wormwood Scrubs will continue to be a cherished public open space and important ecological asset. New sensitive connections to the north and carefully considered improvements will bring Old Oak and White City together and make the Scrubs more accessible to all Londoners. These would be carried out in agreement with the Wormwood Scrubs Charitable Trust, the London Borough of Hammersmith and Fulham and in discussion with the local community.

Figure 53: Wormwood Scrubs

- New and existing amenity space
- Public civic spaces
- New and existing rail stations
- Main streets
- Pedestrian routes
- Active frontage
- Sensitive edges
- ⌘ Bridges and tunnels
- Trees



PREFERRED POLICY OPTION

OPDC will work with stakeholders and agree any proposals with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham to protect and/or enhance Wormwood Scrubs by:

- a) sustaining the existing Local Nature Reserve and sites of borough importance for nature conservation so that there is no net loss;
- b) supporting Wormwood Scrubs as a public open space for exercise and recreation for all Londoners;
- c) improving access to and from Old Oak, Little Wormwood Scrubs, North Kensington, Old Oak Common Estate and other areas to the south;
- d) securing resources for its long-term management and maintenance;
- e) addressing current surface water flooding issues experienced along its edge and in locations in the eastern and western areas; and
- f) carrying out sensitive enhancements.



Figure 54: Wormwood

JUSTIFICATION

4.161 The existing valuable biodiversity assets within the Local Nature Reserve and Sites of Borough Importance for Nature Conservation will be protected reflecting their relevant levels of importance.

4.162 Walking and cycling access to Wormwood Scrubs is currently restricted from its northern edges. The Wormwood Scrubs Act 1879 identifies that the area should be maintained and where appropriate, enhanced as an area for exercise and recreation for the inhabitants of the metropolis. As such, any development to the north of the area should deliver coordinated sensitive new walking and cycling connections to the Scrubs to help connect communities.

4.163 Retaining Wormwood Scrubs as a public open space that is more wild than tamed, will inform how the regeneration of Old Oak relates to the Scrubs. Given the scale of development planned in Old Oak, it is recognised that there will be an increase in users and in the interest of coherent planning and to ensure that local people have access to the Scrubs, there is a need to consider the potential impacts on Wormwood Scrubs of these new users.

4.164 OPDC will work closely with stakeholders, including the Wormwood Scrubs Charitable Trust, London Borough of Hammersmith and Fulham, local residents and interest groups, including the Friends of Wormwood Scrubs in developing guidance and exploring potential sensitive improvements for the Scrubs. Any enhancements would need to be consented by the Wormwood Scrubs Charitable Trust. There are existing drainage and surface water flooding issues which should be addressed to support the functioning and enjoyment of the Scrubs as a public open space and which could also fulfil a more strategic water management role (see Policy EU3,

chapter 12).

4.165 Housing and employment development is not proposed for Wormwood Scrubs and therefore no figures are proposed.

Questions:

QP10a: Do you agree with the approach set out for this preferred policy option? If not, what might you change?

QP10b: Do you have any other comments/observations about the proposed approach for sustaining and enhancing Wormwood Scrubs?

QP10c: How could Wormwood Scrubs be made more accessible for all Londoners?

You can provide comments directly through:

opdc.commonplace.is



Figure 55: Wormwood Scrubs



5

SUSTAINABLE DEVELOPMENT



Sustainable development

5.1 This chapter contains one policy addressing the following policy theme:

- SD1: Sustainable Development;

Questions:

QSDa: Are there any other sustainable development policy themes you think OPDC's Local Plan should be addressing?

QSDb: Do you agree with the chapter's preferred policy option? If not, what might you change?

QSDc: Are there any other policy alternatives that could replace the chapter's preferred policy?

You can provide comments directly through:

opdc.commonplace.is

EVIDENCE BASE

Table 3: Sustainable development Evidence base

Supporting study	Description	Status
Integrated Impact Assessment	<p>Ensures the contents of the draft Local Plan consider, support and enhance:</p> <ul style="list-style-type: none"> ■ the component environmental, social and economic elements of sustainability; ■ equality for all; and ■ physical, mental and emotional health and well-being. <p>Ensure the contents of the draft Local Plan are screened for any impact on Natura 2000 sites.</p>	Draft completed



SD1: Sustainable development

KEY ISSUES

1. If planning policies and development decisions do not contribute to delivering the three elements of sustainability, Old Oak and Park Royal will not be able to deliver long-term sustainable neighbourhoods and thriving communities.

POLICY CONTEXT

National

5.2 The NPPF sets out the three elements of sustainable development that informs the need for the planning system to perform a number of economic, social and environmental roles which “should not be taken in isolation, because they are mutually dependent”.

Regional

5.3 The London Plan sets out a range of policies for realising London’s sustainable development with regard to economic, social and environmental sustainability.

PREFERRED POLICY OPTION

- a) When considering development proposals, OPDC will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area;
- b) Planning applications that accord with the policies in this Local Plan, the London Plan, the West London Waste Plan and, where relevant, with policies in neighbourhood plans will be approved without delay, unless material considerations indicate otherwise;
- c) Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then permission will be granted unless material considerations indicate otherwise –

taking into account whether:

- i) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or
- ii) Specific policies in the NPPF indicate that development should be restricted.

JUSTIFICATION

5.4 The United Nations World Commission on Environment and Development's (WCED) report 'Our Common Future' (published in 1987) defines sustainable development as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs".

5.5 Achieving sustainable development in Old Oak and Park Royal means delivering development that complies with the NPPF and the relevant policies set out in this Local Plan and the London Plan (and, where relevant, with policies in neighbourhood plans) as a whole. As such, OPDC will work with partners to deliver this fundamental requirement to ensure Old Oak and Park Royal delivers long-term sustainable communities and neighbourhoods.

ALTERNATIVE POLICY OPTION

5.6 Achieving sustainable development is a requirement of the National Planning Policy Framework (NPPF). To ensure the draft Local Plan is consistent with the NPPF, alternative policy options are not considered to be appropriate.



6

DESIGN



Design

This chapter contains policies addressing the following policy themes:

- D1: Strategic Policy for design
- D2: Streets and public realm
- D3: Public open space
- D4: New buildings
- D5: Alterations and extensions
- D6: Heritage
- D7: Amenity
- D8: Inclusive design

Questions:

QDa: Are there any other design policy themes that you think OPDC's Local Plan should be addressing?

QDb: Do you agree with the chapter's preferred policy options? If not, what might you change?

QDc: Are there any other policy alternatives that could replace the chapter's preferred policies?

You can provide comments directly through:

opdc.commonplace.is

EVIDENCE BASE

Table 4: Design Evidence base

Supporting study	Description	Status
OPDC Industrial Land Review (ILR)	Assesses the current and future supply and demand for industrial land within Old Oak and Park Royal.	Draft completed
OPDC Development Capacity Study	A study looking at the capacity of the OPDC area to accommodate new homes and jobs.	Draft completed
OPDC Character Note	Sets out suggested character areas within and around Old Oak and Park Royal.	To be developed
OPDC Walking, cycling, streets and public realm strategy	A strategy setting out recommendations for the public realm, public open space and walking and cycling infrastructure for the OPDC area.	To be developed
OPDC Green Infrastructure Strategy	A strategy reviewing existing GI assets, future GI requirements, and identifying opportunities for improving function, connectivity and integration with other infrastructure.	To be developed
OPDC Smart Strategy Interim Report	Sets out key challenges, opportunities and recommendations in relation to emerging smart technology.	Draft completed
HE Old Oak Outline Historic Assessment & Addendum	Assessment of the historic character and appearance of Old Oak.	Completed
OPDC Park Royal Heritage Assessment	Assessment of the historic character and appearance of Park Royal alongside identification of local views.	To be developed
OPDC Views Study	Identification of local views within and around the OPDC area	To be developed

D1: Strategic policy for design

KEY ISSUES

1. Creating a series of new connected places informed by existing positive elements of character to create a sense of place, such as the Grand Union Canal, is of critical importance.
2. It is important that new development achieves the highest standards of design and placemaking.

POLICY CONTEXT

National

6.1 The National Planning Policy Framework (NPPF) states that planning authorities should:

- develop policies based on an understanding and evaluation of its defining characteristics; and
- develop policies to provide guidance for establishing a strong sense of place, that respond to the local character and history, while not preventing or discouraging innovation.

Regional

6.2 The London Plan recognises the importance of placemaking. This sets out a series of design related policies, which provide comprehensive guidance for delivering Lifetime Neighbourhoods and for development to help reinforce or enhance the character,

legibility, permeability and accessibility of neighbourhoods. The London Plan also provides guidance for architecture and building design alongside guidance for development to build on the positive elements of character and have regard to the form, function, structure, scale, mass and orientation of a place.

6.3 The Mayor's Old Oak and Park Royal OAPF principle D5 provides guidance for placemaking alongside a series of place-specific visions and objectives.

PREFERRED POLICY OPTION

Proposals will be supported where they demonstrate the delivery of exemplar world class architectural and landscape design quality that:

- a) responds to and enhances positive elements of existing local character and context; and
- b) contributes to creating new character areas for places and neighbourhoods for locations within Old Oak, where appropriate.

JUSTIFICATION

6.4 In delivering exemplar world class design and successful placemaking, development should consider its relationship to the surrounding context, specifically by positively responding to local views, its relationship with existing and proposed surrounding development and spaces and ensuring it contributes to the creation of a welcoming and outward looking environment.

6.5 By recognising existing positive elements of the local character and context to inform existing and evolving character areas, a sense of place for different areas can be nurtured. The size and scale of development within Old Oak and the contrasting characters of Park Royal and Wormwood Scrubs will enable a series of distinctive neighbourhoods to emerge that exhibit specific characters that have been informed by existing character and by new exceptionally designed places with mix of uses and activities. Where appropriate, there will be opportunities for development to help inform the development of new character areas, specifically within Old Oak.

6.6 Alongside character, context is a critical element in creating a connected and coherent set of places. Context is defined by the GLA Character & Context SPG as “the way in which places, sites and spaces inter-relate with one another whether physically, functionally or visually, or the way in which they are experienced sequentially and understood”. As such proposals should provide relevant information in demonstrating how it is seeking to respond to the existing and envisaged local context.

6.7 The OPDC Place Review Group has been established to advise on the production of planning policy documents and development proposals. Applicants will be encouraged to present proposals to the group for consideration.

6.8 OPDC is developing a Character Study which will be used to inform the next version of the draft Local Plan.

ALTERNATIVE POLICY OPTION

6.9 Alternative policy options are not considered to be appropriate in light of the comprehensive and detailed regional guidance provided by the London Plan and Old Oak and Park Royal Opportunity Area Planning Framework.



Figure 57: Local street art

D2: Streets and public realm

KEY ISSUES

1. High density development must be supported by a high quality, flexible public realm that fulfils a range of needs and delivers successful and distinctive places and neighbourhoods.

POLICY CONTEXT

National

6.10 The NPPF identifies that:

- development should establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.
- policies for managing advertisements should be efficient, effective and simple and should only manage their impact on buildings or on their surroundings and in the interests of amenity and public safety.
- development should deliver places which promote clear and legible pedestrian routes that encourage the active and use of public areas.

6.11 The National Planning Policy Guidance provides detailed guidance for managing advertisements to supplement the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Regional

6.12 The London Plan provides guidance for streets and public realm. This sets out a series of comprehensive design related policies including:

- extensive and detailed guidance for delivering secure, accessible, inclusive, connected, legible public realm that relates to the local context including heritage. This requires the public realm to incorporate the highest quality design, landscaping, planting, street furniture and surfaces. Specifically, development is required to support the legibility of the public realm and it should have clearly defined purposes and an uncluttered appearance. Opportunities for high quality public art and greening are supported.
- guidance to deliver a safe and secure environment in London that is resilient to emergencies and supports opportunities for designing out crime.
- guidance for the delivery of child play space and informal recreation.

6.13 The Mayor's Old Oak and Park Royal OAPF principle D1 and OO2 provides guidance for delivering new and improved streets and public realm.

PREFERRED POLICY OPTION

- a) OPDC will work with stakeholders to deliver an exemplarily designed, welcoming, safe, resilient, flexible, inclusive and sustainable public realm network that facilitates the use and enjoyment of spaces while responding to local character and integrating with surrounding areas.
- b) Proposals will be required to:
 - i. contribute to, or improve, the network of streets as set out in the Places Chapter;
 - ii. contribute to connecting places together and breaking down severance;
 - iii. contribute to improving the quality of existing and creating new public realm;
 - iv. deliver public realm and street furniture that responds to and / or contributes to the delivery of new and improved local character areas;
 - v. be supported by a clear and robust public realm management and maintenance strategy;
 - vi. support wayfinding, in particular

- to key destinations;
- vii. enable the coordinated design, delivery and management of utilities infrastructure and emerging technology; and
- viii. demonstrate engagement with the Mayor's Office for Policing and Crime, the local Metropolitan Police Crime Prevention Design Advisor and other relevant emergency services.

- c) Proposals for advertisements will be required to have a:
 - i. positive impact on associated buildings and surroundings; and
 - ii. neutral or positive contribution to amenity and public safety.



Figure 58: Enhanced public realm



Figure 59: Windrush Square, Brixton

JUSTIFICATION

6.14 The quality and functioning of the public realm is critical in fostering successful places. The public realm provides an important location for social interaction and movement. Further guidance relating to this policy will be provided within the forthcoming OPDC Public Realm SPD.

6.15 The use of appropriate robust materials and the quality of detailed design of the public realm will play a key role in strengthening local identities. To support this, management and maintenance strategies should be provided.

6.16 Street frontages are key in helping buildings frame the public realm and providing a sense of enclosure. The frequency of their frontages along streets can inform the character of the area with regular entrances positioned to provide ease of use.

6.17 To enable the effective management of the public realm and management of utilities infrastructure (including emerging technology) the public realm should be designed to facilitate easy access to subsurface utility infrastructure.

6.18 Emerging and future technology

may enable the public realm to be used and managed more efficiently and this should be encouraged through flexible design and the use of technology, as appropriate. This may include the use of sensors to help understand how spaces are used and can be better organised to support local communities.

6.19 Advertisements can come in a range of formats. They can include digital, illuminated and large-scale shrouds which could potentially have a negative impact on amenity and public safety if not managed and designed appropriately to address these impacts.

6.20 Integrating security and resilience for emergency requirements are important but the impact on wider context and character should also be considered. Early engagement with the Mayor's Office for Policing and Crime, the local Metropolitan Police Crime Prevention Design Advisor and other relevant emergency services will be encouraged.

6.21 The OPDC Walking, Cycling, Streets and Public Realm Strategy will inform the next version of the draft Local Plan.

ALTERNATIVE POLICY OPTION

6.22 In light of the strong national and regional guidance and the requirement of the London Plan to deliver optimum development densities supported by high quality public realm, alternative policy options were not considered to be appropriate.

Questions:

QD2a: Are there other key routes that should be added to the public realm network?

You can provide comments directly through:

opdc.commonplace.is



Figure 60: Integrating services



Figure 61: Below ground waste management



Figure 62: Integrating elements of play



Figure 63: Green and hard landscaping

D3: Open space

KEY ISSUES

1. Sufficient amounts of high quality open space that delivers a range of functions needs to be provided within Old Oak and Park Royal to support the area and to promote the health and well-being of existing and new residents and workers.
2. There are existing open spaces that should be sensitively enhanced, where agreed.

POLICY CONTEXT

National

6.23 The NPPF identifies that:

- access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- policies are required to be based on assessments of the need for open space and opportunities for provision which identify quantitative or qualitative deficiencies in open space.
- open space is protected unless it is considered to be surplus, is better replaced or the development is for alternative sports and recreation provision.

Regional

6.24 The London Plan provides guidance

for open spaces. This sets out policies including:

- benchmark standards for child play space for a range of ages.
- requiring that the strongest protection for Metropolitan Open Land to prevent inappropriate development except in very special circumstances.
- the Mayor's support for new public open space to address areas of deficiency and resist the loss of protected open spaces unless better quality provision is made locally.

6.25 The Mayor's All London Green Grid SPG provides supplementary guidance to the London Plan and considers the delivery of green infrastructure across London. The Mayor's Housing SPG provides guidance for the design of communal open space alongside the design and size of private open space. The Mayor's Play and Informal Recreation SPG provides guidance for child play space.

6.26 The Mayor's Old Oak and Park Royal OAPF principle OO3 provides guidance for the location of new public open spaces including Grand Union Square, Old Oak Square, station squares, small open spaces and towpath linear spaces.

PREFERRED POLICY OPTION

a) OPDC will work with stakeholders to create a network of public open spaces by:

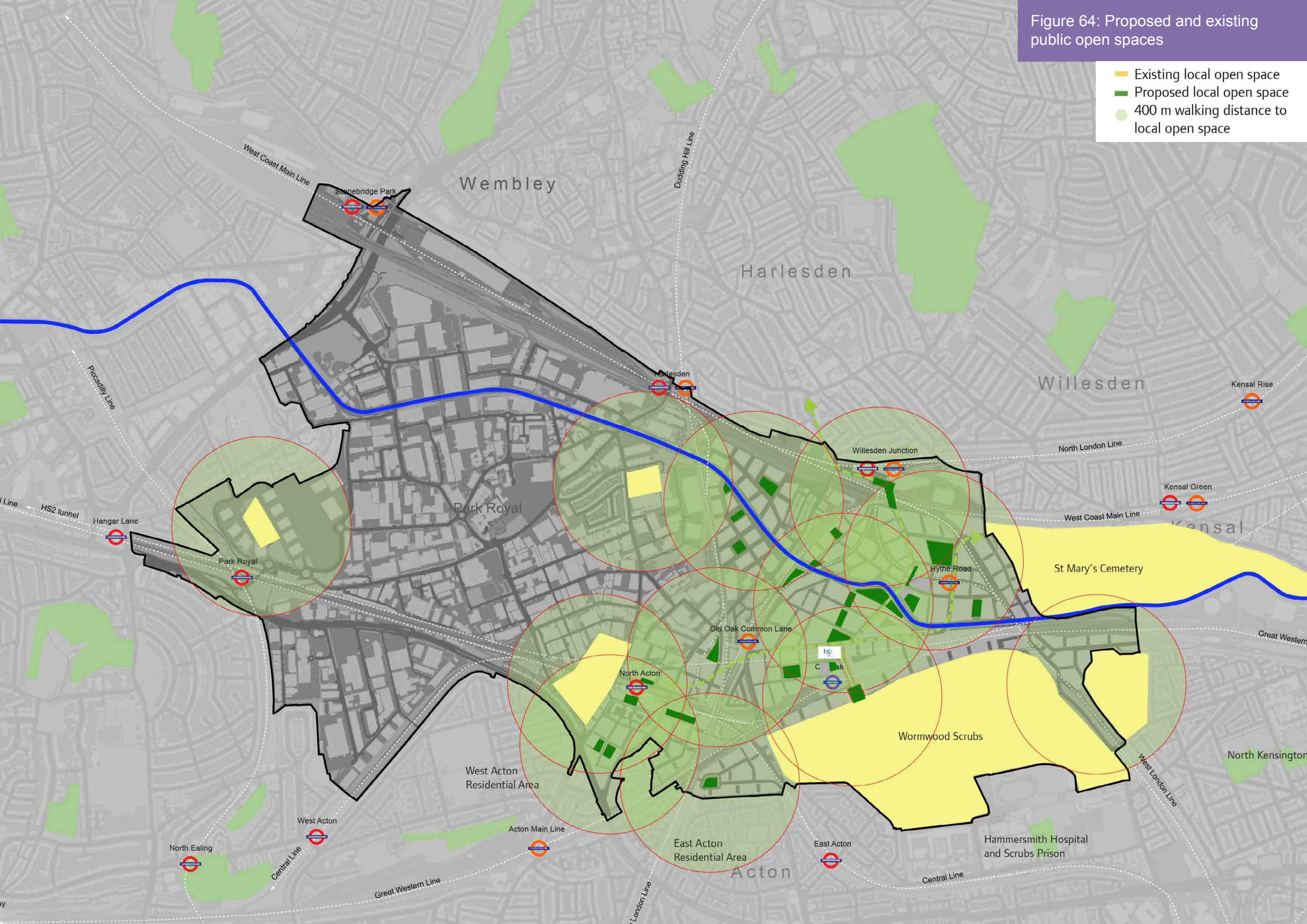
- i. safeguarding and / or enhancing existing public open spaces; and
- ii. creating and connecting new public open spaces to meet identified need.

b) Proposals will be required to:

- i. deliver, improve and / or contribute to the delivery of new public open spaces identified in the Places Chapter;
- ii. deliver public and communal open spaces that are supported by a clear and robust management and maintenance strategy;
- iii. deliver temporary public open spaces that contribute to the vitality, character and activation of an area and supports the delivery of permanent development;
- iv. enhance existing public open space; and
- v. deliver private and communal open space to support the needs of residents.

Figure 64: Proposed and existing public open spaces

- Existing local open space
- Proposed local open space
- 400 m walking distance to local open space



JUSTIFICATION

6.27 Old Oak and Park Royal currently have limited provision of public open space. To meet the needs of existing and future residents, workers and visitors, new spaces need to be provided and existing open spaces protected and / or enhanced in consultation with relevant stakeholders. New public open spaces have been identified within the Places Chapter.

6.28 OPDC will work with stakeholders to explore whether onsite public open space should be delivered on major development sites in addition to the public open spaces identified in the Places Chapter. These should be coordinated with the surrounding provision of existing and proposed public, communal and private open spaces to deliver a coherent and connected open space network. Further information will be provided in the forthcoming OPDC Public Realm SPD.

6.29 Enhancement of existing public and communal open space will be considered in relation to its size, function, quality and character.

ALTERNATIVE POLICY OPTION

6.30 In light of the strong national and regional guidance and the requirement of the London Plan to deliver optimum development densities supported by high quality public open space, alternative policy options were not considered to be appropriate.

Questions:

QD3a: What sort of uses could be encouraged in the different open spaces across Old Oak and Park Royal?

QD3b: Should the proposed policy consider prioritising the delivery of public open space provision ahead of private open space provision?

You can provide comments directly through:

opdc.commonplace.is



Figure 65: Old Oak Park



Figure 66: Civic spaces

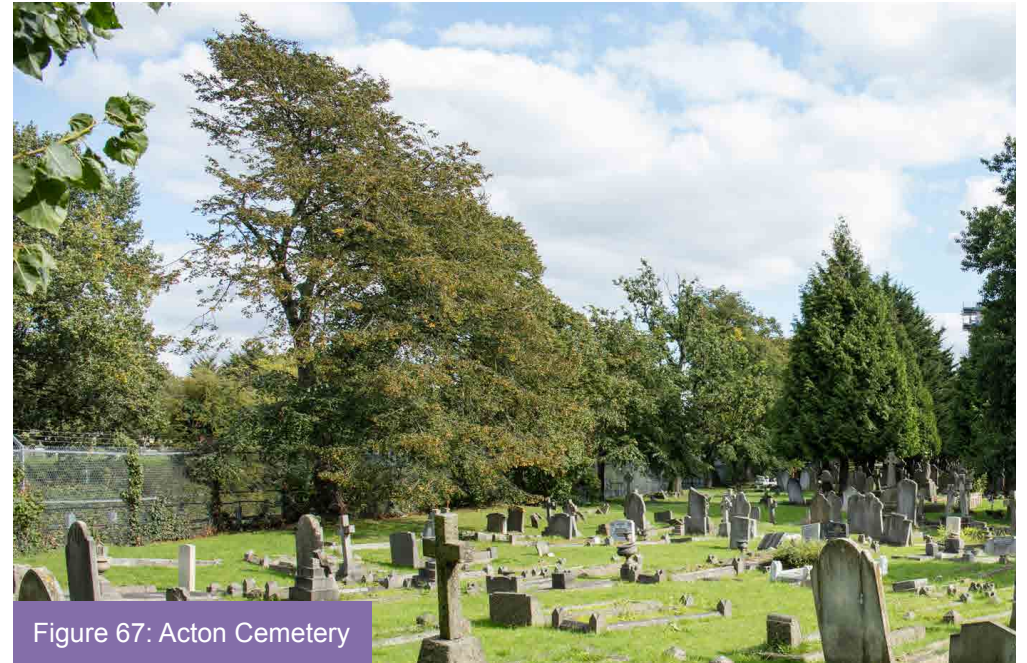


Figure 67: Acton Cemetery



Figure 68: Russell Square



Figure 69: Child playspace, Queen Elizabeth Olympic Park

D4: New buildings

KEY ISSUES

1. New housing, employment uses, town centre uses and social infrastructure should to be delivered at high densities to:
 - take advantage of the access to future excellent public transport accessibility;
 - create a thriving new part of London comprised of a series of neighbourhoods; and
 - contribute to addressing London's housing needs.
2. New industrial workspaces need to be delivered at higher densities than the existing industrial typologies to:
 - support further intensification of Park Royal; and
 - support economic growth in the local and London economies.
3. Building at high density will require exceptional design standards and high quality materials to:
 - achieve a sense of place; and
 - achieve high quality local environments for occupants.
4. In the London Plan, Old Oak and Park

Royal are identified as locations where tall buildings are appropriate. Tall buildings can play a positive role in creating a sense of place, but should be designed to the highest standards and located in the right places to mitigate negative impacts on surrounding areas.

POLICY CONTEXT

National

6.31 The NPPF identifies that:

- good design is indivisible from good planning, and should contribute positively to making places better for people;
- decisions should aim to ensure that development optimises the potential of the site to accommodate development and is visually attractive as a result of good architecture and appropriate landscaping;
- policies should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative; and
- policies should promote or reinforce local distinctiveness.

6.32 NPPG requires that development should give careful consideration to details and materials. Specifically, it requires that materials should be practical, durable, affordable and attractive.

Regional

6.33 The London Plan provides guidance for design. This sets out policies including:

- extensive and detailed guidance on architecture of new buildings and their relationship with their surroundings. Specifically it provides guidance in relation to delivering the highest architectural quality, scale, details and materials, climate change mitigation and adaptation, relationship with the street and indoor/outdoor spaces and flexibility. It also provides guidance for designing out crime and resilience to emergencies.
- specific criteria for tall and large buildings, directing them to Opportunity Areas. Tall buildings are defined in the London Plan as “those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor”.
- specific guidance for the quality and design of housing and is supplemented by the Mayor's Housing SPG.

6.34 The Old Oak and Park Royal OAPF principle OO4 provides guidance for the indicative arrangement of density across Old Oak.

PREFERRED POLICY OPTION

Design

- a) OPDC will work with partners and stakeholders to promote the delivery of world-class exemplarily designed and sustainable new buildings.

Density

- b) Proposals will be required to:
 - i. deliver densities in accordance with those identified in OSP4, the employment policies and the Places Chapter, that contribute to delivering high quality environments for all;
 - ii. demonstrate successful delivery of social infrastructure, other relevant uses and building servicing within a high density context;

Tall buildings

- c) Proposals for tall buildings will be required to:
 - i. accord with OSP4;
 - ii. contribute to the delivery of a visually engaging and coherent skyline;
 - iii. accord with relevant guidance for RAF Northolt safeguarding zones.
 - iv. achieve the highest standards of

design; and
v. be mindful of their surrounding context.

Local views

- d) Proposals will be required to demonstrate how they provide positive contributions to the character and composition of local views.

Materials

- e) Proposals will be required to comprise details and materials that:
 - i. are robust and durable;
 - ii. complement positive elements of the existing character; and
 - iii. positively contribute to the development of a new coherent character and series of places.

JUSTIFICATION

6.35 The delivery of world class sustainable architecture that responds to existing and emerging character and context, while exploring the potential to deliver a new local character, is fundamental to the successful regeneration of Old Oak and Park Royal.

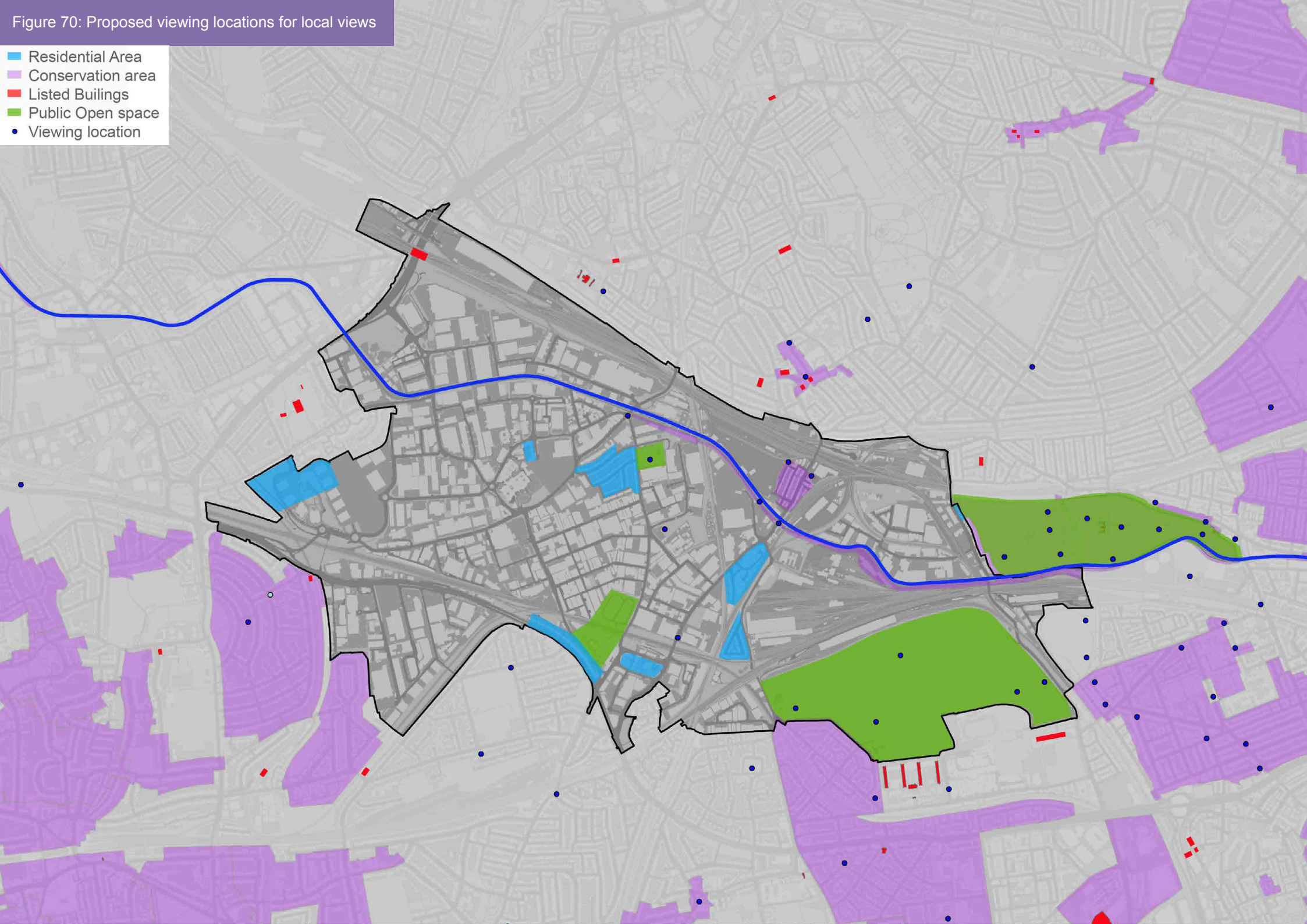
6.36 The potential for optimising development will likely require the delivery of high density development for housing, employment uses and social infrastructure. Elements of this may require the integration of primary schools and health services into the envelopes of high density developments which will require innovative design and management approaches. In delivering high density housing, proposals should consider how variants of perimeter block typologies can optimise the density of development.

6.37 Servicing of buildings, particularly for mixed use buildings, can have a specific impact on building design and the public realm. Where appropriate, proposals should demonstrate how coordination of servicing facilities will be delivered.

6.38 As set out in OSP4, high density development can include tall buildings, as long as such proposals accord with locational guidance, achieve the highest standards of design, are mindful of their surrounding context, delivers a moment of interest and accord with the requirements set out in national guidance, the London Plan and the draft preferred policy options in this draft Local Plan.

Figure 70: Proposed viewing locations for local views

- Residential Area
- Conservation area
- Listed Buildings
- Public Open space
- Viewing location



6.39 The delivery of buildings will impact on the character of surrounding areas and should enhance the skyline. Any proposals of 91.4m above ground level should consult the Defence Infrastructure Organisation.

6.40 Local views from within and outside Old Oak and Park Royal can help positively shape the local skyline, provide visual interest and contribute to delivering high levels of amenity while informing the local character and identity of the area. Specific consideration will be given to how the massing and elevational treatments of development contributes to views. These views are those taken from existing residential communities, existing town centres, along the Grand Union Canal, public open spaces and heritage assets (including conservation areas). OPDC will be developing these in further detail to inform the next version of the draft Local Plan in consultation with the community and stakeholders. In demonstrating how views accord with the proposed policy option, proposals should include verified daytime, evening and night-time views that consider tree

coverage.

6.41 Details and materials that complement not only positive elements of existing character but also inform new evolving character, while considering maintenance requirements, will play a key role in delivering successful and resilient places.

6.42 An important element of creating a high quality place is ensuring that development is resilient to terrorism, specifically for development in busy areas such as town centres, catalyst uses and stations. Development proposals should have regard to the appropriate guidance published by the National Counter Terrorism Security Office, Centre for the Protection of National Infrastructure and liaise with the Counter Terrorism Security Advisors.

ALTERNATIVE POLICY OPTION

6.43 In light of the detailed national and regional guidance, specific alternative policies were not considered to be appropriate.

Questions:

QD4a: Are there any additional criteria and/or elements to the proposed policy option for tall buildings and London Plan policies which should be considered?

QD4b: Where should key views be identified from? What should they be focused on?

You can provide comments directly through:

opdc.commonplace.is

D5: Alterations and extensions

KEY ISSUES

1. Alterations to existing buildings can negatively impact the character of an area if not managed appropriately.

POLICY CONTEXT

National

6.44 A significant amount of different types of alterations are allowed by legislation known as permitted development rights.

Regional

6.45 The London Plan provides limited specific guidance for managing alterations and shop fronts that is not managed by other general policies.

PREFERRED POLICY OPTION

- a) Proposals for alterations and extensions will be required to:
 - i. respect and / or improve the architectural quality of the existing building and the character of its setting;
 - ii. be appropriate to the scale, form, height and mass of the existing building and any surrounding buildings;
 - iii. relate sympathetically to any other sensitive sites that will be affected; and
 - iv. have neutral or positive impact on local views.
- b) Proposals for replacement shopfronts or alterations to existing shopfronts will be required to:
 - i. relate sympathetically to the upper parts of the building and the part of the shopfront to be retained in terms of the design and materials;
 - ii. not result in the loss or partial loss of shopfronts which are of architectural interest; and
 - iii. provide open and active frontages to the public realm.

JUSTIFICATION

6.46 Alterations and extensions can affect the character of a building and its surrounding area. If they are not designed appropriately, both major and minor works have the potential to undermine the contribution of an existing building to its immediate surroundings or the pattern of development in a wider area. Proposals to alter existing buildings must therefore ensure proposed extensions or alterations relate sympathetically to their context and achieve a high standard of design. Proposals should demonstrate how elements considered to be of positive value to local character have been included and / or reflected in their design.

6.47 In buildings where the windows are a valuable architectural feature of a property or group of properties, replacement windows should seek to match the original in terms of their materials, design, size, method of opening and section.

6.48 The addition of building services equipment to existing buildings should

seek to utilise internal spaces such as basements before other locations are considered.

6.49 Shopfronts have an important role in placemaking because they are the most significant interface between commercial buildings and users of the public realm. This importance will be exaggerated at Old Oak due to the planned scale of development and the need to create a high quality pedestrian environment.

6.50 Shopfronts, including specific architectural features, considered to be of architectural or historic interest should be preserved and enhanced if they are considered to provide a valuable contribution to local character and distinctiveness. New buildings that include commercial or other ground floor uses that provide access to the public should demonstrate how the design of the shopfront relates to the architecture of the building and creates a rhythm to the building street frontage. Design should also carefully consider the location, materials and robustness of alarm boxes, canopy boxes and security cameras to avoid undermining the appearance of new developments.

6.51 Solid and perforated roller shutters can have a negative impact on the

public realm. Where roller shutters are considered necessary, internal perforated shutters should be located within the shop unit.

ALTERNATIVE POLICY OPTION

1. Guidance is not provided for alterations, extensions and shopfronts.

6.52 The benefit of this approach would be the development of a streamlined local planning framework. The disadvantage would be that individual and an accumulation of unmanaged amendments to existing buildings could result in negative impacts on the local character and context.

D6: Heritage

KEY ISSUES

1. It is important that regeneration and intensification recognises the positive role that heritage and the historic environment can play in helping to shape the character of development.
2. Proposed uses within or for designated heritage assets may not be consistent with the assets' significance.

POLICY CONTEXT

National

6.53 The NPPF identifies that local planning authorities should set out a positive strategy for the conservation and enjoyment of the historic environment that considers:

- the desirability of sustaining and enhancing the significance of heritage assets;
- putting them to viable uses consistent with their conservation and the wider social, cultural, economic and environmental benefits;
- the desirability of new development making a positive contribution to local character and distinctiveness;
- undesignated heritage assets; and
- opportunities for heritage to contribute to the character of a place.

Regional

6.54 The London Plan provides guidance for design in Chapter 7. This sets out policies including:

- comprehensive and detailed guidance for heritage assets and archaeology. Specifically it identifies that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. It also requires development to conserve their significance and make provision for the protection of archaeological resources, landscapes and significant resources.
- guidance for heritage-led regeneration and seeks regeneration schemes to make use of heritage assets to stimulate environmental, economic and community.

PREFERRED POLICY OPTION

a) OPDC will work with Historic England and stakeholders to:

- i. identify, conserve, enhance and improve access to the historic environment, heritage assets and their settings where appropriate;
- ii. ensure heritage assets contribute to improving and creating a sense of place; and
- iii. address Heritage at Risk.

b) Proposals will be required to conserve and / or enhance the significance of heritage assets to contribute to successful placemaking.

Figure 71: Old Oak Common Sidings, 1923



EPW009683 © English Heritage. Aerofilms collection

Figure 72: North Acton, 1931



EPW035225 © English Heritage. Aerofilms collection

JUSTIFICATION

6.55 Heritage assets and their settings play a critical role in helping to inform placemaking and generating social, economic and environmental benefits for Old Oak and Park Royal. As such their architectural or historic special interest should be conserved and enhanced.

6.56 In 2015, Historic England published the Old Oak Outline Historic Area Assessment to inform the development of planning policy for Old Oak and the designation of local assets. Alongside this draft Local Plan, OPDC is also consulting on the designation of the proposed Cumberland Park Factory Conservation Area. The two existing designated heritage assets within the OPDC area are the Grand Union Canal Conservation Area and the Grade II Listed Brent Viaduct.

6.57 OPDC will be developing a Park Royal Heritage Assessment and a Views Study to inform the next version of the draft Local Plan which will also consider potential heritage assets within Park Royal. OPDC will use this information alongside the Old Oak Outline Historic Area Assessment to work with Historic England and stakeholders in exploring the designation of other heritage assets including the potential development of

a Local List.

6.58 Although OPDC is not responsible for the adjacent St. Mary's and Kensal Green Cemetery Conservation Areas, they contain a number of heritage assets which are identified by Historic England to be at risk. OPDC will work with Historic England and other stakeholders to remove these from the Heritage at Risk Register.

6.59 By supporting proposals which seek to promote the significance of heritage assets through beneficial reuse, assets can help to inform wider placemaking and deliver a wide range of economic benefits. The proposed designation of the Cumberland Park Factory Conservation Area aims to facilitate this aspiration and continue the legacy of employment uses and economic innovation within Old Oak.

ALTERNATIVE POLICY OPTION

6.60 In light of the strong national and regional guidance provided for managing heritage, providing alternative policy options is not considered to be appropriate.

Question:

QD6a: Do you have an opinion on the designation of the proposed Cumberland Factory Conservation Area, which is being publicly consulted on alongside this Local Plan?

You can provide comments directly through:

opdc.commonplace.is

Figure 73: Frontages of proposed Cumberland Park Factory Conservation Area



D7: Amenity

KEY ISSUES

1. Building a new part of London requires the provision of high quality amenity for building users. However, building at higher densities can have an impact on the quality of the environment for building users in and around sites if not carefully managed.

POLICY CONTEXT

National

6.61 The NPPF identifies that planning should always seek to ensure a good standard of amenity for all existing and future occupants of land and buildings as a core planning principle.

6.62 The NPPG identifies that the scale of buildings should take account of local climatic conditions, including daylight and sunlight, wind, temperature and frost pockets.

Regional

6.63 The London Plan provides guidance for amenity. This sets out policies including:

- guidance requiring that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings with a specific reference to housing. It references the elements of amenity to be privacy, overshadowing,

wind and microclimate.

- specific guidance in relation to tall buildings not adversely affecting their surroundings also in terms of microclimate, wind turbulence, overshadowing, noise and reflected glare.

PREFERRED POLICY OPTION

a) OPDC will work with stakeholders to ensure that development delivers a high level of amenity and high quality environment for building users in and around Old Oak and Park Royal; and

b) Proposals will be required to demonstrate that they achieve appropriate levels of:

- privacy for workspaces and habitable rooms; and
- non-reflected daylight and sunlight.

JUSTIFICATION

6.64 New development and all density levels will need to deliver a high standard of amenity in terms of privacy, overshadowing, air quality, noise and light pollution, daylight/sunlight, wind and microclimate for future building users and neighbours.

6.65 During construction and operational phases, OPDC will work with stakeholders to minimise negative impacts on local communities.

6.66 Appropriate levels of privacy and daylight / sunlight are relevant to the types of use of buildings associated activities. For residential uses, this is important for habitable rooms and private open spaces. To support the amenity of building users, proposals demonstrating levels of daylight / sunlight should provide information relating to non-reflected light in accordance with relevant site layout planning for daylight and sunlight guidance.

6.67 To minimise the visual and acoustic impact of plant and services equipment, this should always be integrated into new buildings with appropriate capacity for future equipment incorporated into the design. External equipment should be sensitively sited to minimise any

visual impact, including consideration of long distance views, whilst allowing for necessary noise mitigation.

6.68 Proposed policy options for managing air quality and noise are provided in the Environment and Utilities Chapter.

ALTERNATIVE POLICY OPTION

1. London Plan policies are used to manage amenity

6.69 The benefit of this option would be the use of a London-wide standardised approach and the provision of a streamlined Local Plan. The disadvantage would be the inability for OPDC to manage specific amenity issues in relation to higher density development.

Question:

QD7a: Could policies allow a greater impact on internal residential amenity to accommodate higher densities?

You can provide comments directly through:

opdc.commonplace.is

D8: Inclusive design

KEY ISSUES

1. A number of existing destinations within Old Oak and Park Royal have restricted access including the Grand Union Canal.
2. Infrastructure and impermeable land uses across the area present barriers to movement that need to be addressed.

POLICY CONTEXT

National

6.70 The NPPF identifies that local planning authorities need to plan positively for the achievement of inclusive design for all developments, including buildings, public and private spaces and that planning policies and development should create safe and accessible environments.

6.71 Building Regulations Part M provides legislation in relation to the access to and use of buildings. This sets out requirements for accessibility for general housing, accessible and adaptable housing and wheelchair user dwellings.

Regional

6.72 The London Plan provides guidance for inclusive design. This sets out policies including:

- detailed guidance for delivering Lifetime

Neighbourhoods, requiring development to maximise the opportunity for community diversity, inclusion and cohesion.

- detailed guidance for delivering inclusive environments. Specifically it requires all new development to achieve the highest standards of accessible and inclusive design by according with a series of criteria based policies.
- requiring development delivers 10% of new housing to be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. The policy also requires all new housing to be built to Lifetime Homes Standards.

6.73 The Accessible London SPG provides further guidance on the implementation of London Plan to deliver the Mayor's aspirations for delivering an accessible environment in London, with particular emphasis on the access needs of disabled and older people.

6.74 The Housing SPG provides additional specific guidance for wheelchair housing to Building Regulations Part M to ensure new homes are designed to allow sufficient flexibility to adapt to residents' changing needs and circumstances.

PREFERRED POLICY OPTION

- a) OPDC will work with stakeholders to promote and deliver an exemplarily inclusive and accessible designed environment for Old Oak, Park Royal and Wormwood Scrubs.
- b) Proposals will be required to meet the highest standards of accessible and inclusive design by:
 - i. delivering accessible design solutions that contribute to addressing existing barriers;
 - ii. seeking to exceed latest guidance on accessible and inclusive design; and
 - iii. engaging with relevant stakeholders to inform proposals at the earliest opportunity.

JUSTIFICATION

6.75 Inclusive design is defined by the NPPF as “designing the built environment, including buildings and their surrounding spaces, to ensure that they can be accessed and used by everyone”.

6.76 In promoting the delivery of the highest quality inclusive and accessible environments, OPDC seeks to enable the creation of a series of Lifetime Neighbourhoods that meet the needs of all sections of the community, including disabled and older people. With this in mind, the OPDC Place Review Group has specific expert representation in accessible and inclusive design. OPDC will work with a range of stakeholders to achieve this aspiration including local access groups represented on the London Access Forum.

6.77 The existing network of transport infrastructure currently has a negative impact on people accessing areas within Old Oak and on-street congestion, alongside a poor quality physical environment, restricts easy movement within Park Royal. New development will play a new role in addressing these barriers to deliver inclusive and welcoming environments.

6.78 Proposals which demonstrate

how they will exceed the existing latest guidance for inclusive design for housing, commercial uses (including hotels, offices and town centre uses), infrastructure, public realm and public open spaces (including child play space) will be supported. Proposals which demonstrate engagement with relevant access groups at the earliest opportunity will be supported.

ALTERNATIVE POLICY OPTION

6.79 In light of the strong national and regional guidance provided for delivering inclusive and accessible environments, providing alternative policy options is not considered to be appropriate.



Figure 74: Accessible and green spaces



FJ06 WDY

W414 XOK

7

HOUSING



Housing

This chapter contains policies addressing the following policy themes:

- 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: Houses with shared facilities
- H8: Specialist housing
- H9: Gypsy and Traveller Accommodation
- H10: Student housing

Questions:

QH_a: Are there any other housing policy themes that you think OPDC's Local Plan should be addressing?

QH_b: Do you agree with the chapter's preferred policy options? If not, what might you change?

QH_c: Are there any other policy alternatives that could replace the chapter's preferred policies?

Please note that Policy H4 does not have a preferred policy option and there are a series of separate questions relating to this policy on page 171.

You can provide comments directly through:

opdc.commonplace.is

EVIDENCE BASE

Table 5: Housing Evidence base

Supporting study	Description	Status
OPDC Strategic Housing Market Assessment (SHMA)	The Strategic Housing Market Assessment (SHMA) identifies the objective housing need across tenures for the OPDC area and a wider catchment covering the London Boroughs of Brent, Ealing and Hammersmith and Fulham.	Draft completed
OPDC Gypsy and Traveller Accommodation Needs Assessment (GTANA)	The Gypsy and Travellers Accommodation Needs Assessment will identify the specific housing needs of the Gypsy and Travellers community.	Draft in development
OPDC Affordable Housing Viability Assessment	The study tests the viability of affordable housing across Old Oak and Park Royal.	To be developed
OPDC Development Capacity Study (DCS)	A study looking at the capacity of the OPDC area to accommodate new homes and jobs.	Draft completed



H1: Strategic policy for housing

KEY ISSUES

1. The delivery of new homes to meet housing needs is a critical issue facing the UK.
2. Central government has:
 - a. introduced reforms to the planning framework to speed up delivery of new homes. The draft Housing and Planning Bill (2015) proposes measures to boost housing supply and home ownership
 - a. set a target to deliver an additional one million homes by 2020, including 200,000 Starter Homes.
3. Old Oak and Park Royal has a key role in delivering much needed new housing within London.

POLICY CONTEXT

National

7.1 The National Planning Policy Framework (NPPF) states that local planning authorities should:

- objectively assess the housing needs for market and affordable housing;
- identify key sites critical to the delivery of its housing strategy, (over the next five, ten and where appropriate, fifteen years); and
- demonstrate expected rates of housing delivery.

Regional

7.2 Housing Policies in the London Plan (2015) recognise London's pressing need for new housing. The Plan:

- identifies a London-wide housing need for between 49,000 – 62,000 new homes per year between 2015-2036
- sets annual average housing supply targets for London boroughs on the basis of an annual average supply of 49,000 new homes
- states that the supply of new housing should comprise a range of housing types, sizes, tenures and include a percentage of (wheelchair) accessible homes.

PREFERRED POLICY OPTION

OPDC will work to ensure the area plays a crucial role in delivering a range of high quality housing that addresses London's housing requirements. This will be achieved through encouraging:

- a. the delivery of new housing, where it accords with other policies in this Local Plan;
- b. a mix of housing types and tenures to meet a wide variety of needs; and

c. developments to be flexible and adaptable to accommodate future need, innovation and smart technologies.

JUSTIFICATION

7.3 The OPDC area covers two of London's Opportunity Areas (Old Oak and Park Royal) which are identified in the London Plan as having capacity to provide a minimum 25,500 new homes. The area will help play a critical role in meeting London's strategic housing need and in meeting local need. To support this, OPDC will actively promote the development of land for housing, where development proposals accord with other policies in this draft Local Plan.

7.4 Given the scale of new homes that could be delivered in the area, OPDC has set up a housing advisory group of experts to help it develop its policies and strategies and plan for and deliver a wide range of housing types and tenures. This will include affordable housing, starter homes, low cost market

housing, private rented sector (PRS) and open market housing. There is also an opportunity to plan and deliver a range of housing products aimed at specific groups, such as students or older people.

7.5 It is imperative that OPDC delivers a lasting legacy of high quality housing by providing 'Lifetime Neighbourhoods'. Housing design, both internally and externally and across all housing tenures and types, will be expected to be exemplary. It will need to incorporate the highest standards of modern design and flexibility that can accommodate smart and innovative technologies from the outset. As well as this, it 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. High-quality housing is a key determinant of good health and well-being. OPDC will encourage developers to consider positively impacting on mental and physical health through the quality of

ALTERNATIVE POLICY OPTION

7.6 No suitable policy alternative has been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.



Figure 76: St. Andrews, Bow

H2: Housing supply

KEY ISSUES

1. London's population is projected to grow to over 11 million by 2050 and will need a supply of new housing to accommodate it.
2. OPDC will play an important role in meeting the need for new housing identified in the London Plan - a requirement for 49,000 new homes per annum across London – by delivering a minimum of 25,500 new homes.
3. OPDC's Local Plan policy will need to demonstrate what proportion of the 25,500 target is feasible to deliver within the plan period over the next 20 years, considering issues such as site availability, deliverability and market needs.

POLICY CONTEXT

National

7.7 To significantly boost the supply of housing, the NPPF states that local planning authorities should:

- meet the full objectively assessed needs for market and affordable housing and identify key sites for the delivery of housing;
- identify and update annually a supply of specific deliverable sites sufficient to provide five years-worth of housing;
- identify a supply of specific, developable

sites or broad locations for growth, for years 6-10 and where possible, for years 11-15 and for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period.

Regional

7.8 The London Plan (2015) identifies London's housing need and provides detail on meeting this need through increasing housing supply. The potential for the area to accommodate a minimum 25,500 new homes is set out in annex one of the London Plan.

PREFERRED POLICY OPTION

OPDC will support delivery of new homes during the Plan period (2017-2037). This new housing will be achieved through:

- a. Setting an annual housing target;
- b. Promoting the development of sites identified within the Development Capacity Study (DCS);
- c. Promoting development opportunities on windfall sites, where

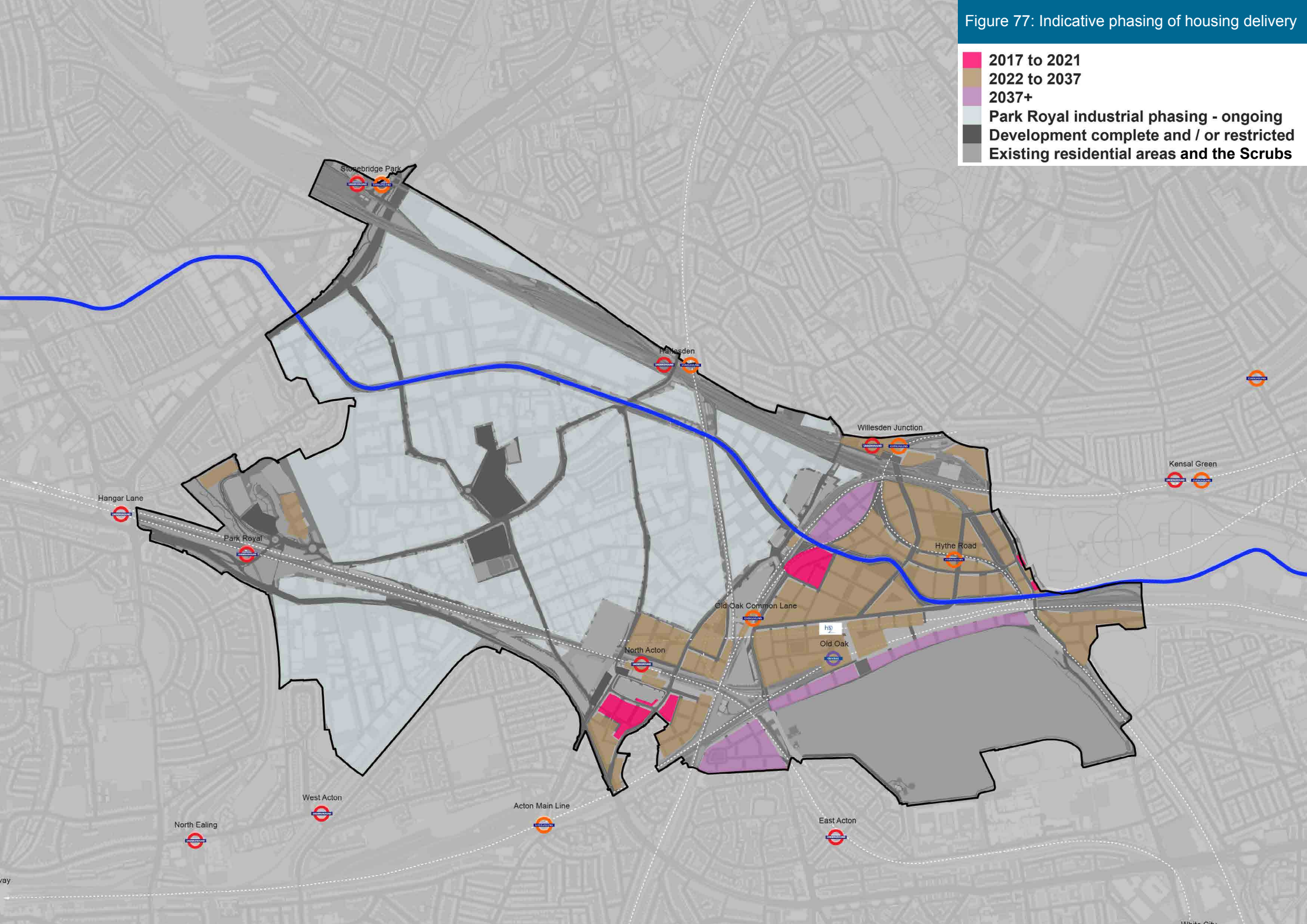
- these accord with other Local Plan policies;
- d. Working with the London Boroughs of Brent, Ealing and Hammersmith and Fulham to bring vacant dwellings back into use;
- e. Supporting housing conversions and changes of use to residential where this accords with other Local Plan policies; and
- f. Monitoring delivery and publishing information on the rate of housing starts and completions and the trajectory of deliverable and developable housing supply.

JUSTIFICATION

7.9 London is a global city experiencing a period of rapid population growth. This, coupled with a slow rate of housing delivery has resulted in a widening gap between housing supply and demand. The 2011 census shows that London's population is growing faster and in ways previously not forecast leading to London's Strategic Housing Market Assessment identifying a housing requirement of between 49,000 and

Figure 77: Indicative phasing of housing delivery

- 2017 to 2021
- 2022 to 2037
- 2037+
- Park Royal industrial phasing - ongoing
- Development complete and / or restricted
- Existing residential areas and the Scrubs



62,000 new homes per year. Figure 78 shows the projected population for the three authorities covered in the OPDC area.

7.10 The NPPF requires local planning authorities to 'ensure that their Local Plan meets the full, and objectively assessed, needs for market and affordable housing in the housing market area'.

7.11 Based on the area's current population of 7,000 people and 2,800 households and following national and regional guidance for preparing a Strategic Housing Market Assessments, OPDC's work identifies an objectively assessed housing need for the OPDC area of 1,200 homes, of which 564 as affordable housing, over the plan period up to 2037.

7.12 However, as London's single largest regeneration scheme and recognising that existing guidance for producing a SHMA is based on a standard local planning authority and not one created through a Mayoral Development Corporation, the OPDC area can deliver new homes far in excess of this objectively assessed housing need and so needs to look wider than just its immediate boundary.

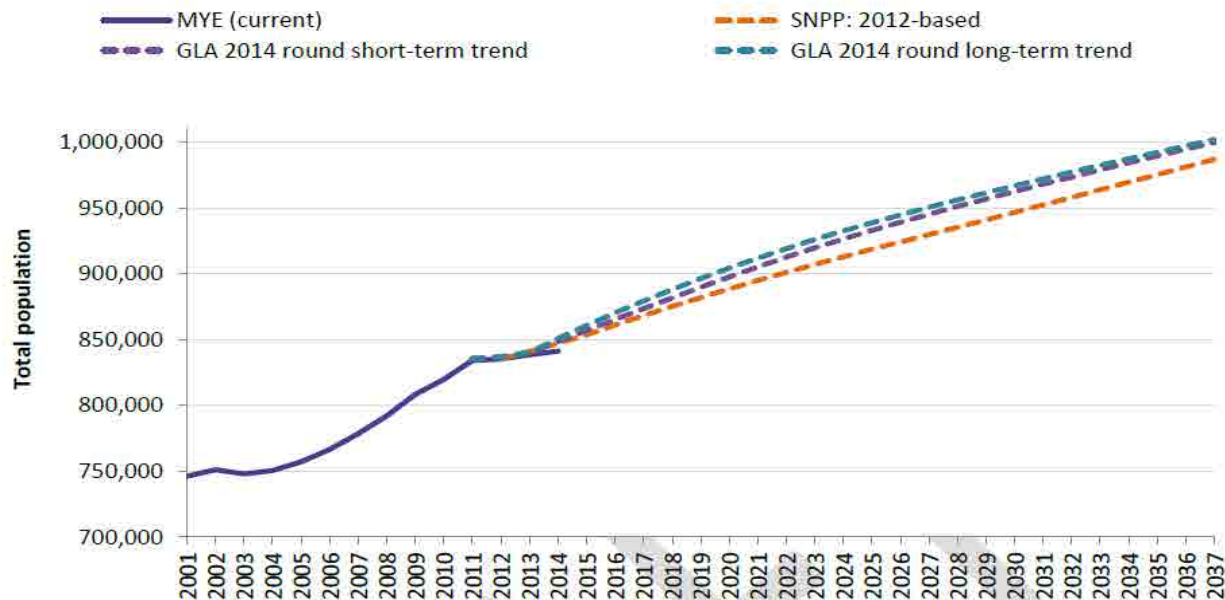


Figure 78: Projected population

7.13 In realising its wider strategic role and in supporting west London's housing needs, the combined area of the London Boroughs of Brent, Ealing and Hammersmith & Fulham has been identified as OPDC's housing market area in OPDC's draft SHMA. In adopting this approach, a much wider demographic base is included in the population projections. The draft SHMA identifies a housing need for 96,000 homes across this housing market area over the plan period. Within this, the SHMA identifies an objectively assessed need for 44,800 (48%) affordable units and 48,400 (52%) market units.

7.14 The draft DCS identifies the indicative phasing for the areas to be brought forward for residential development (subject to known constraints). The table below provides further details on the first five-year supply of housing (deliverable) as well as sites for the next 6-20 years (developable). The draft DCS shows that the OPDC area could meet almost 25% of the housing market areas' objectively assessed need over the next 20 years.

7.15 Table 6 and figure 77 sets out the delivery phases for housing development. Many of these areas

cannot be brought forward in advance of 2026, as they rely on the opening of the Old Oak Common station and/or are reliant on the release of land required up until or after this date.

7.16 Further work is being progressed to identify other areas likely to come forward and contribute to OPDC’s first five-year housing supply (deliverability), OPDC will also identify an annual delivery target following this further work. Further details will be provided in the next iteration of the Local Plan.

7.17 There may also be other ‘windfall’ sites that have not yet been identified in the DCS. They may make a contribution to the supply of new housing. As part of this consultation we are inviting suggestions for additional sites that could help contribute towards meeting London’s growing housing need through a ‘call for sites’.

7.18 Changes of use to residential and housing conversions can also contribute to the overall housing supply. Changes of use will be supported where they accord with other draft Local Plan policies. The appropriateness of housing conversions is covered in Policy H5.

7.19 Monitoring new housing delivery

Table 6: Early indicative housing delivery

Years	Development Phase	Delivery Phase	Unit Delivery
0-5	2017 - 2021	1	2,100
6-20	2022 - 2037	2	19,600
20+	2037+ (post plan period)	3	4,000

will be vital to achieving the broader objectives and OPDC will report on the number of new homes started and completed in its Authority Monitoring Report (AMR). The AMR will also contain a housing trajectory which will show annual updated information on OPDC’s 0-5 year, 6-10 year and 11-15 year housing supply.

ALTERNATIVE POLICY OPTION

1. Seek to deliver a higher number of new homes within the Local Plan period.

7.20 This option is unlikely to be achievable as there are significant infrastructure and delivery issues that would need to be overcome to free up all sites for development within the plan period. Further information on site availability is set out in the DCS.

Questions:

QH2a: Do you agree with the approach OPDC is taking to its objectively assessed housing need? If not, please explain why.

QH2b: Do you agree with sites identified for the first 5 years in figure 77?

QH2c: Are there sites, that have not been identified as providing the first five year supply (2017-21), that you consider can be brought forward to deliver housing in this period?

You can provide comments directly through:

opdc.commonplace.is

Call for sites consultation

7.21 OPDC's draft Development Capacity Study identifies land that OPDC is currently aware of that can be developed for housing. It identifies the potential phasing showing when they may come forward for delivery, based on currently available information.

7.22 As well as areas identified in the DCS for development, OPDC are as part of this consultation inviting suggestions for additional sites that could support development through a 'call for sites.' This will assist OPDC to meet its obligations under the NPPF and assist in implementing the 'presumption in favour of sustainable development' when planning decisions are taken.

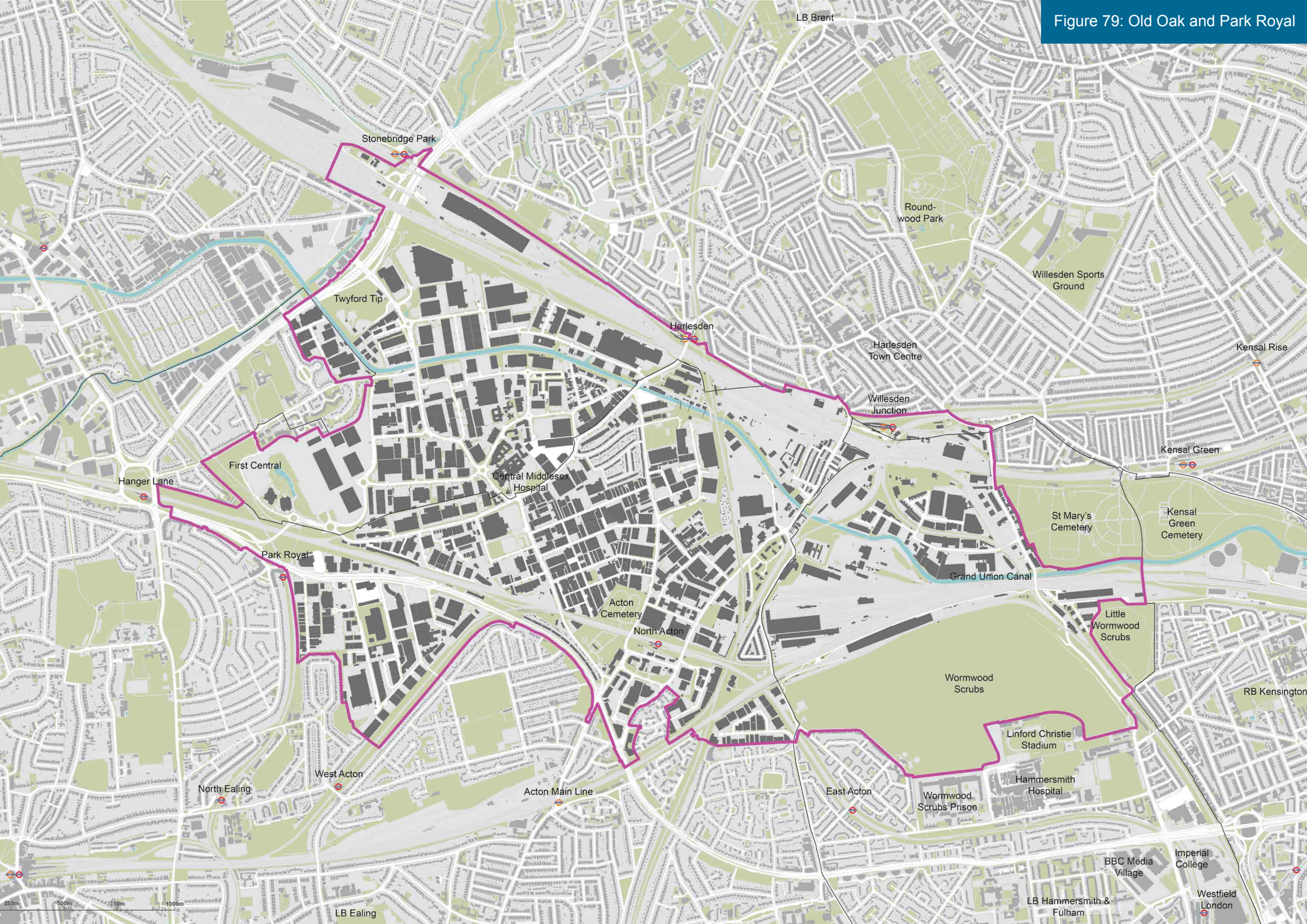
Questions:

QH2d: Are there any sites excluding those already identified in OPDC's Development Capacity Study (DCS) or sites designated as Strategic Industrial Location (SIL) that you would like to see identified as a site capable of contributing towards OPDC's overall housing supply?

You can provide comments directly through:

opdc.commonplace.is

Figure 79: Old Oak and Park Royal



H3: Housing mix

KEY ISSUES

1. Different households require different types and sizes of housing. A wide choice of housing broadens the appeal of an area to new residents as well as meets the area's housing need. Within Old Oak and Park Royal an appropriate mix of housing across all types and tenures is needed to create balanced and sustainable communities.
2. Delivering a mix of family and non-family sized housing will be important.
3. There will be a challenge in securing appropriate levels of well-designed family accommodation as part of high density development if not carefully planned and located.

POLICY CONTEXT

National

7.23 The NPPF requires local planning authorities to plan for the delivery of a wide choice and mix of housing based on evidence. In doing so, local planning authorities will need to identify the size, type, tenure and range of housing that is required including the mix of housing in particular locations and meeting affordable housing needs on site.

Regional

7.24 The London Plan states that Londoners should have a genuine choice of homes they can afford and which meet their requirements for different sizes and types. The provision of affordable family-sized housing has been specifically identified as a strategic need in London.

PREFERRED POLICY OPTION

Proposals for new housing developments should deliver a mix of dwelling types and sizes to meet strategic and local need and support the creation of mixed, balanced and sustainable neighbourhoods taking into consideration:

- a. The housing mix and population and household size projections identified in OPDC's draft Strategic Housing Market Assessment (SHMA);
- b. The affordable housing component of developments should aim to achieve the following housing mix:

1 bed flat	2-bed flat	3-bed flat	4-bed flat
22%	24%	36%	17%

- c. The market housing component of developments should aim to achieve a mix of unit sizes and in particular, family sized housing;
- d. The local character and ability of the site to accommodate a mix of housing types and sizes; and
- e. The design of proposals for new homes to be of the highest quality delivering 'Lifetime Neighbourhoods' and provide 90% of units as Building Regulation M4(2) 'accessible and adaptable dwellings' and 10% of new housing as Building Regulation M4(3) 'wheelchair user dwellings' across all tenures.

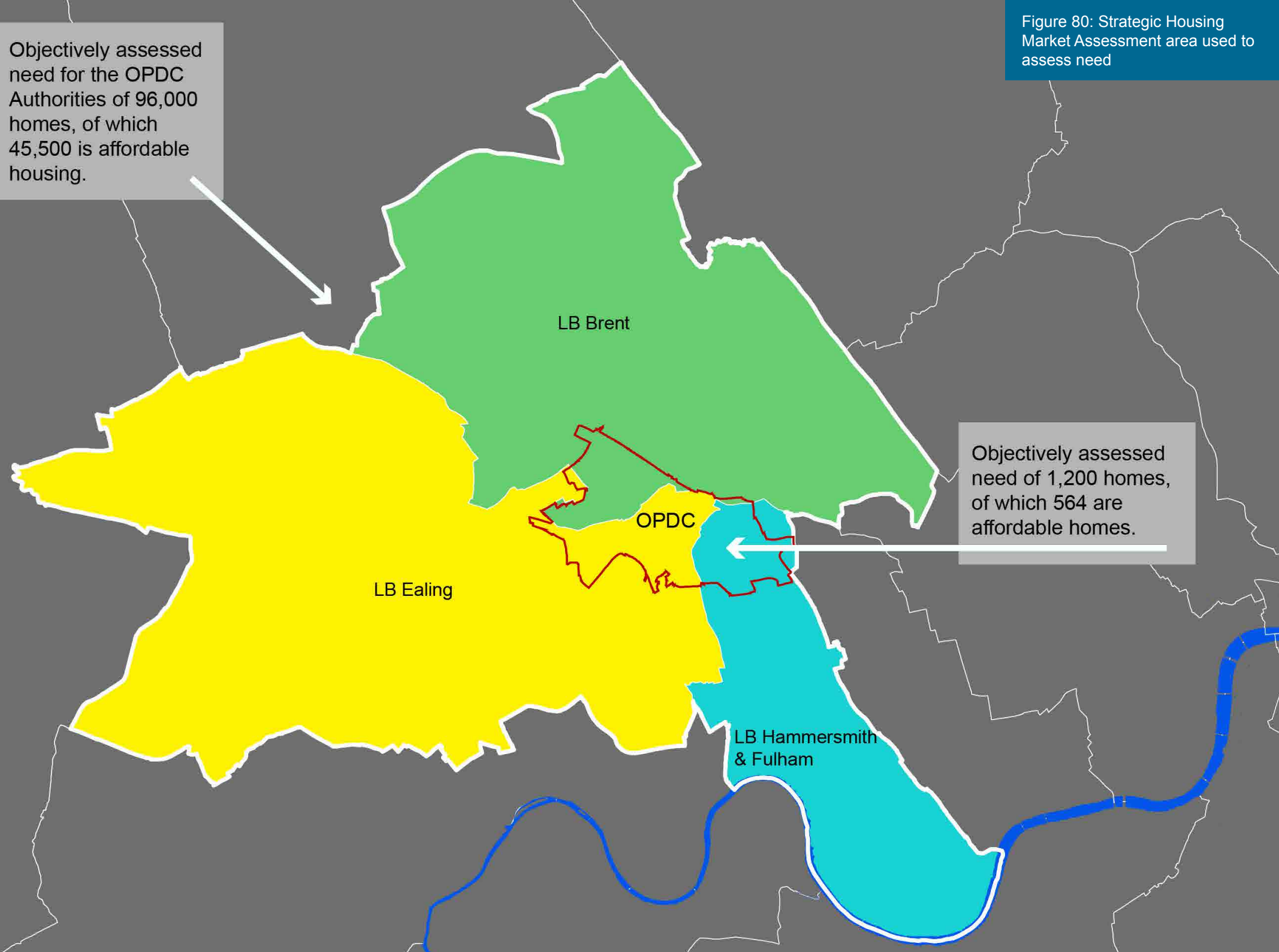
JUSTIFICATION

7.25 OPDC's draft Strategic Housing Market Assessment (SHMA) provides evidence of local housing need and population and household size projections. When considering proposals for new residential developments, the proposed scheme will be expected to take into account the current SHMA and any other relevant local data. Due regard should be given

Figure 80: Strategic Housing Market Assessment area used to assess need

Objectively assessed need for the OPDC Authorities of 96,000 homes, of which 45,500 is affordable housing.

Objectively assessed need of 1,200 homes, of which 564 are affordable homes.



to the most up to date version of the SHMA to determine the relevant mix.

7.26 The SHMA identifies that the greatest demand is predicted for family sized dwellings across both market and affordable housing. Affordable housing should meet the need identified in the above preferred policy option. For market housing, OPDC's draft SHMA identifies a need for a range of unit sizes and in particular family sized housing. OPDC will encourage early engagement from developers to discuss how market housing provision can help OPDC to meet this need.

7.27 While developments are expected to reflect the identified dwelling mix, rigid application of these may not be appropriate in every case and development proposals are expected to take into account, site viability, location, and other constraints.

7.28 Family sized housing (which the London Plan identifies as having 3 or more bedrooms) is better located on the lower floors of high-density development where it affords better access to courtyards and outside space. In general, OPDC will expect family sized units to be located on lower floors but recognises that certain locations such as town centres or sites adjoining

infrastructure may not be suitable for family sized units on the lower floors. Where family sized units are included in schemes in these locations, they will need to be carefully designed.

7.29 There is a need to ensure that new housing is designed to be readily adaptable and that it will meet the differing and changing needs of households, particularly as the UK's population is growing older. There is also a significant need in London and in the local area for accessible housing across all tenures. To support these demographics and needs changes, OPDC will require that 90 percent of new homes are designed to be accessible and adaptable (Building Regulation M4(2)) and that 10 percent of new homes are fully equipped or adaptable for wheelchair users (Building Regulations M4(3)).

ALTERNATIVE POLICY OPTION

1. Allow a proportion of new housing (micro-housing) to not comply with London Plan space standards or Building Regulations M4(2) and M4(3)

7.30 An alternative option would be to allow a small proportion of new homes to not comply with London Plan space requirements or Building Regulations M4(2) or M4(3). This option would deliver a proportion of micro units (providing less floorspace than the London Plan one person space requirements), which could offer opportunities for lower cost market housing. 'Pocket Homes' provides recent examples of this type of accommodation, having been delivered on a number of sites across London, including locally in Ealing and in Hammersmith and Fulham. However, these new homes would not be designed to meet lifetime needs and would therefore only be appropriate for those people wanting smaller units or those with limited budgets who wanted to live close to central London. However, such small unit sizes could negatively impact on the health and well being of the individual(s).

Figure 81: Adelaide Wharf, Hackney

Questions:

QH3a: Do you agree with the identified size and mix for affordable housing that should be delivered? If not, what should an alternative mix be and why?

QH3b: Should OPDC consider identifying a proportion of housing that does not meet the London Plan space requirements or Building Regulations M4(2) and M4(3)? (see para 7.30 for more information)

You can provide comments directly through:

opdc.commonplace.is



H4: Affordable housing

KEY ISSUES

1. There is a significant London-wide and local need for affordable housing and an aspiration for Old Oak and Park Royal to contribute to the delivery of these affordable homes.
2. Securing the required levels of affordable housing onsite will be a challenge in the context of infrastructure requirements and viability.
3. Understanding of the long-term implications of the changes to affordable housing (both its definition and funding arrangements) introduced through the Housing and Planning Bill will continue to evolve as the Bill makes its passage through parliament. Through its Local Plan, OPDC will be required to respond to changes once the Bill is enacted.

POLICY CONTEXT

National

7.31 The NPPF defines affordable housing as social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. To comply with this definition affordable housing should:

- be provided to households whose needs are not met by the market;

- to be provided to eligible households, where eligibility takes into account local incomes and house prices; and
- remain at an affordable price for future eligible households unless the subsidy is recycled for alternative housing provision.

7.32 The NPPF also defines intermediate housing as that which is provided at a cost which is above the income level at which social or affordable rented housing is required and below the entry level for purchasing a home at lower quartile prices on the open market.

7.33 The government's recently announced Starter Homes initiative is the latest addition to the affordable housing product range. The draft Housing and Planning Bill states that proposals for new developments will be required to provide Starter Homes.

Regional

7.34 London Plan policies relating to affordable housing identify a target of at least 17,000 more affordable homes per year from sites with a capacity for 10 or more homes. These policies also specify that 60% of affordable homes in London should be affordable or social rented, and the remaining 40% should be for intermediate sale or rent.

POLICY OPTIONS

7.35 There are two key factors that need to be considered when setting an affordable housing policy:

1. What is the objectively assessed housing need i.e. what is the evidence of need for different types of housing in the area and in London as a whole and,
2. How viable is it to deliver affordable housing based on viability assessments.

7.36 As set out in paragraph 7.13, OPDC's draft SHMA identifies an objectively assessed need for 48% affordable housing over the next 20 years. However, OPDC is still developing its evidence base for the viability of affordable housing and it has therefore not been possible to set an affordable housing percentage target as part of this draft Local Plan. OPDC will continue to develop this evidence base over the coming months to inform the affordable housing policy in the next draft Local Plan.

7.37 While the affordable housing policy evidence and detail will develop over time, OPDC considers that a set of clear policy principles should apply to any future affordable housing policy. These are to:

1. Optimise affordable housing provision;
2. Require applicants to sign-up to the Mayoral Concordat, to market new homes in London and the UK at the same time as abroad;
3. Provide on-site affordable housing;
4. Secure a mix of affordable housing for a range of household income levels;
5. Achieve tenure blind developments;
6. Achieve a mix of tenures across all developments; and
7. Agree an approach for establishing nominations rights to the affordable rented housing.

THE FOUR OPTIONS

7.38 As OPDC's evidence on need and viability continues to emerge, OPDC has been considering four broad approaches that it could take when setting an affordable housing policy for the area. OPDC invites views and comments on which of these potential policy approaches to develop further.

OPTION 1 - FIXING THE PERCENTAGE

7.39 A single OPDC wide figure is fixed for the level of affordable housing. The Mayor's draft Housing SPG supports this approach in Opportunity Areas. This fixed rate would be subject to a regular review of viability by OPDC and this figure would need to be amended to keep track of market changes. OPDC may also need to consider abnormal costs on specific sites in extreme circumstances and where clearly demonstrated and justified. Comments are invited on whether or not this option should have a review mechanism (please see questions below). The table below sets out the strengths and weaknesses of this option.

Strengths	Weaknesses
<ul style="list-style-type: none"> ■ Helps provide certainty to developers and land owners about the affordable housing requirements and helps prevent land price rises based on hope value. ■ Gives a single definite target and delivers policy compliant levels of affordable housing over the life of a large scheme. ■ Easy to define any external subsidy required to deliver this policy requirement. ■ Clear definition of obligations where land is sold. ■ No need to negotiate on commuted sums as part of negotiations ■ Reduces lengthy and costly negotiations with applicants as there would be no need for any detailed viability assessments. 	<ul style="list-style-type: none"> ■ The fixed affordable housing level is dependent on the quality of OPDC initial viability work– including estimated costs for abnormals and infrastructure. ■ May require a high density to meet identified housing needs. ■ Little flexibility to respond to rapid changes in market conditions. ■ Could end up with less affordable housing if market performs strongly and if there is no review mechanism. ■ Not an approach that has been tried or tested anywhere before. ■ The fixed percentage may have to be set at a low rate due to initial viability. ■ Would require robust and regular viability analysis by OPDC to ensure conformity with national and regional policies.

OPTION 2 – PRODUCT DEPENDENT RANGE

7.40 A percentage range is set for each product type, recognising that some affordable housing products are more costly to deliver than others or are more suited to different types of developments. The table below sets out the strengths and weaknesses of this option.

Strengths	Weaknesses
<ul style="list-style-type: none"> ■ Innovative. ■ Clear minimum/maximum range for negotiations. ■ Move away from a hard target. ■ Flexible enough to reflect different development types, site economics or local priorities. 	<ul style="list-style-type: none"> ■ Complex to negotiate and monitor. ■ May not provide a mixed and balanced sustainable community as it could promote developments providing only one affordable tenure type.

OPTION 3 – VIABILITY TESTED PERCENTAGE

7.41 This is the approach currently favoured by local planning authorities. A percentage target is set but this target is still subject to viability and each individual scheme would be viability tested to see how much affordable housing it could deliver. The table below sets out the benefits and disbenefits of this option.

Strengths	Weaknesses
<ul style="list-style-type: none"> ■ Approach currently adopted by local planning authorities. ■ This option has a proven track record of being accepted by Secretary of State. ■ Transparency – reliance on published and verifiable data through developers' viability assessments. ■ Responsive to market conditions – but also to needs as tenure and product types could flex. ■ Responsive to site-specific conditions. 	<ul style="list-style-type: none"> ■ Does not control land price rises in the same way as Option 1. ■ Could result in the level of affordable housing secured being below the policy target. ■ Time consuming and will require costly and protracted negotiations. ■ No incentive for developers/ applicants to exceed set target. ■ Can have sites where no or little affordable housing is viable.

OPTION 4 – NEGOTIATE A TARGET ON SITE-SPECIFIC BASIS

7.42 This seeks the maximum reasonable amount of affordable housing without specifying a percentage target for each development to achieve. A review of relevant economic data at the outset will enable an allocation of affordable housing on the site to be determined.

Strengths	Weaknesses
<ul style="list-style-type: none">■ No upper thresholds and could secure high levels of affordable housing on certain sites beyond the levels in the London Plan.■ Is a site specific approach.■ A strong audit trail.■ Does not require upfront or comprehensive viability analysis.	<ul style="list-style-type: none">■ Does not provide certainty on the level of affordable housing that will be secured through a development.■ Will not be in compliance with the London Plan or NPPF.■ Is not aspirational.■ Requires long and costly negotiations on each site.■ Relies on verifiable data.

Questions:

QH4a: Do you agree with the affordable housing policy principles that would apply to any of the four affordable housing options?

QH4b: Which of the four proposed options do you think would secure the best outcome for meeting affordable housing need? Please explain why.

QH4c: Are there any other strengths and weaknesses to the four options that should be included?

QH4d: Are there other options that should be considered as a policy option?

QH4e: Should option 1 include a review mechanism?

You can provide comments directly through:

opdc.commonplace.is

H5: Existing housing

KEY ISSUES

1. There are approximately 2,800 existing homes. While this is a relatively low number given the size of the area, OPDC recognises the importance of the existing housing as providing a suitable supply of homes for the established communities.
2. Long-term empty homes not only impact negatively on their immediate environment, they also remove the potential to use a home in an area.
3. Empty homes are an issue that should be addressed.

POLICY CONTEXT

National

7.43 The NPPF states that local planning authorities should identify and bring back into use empty residential housing and buildings in line with local housing and empty homes strategies. Where appropriate, it may use its compulsory purchase powers to achieve this. It states that where there is an additional identified need for housing, planning applications for conversions from commercial to residential use should normally be approved.

Regional

7.44 Policies in the London Plan specifically

protect residential dwellings and seek to prevent the loss of existing housing numbers, including affordable housing numbers, unless the housing is replaced at existing or higher densities with at least an equivalent floorspace.

PREFERRED POLICY OPTION

OPDC will seek to optimise the use of existing the housing stock and land through:

- a. Resisting the net loss of existing housing units or floorspace through change of use or redevelopment, except in areas of Strategic Industrial Location (SIL) or where it is being reprovided at a higher density;
- b. Work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham and other stakeholders to bring vacant residential properties back into use (including where appropriate the use of empty dwelling management orders or compulsory purchase powers);
- c. Permit conversions of existing dwellings to two or more dwellings where:

- i. at least one family sized unit (3 bed+) is provided through each conversion with access to amenity space;
- ii. residential conversions maintain the amenity of neighbours, the general character of the surrounding area and do not result in cumulative stress on services; and
- iii. The proposal would not result in adverse impacts on parking and/ or other local amenities.

JUSTIFICATION

7.45 OPDC will refuse proposals that would result in the net loss of existing levels of housing, except in the areas identified as Strategic Industrial Location (SIL). However, OPDC will allow the loss of existing housing where it is to be replaced by new housing at equivalent or higher density.

7.46 Empty homes can undermine housing supply and negatively impact on adjacent residents and the surrounding area. The longer a dwelling remains empty the more dilapidated it is likely

to become. Once back in use, these dwellings will contribute towards the overall supply of new homes. OPDC will work with the local authorities, landowners and other stakeholders to bring vacant residential buildings back into use. This could include, where necessary, using empty dwelling management orders or compulsory purchase powers (see Delivery and Implementation chapter).

7.47 The OPDC area's existing housing stock is limited but conversions can make a valuable contribution towards delivering new homes and increase the availability of smaller homes. However, the potential cumulative stress from conversions of larger dwellings to smaller homes on both the supply of family sized homes and on on-street parking provision, waste collection and other social amenities needs to be weighed against the wider economic benefits from such conversions and the resultant overall growth in the number of new homes. OPDC will consider these on a case by case basis.

ALTERNATIVE POLICY OPTIONS

1. Take a more flexible approach to the loss of existing stock

7.48 This allows for the loss of existing residential stock for non-residential uses. This may enable greater deliverability of sites; however, proposals resulting in the loss of existing housing without it being replaced could undermine the overall housing supply.

2. Allow the conversion of smaller family sized units and not require a proportion of these to be replaced as family homes.

7.49 Allowing conversions of smaller family sized units without requiring their replacement would increase the overall number of new housing supplied, but it will result in a loss of family sized accommodation.

H6: Housing in the Private Rented Sector

KEY ISSUES

1. The private rented sector (PRS) accounts for approximately 25% of London's housing market. The sector helps meet demand for short and long-term housing as well as providing accommodation for households unable to afford to buy their own home or access affordable rented housing.
2. OPDC should consider how PRS can play a role in supporting the overall supply of housing within its area whilst creating a mixed and balanced community.

POLICY CONTEXT

National

7.50 The government has promoted growth of a new development sector building homes specifically for private rent.

Regional

7.51 In providing for a choice of housing, the London Plan provides positive and practical support to sustain the PRS contribution towards increased housing delivery and meeting housing need.

PREFERRED POLICY OPTION

OPDC will require new purpose built private rented accommodation, in appropriate locations, to:

- a) Meet local and London's strategic private rented housing needs;
- b) Provide an affordable housing contribution;
- c) Provide PRS for a defined period with a review mechanism or in perpetuity; and
- d) Incorporate high standards of design and provide a management strategy, committing to high standards of ongoing management of the premises.

JUSTIFICATION

7.52 OPDC's draft Strategic Housing Market Assessment identifies the Private Rented Sector (PRS) as making up approximately 30% of the housing tenure across the OPDC's host boroughs (Brent, Ealing and Hammersmith and Fulham). The private rented sector (PRS) plays an

important role in providing homes for those choosing not to, or unable to, buy homes or access affordable housing. It is also an important component in delivering a choice of housing and can play an important role in early delivery and placemaking.

7.53 Historically, private rented homes have often been regarded as badly maintained properties suffering from overcrowding, hazards, poor facilities and insecure tenancies. However, in recent years institutional companies and investors have started to provide large-scale purpose built PRS accommodation, such as at the Olympic Village in Stratford. This accommodation is generally of a much higher standard than the majority of traditional rented accommodation.

7.54 New PRS will need to provide affordable housing. Based on the viability analysis there may be an opportunity to consider the type of affordable PRS product – this could include a proportion as discounted market rent. OPDC will secure a proportion of PRS homes at below

market rates for a specified period or in perpetuity, through covenants, section 106 or other legal agreements, and in line with the affordable housing policy.

7.55 Where discounted market rent is secured as the affordable component of a PRS scheme, we will encourage developers to offer 'deposit savings options' for these tenants whereby the tenant pays into a savings scheme with contributions also provided by the developer. This would enable tenants to save towards a deposit for future homeownership.

7.56 OPDC will encourage the retention of private rented units in perpetuity. Where, this is not the case and PRS schemes are agreed for a defined period, then a review mechanism will be triggered at the point at which the PRS units in a scheme convert to market sale. This review will consider the affordable housing requirements at that time and commuted sums for affordable housing would be made to the local planning authority.

ALTERNATIVE POLICY OPTION

1. Make it mandatory for PRS proposals to sign up to London Rental Scheme (LRS)

7.57 Having landlords sign up to the voluntary London Rental Standard (LRS) can help to ensure a high quality standard of PRS and positively impact on the amenity of neighbouring residents. Making it a mandatory requirement for all PRS proposals to either have in place arrangements/agreements to professionally manage stock will mean an increase in associated costs and could result in some smaller schemes not being delivered.

Questions:

QH6a: Should OPDC seek to have covenants for below market rate purpose built Private Rented Sector accommodation? Please explain why.

QH6b: Should all developments for purpose built private rented sector (PRS) be required to sign up to the London Rental Scheme? Please explain why.

You can provide comments directly through:

opdc.commonplace.is

H7: Housing with shared facilities

KEY ISSUES

1. A house with shared facilities or a house in multiple occupation (HMO) generally refers to a flat or house that is the main resident for three or more occupiers forming two or more households and who share a kitchen, bathroom or toilet.
2. Hostels generally cater for a specific group or groups of occupiers, for example, long or short-term vulnerable residents and homeless persons. Hostels may provide some meals or welfare arrangement to the occupiers and have on site management. They may be provided on a temporary basis, such as winter shelters for the homeless, and by different public bodies or charities.
3. HMOs and hostels contribute to the overall supply of housing and have an important role in helping to meet an area's housing need.
4. They can also adversely impact, especially in high concentration, on the amenity of neighbouring properties if not properly managed and controlled.

POLICY CONTEXT

National

7.58 The NPPF states that local planning authorities should deliver a wide choice of

high quality homes and shared houses, either purpose built or otherwise, are an important part of the housing stock. Amendments, in 2010, to the Use Classes Order and the General Permitted Development Order introduced a new class of residential development – C4: Houses in Multiple Occupation (commonly referred to as 'small HMOS'). The Sui Generis HMOs, which existed under the previous legislation, are now commonly referred to as 'large HMOs' and consist of more than six occupants.

Regional

7.59 The London Plan recognises the strategically important role of HMOs in meeting distinct needs and reducing pressure on other elements of the housing stock.

PREFERRED POLICY OPTION

Proposals for new purpose built shared housing or for the net loss of the existing shared housing will be considered against the following criteria:

- a. Whether meets identified local need for shared housing;
- b. Whether it complies with any relevant standards, including quality;

- c. Whether it is located in areas with a high public transport access level and facilities and services such as shops, social infrastructure etc.; and
- d. Whether it gives rise to unacceptable impacts on amenity.

JUSTIFICATION

7.60 Shared housing can play an important role in providing accommodation and meeting the housing need of individuals unable to access self-contained affordable or market rented housing.

7.61 Where HMOs are not carefully managed and if there is an overconcentration of HMOs in a location, they can negatively impact on the amenity of that location. Where evidence suggests this to be the case, OPDC will consider proposals to either improve the accommodation's standard or accept its loss to an alternative housing use.

7.62 New HMOs or hostels should

be located in areas that can absorb the more intensive occupancy rates by individuals living as separate households and sharing a property. In addition, proposals for HMO's or hostels need to be accompanied by information setting out how arrangements will effectively manage the scheme.

ALTERNATIVE POLICY OPTION

1. Encourage the conversion or loss of shared housing without replacing it.

7.63 This approach would be more responsive to market needs, but encouraging the loss of shared housing would remove this form of housing from the overall affordable housing supply. This may result in greater pressure on other forms of affordable housing.

H8: Specialist housing

KEY ISSUES

1. There is an increasing need for specialist housing for older people and vulnerable people.
2. The scale of regeneration in the OPDC area provides opportunities to meet this need.
3. Providing these types of specialist housing in new high density buildings will require careful planning, design and location to ensure future residents' needs are accounted for and they are integrated into the new development.

POLICY CONTEXT

National

7.64 The NPPF identifies the need for local planning authorities to plan for a wide choice of housing, including housing for older people.

Regional

7.65 Policies in the London Plan require specific account to be taken of the housing needs of older persons in the design of developments and when assessing older people's housing needs. Local planning authorities are required to identify and develop plans and strategies for other supported housing needs. In doing so, the long and short-term

supported housing needs of vulnerable and disadvantaged groups should be assessed.

PREFERRED POLICY OPTION

- a) OPDC will require an appropriate supply of specialist care and supported needs housing for older people and/or vulnerable people to live as independently as possible.
- b) OPDC will require proposals to be:
 - i. suitable for the intended occupiers in terms of the standard of facilities, the level of independence, the provision of support or care and be accompanied by relevant management policies;
 - ii. of an appropriate mix of sizes to meet needs;
 - iii. of a high design quality, including inclusive design and provision of adequate internal and external space; and
 - iv. accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers.
- c) In the case of market-led development aimed at older people

and/or vulnerable people, particularly where self-contained units are included, contributions to the supply of affordable specialist housing will be required.

JUSTIFICATION

7.66 The London Strategic Housing Market Assessment 2013 identified a net strategic requirement for between 3,600 and 4,200 new older persons housing units per year between 2015 and 2025. OPDC's draft SHMA identifies that specialist housing needs from the local area (Brent, Ealing and Hammersmith and Fulham) will increase by more than 400 persons per annum over the 20 year period.

7.67 OPDC will support proposals for specialist housing where it contributes to the mix of an area and is delivered through partnerships (arrangements between developer and support service provider) and will have arrangements in place for the long-term management of the development/scheme.

7.68 OPDC will support proposals that enable older people to live in their homes for as long as they want and to then move to supported living when they require greater support to remain independent. Proposals for new older people housing will need to be available at a range of costs to suit a range of financial circumstances. As such developments should contain a proportion of affordable units for older people.

ALTERNATIVE POLICY OPTION

7.69 No alternative policy option is considered since the proposed policy is consistent with national and regional policy to deliver a wide choice of good quality homes that meet the housing needs of older people and vulnerable people. The NPPF requires local planning authorities to plan for a mix of housing and this policy is in line with this national planning policy.

H9: Gypsy and Traveller Accommodation

KEY ISSUES

1. OPDC needs to ensure that it has effective plans to meet the distinct accommodation needs of gypsies and travellers.
2. The authorised site in the London Borough of Ealing falls within OPDC's boundaries and the pitches on it meet the needs of the existing community (shown in figure 82).
3. OPDC will need to plan for the existing pitches located at this site and consider whether there is any additional need for pitches in the OPDC area.

POLICY CONTEXT

National

7.70 Planning policy for traveller sites (August 2015) states that local planning authorities should:

- make their own assessment of need (in respect of traveller sites);
- work jointly with other local planning authorities to develop plans through identifying land for sites;
- plan for sites over a reasonable timescale;
- reduce unauthorised developments and encampments and make enforcement more effective;
- ensure that access to education, health, welfare and employment is facilitated by

the provision of suitable accommodation; and

- have due regard to the protection of local amenity and local environment.

Regional

7.71 The London Plan states that local planning authorities should identify and address the accommodation requirements of gypsies and travellers (including travelling show people).

PREFERRED POLICY OPTION

- a. OPDC will give careful consideration to the needs of gypsies and travellers and work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham to secure a sufficient supply of plots/pitches to meet the needs of existing and future gypsy and traveller households (including travelling show people);
- b. Where OPDC's Gypsy and Traveller Accommodation Needs Assessment study determines a need for provision of pitches on an additional site OPDC will work with the London Boroughs of Brent, Ealing and Hammersmith

& Fulham to identify a suitable site. Any new sites, pitches and/or plots for travellers should:

- i. Be accessible to transport (including safe access to/from the main road network), services and facilities, and be capable of being supported by the local social infrastructure;
- ii. Be capable of connecting to the utilities infrastructure; and
- iii. Support the health and wellbeing of the occupiers of the site by providing appropriate facilities, layout and design quality.

JUSTIFICATION

7.72 There is currently one authorised site in the London Borough of Ealing, which falls within OPDC's area. OPDC has commissioned a Gypsy and Traveller Accommodation Needs Assessment in order to provide it with an evidence base. The assessment will identify the need for pitch provision during the plan period and inform the development of a strategy to meet the identified need. As this work is in

progress, outputs from it will inform the next iteration of the draft Local Plan gypsy and traveller accommodation policy.

7.73 Historical data shows a sufficient level of churn at the existing site, which should enable this site to continue to meet any need arising in the short/medium term. Where evidence of additional need emerges, OPDC will work with the three local boroughs to meet the additional identified need and identify a suitable alternative site in line with the requirements of this preferred policy option.

ALTERNATIVE POLICY OPTION

7.74 No alternative policy option has been considered, as national policy requires local planning authorities to meet the needs of gypsy and travellers within its area as part of its objectively assessed need and 5-year supply

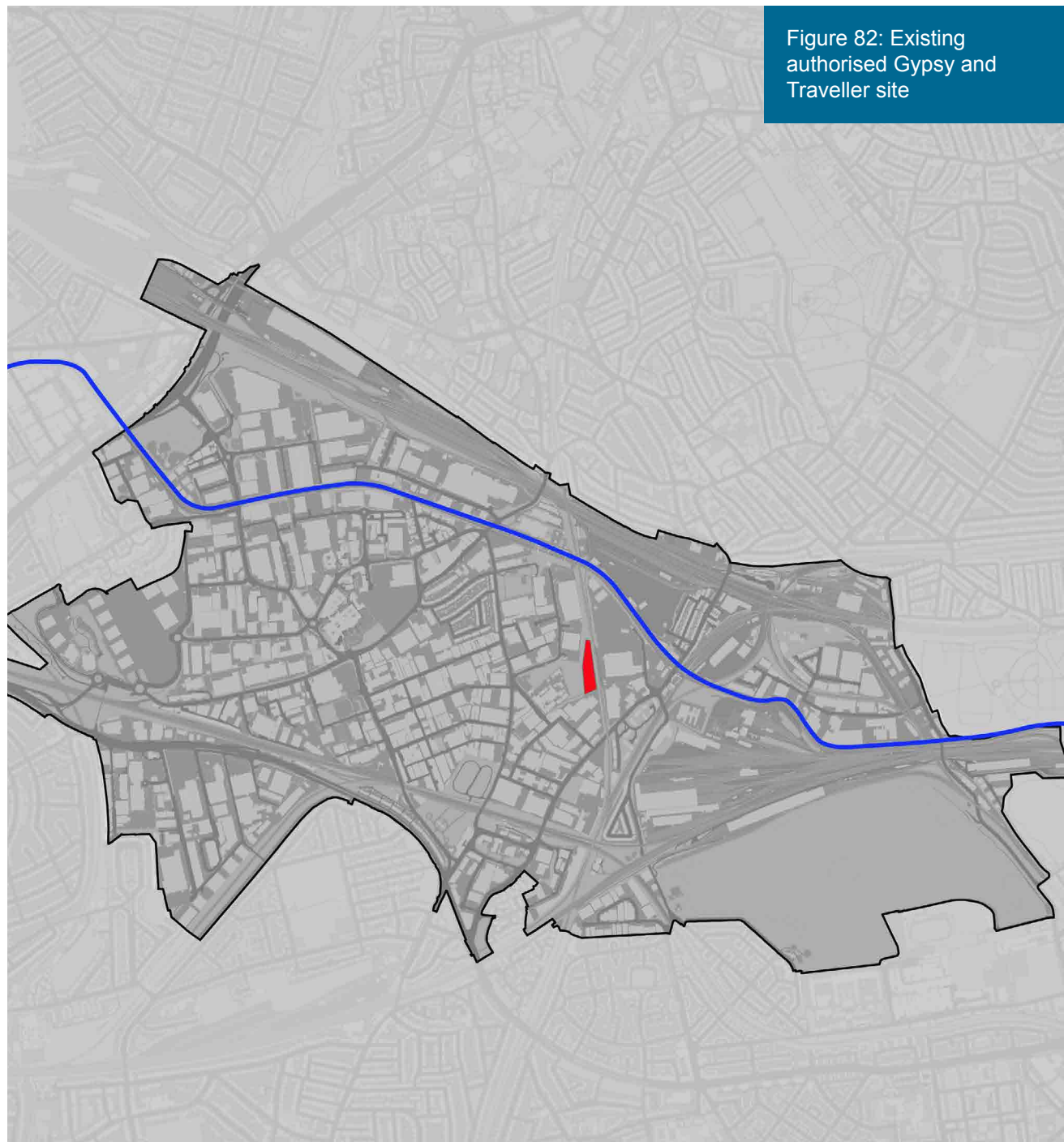


Figure 82: Existing authorised Gypsy and Traveller site

H10: Student accommodation

KEY ISSUES

1. London is home to some of the world's finest universities. They are important assets for the city and the UK. Suitable and affordable student accommodation plays a major role in the university experience. Well-designed and purpose built student accommodation, managed effectively and in the right location not only provides a place to live and study but also relieves pressure from the private housing market.
2. OPDC needs to work with these universities, as well as specialist student accommodation providers to support the supply of new well-managed, purpose built student accommodation.

POLICY CONTEXT

National

7.75 The NPPF require local planning authorities to plan for a choice of housing, creating sustainable, inclusive and mixed communities.

Regional

7.76 London Plan policies require local planning authorities to address student accommodation needs.

PREFERRED POLICY OPTION

- a) Student housing will be supported where it:
 - i. Contributes to the vibrancy and diversity of an area, especially in the early phases of the plan period;
 - ii. Enhances immediate and surrounding areas;
 - iii. Is of the highest design quality;
 - iv. Is located in areas with high PTAL or is easily accessible by non-motorised forms of transport;
 - v. Does not result in a localised over-concentration of student housing; and
 - vi. Results in no net loss of conventional housing supply, especially self-contained homes.
- b) Proposals must include:
 - i. Management and maintenance plans demonstrating how the amenity of neighbouring residents will be protected; and
 - ii. What steps would be taken to minimise impacts on neighbouring uses
- c) Where the proposal is not linked to

a specified educational institution it will need to provide the maximum reasonable amount of affordable student housing.

JUSTIFICATION

7.77 The Mayor's Academic forum has provided projections for the growth of full time students in London from 2011/12 to 2026/27 and the required additional purpose-built student accommodation that this growth generates. These projections estimate that by 2026/27 London's current student population of just over 365,000 will have increased to between 429,391 and 487,317.

7.78 OPDC recognises the many positive benefits that universities/higher education institutions and their students bring to London. Both enhance an area's reputation as a dynamic and vibrant location, create a critical mass for the delivery of goods, services and events, provide local businesses with skilled workers and seasonal workers and can aid regeneration and investment.

7.79 To achieve mixed and balanced communities, provision of purpose

built student accommodation will be supported but it must not result in an over-concentration in any one particular location. This will avoid issues of:

- not achieving a mix and variety of housing in a location;
- overconcentration of one form of dwelling type;
- directly related noise and management concerns;
- vacant premises at particular times of the year; and
- pressure on the transport infrastructure at particular times of the year (end/start of terms).

7.80 There may be an opportunity to set a quantum of student accommodation that the OPDC area could aspire to deliver (see consultation questions below).

7.81 Proposals for student accommodation will be required to be of high quality in relation to design and size. Student housing schemes, by virtue of providing a number of units of the same size, can result in monotonous façade treatments which can negatively impact on the public realm. Proposals should specifically seek to deliver interesting and high quality facades, that complement the existing and emerging character of the area.

7.82 Student housing proposals should make an appropriate contribution to affordable housing, subject to viability.

7.83 Proposals for student housing should be located in or close to transport nodes so that students can easily access public transport, workplaces and services. Developments located close to transport nodes will also support with the movement of students especially during the start and end of terms.

7.84 OPDC will expect proposals to be accompanied by management plans setting out how any impact on the surrounding area and the amenity of the neighbouring residents will be mitigated. These plans must provide details of the management regime to be implemented on site, from first occupation and on an ongoing basis. Management and maintenance plans should, as a minimum, include detailed information on:

- a. move-in/out arrangements at the start and end of the academic year;
- b. how individual student units will be managed;
- c. how communal facilities, including landscaping, deliveries and collections will be managed;
- d. security and fire safety procedures;

and
e. procedures for community liaison.

Questions:

QH10a: Should an area wide student housing target be identified? Please explain why.

QH10b: Should OPDC seek to restrict new development of student housing in certain locations? See the place policies for North Acton.

You can provide comments directly through:

opdc.commonplace.is

ALTERNATIVE POLICY OPTION

1. Require student housing proposals to be linked to specified educational institutions

7.85 While this may provide the required level of affordable student accommodation and the management policies of the educational institution will ensure that the development is appropriately managed, it may not enable the future flexible use of the accommodation.



8

EMPLOYMENT



Employment

This chapter contains policies addressing the following policy themes:

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

Questions:

QEa: Are there any other employment policy themes that you think OPDC's Local Plan should be addressing?

QEb: Do you agree with the chapter's preferred policy options? If not, what might you change?

QEc: Are there any other policy alternatives that could replace the chapter's preferred policies?

You can provide comments directly through:

opdc.commonplace.is

EVIDENCE BASE

Table 7: Employment Evidence base

Supporting study	Description	Status
OPDC Industrial Land Review	Assesses the current and future supply and demand for industrial land within Old Oak and Park Royal.	Draft completed
OPDC Development Capacity Study (DCS)	A study assessing the development capacity of development plots within the OPDC area	Draft completed
GLA Creating Open workspaces document	Assesses London-wide demand and opportunities with recommendations for local planning policy in relation to non-traditional workspaces for micro, small and medium enterprises.	Completed

E1: Strategic policy for employment

KEY ISSUES

1. To secure benefits generated by the huge increase in accessibility, as a result of the arrival of a new HS2, Crossrail and Great West Coast Main Line station, there will be a need to release Strategic Industrial Location (SIL) designation in Old Oak to support a mixed use approach to development and optimise the delivery of a range of employment workspace typologies. This needs to be considered against London's and west London's release of industrial land which is greater than envisaged by the GLA 2011 benchmarking exercise.

POLICY CONTEXT

National

8.1 The NPPF sets out a number of requirements for Local Plans including setting a clear economic vision and strategy that encourages sustainable economic growth which is supported by flexible policies that meet the development needs of existing and new business sectors.

Regional

8.2 The London Plan seeks to maximise the benefits from new infrastructure to secure sustainable growth and development. It supports office based employment by focusing

new development in viable locations with good public transport. It also states that how development in and adjacent to SIL should be planned and managed to support the continued functioning of SIL.

8.3 The London Plan alongside the Old Oak & Park Royal OAPF (2015) identify the principle of SIL being consolidated and intensified at Park Royal to both ensure its continued protection and accommodation of 10,000 new jobs and for non-industrial employment uses to be provided in Old Oak to deliver approximately 55,000 new jobs.

PREFERRED POLICY OPTION

OPDC will work with stakeholders to deliver a sustainable and robust local economy that promotes Old Oak and Park Royal as a place for enterprise and innovation and which contributes to London's economic growth. This will be achieved by:

- a) establishing Old Oak as a recognised commercial hub;
- b) consolidating Strategic Industrial Location (SIL) at Park Royal;
- c) supporting proposals that deliver

economic growth by:

- i. contributing to delivering a range of employment uses in areas outside of SIL to support the delivery of 55,000 new jobs; and
- ii. contributing to delivering a range of industrial uses within Park Royal's SIL and the area's intensification to accommodate 10,000 new jobs.

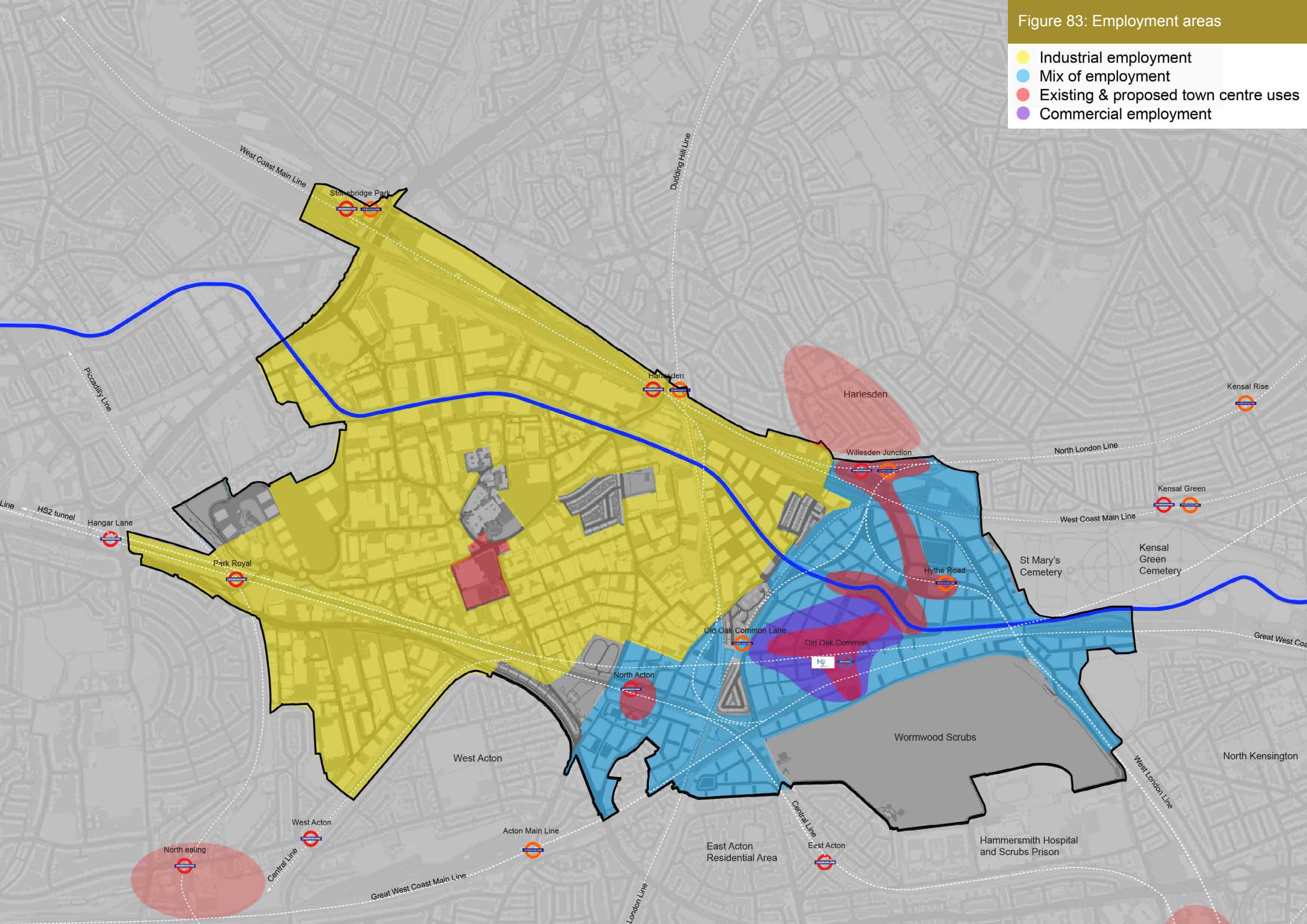
JUSTIFICATION

8.4 Old Oak and Park Royal have a long history of economic innovation and growth that has shaped the surrounding areas and London as a whole. The area is the UK's largest and most successful industrial location and it plays a fundamental role in supporting the functioning of London.

8.5 The regeneration opportunities presented by the arrival of High Speed 2 and Crossrail at Old Oak should continue to support this legacy of employment and innovation that benefits the local area, west London and London as a whole. To support this opportunity, the London Plan,

Figure 83: Employment areas

- Industrial employment
- Mix of employment
- Existing & proposed town centre uses
- Commercial employment



Old Oak & Park Royal Opportunity Area Planning Framework and OPDC Development Capacity Study (DCS) identify that Old Oak has the potential to deliver space for 55,000 new jobs and has the potential through intensification to deliver 10,000 new jobs. To facilitate this, land currently designated as SIL in Old Oak should be de-designated as SIL to enable mixed use development. The main employment hub should be focused close to the new Old Oak Common Station, which will benefit from high levels of public transport accessibility. In other areas of Old Oak, a more varied and mixed type of employment space will be encouraged to support micro, small and medium business growth.

8.6 Old Oak and Park Royal currently has a diverse economic profile, with 1,500 business units employing an estimated 36,000 people. In total there is approximately 2,100,000sqm of employment floorspace on 355 hectares of employment sites within SIL across the area. It provides much needed employment to the surrounding areas and west London, while supplying diverse goods and services to businesses and inhabitants across the local area, west London and the capital.

8.7 This diverse range of sectors forms a patchwork across Old Oak and Park Royal with some sectors having a greater presence. These are:

- logistics;
- prop houses and film studios;
- food manufacturing and wholesale; and
- vehicle sale and repair.

8.8 Businesses occupy a range of different space typologies and sizes, from small workshops to large warehouses.

8.9 OPDC must consider how to accommodate and support new and existing economic sectors as they grow and develop as well as retain those which are successful. Critical to this will be the delivery of exemplar digital communications infrastructure. OPDC should play an important role in ensuring the necessary conditions are in place to attract new employment and innovative business sectors to the area. Further work will be carried out to identify the types of conditions necessary to attract these sectors. Today, it is not possible to define exactly what future sectors may seek to locate here. However, sectors which comprise the 'Innovation Economy' could be a significant element of this. These sectors include clean technology,

applied sciences, life sciences, niche manufacturing, creative industries, film and screen, circular economy and other digital and innovation technology based industries. OPDC will support and promote measures to grow existing and new employment clusters with employment-generating potential to enhance the area's economic profile and performance and act as a magnet to draw further investment into the area. Specifically, it will support the synergies between jobs and economic growth with the delivery of education and health institutions within the area as set out in policies SI2 and SI3.

8.10 OPDC is exploring what these sectors could be and what their spatial and design requirements are to inform the next stage of consultation on the draft Local Plan.

ALTERNATIVE POLICY OPTION

8.11 Alternative policy options are not considered to be realistic given that strategic guidance is set out in national and regional policy frameworks.

Questions:

QE1a: What business sectors should OPDC seek to attract to the area and what specific design and operational requirements would attract these sectors?

You can provide comments directly through:

opdc.commonplace.is

Figure 84: Offices in the City of London



Figure 85: Prop warehousing in Park Royal

E2: Old Oak

KEY ISSUES

1. The London Plan identifies Old Oak as having the potential to accommodate 55,000 new jobs in response to new strategic transport infrastructure. The Old Oak and Park Royal OAPF suggests that these jobs will be across a range of sectors including a significant amount of new commercial and town centre uses. This will require the release of Strategic Industrial Location to accommodate this growth.
2. Due to the timescales of the development, policies need to be able to accommodate a range of potential employment sectors as demand for workspace increases.
3. Employment floorspace typologies need to be both flexible and located to support a mixed and vibrant place.
4. There are a range of proposed uses in Old Oak that may benefit from the co-location of non-residential floorspace, to act as a buffer and mitigate environmental impacts of existing and future infrastructure.

POLICY CONTEXT

National

8.12 The NPPF requires Local Plans to support existing business sectors and plan for new or emerging sectors.

Regional

8.13 For industrial areas, the London Plan interprets this guidance to focus new office development on viable locations with good public transport access. The London Plan specifically identifies Old Oak as having capacity to accommodate 55,000 new jobs.

PREFERRED POLICY OPTION

Old Oak will become a mixed employment hub by requiring proposals to provide:

- a) a new commercial area and a range of flexible open workspace typologies in locations identified in the Overarching Spatial Policies and Places Chapters; and
- b) town centre uses which generate employment along the High Street, in and around Old Oak Common Station and in other accessible locations.

JUSTIFICATION

8.14 The London Plan identifies Old Oak as having the potential to deliver 55,000

new jobs in response to new strategic transport infrastructure. The Old Oak and Park Royal OAPF suggests that these jobs will be largely commercial based along with a smaller proportion of other town centre uses such as retail, leisure, culture and community uses. Future employment sectors attracted to Old Oak will change over time. It is therefore important to retain flexibility in their design and management. However, OPDC will expand on these possible sectors in the next version of the draft Local Plan. A new commercial hub including a significant proportion of the area's new office and commercial employment would be focused on and around Old Oak Common Station. The station is due to open in 2026 and sites around the station are only likely to be available for development near to this point.

8.15 Outside of the commercial hub, OPDC will strongly encourage a more varied and flexible commercial offer as part of mixed use development. These areas can provide much needed space for micro, small and medium enterprises, including open

workspaces (see policy E4). These spaces are typically smaller than those located within the new commercial hub and as such can offer greater choice for businesses and encourage a more varied economic offer.

8.16 Light industrial uses can make use of spaces not suited to other uses. There will be a significant amount of transport infrastructure retained in Old Oak where such uses could act as a buffer to more sensitive residential and community uses. Light industrial uses can also contribute to local distinctiveness and a unique character of an area. Fish Island, on the edge of the Queen Elizabeth Olympic Park provides a strong case study for the role these spaces can play in contributing to the identity of an area.

8.17 North Acton has the potential to deliver new town centre employment floorspace that will contribute to a sense of place and activation of the local area.

ALTERNATIVE POLICY OPTION

1. Support for focusing B1(a) uses in and around Old Oak Common Station is not provided.

8.18 The benefit of this approach would be the provision of a more flexible approach to office distribution across Old Oak. The disadvantage would be that the commercial centre around Old Oak Common Station could become less defined leading to the location of office space in less accessible locations.

2. Support for B1(b) and B1(c) uses in Old Oak north is not provided.

8.19 The benefit of this approach would be that additional floorspace is provided for non-industrial uses. The disadvantage would be that locations not suited to retail, office, leisure or residential uses could remain vacant and negatively impact on the amenity of the public realm.

E3: Park Royal

KEY ISSUES

1. The draft OPDC Industrial Land Review (2015) has identified that the rate of release of industrial land in west London boroughs has been higher than the annual target envisaged by the 2011 GLA benchmarking process. This is creating pressure on existing industrial locations, including Park Royal, to accommodate industrial uses. The release of SIL will place further pressures on industrial land requirements at Park Royal.
2. The impact of the transformative regeneration at Old Oak will need to be managed to secure benefits for Park Royal and address issues created by this change.
3. The impact of the construction and future operation of development at Old Oak needs to be carefully managed to support the operation of Park Royal.
4. The Park Royal Business Group has identified that Park Royal lacks uses which support the industrial businesses in the estate.

POLICY CONTEXT

National

8.20 The NPPF requires Local Plans to support existing business sectors and plan for new or emerging sectors.

Regional

8.21 For industrial areas, the London Plan policies interpret national guidance to promote, manage and where appropriate, protect Strategic Industrial Locations (SIL). For planning decisions it sets out a series of criteria that supports the delivery of 'broad industrial type uses', SME or new emerging industrial sectors workspace or small scale 'walk to' services for industrial occupiers within SIL. The London Plan requires that uses in or adjacent to SIL should not compromise the integrity and effectiveness of these locations to accommodate industrial type activities.

8.22 The London Plan also identifies two types of SIL. These and the broad industrial type activities are defined in the glossary.

PREFERRED POLICY OPTION

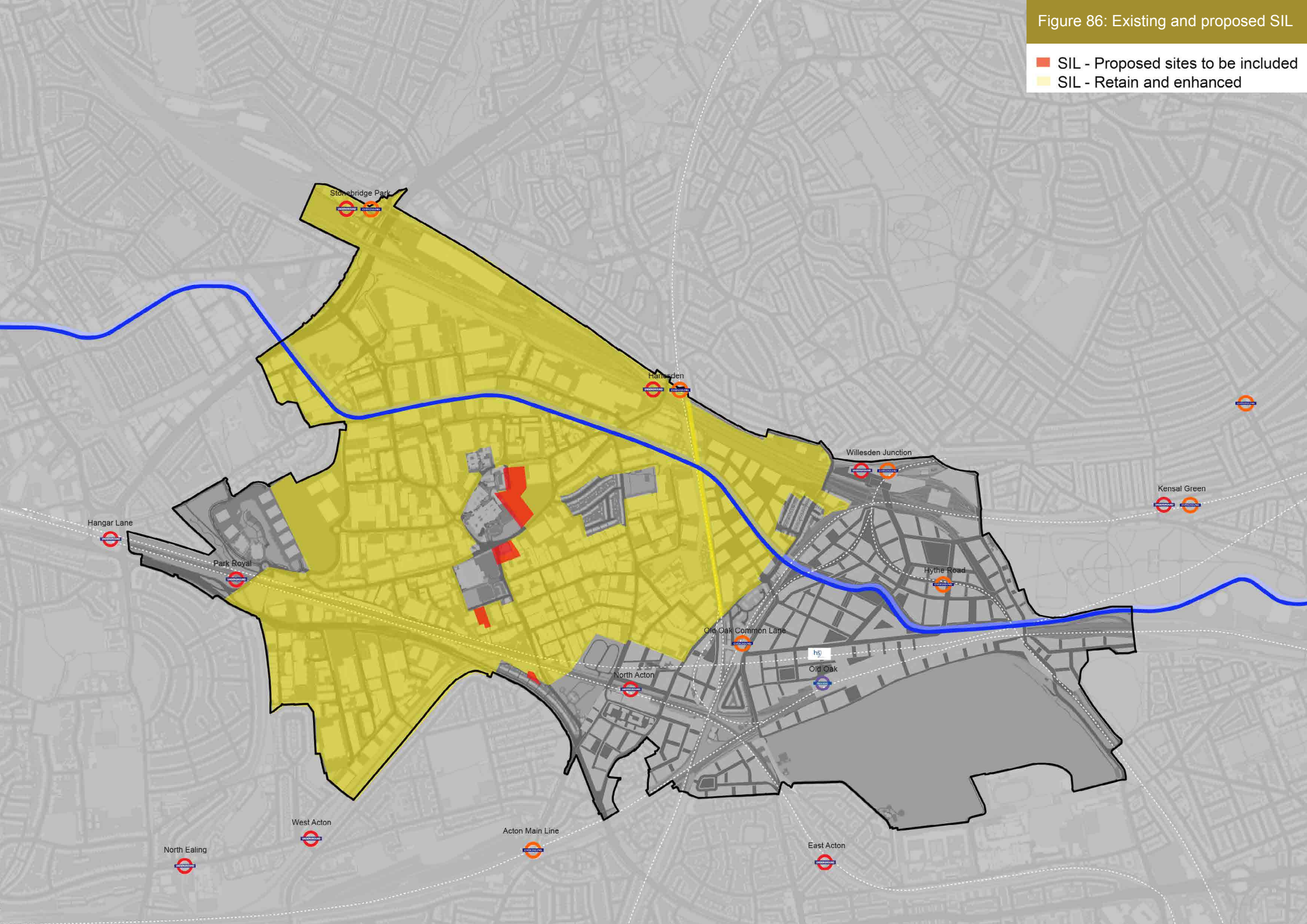
Park Royal Strategic Industrial Locations (SIL) will be retained and where possible enhanced by:

- a) protecting existing SIL;
- b) requiring proposals for uses adjacent

- c) designating the following sites as new SIL:
 - i. Matthew Park (B6.29);
 - ii. Central Park (B6.31);
 - iii. Corner of Acton Lane and Park Royal Road (E2.05b);
 - iv. Vacant land on Western Road (E3.19); and
 - v. The Courtyard Estate (E4.26).
- d) intensifying the use of land by requiring proposals to demonstrate how they are maximising the use of sites, including the provision of smaller units, to support greater employment densities; and
- e) supporting appropriate town centre uses in the Park Royal Centre outside of SIL.

Figure 86: Existing and proposed SIL

- SIL - Proposed sites to be included
- SIL - Retain and enhanced



JUSTIFICATION

8.23 Park Royal forms an important function as a reservoir of industrial land in west London. London needs such reservoirs to function efficiently and supply the population and other businesses with goods and services, while also accommodating any future manufacturing activity that needs to remain in the capital. With the release of industrial land occurring at a greater rate than previously expected, OPDC will work with the GLA, west London boroughs and other relevant stakeholders to help manage the supply of industrial land across the sub-region and London.

8.24 SIL is suitable for a wide range of industrial uses, but what sets SIL in Park Royal apart is its size and location. It is one of the few areas of London's industrial reservoir that can accommodate uses which can lead to land use conflicts elsewhere. This includes land for waste, utilities and transport but also industrial activities operating 24 hours a day and creating industrial noise. These features are one of Park Royal's most important land use assets and one of the keys to its success.

8.25 In demonstrating how uses adjacent to SIL will not negatively impact on uses within the SIL, proposals

should define how the uses, design and layout will ensure that impacts on building occupant amenity and the road network would be managed.

8.26 OPDC will use its planning enforcement powers to ensure the SIL can continue to operate effectively.

8.27 To help promote the industrial role of Park Royal, ancillary uses within a multifunctional space can play a key role in supporting existing businesses and future industrial uses. These uses may include ancillary retail, meeting, eating and drinking spaces alongside shared services that industrial units may not be able to accommodate but can provide a valuable service for businesses and employees.

8.28 Applicants will be expected to demonstrate how these proposals have been optimised to include a range of unit sizes that cater to a diverse range of industrial uses including those requiring 'open workspaces'. This will provide accommodation for a broad range of businesses that require diverse unit types, sizes and rental or tenure conditions.

8.29 While the market can play a key role in determining the form and mix of industrial property development, the decreasing levels of SIL across London

means that OPDC needs to ensure that the remaining stock of land is used as efficiently as possible through intensification including modernisation and improvements to existing stock and sites. Development proposals should set out how more intensive forms of development with more industrial floorspace and higher plot ratios have been considered, ensuring this happens on each plot. This process may include considering multi-storey warehousing, delivering a range of unit typologies for 'open workspaces' (including small units of less than 250sqm to meet London wide demand) and demonstrating how adjacent site owners have coordinated development proposals and/or considered the potential for sharing services. OPDC will be exploring whether it can play a more active role in delivering this aspiration.

8.30 New sites proposed for inclusion within SIL have been subject to a thorough analysis to consider their appropriateness to be included within SIL. For each site this analysis is set out in the adjacent table. Further information on this is included in the draft Industrial Land Review.

8.31 It is envisaged that further detailed guidance for Park Royal will be provided within a Park Royal Supplementary

Figure 87: Businesses in Park Royal



Planning Document.

8.32 The Park Royal Centre will play an important role as a neighbourhood town centre in delivering uses which support the functioning of the wider Park Royal area and in delivering open workspace typologies. Further information is provided in preferred policy option P6.

ALTERNATIVE POLICY OPTION

1. SIL boundary is not extended.

8.33 The benefit of this approach would be sites could deliver non-industrial uses which support the functioning of SIL. However, not designating sites considered to be appropriate for SIL could be considered as a lost opportunity to help support the continued success of Park Royal.

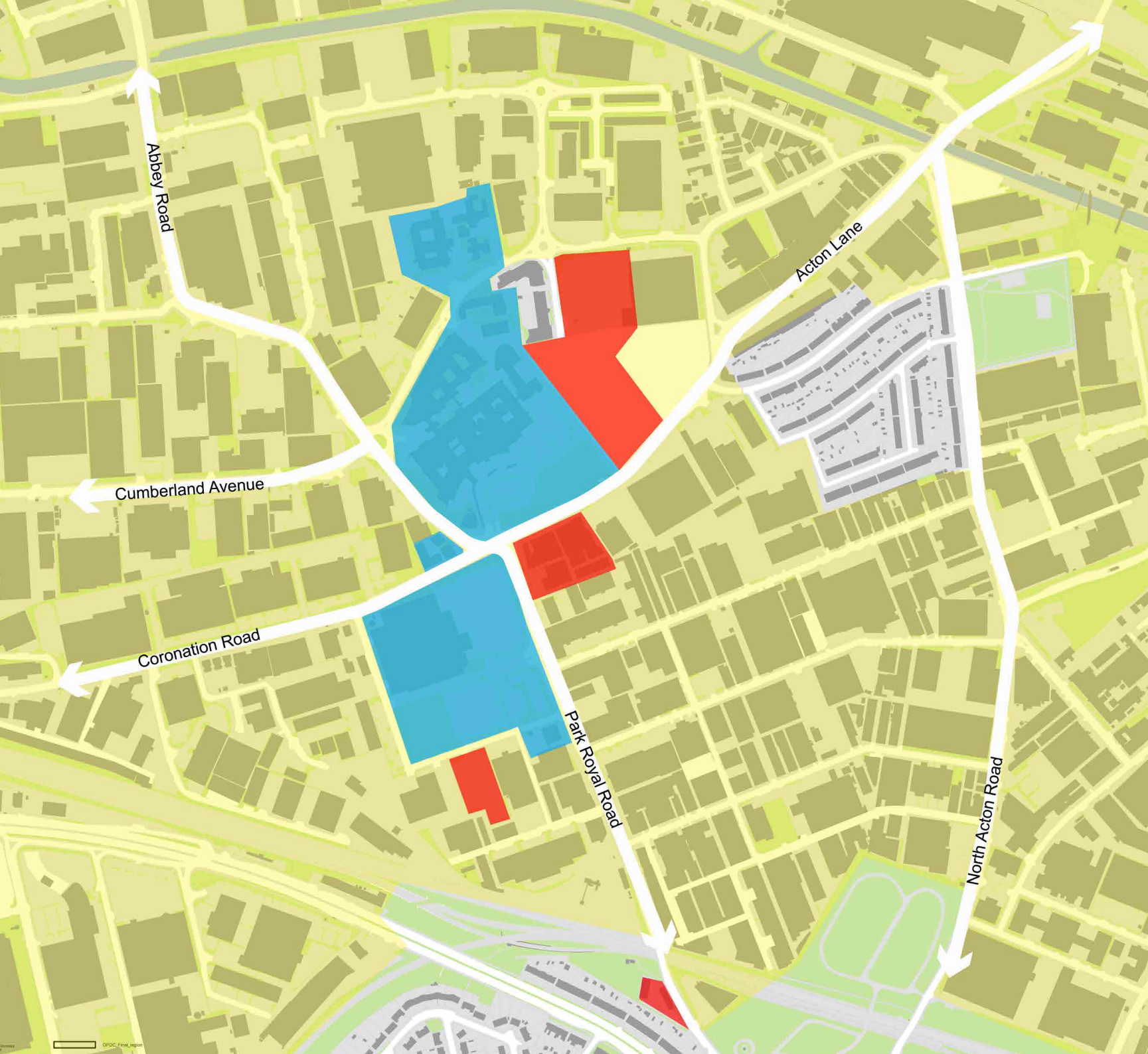
2. Additional land in Park Royal is released, such as the High Speed 2 construction work sites north and south of the canal, to accommodate other forms of development.

8.34 The benefit of this approach would be that additional development capacity is delivered. The disadvantage is that further pressure on industrial land capacity is created and it would threaten the future success of Park Royal.

Table 8: Proposed SIL site designations and reasoning

Site	Reasoning for designation
Matthew Park (B6.29)	<ol style="list-style-type: none"> 1. Currently in industrial use; 2. Abutting existing industrial uses (site B6.31) recommended to be designated as a SIL; 3. Located adjacent to SIL designation to the north and east; and 4. Addressing incomplete SIL designation. Industrial warehousing designated as a SIL but supporting loading area not currently designated.
Central Park (B6.31)	<ol style="list-style-type: none"> 1. Currently in industrial use; 2. Abutting existing industrial uses (site B6.29) recommended to be designated as a SIL; 3. Located adjacent to SIL designation to the south east; and 4. Addressing incomplete SIL designation. Only a portion of industrial warehousing and loading areas on site designated as a SIL.
Corner of Acton Lane and Park Royal Road (E2.05b)	<ol style="list-style-type: none"> 1. Abutting existing SIL designation to the east, south and west.
Vacant land on Western Road (E3.19)	<ol style="list-style-type: none"> 1. Currently in industrial use with 'walk to' uses serving the business community facing Acton Way and Park Royal Road; and 2. Abutting existing SIL designation to the east and south.

Figure 88: Proposed SIL designations



- SIL - Proposed sites to be included
- SIL - Retain and enhanced
- Non-SIL town centre / health uses

E4: Open workspace

KEY ISSUES

1. The London Enterprise Panel recognises that SMEs contain much of London's future innovation, enterprise and growth but it is becoming increasingly hard to find business premises at affordable rates. The draft OPDC Industrial Land Review also concludes that industrial workspace developers tend to build speculative units that are targeted at medium and larger businesses rather than micro or small businesses. As such, a key issue is that the delivery of appropriate floorspace for SMEs is necessary but difficult to secure.
2. The management, design, flexibility and affordability of these spaces can present a challenge to traditional employment space developers.
3. There are a range of difference economic sectors comprising micro, small and medium enterprises that could play a very positive role in contributing to economic growth and placemaking. These are broad ranging and include digital, creative, cultural, life sciences, applied sciences, clean, green and low carbon technology and the circular economy. OPDC will need to develop a strategy for how to attract and support these growing sectors to locate to Old Oak and Park Royal.

POLICY CONTEXT

National

8.35 The NPPF requires Local Plans to support existing business sectors and plan for new or emerging sectors.

Regional

8.36 London Plan interprets this guidance by identifying the need to ensure the 'availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium enterprises, including the voluntary and community sectors'.

8.37 London Plan policy on new and emerging economic sectors highlights the need to 'support the evolution of London's science, technology, media and telecommunications sector, promote clusters such as Tech City and Med City ensuring the availability of suitable workspaces'.

PREFERRED POLICY OPTION

Proposals for open workspace typologies will be supported by:
a) protecting and/or enhancing existing

- viable open workspace typologies where they make maximum use of their site and contribute to the wider regeneration of the OPDC area;
- b) requiring proposals for major commercial development to deliver affordable workspace;
 - c) supporting proposals for open workspaces typologies where they are demonstrated to be:
 - i. appropriately located and designed;
 - ii. viable for nurturing and stimulating entrepreneurial activity, in particular in future growth sectors;
 - iii. informed by the business needs of open workspace providers and the requirements of relevant small business sectors;
 - iv. appropriately managed by a registered workspace provider, or supported by a Management Scheme, and agreed through Section 106 agreements; and
 - v. not resulting in a net loss of employment land or floorspace;
 - d) exploring mechanisms to deliver open workspaces in accordance with OPDC regeneration priorities.

Proposals for temporary employment floorspace will be encouraged where it:

- e) contributes to the vitality, character and activation of an area;
- f) contributes to establishing and/or growing business sector clusters that make a positive contribution to the economic and social regeneration of the area;
- g) provides open workspace typologies; and
- h) demonstrates how it would complement the longer term comprehensive regeneration of the area.

JUSTIFICATION

8.38 The GLA's Creating Open Workspaces document (2015) shows how 'Open workspaces' to be designed and managed to support small, medium and micro enterprises. These typologies are usually flexible, with shared facilities and low-cost or managed workspaces and can include office space with flexible rental terms, co-working spaces, incubator spaces, accelerator spaces, creative/artist spaces and makerspaces. They tend to be flexible and affordable and are ideally managed by an appropriate workspace provider. Other low threshold enterprise space can have similar characteristics and provide some of the benefits of open workspaces for small businesses, as identified in the GLA Accommodating Growth in Town Centres (2014) report. Existing examples can be seen at Birmingham's Custard Factory in Digbeth, Impact Hub in Westminster and Acme Studios in Southwark. Lease agreements between developers, workspace providers and tenants are key to the successful delivery of effective workspaces.

8.39 Affordable workspaces will be required to meet need for workspaces for a range of growth sectors provided at sub-market levels. As such, any proposals for major commercial

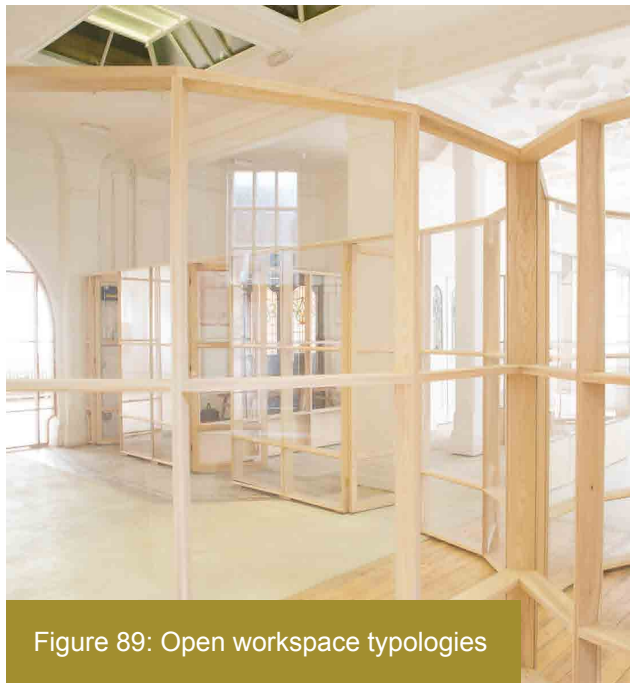


Figure 89: Open workspace typologies



Figure 90: Open workspace typologies

development should demonstrate how they will deliver viable and sustainable affordable workspace.

8.40 OPDC will be exploring what spatial, design and management requirements are needed to be delivered in the Local Plan open workspace typologies. This will be undertaken as part of the evidence base to inform development of OPDC's Socio-economic Regeneration Strategy and other Local Plan evidence base to inform the next draft of the Local Plan.

8.41 99% of the business units in the OPDC area are micro, small and medium sized, employing 76% of the workforce. 56% of these are micro with less than 10 people; they make up only 10% of the workforce. Businesses occupy a range of different space typologies and sizes, from small workshops to large warehouses. As such, where existing workspaces meet with the criteria in Policy E4c) it is proposed that they should be protected.

8.42 To support continued economic innovation and diversity in Old Oak and Park Royal, innovative design, delivery and management of open workspaces for start-up businesses needs to be supported in the regeneration of the area. Existing open workspace

typologies will be supported where they positively contribute to the wider regeneration of the area and are demonstrated to be viable. Proposals for these typologies will be supported and/or informed by the business needs and design requirements of relevant workspace providers.

8.43 Temporary employment uses, otherwise known as meanwhile or pop-up uses, can play a key role in

helping to generate a sense of place and activation of an area during the transformation phases and enabling new entrepreneurs to test their business ideas. Kings Cross has seen the use of a diverse range of temporary uses successfully drawing people into the area and generating interest before development is completed. These uses include the King's Cross Pond and the Floating Cinema alongside numerous events. Temporary uses may be in the



Figure 91: Open workspace typologies

form of open workspace or traditional typologies. Existing examples include Pop Brixton and the forthcoming Peckham Levels.

8.44 Within Old Oak, the long-term development timescales provide the opportunity for temporary employment uses to be located within the area and provide critical space for emerging sectors, specifically those generated by higher education establishments. Consideration will need to be given to the potential impact of these uses on the wider regeneration of the area and the impact on existing uses and residents. Major proposals should be accompanied by a meanwhile strategy to demonstrate how they accord with policy requirements (see Policy OSP5, chapter 3).

ALTERNATIVE POLICY OPTIONS

1. Delivery of onsite open workspace is required for residential and/or commercial proposals.

8.45 To help further ensure that open workspace typologies for small, medium and micro enterprises, this option would require all proposals for residential and/or employment proposals to deliver onsite open workspace. The advantage of this option would be to provide a large

quantum and range of employment workspace and support a diverse local economy. The disadvantage would be that low quality spaces may be produced and would be burdensome for smaller developments. Provision of such spaces without an appropriate market needs assessment may result in high vacancy rates which may have a negative impact on placemaking and perceptions of community safety.

2. Delivery of small-scale workspaces is supported with coordinated delivery of rented small-scale residential units outside of the SIL.

8.46 To support the delivery and operation of small-scale workspaces, these spaces could be linked with the use of rented small-scale residential units for occupiers within Old Oak. This would be secured through S106 agreements and other management arrangements. The advantage of this option would be that development would support start-up businesses to be established and would support the delivery of a range of housing typologies meeting potential need. 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 and increase overall vacancy rates.

Questions:

QE4a: Where should open workspaces be located?

QE4b: What are the design and operational requirements for deliver open workspaces?

QE4c: Should policies seek the provision of affordable workspace as part of all new development?

You can provide comments directly through:

opdc.commonplace.is

E5: Local access to employment and training

KEY ISSUES

1. Some of the areas to the north and south of the OPDC area are shown to be in the 10% most deprived locations in the country. OPDC needs to work with partners to ensure that local people, especially those in deprived locations, are able to access opportunities to improve their skills, training, qualifications and gain employment generated by the regeneration of Old Oak and Park Royal.

POLICY CONTEXT

National

8.47 The NPPF sets out a commitment to secure economic growth in order to create jobs and prosperity.

Regional

8.48 London Plan policies support this aspiration with the Mayor committing to ensuring equal life chances for all Londoners alongside seeking to co-ordinate initiatives to improve employment opportunities and remove barriers to employment and progression.

PREFERRED POLICY OPTION

- a) OPDC will maximise access to employment, skills training, apprenticeships and pre-employment support that responds to changing labour market conditions and employer demand by:
 - i. promoting the benefits of responsible business by giving developers and employers information and tools to recruit a local talent pool and source local firms to fulfil their business needs; and
 - ii. working with partners and relevant stakeholders to deliver a coordinated, demand-led training and employment offer and effective pathways for local people into sustainable jobs and higher paid work.
- b) Development proposals will be required to include a Local Employment and Training Agreement setting out how they will meet OPDC's socio-economic regeneration priorities.

JUSTIFICATION

8.49 Getting more local people into sustained employment is key to the successful regeneration of Old Oak and Park Royal, so maximising access to local employment and training is a key priority for OPDC. OPDC intends to play an active role in implementing and coordinating initiatives to secure employment, training and apprenticeships through its own activities, through development proposals, and through partnership working with the boroughs and employment and skills providers.

8.50 Some of the areas to the north and south of the OPDC area are shown to be in the 10% most deprived locations within the country, with local communities experiencing high levels of worklessness and children in poverty. Employment uses and associated education and training opportunities can play a fundamental role in addressing socio-economic deprivation and poverty. Having a job is also a key determinant of health and well-being. As such, it will be important that local employment and training opportunities are maximised to ensure that they support community development and help to contribute to a robust local economy.

8.51 In order to ensure that this new part of London becomes a well-connected and inclusive part of the city that is linked into surrounding neighbourhoods, it will be vital that change is planned so that local people (including existing and future residents and businesses) will be able to benefit from the opportunities that will come forward. OPDC will support a range of jobs, skills, apprenticeship and enterprise interventions that will equip local people to be able to compete in the economy of the future, that add value to existing provision in the three boroughs and that contribute to wider west London sub-regional provision.

8.52 An informed and skilled local community can provide the local labour force that existing and new employers need to help grow their businesses. There is an opportunity to enable local residents to secure work closer to where they live which in turn will generate wealth and contribute to the development of a robust and sustainable local economy.

8.53 To ensure proposals for major developments are meeting OPDC's socio-economic regeneration priorities, the Local Employment and Training Agreement should set out development employment forecasts, proposed targets for employing a local labour

force; demonstrating how they will proactively seek to employ women, Black and Minority Ethnic (BAME) groups, Disabled people and ex-offenders; provide apprenticeship and skills training opportunities; and include a commitment to advertise construction and end use job vacancies locally in local labour and business schemes and job centres; and pay employees the living wage.

8.54 In delivering its own regeneration priorities, OPDC is currently envisaging undertaking the following:

- Brokering training, apprenticeship and jobs with employers, contractors, public, private and third sectors to link local young people and adults into training and sustainable jobs;
- Working with schools, the further education (FE) and higher education (HE) sector, and businesses to deliver a high quality educational offer that responds to employers' needs, raises young peoples' aspirations and provides them with the knowledge and skills that they will need to compete effectively within a world city, whatever their chosen career; and
- Using its procurement of works and services to promote local employment, training and apprenticeships and encourage supplier diversity and SME involvement in supply chains.

8.55 OPDC will work with partners and stakeholders, including:

- HS2, other transport bodies and their supply chains and end use employers to share labour forecasting data on construction and end-use requirements to help plan for local employment and skills offers;
- developing with partners, demand-led, localised employment and training initiatives, including brokerage schemes so that employers are able to benefit from a local workforce that is appropriately trained and local people have access to job, training and apprenticeship vacancies.

8.56 Alongside the draft Local Plan, OPDC will also prepare a Section 106 Supplementary Planning Document that will set out the mechanisms to be implemented to secure employment, training and apprenticeships for local people.

ALTERNATIVE POLICY OPTIONS

8.57 Securing access to employment, skills training, apprenticeships and pre-employment support is considered to be a priority for OPDC and is supported by local stakeholders. As such, an alternative policy is not considered to be appropriate.



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9

TOWN CENTRE USES



Town centre uses

9.1 This chapter contains policies addressing the following policy themes:

- TC1: Strategic Policy for 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: Evening night time economy uses

Questions:

QTCa: Are there any other town centre use policy themes that you think OPDC's Local Plan should be addressing?

QTCb: Do you agree with the chapter's preferred policy options? If not, what might you change?

QTCc: Are there any other policy alternatives that could replace the chapter's preferred policies?

You can provide comments directly through:

opdc.commonplace.is

EVIDENCE BASE

Table 9: Town centre uses Evidence base

Supporting study	Description	Status
OPDC Retail and Leisure Needs Study (RLNS)	A study looking at the quantitative need for retail and leisure space in the OPDC area generated by those living, working and visiting the area. The study also includes qualitative recommendations to deliver vital and vibrant town centres.	Draft completed
OPDC Cultural Principles	A document showing how OPDC can contribute to London's position as the world's cultural capital and how embedding culture in development can assist placemaking.	Draft completed

TC1: Strategic policy for town centre uses

KEY ISSUES

1. The new population will need to have access to town centre uses and services to serve their needs.
2. The Old Oak and Park Royal area itself is poorly served by town centre uses, but the wider hinterland is well served through a network of town centres, such as Harlesden, Ealing and Shepherd's Bush.
3. Provision will need to complement existing neighbouring centres and their ability to grow in future.
4. Town centre uses can play a critical role in placemaking, adding vibrancy to buildings and the public realm and helping to attract people to live, work and visit the area.
5. 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.

POLICY CONTEXT

National

9.2 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.

Regional

9.3 The London Plan promotes the importance of providing adequate retail, visitor accommodation and culture, sports and leisure uses to accommodate London's growing needs and the role that these facilities can play in promoting economic prosperity and maintaining London's status as one of the world's greatest cities.

PREFERRED POLICY OPTION

OPDC will support proposals for town centre uses that:

- a) Provide locally and strategically significant culture, sports and leisure facilities, that act as catalysts for regeneration and help strengthen London's position as the world's cultural capital;
- b) Provide a range of A-class uses that serve the needs of existing and new residents, employees and visitors in terms of their location, scale and phasing;
- c) Create a network of new town centres that are the focus for town centre uses and which complement London's wider network of centres;

- d) Add to the activation and vibrancy of the area and help to create a sense of place;
- e) Promote social and economic regeneration and healthy lifestyles; and
- f) Deliver best practice in terms of implementing innovative technology, design and management of spaces to support long term sustainability.

JUSTIFICATION

9.4 A key role of OPDC is to coordinate and drive forward the regeneration and transformation of the area. As part of this, there is a need for a range of life choices to be provided for existing and future people living, working and visiting Old Oak and Park Royal. Town centre uses will play a critical role in achieving this, providing new employment and services and adding vibrancy and activity.

9.5 The OPDC Cultural Principles document sets out how OPDC could play a significant role in London's cultural offer by delivering new cultural

destinations. This could include a mix of culture, sports and leisure uses to serve the needs of existing and new residents, the surrounding neighbourhoods and strategically across London and the south-east.

9.6 Small and large-scale culture, sports and leisure uses, which could act as catalysts for regeneration should be supported by visitor accommodation as well as a range of retail uses and eating and drinking establishments to serve the needs of those living, working and visiting the area. Town centre uses will be focused within a series of new designated town and local centres (see policy TC2). To support these centres, employment and 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.

9.7 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.

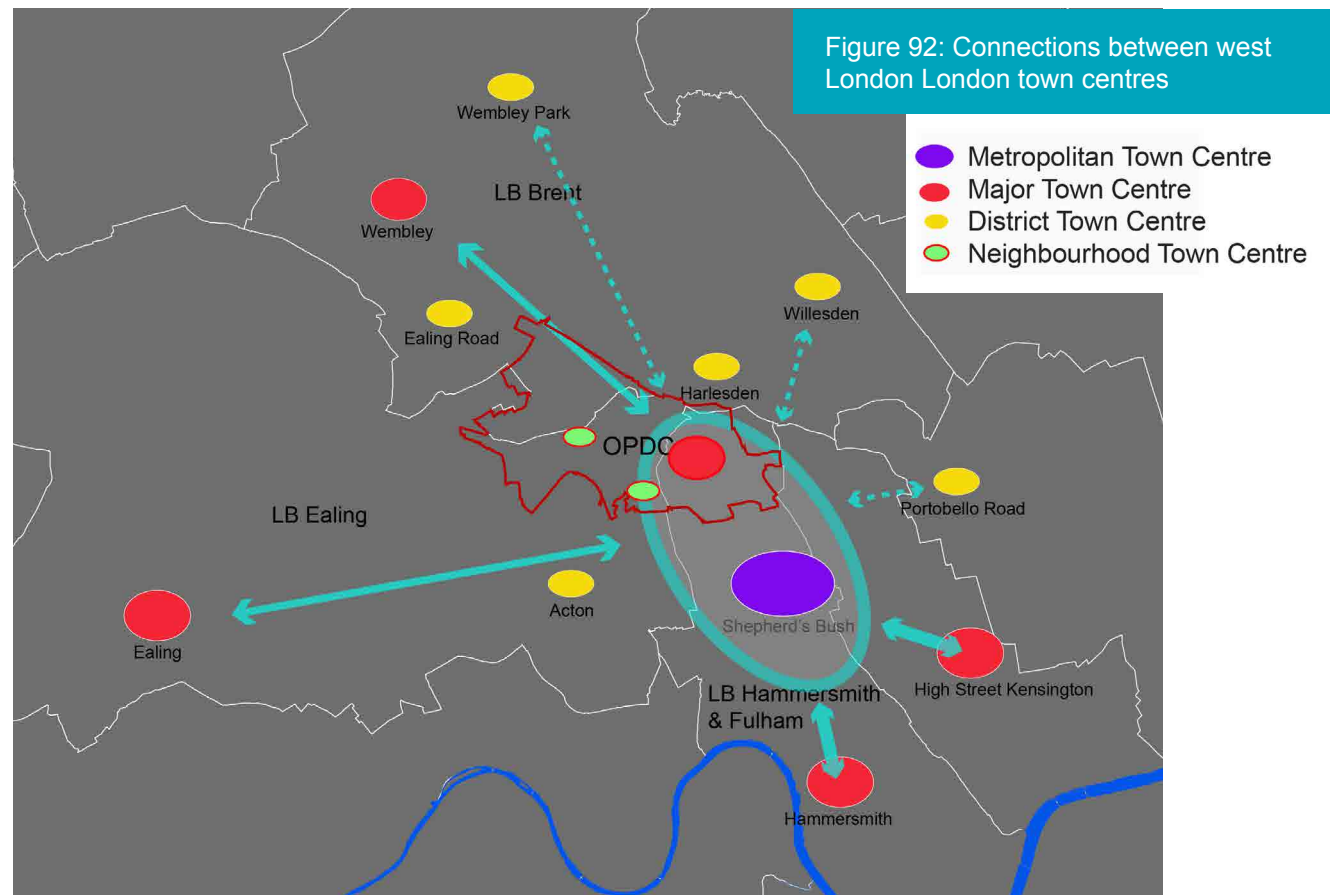
9.8 Through their spatial distribution and function, town centre uses can also promote healthy lifestyles and OPDC's

role as a 'Healthy New Town'.

9.9 The enhancement of existing centres and provision of new town centres provides opportunities to demonstrate how new technology can be successfully integrated to support flexibility and ongoing changes in the retail and leisure sector.

ALTERNATIVE POLICY OPTION

9.10 There are no alternative options considered appropriate as this would not accord with OPDC's draft Retail and Leisure Needs Study (RLNS) or the London Plan, which requires a mix of uses as part of major development proposals.



TC2: Town centre hierarchy

KEY ISSUES

1. The only existing centre in the OPDC area is the neighbourhood centre in the middle of Park Royal, designated in LB Ealing's Core Strategy.
2. To support the needs of new employees, residents and visitors to the area, a new network of town centres needs to be designated.
3. The centres should be of a sufficient size to meet needs, promote sustainability and assist with placemaking.
4. It is recognised that a new centre at Old Oak will impact on west London, but this new centre will need to be planned and sized so as to complement the existing hierarchy.

POLICY CONTEXT

National

- 9.11 The NPPF requires local authorities to:
- positively plan for town centres, promoting competitiveness and setting out policies for the management and growth of centres over the plan period;
 - define a network and hierarchy of centres that is resilient to anticipated future economic changes;
 - set policies for the consideration of town centre uses which cannot be accommodated within designated town

centres; and

- apply a sequential approach requiring applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.

Regional

9.12 The London Plan 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 and parts of which are also identified as areas of regeneration.

PREFERRED POLICY OPTION

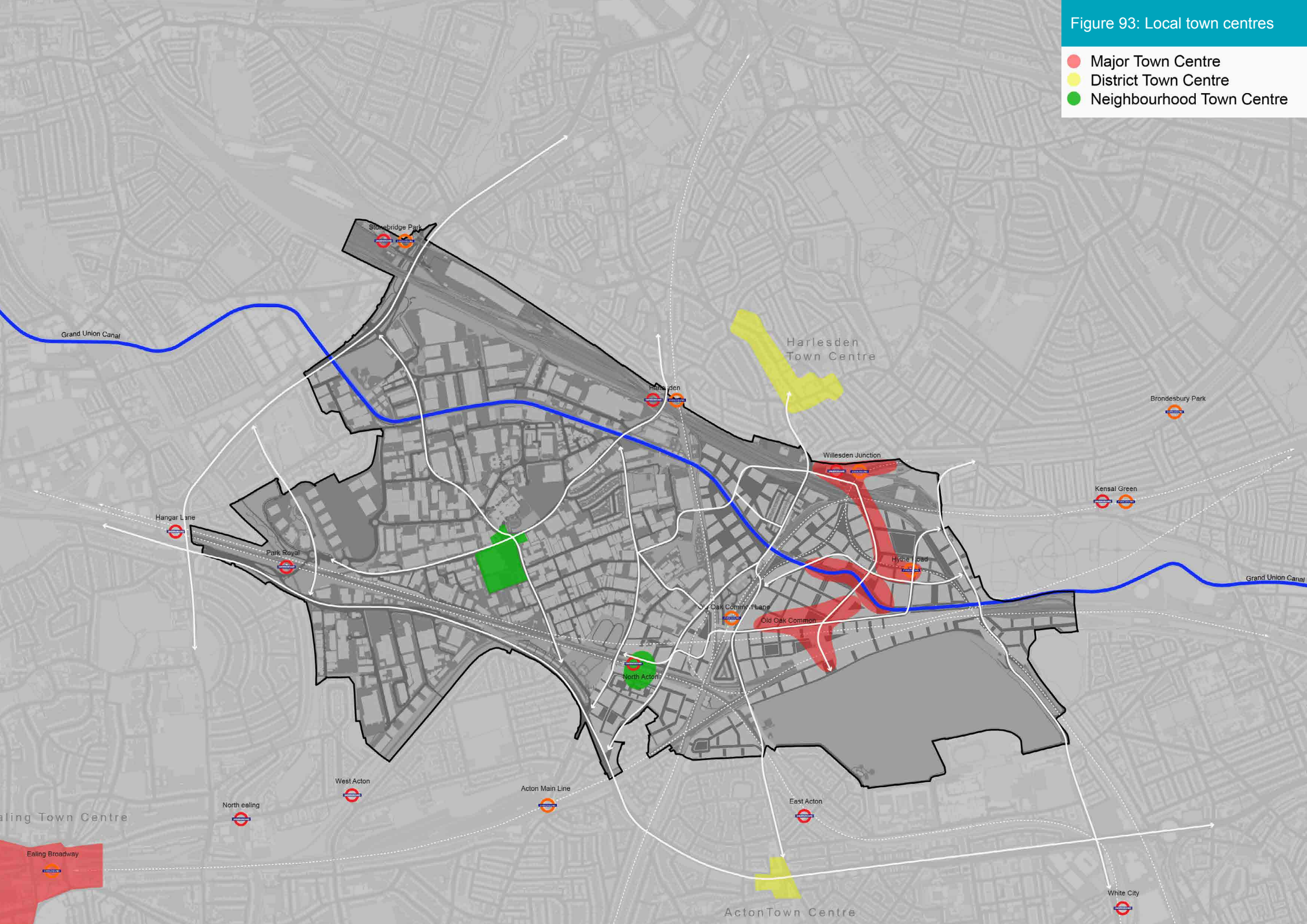
- a) OPDC will support development that delivers the following town centre hierarchy:
- i. Old Oak High Street – a potential new Major Centre within Old Oak (see Policy P3);
 - ii. North Acton - a potential new Neighbourhood Centre close to North Acton Station (see Policy P7); and
 - iii. Park Royal – a Neighbourhood

Centre in the middle of the Park Royal Industrial Estate (see Policy P6).

- b) Existing edge or out of centre town centre uses will be protected where they meet local needs;
- c) Proposals for new town centre uses on the edge of or outside of town centres may be appropriate but only where a sequential approach has been taken to site identification, looking firstly within centres and secondly on the edge of centres and where they;
 - i. Address identified deficiencies in need;
 - ii. Reduce the need to travel by car and do not have an adverse impact on the operation of the road network;
 - iii. Support placemaking;
 - iv. Do not impact on the functioning of Strategic Industrial Locations; and
 - v. Do not have an adverse impact on, and support the role and function of, designated centres.
- d) OPDC will require developers to submit an impact assessment for schemes:
 - i. providing over 5,000sqm of town centre uses in the Old Oak High

Figure 93: Local town centres

- Major Town Centre
- District Town Centre
- Neighbourhood Town Centre



- Street Major Centre; and
- ii. providing over 2,500sqm of town centre uses gross elsewhere (and including both the North Acton and Park Royal centres).

JUSTIFICATION

9.13 OPDC's draft Retail and Leisure Needs Study (RLNS) identifies that a new Major Centre should be designated in the Old Oak area. This recognises that:

- the significant new population that will be created in the area - 50,000 new residents, 55,000 employees and 250,000 people interchanging (embarking or disembarking) each day within Old Oak Common Station. The draft RLNS identifies that this would generate a quantitative need for 52,500sqm of A-class uses alone within Old Oak High Street during the draft Local Plan period (to 2037).
- the fantastic 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; and
- a new major town centre in Old Oak would have significant benefits to placemaking 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.

9.14 The draft Retail and Leisure Needs Study (RLNS) has tested the impact that the designation of Old Oak High Street as a 'major' centre would have on the surrounding retail hierarchy. This shows that negative impacts are likely to be minimal and that most if not all centres are likely to significantly benefit from the additional expenditure brought to the area by the new residents, employees and visitors. OPDC will be working with the local authorities to explore ways in which existing town centres such as Harlesden, Shepherd's Bush and Ealing can be well positioned to capture the benefits of this new expenditure.

9.15 OPDC will also work closely with the London Borough of Hammersmith and Fulham to consider how this new major new town centre in Old Oak can complement the existing metropolitan town centre designated at Shepherd's Bush, which has undergone rapid expansion in recent years, with the

opening of the Westfield London shopping centre and which is currently being further extended.

9.16 In recent years, development in North Acton has delivered over 2,000 homes and an additional 1,000 student homes with current and future schemes anticipated to deliver an additional 2,000+ homes within the plan period as well as a substantial quantum of new jobs, particularly to the north of North Acton station in the Park Royal Industrial Estate. To support this growing population and to provide a range of town centre uses within easy reach of residents and employees, the preferred policy option proposes that North Acton is designated as a new Neighbourhood Centre. OPDC's draft RLNS suggests that this centre should accommodate approximately an additional 5,000sqm of A-class floorspace.

9.17 The centre of Park Royal was identified as a Neighbourhood Centre in Ealing's Core Strategy (2010). The continuation of this designation recognises the important role that this centre plays in acting as a service centre for employees in the Park Royal Industrial Estate. The intensification and growth of the Park Royal Industrial Estate will provide opportunities for OPDC to review the boundary of this

centre through future iterations of the draft Local Plan.

9.18 Outside of these centres, there are a number of existing town centre uses, including a number of eating and drinking establishments, convenience stores and culture, sports and leisure uses. These uses will continue to be protected where these facilities are providing local facilities to residents and employees and where there are no comparable alternative facilities in the vicinity.

9.19 Retail and other town centre uses should be focused within the designated town 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. Such provision should also demonstrate how it supports placemaking, such as by providing improved legibility or by providing active uses in areas of high footfall. Applicants would also need to demonstrate that the proposal's form and function would

not detract from the designated centres both within the OPDC area and within the wider hinterland.

9.20 The designation of the new town centre hierarchy would negate the need for a sequential test for developments within that centre under paragraph 24 of the NPPF. However, as no centres with the exception of Park Royal are currently established, OPDC's draft RLNS recommends that retail impact assessments are required until such time as the proposed centres are designated, in order to ensure that uses will have a complementary impact on existing and new town centres. In accordance with the draft RLNS, OPDC will require applicants proposing in excess of 5,000sqm gross additional town centre use space in Old Oak High Street and 2,500sqm gross additional town centre use space elsewhere to submit an impact assessment. In accordance with the NPPF, this 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.

ALTERNATIVE POLICY OPTION

1. Identify Old Oak High Street as a Metropolitan Centre.

9.21 This option would provide the opportunity to increase the scale of town centre uses in the Old Oak area. This option would have benefits in terms of making Old Oak an attractive destination and could have benefits for placemaking by attracting higher footfall. However, 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. The greater quantum of retail on Old Oak High Street could also make it more difficult to let space.

9.22 Examples of other 'metropolitan' town centres in London are Ealing, Shepherd's Bush and Kingston.

2. Two centres are designated in Old Oak - a District Centre to the north of the canal and a Neighbourhood Centre around Old Oak Common Station.

9.23 This option would limit the quantum of town centre uses to look to minimise impacts on nearby town centres such as Harlesden, Ealing and Shepherd's Bush. However, this approach would not provide sufficient floorspace to cater for the needs arising from development. The London Plan explains that typically District Centres contain 10,000-50,000sqm retail, leisure and service floorspace and that Neighbourhood Centres, would by virtue, be at either the lower end of this range or below 10,000sqm. The Retail and Leisure Needs Study identifies a quantitative need for 52,500sqm of A-class floorspace alone in Old Oak during the plan period and consequently, designating a District Centre and Neighbourhood Centre 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. The approach of designating a Neighbourhood Centre around the Old Oak Common Station would also fail to capture the catalytic impact that the

station could have on the immediate area and wider hinterland. The Old Oak Common Station is estimated to have approximately 250,000 passengers a day interchanging (embarking or disembarking). There is a significant opportunity for the land uses around the Old Oak Common Station to attract these passengers who are interchanging into the surrounding hinterland and to help activate the place and capture economic benefits for the area and its hinterland and this opportunity would be limited through the designation of a Neighbourhood Centre here, rather than a Major Centre.

9.24 Examples of other District Centres in the area are Harlesden, Hanwell and Portobello Road and examples of other 'neighbourhood' centres in the area are East Acton, Kensal Rise and Perivale.

3. Two centres are designated in Old Oak - a District Centre to the south of the canal around Old Oak Common Station and a Neighbourhood Centre to the north of the canal.

9.25 As with option 2 above, this option would seek to limit the quantum of town centre uses to minimise impacts on nearby town centres. As above, it is unlikely that a district and neighbourhood centre would provide sufficient floorspace to cater for the needs of development and certainly would not provide a policy framework for the establishment of strategic culture, sports and leisure uses in the area.

9.26 The designation of a district centre to the south of the Grand Union 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 placemaking.

4. Park Royal is not identified as a Neighbourhood Centre and a different approach is taken to town centre uses in the area.

9.27 The town centre uses in the centre of Park Royal, in particular the ASDA supermarket, generate significant volumes of traffic which have an impact on the ability of Park Royal to function as an industrial estate. 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 if the town centre uses are dispersed requiring employees and residents to travel further for their services. It would also see the loss of well used existing local services over time.

TC3: Vibrancy

KEY ISSUES

1. Town centre uses play an important role in placemaking, by attracting people to an area and helping to enliven it.
2. This will be particularly important at Old Oak where comprehensive regeneration will support the creation of a new part of London without a clearly defined character.
3. The policy should look to secure a mix of retailers over a wide range of uses and types, including independent retailers, who can add diversity to a shopping centre and play an important role in supporting the local economy.
4. The policy should also look to control uses that may have a negative impact (through over-concentration of one use type) on placemaking.

POLICY CONTEXT

National

9.28 The NPPF requires local planning authorities to:

- recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
- promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality

of town centres; and

- retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;

Regional

9.29 The London Plan supports 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.

PREFERRED POLICY OPTION

To promote the role that town centre uses can play in shaping high quality places in Old Oak and Park Royal and ensure that designated centres are vibrant and viable, OPDC will:

- a) Support the role town centre uses can play in delivering high quality places by encouraging proposals that:
 - i. Provide for outdoor uses such as eating and drinking uses with

outdoor seating, event space and street markets where viable and where they do not detract from residential amenity. Any proposals for street markets would need to be accompanied by a management plan;

- ii. Deliver and maintain high quality accessible shopfronts; and
 - iii. Deliver and maintain high quality overlooked public realm.
- b) Encourage the provision of meanwhile uses in early development phases (see OSP5);
 - c) Support innovation and flexibility so that uses can expand and/or change between use classes subject to demand and appropriate permissions/agreements;
 - d) Require proposals for A-Class uses (retail and food and drinking establishments) to provide a mix of unit sizes, including at least 10% of floorspace for units of 80sqm or less to support independent retailers. Applicants should actively market these units within the local communities;
 - e) Require proposals:

- i. Providing over 2,500sqm of A-class floorspace to submit a Retail Vision Statement; and
 - ii. Providing over 2,500sqm of town centre use floorspace to submit a Cultural Action Plan.
- f) Support the creation of a healthy new part of London by supporting uses that have a positive impact on health and well-being and restricting planning applications for:
- i. betting shops, pay-day loan shops and games arcades; and
 - ii. takeaways (Class A5 uses), particularly where they are in close proximity to primary and secondary schools.



Figure 94: Exhibition Road

JUSTIFICATION

9.30 Town centre uses within the OPDC area, particularly in Old Oak, will help to play a critical role in the approach to placemaking. 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. Any proposals for street markets would need to be accompanied by a management plan that identifies its hours of operation and storage arrangements when not in use, types of traders, servicing and transport impacts.

9.31 The quality of buildings fronting onto the public realm will be of equal importance to ensuring that town centres create vibrancy and activity. Proposals must ensure that shopfronts and other active frontages are accessible and are designed to the highest quality, considering how proportions, materials and detailing relates to and complement their surroundings, exploring opportunities for variety, innovative design and local distinctiveness.

9.32 In Old Oak in particular, it will be important to create a place as early as

possible in the development phases. Meanwhile or temporary town centre uses could play an important role in achieving this and Policy OSP5 encourages major development proposals to submit a meanwhile strategy demonstrating how their proposals will actively promote and deliver meanwhile uses in early development phases.

9.33 Given the scale of development envisaged within the OPDC area and the timescales over which this development is programmed for delivery, it will be important for proposals to be designed to be sufficiently flexible to allow for changing market conditions and accommodate emerging retail typologies. OPDC will encourage proposals that allow for flexibility in their size, for example by providing for expansion through the future creation of mezzanines or the subdivision/amalgamation of units. OPDC will also support proposals that, through their design, consider the ability for units to readily change use class.

9.34 Within town centres, it is important to have a variety of retailers in order to create vibrancy and ensure the long term vitality of the centre. To support this, OPDC will expect retail proposals to provide for a range of unit sizes for

A-class floorspace and secure at least 10% floorspace for units of 80sqm or less (defined in the London Small Shops Study 2010), which will also help support the establishment of SMEs and independent retailers in the OPDC area, who tend to operate in smaller units.

9.35 For major applications providing over 2,500sqm of A-class uses (which is the threshold for OPDC's requirement for a Retail Impact Assessment in Policy TC2), OPDC will require applicants to submit a Retail Vision Statement. This should set out in more detail what the applicant's expectations are in terms of the type of retailers and eating and drinking establishments. The Vision Statement should also identify what the long term management arrangements are for the proposed units and what opportunities this might provide for the longer term management of the centre, in a similar way to how the Howard de Waldon Estate has managed Marylebone High Street.

9.36 OPDC's Cultural Principles document identifies that OPDC can help play an important role in continuing London's position as the globe's cultural capital. To support this, proposals providing in excess of 2,500sqm of town centre use floorspace will need to

submit a Cultural Action Plan that sets out how their scheme will contribute to the cultural offer in Old Oak and Park Royal as support OPDC's realisation of its cultural vision.

9.37 The "Health on the High Street" report published by The Royal Society for Health in 2015 provides a range of sources of evidence about the negative health impact of betting shops, payday loan shops and fast food takeaways and the positive health impacts of health services, pharmacists, leisure centres/ health clubs, libraries, museums and art centres and pubs and bars. There has been a growing concern in recent years about the proliferation and over-concentration of betting shops, pay-day loan shops and amusement arcades and their impacts on mental health and the vibrancy and vitality of town centres. In 2015 Government re-classified betting shops and pay-day loan shops within a separate use class (amusement arcades are already within a separate use class). There has also been a growing concern about the growth in fast food takeaways (Class A5 uses) and their impact on health, in particular, regarding the proximity of takeaways to schools and the impact that this has on childhood obesity. Evidence shows that the type of food on sale nearest to schools influences the diet of schoolchildren and that the

availability of "unhealthy" foodstuffs makes healthier choices less likely. As a 'Healthy New Town', OPDC will restrict proposals for new takeaways in close proximity of school entrances and will promote the loss of existing takeaways within these areas. In addition, OPDC will resist proposals that would result in the clustering of A5 uses to the detriment of the character and function or vitality and viability of a centre. As a 'Healthy New Town' OPDC, in consultation with NHS England, will work closely with stakeholders to promote and support uses that have a positive impact on health and well-being. It will also resist proposals for new, and encourage the loss of existing, facilities that have a detrimental impact on health and well-being.

ALTERNATIVE POLICY OPTION

1. Take a more flexible approach to betting shops, pay-day loan shops and takeaways.

9.38 This option 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. The benefits to this approach would be that it would be more responsive to market demands. However, the option would have 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 London.

Questions:

QTC3a: What restrictions should be identified for betting shops, pay-day loan shops games arcades and takeaways?

You can provide comments directly through:

opdc.commonplace.is

TC4: A-Class needs

KEY ISSUES

1. 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.
2. 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 placemaking benefits that A-class floorspace could bring to the OPDC area.
3. Conversely, if too much A-class floorspace is provided, units could remain vacant or the uses could start to draw significant levels of trade away from the surrounding retail hierarchy and have a detrimental impact on their vitality and viability.
4. 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.

POLICY CONTEXT

National

9.39 The NPPF sets out an expectation that local planning authorities assess the quantitative need for town centre uses including A-class uses and that sites should be identified to meet this need.

Regional

9.40 The London Plan requires local planning authorities to identify future levels of retail and other commercial floorspace need.

PREFERRED POLICY OPTION

- a) A-class uses (retail and eating and drinking establishments) should serve the needs of the development and complement nearby centres. This will be achieved by requiring developers to:
 - i. Accord with the quantitative need identified below:

	Local Plan period (2037)
A1	27,950 - 33,450 sqm
A1 service and A2	15,100 - 18,500 sqm
A3-A5	10,650 - 12,150 sqm
Total	53,700 - 64,100 sqm

- ii. Submit a masterplan showing how their proposals fits within a wider comprehensive approach and how their retail provision interacts

with provision in neighbouring schemes;

- iii. Demonstrate through robust justification and evidence that the proposals would not adversely affect the vitality and viability of nearby centres where proposals would exceed the quantitative need; and
- iv. Submit a 'Town Centre Enhancement Strategy' where proposals are likely to have an impact on nearby centres;
- b) In the Local Plan period, A-class uses should be broadly distributed across the town centre hierarchy as follows:
 - i. Approximately 52,500sqm in Old Oak High Street Town Centre;
 - ii. Approximately 5,000sqm in North Acton Neighbourhood Centre; and
 - iii. Approximately 5,000sqm in Park Royal Neighbourhood Centre.

JUSTIFICATION

9.41 The new population that will be living, working, visiting and travelling through the OPDC area will need to be served by an appropriate quantum of retail. There retail quantum will be vital

in making a new place and creating activity and vibrancy. However, the area surrounding OPDC is currently well served by retail and it is important that the vitality and viability of these centres are not undermined by this new retail provision. This is particularly the case with Harlesden Town Centre in the London Borough of Brent, which is the closest town centre to OPDC and which is the most susceptible to impacts as a result of proposals for retail in OPDC.

9.42 The Old Oak and Park Royal Retail and Leisure Needs Study (RLNS) has tested the appropriate overall quantum and phasing of retail in OPDC. The study assumes that approximately 75% of convenience expenditure and 15-25% of comparison expenditure from the population will be retained in the area (with 25% and 75-85% respectively being spent in the surrounding hinterland). The RLNS recommends that OPDC adopt a 25% retention figure for comparison expenditure in recognition of the potential designation of a new major town centre at Old Oak High Street. The study confirms that this quantum of retail would:

- Deliver the necessary placemaking benefits for the OPDC area;
- Provide an appropriate quantum of retail to provide for the needs of the development, including those

living, working, visiting and travelling through OPDC; and

- Not have a significant detrimental impact and may have a beneficial impact on neighbouring town centres.

9.43 For larger retail proposals, OPDC will require applicants to submit a Town Centre Enhancement Strategy that would need to recommend how nearby town centres might be impacted by a proposal and also set out how interventions in town centres could maximise benefits and avoid risks. The RLNS identifies that this will be of particular relevance to Harlesden, which the study identifies at the town centre with the most to lose or gain as a result of retail provision in OPDC.

9.44 The RLNS sets out the broad spatial distribution of retail and other A-class uses, which identifies that the majority of this floorspace should be provided within the Old Oak High Street Major Centre. This recognises the substantial uplift in new homes and jobs is likely to occur in the Old Oak area. However, the study also identifies potential growth in both North Acton and Park Royal, which will both see increases in new homes and jobs across the plan period.

ALTERNATIVE POLICY OPTION

1. Identify OPDC as a more significant retail destination with a higher quantum of retail over and above that required to serve the needs of the development.

9.45 This option would have potential benefits in terms of placemaking, 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 and as a consequence, this policy approach has not been identified as the preferred option.

TC5: Culture, sports and leisure facilities

KEY ISSUES

1. Culture, sports and leisure facilities make an important contribution to placemaking, 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.
2. The Mayor's Cultural Strategy promotes London as the global centre for culture and as London's largest and well connected regeneration area.
3. The OPDC area and particularly Old Oak can play a leading role in maintaining London's pre-eminence for culture, sports and leisure.

POLICY CONTEXT

National

9.46 The NPPF sets out an expectation that local planning authorities assess the quantitative need for town centre uses including culture, sport and leisure uses and that sites should be identified to meet this need.

Regional

9.47 The London Plan requires local planning authorities to assess the quantitative need for town centre uses, including culture, sports and leisure. The plan and the Mayor's Sports Legacy Plan aim to increase partici-

pation in, and tackle inequality of access to, sport and physical activity in London, particularly amongst groups/areas with low levels of participation.

PREFERRED POLICY OPTION

Proposals for culture, sports and leisure facilities will be required to:

- a) Support the creation of a cultural, sporting and leisure destination at Old Oak, serving both a local and a London-wide catchment;
- b) Help support placemaking and/or act as a catalyst for regeneration;
- c) Not give rise to unacceptable impacts on amenity and transport; and
- d) Provide affordable access for local communities.

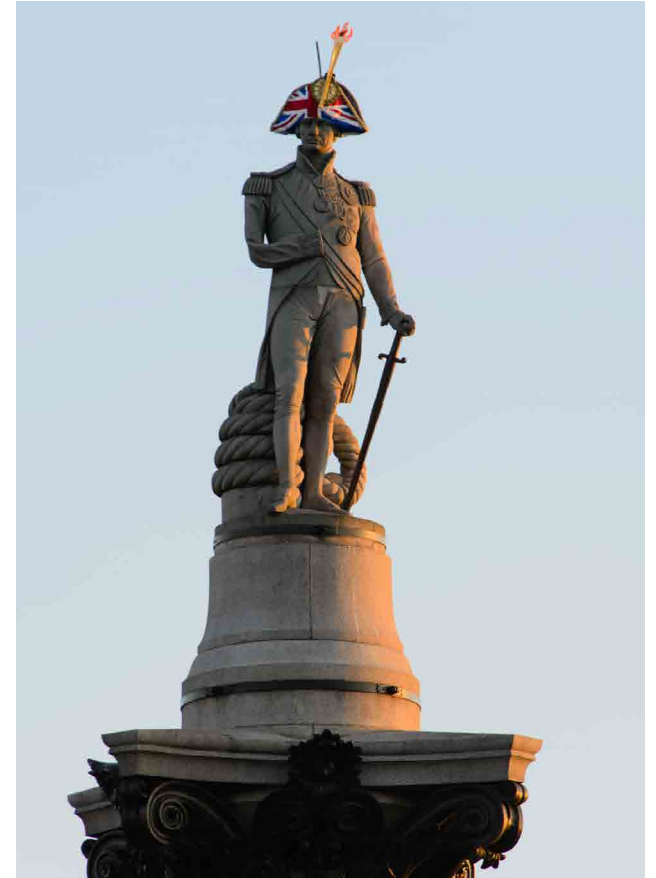
JUSTIFICATION

9.48 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. As London's largest regeneration project, OPDC can play a central role in delivering new cultural facilities to help consolidate London's position as a global leader for culture. OPDC has produced a Cultural Principles document which outlines how this could be supported. 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.

9.49 Culture, sports and leisure uses can play an integral role in the place-shaping strategy for Old Oak and Park Royal, particularly as part of the early development phases. The scale of the Old Oak area in particular, provides opportunities for a range of large and small-scale culture, sports and leisure uses that could become a focus or a catalyst for regeneration in a similar way to the Central St Martins – University of Arts at Kings Cross (see Policy OSP 5, Chapter 3). OPDC will work with landowners and providers to

Figure 95: Cultural uses & events



achieve this.

9.50 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; as a healthy new part of London, OPDC is keen to ensure that there is access for all to new sports facilities for local communities. OPDC will seek to secure a proportion of affordable sports and leisure provision as part of any planning agreement, in the form of discounted membership fees and discounted non-membership access fees.

ALTERNATIVE POLICY OPTION

1. Set a quantum threshold for culture, sports and leisure uses.

9.51 This option would identify an indicative floorspace figure for non A-class town centre uses such as for leisure, sports and culture. It would provide a clearer indication of the acceptable quantum of floorspace for other town centre uses, providing greater certainty to stakeholders. However, this approach would constrain the ability for these sorts of uses to aid with placemaking 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.

Questions:

QTC5a: What culture, sports and leisure uses do you think OPDC should look to attract to the OPDC area?

QTC5b: Where should such uses be located and why?

You can provide comments directly through:

opdc.commonplace.is



Figure 96: Cultural uses & events

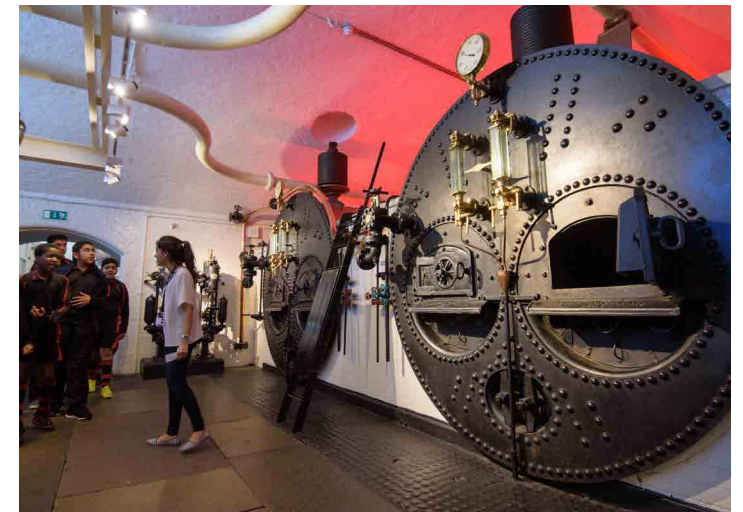


Figure 97: Grand Union Canal



TC6: Visitor accommodation

KEY ISSUES

1. London has a growing need for visitor accommodation and particularly business hotels and convention centres.
2. 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.
3. There is and will be a growing demand for hotel spaces for people visiting Park Royal businesses.

POLICY CONTEXT

National

9.52 The NPPF states that local planning authorities should ensure that the needs for main town centre uses such as hotels are met in full and are not compromised by limited site availability.

Regional

9.53 The London Plan promotes the provision of additional visitor infrastructure and promotes a London-wide target to deliver an additional 40,000 hotel bedrooms by 2036 and that in particular, new business hotel space and convention centres should be provided.

PREFERRED POLICY OPTION

OPDC will contribute to London's visitor infrastructure and London's overall need for an additional 40,000 high quality hotel bedspaces by 2036 by:

- a) Supporting proposals for visitor accommodation within OPDC's designated town centres and/or within area of high public transport accessibility;
- b) Requiring proposals to provide at least 10% of hotel bedrooms as wheelchair accessible and submit Accessibility Management Plans;
- c) Providing a range of types of visitor accommodation over a range of affordabilities;
- d) Promoting the provision of business hotels and multi-functional convention facilities; and
- e) Promoting high quality design and protecting the amenity of nearby residents

JUSTIFICATION

9.54 The London Plan establishes a London-wide need for an additional 40,000 hotel bedrooms by 2036. Due to

its high public transport accessibility and proximity to destinations such as the West End, Heathrow and first point of call for trains coming from the north, the OPDC area is likely to be an attractive location to meet this need. Visitor accommodation within the OPDC area should be focused within designated centres and in areas of high public transport access to minimise impact on residential amenity and to minimise the need for car parking and hence reduce the impact on the transport network.

9.55 Applicants will be required to provide at least 10% accessible hotel bedspaces and will be required to submit an Accessibility Management Plan committing to providing an enhanced level of customer care to disabled guests and, at the same time, optimise the use of the accessible rooms.

9.56 OPDC will welcome proposals over a wide range of affordabilities, from high end 5* hotels down to value and budget hotels in order that a wide variety of tourists will be attracted to the area and to London. There is a

particular need in London for high quality business visitor accommodation and the Old Oak area will be particularly well suited to providing for this need with good connections to Heathrow, Gatwick, Central London and the north of England.

9.57 Business accommodation should include provision for conference facilities and in large hotels, convention centre facilities, for which there is currently an under-supply in west London. Providing high quality facilities is essential as the quality of hotel accommodation often shapes visitors perceptions of the capital and encourages recommendations and/or repeat visits. OPDC will encourage developers to join national quality assurances such as VisitEngland's National Quality Assessment Scheme. OPDC will also require developers to demonstrate that proposals do not have a detrimental impact on the amenity of neighbours, particularly residents and will require developers to submit management schemes demonstrating how potential impacts will be minimised and mitigated against.

9.58 It should be noted that this preferred policy option does not provide guidance for emerging sharing economy models for delivering visitor accommodation.

ALTERNATIVE POLICY OPTION

9.59 No reasonable alternative policy options have been identified, as alternatives would not be consistent with the NPPF or in general conformity with the London Plan.

TC7: Evening night time economy

KEY ISSUES

1. Night-time economy uses play an important role in adding to vibrancy of an area. However, if not carefully designed and located they can result in disturbance to residents, in particular in high density areas.
2. A policy is necessary to set in place controls on the hours of operation of such uses so that there is a limit to the hours of operation without express permission for later opening hours.

POLICY CONTEXT

National

9.60 The NPPF requires local authorities to recognise town centres as the heart of their communities and pursue policies to support their viability and vitality.

Regional

9.61 The London Plan requires local planning authorities in their Local Plans to minimise the impact of night time economy uses on other land uses. The approach should take into account the cumulative effects of night time uses and saturation levels beyond which would result in unacceptable impacts on the environmental standards befitting a world city and quality of life for local residents.

PREFERRED POLICY OPTION

- a) Planning permissions for eating and drinking establishments and culture, sports and entertainment uses, either as the main or as the ancillary use, will be the subject of conditions controlling hours of operation to minimise their impact on residential amenity;
- b) There will be a presumption that:
 - i. Within designated centres premises should close by 00:00; and
 - ii. Outside of designated centres premises should close by 23:00.
- c) Proposals for extended opening hours beyond the limits outlined under b) would need to demonstrate that:
 - i. there would be no detrimental harm to the amenity of neighbours resulting from the facility itself or from those travelling to and from the facility; and
 - ii. the proposal would not result in harmful cumulative impacts in association with other late licensed properties.

JUSTIFICATION

9.62 OPDC 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 alongside adding activity to the public realm and supporting the local economy. However, it is important in the late evening and during the night that the impact of these uses on the amenity of neighbours, particularly residents, is controlled. OPDC will condition planning permissions to minimise this impact. 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.

9.63 Residential uses surrounding town centre locations where there is potential for late night activities should carefully consider the locations of habitable rooms and in particular bedrooms. They should also clearly demonstrate how

noise attenuation measures have been included and designed to the highest standards. This approach is necessary to ensure both a vibrant night-time economy and high quality residential environment.

ALTERNATIVE POLICY OPTION

1. Take a more flexible approach to hours of operation for night-time economy uses in Old Oak, particularly in vicinity of Old Oak Common station.

9.64 OPDC is promoting the Old Oak area as a destination for catalyst uses, including culture, sports and leisure uses and other night-time economy uses. To support this aspiration, a more flexible approach to the hours of operation for night-time economy uses could be taken, particularly in close vicinity to the Old Oak Common station and along Old Oak High Street. Such uses and new homes being delivered in the Old Oak area could be designed to minimise the noise and light impacts of these late night uses; however, consideration may need to be given to the cumulative impact of these uses if a more flexible approach to hours of operation were to be taken. Views are sought on this alternative option in the consultation question below.

Questions:

QTC7a: What locations might be suitable for more flexible hours of operation for night-time economy uses if OPDC were to adopt the proposed alternative policy?

You can provide comments directly through:

opdc.commonplace.is



10

SOCIAL INFRASTRUCTURE



Social infrastructure

10.1 This chapter contains policies addressing the following policy themes:

- SI1: Strategic Policy for Social Infrastructure
- SI2: Educational
- SI3: Health
- SI4: Community facilities
- SI5: Pubs

Questions:

QSIa: Are there any other social infrastructure policy themes that you think OPDC's Local Plan should be addressing?

QSIb: Do you agree with the chapter's preferred policy options? If not, what might you change?

QISc: Are there any other policy alternatives that could replace the chapter's preferred policies?

You can provide comments directly through:

opdc.commonplace.is

EVIDENCE BASE

Table 10: Social infrastructure Evidence base

Supporting study	Description	Status
OPDC Old Oak and Park Royal Development Infrastructure Funding Study (DIFS)	Assessment of the infrastructure needed to support the scale of development planned in the OPDC area.	Completed
OPDC Development Capacity Study (DCS)	A study assessing the development capacity of development plots within the OPDC area.	Draft completed

SI1: Strategic policy for social infrastructure

KEY ISSUES

1. The future population in the OPDC area will need to be supported by adequate provision of social infrastructure to meet the population's needs.
2. The scale of development in Old Oak and Park Royal provides substantial opportunities to upgrade existing facilities and to provide smart technology demonstrating best-practice in terms of the provision of social infrastructure.

POLICY CONTEXT

National

10.2 The NPPF requires local planning authorities to ensure an integrated approach to considering the location of community facilities and services. Local planning authorities are required to work with other authorities and providers to assess the quality and capacity of infrastructure for health, social care and education and its ability to meet forecast demands.

Regional

10.3 The London Plan notes that adequate provision for social infrastructure is particularly important in areas of major new development. The policy requires local planning authorities to provide a framework for collab-

orative engagement with social infrastructure providers and community organisations and ensure that adequate social infrastructure provision is made to support new developments.

PREFERRED POLICY OPTION

OPDC will:

- a) Safeguard existing social infrastructure subject to a continued need;
- b) Secure enhancements to existing and provide new social infrastructure to support the needs of the new population living and working in the OPDC area;
- c) Require high quality and inclusive design of social infrastructure;
- d) Promote the innovative delivery of social infrastructure;
- e) Promote the co-location and multi-functionality of social infrastructure; and
- f) Work with stakeholders to consider funding arrangements for the ongoing maintenance costs of social infrastructure.

JUSTIFICATION

10.4 There are a number of existing social infrastructure facilities in the OPDC area. OPDC will seek to protect this social infrastructure space as part of any development proposals. This could include the re-provision of the space within a new scheme, but any new space should be of an equal or better standard in terms of its access and quality of service.

10.5 The Old Oak and Park Royal Development Infrastructure Funding Study (DIFS) identifies that the OPDC area will require a broad range of new social infrastructure facilities (including education, health, emergency services and community facilities) to support the areas' future residents and employees. Table 16 in the Delivery and Implementation Chapter outlines the type, quantum and phasing of social infrastructure. The exact need arising from each individual development will be generated by calculating the anticipated population and child yield, based on home sizes and tenures.

10.6 Social infrastructure facilities are

locations where neighbouring residents get the opportunity to meet one another and can play a vital role in creating a sense of community. OPDC will work with relevant stakeholders/partners to expand existing social infrastructure both within and outside the OPDC area and where appropriate within earlier development phases. This will help to knit together the new community with existing communities surrounding the OPDC area. This approach could also be a more cost effective way of providing infrastructure. The potential for the expansion of existing infrastructure will be contingent on further discussions with service providers and it is recognised that many of the surrounding facilities will not be capable of expansion. Within later phases, it is anticipated that social infrastructure will need to be provided on-site. OPDC will work with developers and service providers to coordinate the delivery of this on-site infrastructure, which may be funded and delivered in a number of different ways, including through planning agreements and Community Infrastructure Levy (CIL).

10.7 Enhancements to existing and provision of new community use infrastructure should be designed to the highest quality. New community uses should aim to achieve best practice design standards which help to establish

these new facilities as focal points within the development. When designing community uses, developers should consider the needs of all members of the community and particularly the protected characteristics in the Equality Act 2010. In delivering services, OPDC will work with stakeholders to promote and explore the use of contemporary and innovative technology to benefit service users and providers.

10.8 Space is at a premium in London and getting the most efficient use of public buildings, must be a primary consideration. In the design of social infrastructure, particular consideration should be given to the promotion of the multi-functionality and use of buildings.

10.9 OPDC will work closely with service providers and the local authorities to ensure that when new or expanded facilities are being secured; there is adequate certainty and security around the ongoing maintenance costs in order that the facilities remain viable in the longer term; and do not place an undue burden on service providers' funding streams.

ALTERNATIVE POLICY OPTION

1. Require new social infrastructure to be provided solely on-site rather than looking to expand surrounding existing facilities.

10.10 This approach would help with placemaking, by delivering a range of community facilities on-site in earlier development phases. This approach may also have benefits on the transport network as new residents would not have to travel as far to access community uses. However, this option would not help to knit the residents and employees on early sites with the existing community and may leave these sites feeling isolated in early years.

SI2: Education

KEY ISSUES

1. Funding for schools is based on a per-pupil rate and covers a school's maintenance costs and some limited capital expenditure.
2. There are other funding pots available for capital expenditure, such as the Targeted Basic Need Programme, but this does not account for increases in child yield resulting from development.
3. There is therefore a need for OPDC to secure funding to cover the capital costs of providing new education provision to meet the needs of the new population.
4. Given the scale of development in the area, there is also an opportunity to promote the OPDC area as an appropriate location for higher education institutions and recognise the potential benefits this might have as a catalyst for the regeneration of the area and the wider economy.

POLICY CONTEXT

National

10.11 The NPPF states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for education. The NPPF requires local planning authorities to take a proactive, positive and collab-

orative approach to meeting school place requirements, and to development that will widen choice in education. In particular, the NPPF states that local planning authorities should give great weight to the need to create, expand or alter schools and work with schools promoters to identify and resolve key planning issues before applications are submitted.

Regional

10.12 The London Plan states that borough strategies should provide the framework:

- for the regular assessment of the need for childcare, school, higher and further education institutions and community learning facilities at the local and sub-regional levels; and
- to secure sites for future provision recognising local needs and the particular requirements of the education sector.

10.13 The policy also states that boroughs should support and maintain London's international reputation as a centre of excellence in higher education.

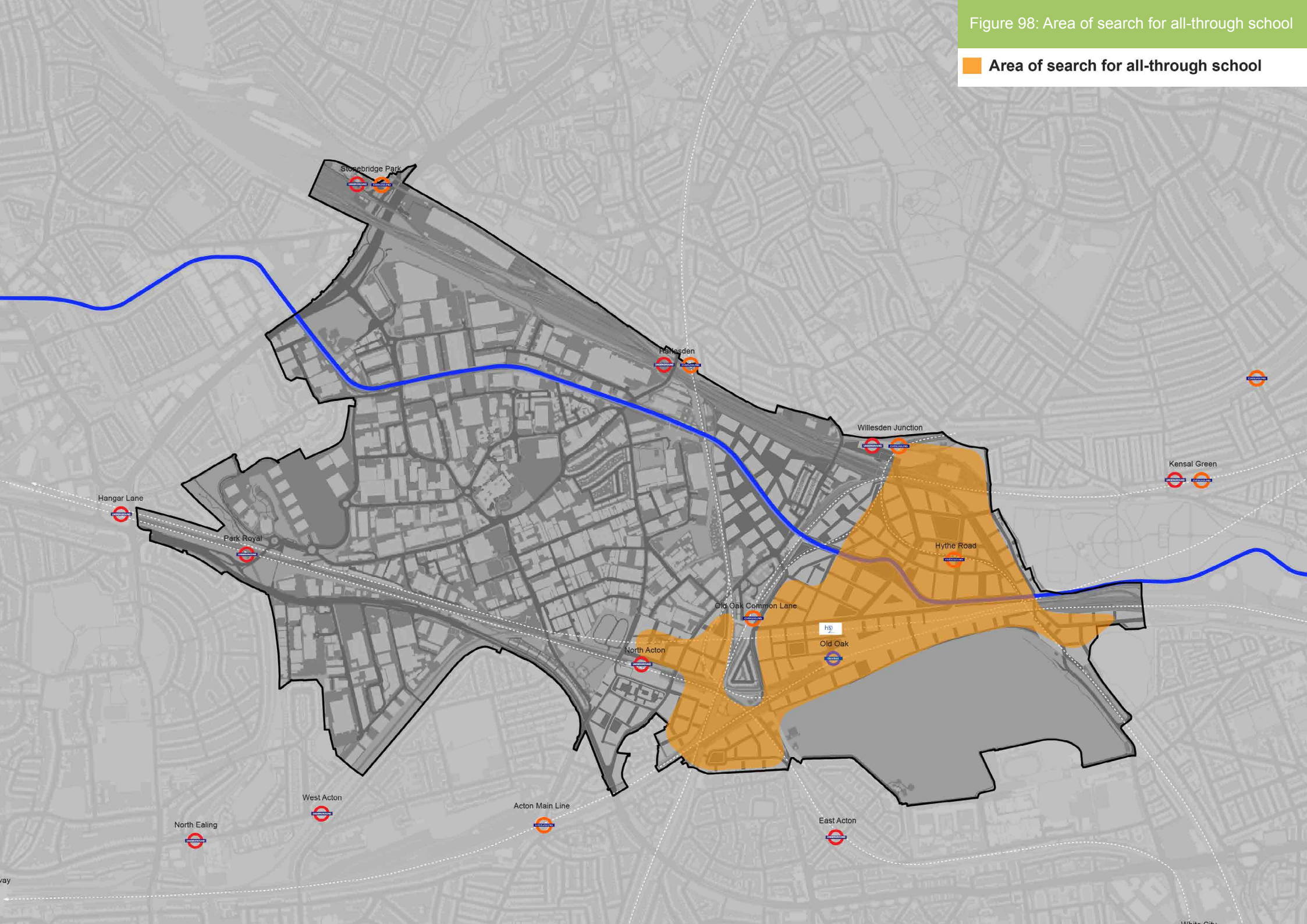
PREFERRED POLICY OPTION

OPDC will:

- a) Require proposals to provide adequate educational provision to meet the needs of development;
- b) Work with surrounding local authorities to identify sites for school expansion in the short/medium term;
- c) Allocate sites for the provision of a new all-through school (ages 3-18) and work with landowners and developers to secure sites for primary schools and nurseries; and
- d) Support the establishment and growth of higher education institutions in the OPDC area.

Figure 98: Area of search for all-through school

 Area of search for all-through school



JUSTIFICATION

10.14 The Development Infrastructure Funding Study (DIFS) identifies that there will be a significant need for additional educational facilities resulting from development. Proposals will be assessed against the local authorities' child yield calculators to determine what educational requirements will be necessary to adequately mitigate against the impacts of development on the local authorities' educational services.

10.15 The DIFS identifies that in the earlier phases of development there may be the potential to expand existing educational facilities in the surrounding hinterland to meet this need. This could be a more cost effective way of providing facilities and could also help to knit the new community into existing communities. OPDC will undertake further discussions with education providers to understand the potential for the expansion of existing facilities. If this is not feasible, education facilities will need to be provided on-site and this will certainly be the case in the medium/long-term given the scale of development anticipated in the area. The DIFS identifies the need for on-site primary and nursery provision and an all-through school. Primary and nursery schools generally have smaller footprints and in larger schemes, can be

incorporated into the scheme's design. However, if proposals come forward in a piecemeal fashion OPDC will allocate sites for the delivery of new facilities. The all-through school will require a substantial land-take. Work in the DIFS shows that based on current phasing and child yields, the all-through school is likely to be required towards the end of the plan period. Figure 98 identifies an 'area of search' for the provision of this all-through school, showing all the sites that are not identified as coming forward in the first five years in OPDC's Development Capacity Study (DCS). We are inviting stakeholders to suggest a preferred location for this facility through their consultation responses on this Local Plan.

10.16 London is one of the world's global centres for education. It is home to a wide number of universities and colleges including the world renowned Imperial College London and University College London universities, both of which are ranked in the top 10 of the QS World University Rankings 2015. In recent years, there has also been a growth in London of universities establishing 'satellite' hubs in London to capitalise on London's world city status, such as the Newcastle University and the University of Sunderland, who have both recently opened London campuses. The development potential

in the OPDC area provides significant opportunities to meet this growing need for higher education space. These higher education institutions could act as a catalyst for the regeneration of the OPDC area (see OSP 5, Chapter 3), by helping to create a sense of place in early phases, in a similar way to the recently completed Central St Martins - University of Arts at Kings Cross.

ALTERNATIVE POLICY OPTION

1. Do not promote the OPDC area as a location for higher education uses

10.17 Instead of promoting higher educational uses to the area, this approach would instead take a more flexible approach and proposals would be assessed on a case by case basis. This approach would not preclude the provision of higher educational uses in the OPDC area. However, as London's largest development site, OPDC thinks it is right to identify the potential for the OPDC area to accommodate higher educational uses and the positive role it could play in supporting regeneration.

Questions:

QS12a: What site or sites within the OPDC area do you think should be identified for an all-through school?

You can provide comments directly through:

opdc.commonplace.is



Figure 99: Westminster City School

SI3: Health

KEY ISSUES

1. As a Healthy New Town, OPDC should be designed to encourage healthy living and well-being from the out-set.
2. There is a need to ensure that development in Old Oak and Park Royal is supported by adequate health infrastructure.
3. OPDC will need to secure facilities to meet the needs arising from development.
4. Any facilities will need to be easily accessible for all residents.
5. There may be opportunities for health uses to be co-located with other community spaces.
6. Planning for the provision of healthcare is challenging given the upcoming changes to process and funding of healthcare across the country and there is therefore a need for flexibility.

POLICY CONTEXT

National

10.18 The NPPF requires local planning authorities to secure accessible local services that reflect the community's needs and support its health, social and cultural well-being. The NPPF requires local planning authority Local Plans to include strategic policies to deliver the provision of health.

Regional

10.19 The London Plan states that borough strategies should identify and address specific social care issues facing the area and work with service providers to, assess the need for facilities and secure sites and building for the provision of health facilities to meet future needs. The policy also requires boroughs to promote the continued role and enhancement of London as a national and international centre of medical excellence and specialised facilities.

PREFERRED POLICY OPTION

OPDC will:

- a) Support the delivery of a 'Healthy New Town' to encourage healthy living and innovation in health;
- b) Require proposals to provide adequate health provision to meet the needs of development;
- c) Ensure that new health facilities are easily accessible to all users, flexibly designed and potentially co-located within other community uses; and
- d) Support the establishment and growth of national and international health institutions in the OPDC area.

JUSTIFICATION

10.20 OPDC has been designated as a 'Healthy New Town' by the NHS. It is critical that this new part of London is designed to encourage healthy living. To support this, OPDC will require that new development in the OPDC area delivers best practice in promoting health and well-being including through the design of the built environment.

10.21 OPDC will ensure that the new population in Old Oak has access to a range of health uses to meet their needs. OPDC will work with developers and service providers to ensure development proposals deliver adequate health provision, including health centres with space for GPs, social care facilities, dentists, pharmacies and opticians.

10.22 OPDC will look to secure the provision of health services on-site as early as possible in order that facilities are easily accessible for members of the new community. Facilities should be located in designated town centres and close to areas of high public transport access, which would

be easily accessible and visible for members of the public. There will also be opportunities to co-locate health provision with other uses, such as with community facilities or sports and leisure centres, to deliver efficiencies in space and maintenance costs.

10.23 The OPDC area is home to Central Middlesex Hospital and Hammersmith Hospital is also to the immediate south of the OPDC area. The scale of development planned in the OPDC area provides opportunities for these facilities and others across London to expand to further medical science and help strengthen London's position as one of the world's centres for medical excellence. Health institutions could act as a catalyst for the regeneration of the OPDC area, by helping to create an early sense of place (see Policy OSP 5, Chapter 3).

ALTERNATIVE POLICY OPTION

10.24 No reasonable alternative policy options have been identified, as it is considered that an alternative approach to that outlined in the preferred policy option would not be in conformity with the NPPF, London Plan or draft supporting evidence base.

SI4: Community facilities

KEY ISSUES

1. There is a need to ensure that development in Old Oak and Park Royal is supported by adequate community facilities, such as libraries, places of worship, halls for hire, youth space and training and meeting space.
2. Community facilities could be key hubs of activity within town centres and in areas of high public transport access and could help with placemaking.

POLICY CONTEXT

National

10.25 The NPPF requires local planning authorities to plan positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities and residential environments.

Regional

10.26 The London Plan promotes the protection and enhancement of social infrastructure and the need for local planning authorities to secure sites for future provision or reorganisation of provision.

PREFERRED POLICY OPTION

OPDC will secure a range of new high quality community facilities that:

- a) support the needs of the new population;
- b) Provide for a diverse range of community uses, such as library space, places of worship, post offices, police shops, halls for hire, youth space, adult learning and training space, community cafés, flexible office and meeting space for use by residents and voluntary sectors;
- c) are located at key destination points within the OPDC area, close to destinations of high footfall and high public transport access;
- d) are of a high design quality, promoting inclusivity; and
- e) are co-located where feasible with other community or town centre uses.

JUSTIFICATION

10.27 Good quality community facilities can have a significant bearing on the quality of life and health and well-being of a community, by encouraging social interaction, promoting learning and by providing support services for those living, working and visiting an area.

10.28 Given the scale of development envisaged in the OPDC area there will be a need for, and opportunities to provide, a range of community facilities. OPDC will work with service providers and developers to ensure that a range of community facilities are provided to support the needs of the area.

10.29 Community facilities will play an important role in placemaking in the OPDC area, helping to create hubs of activity and focal points for neighbourhoods. Facilities should be located within prominent and highly visible positions in the development, in areas of high footfall and or high public transport access. Community facilities should also be delivered to a high design quality with opportunities for architectural distinctiveness to

distinguish community facilities from their surroundings so that they act as destination points. This approach has been successfully delivered in other regeneration projects in London such as at Peckham Library. Community facilities should be designed to be fully inclusive. Particular consideration should be given to the needs of people with a protected characteristic as defined in the Equality Act 2010. In order to save costs and attract as many people as possible to community facilities and other public services, opportunities for the collocation of community facilities with other social infrastructure or town centre uses should be explored.

ALTERNATIVE POLICY OPTION

10.30 No reasonable alternative policy options have been identified, as it is considered that an alternative approach to that outlined in the preferred policy option would not be in conformity with the NPPF, London Plan or draft supporting evidence base.



Figure 100: Peckham Library

SI5: Pubs

KEY ISSUES

1. Pubs are an important community use, providing a place to meet, socialise and be entertained.
2. In recent years, London has seen an increase in the number of planning applications to convert pubs to alternative land uses.
3. There has been a growing concern about this at the national, regional and local level and more and more Local Plans are now looking to safeguard pubs as community uses.
4. OPDC has three public houses within its boundary and consideration should be given to whether OPDC should look to safeguard these pubs as community uses.

POLICY CONTEXT

National

10.31 The NPPF does not say anything explicit on the protection of pubs. However, in 2015, the government introduced changes to the planning use class order to take away powers for permitted development rights where pubs have been listed as 'assets of community value'.

Regional

10.32 The London Plan states that local

planning authorities should develop policies to prevent the loss of valued local community assets, including public houses, justified by robust evidence.

PREFERRED POLICY OPTION

OPDC will protect pubs unless it can be demonstrated that for at least 12 months:

- a) the pub is no longer a viable business, demonstrated through accounts data; and
- b) the property has been appropriately marketed for a continuous period and no suitable offer has been made.

JUSTIFICATION

10.33 In recent years, there has been growing concern about the loss of public houses in the UK. In April 2015, Government changed the permitted development rights to provide a greater level of protection to pubs listed as Assets of Community Value (ACV). Developers must also now submit a written request to the local authority to determine whether the building has been the subject of an ACV nomination prior to carrying out any development that has the benefit of permitted development rights and no development can be carried out or a period of 56 days following the date of the request to the local authority.

10.34 Within the OPDC are there are currently three public houses. These are:

- The Castle in North Acton;
- The Fisherman's Arms on Old Oak Lane; and
- The Grand Junction Arms on Acton Lane.

10.35 At the time of the production of

this Local Plan, none of the three public houses are listed as ACVs.

10.36 OPDC considers that pubs can act as hubs for community life, which is important for mental health and wellbeing. They provide a social space and promote community cohesion, provide economic benefits by providing jobs, supporting local food suppliers, bringing activity to high streets and can also provide heritage value. As a 'Healthy New Town' OPDC proposes that the Local Plan looks to protect its public houses, subject to their continuing viability. For any proposal to be considered acceptable, OPDC will require applicants to submit detailed accounts data for at least the past year and also that the proprietor has appropriately marketed the property as a public house at a reasonable rate and has not had a suitable offer. This preferred policy approach adheres to the Campaign for Real Ale's (CAMRA's) 'Public House Viability Test' guidance document.

ALTERNATIVE POLICY OPTION

1. OPDC takes a more flexible approach to the loss of public houses and does not set out stringent requirements for information on accounts and marketing of the property.

10.37 This approach would have potential advantages of it allowing for the optimisation of development on sites occupied by public houses. This approach may however result in the loss of pubs that provide a valued community facility and has therefore not been identified as the preferred policy option.



Figure 101: Grand Junction Arms



11

TRANSPORT



Transport

11.1 This chapter contains policies addressing the following policy themes:

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

Questions:

QTa: Are there any other transport policy themes that you think OPDC's Local Plan should be addressing?

QTb: Do you agree with the chapter's preferred policy options? If not, what might you change?

QTc: Are there any other policy alternatives that could replace the chapter's preferred policies?

You can provide comments directly through:

opdc.commonplace.is

EVIDENCE BASE

Table 11: Transport Evidence base

Supporting study	Description	Status
OPDC Old Oak Strategic Transport Study	A strategic assessment of the existing transport provision in Old Oak, the impact of the planned future growth and identification of the transport interventions required to mitigate those impacts.	Completed
OPDC Park Royal Transport Strategy (PRTS)	A strategic assessment of the existing transport provision in Park Royal, the impact of the planned future growth and identification of the transport interventions required to mitigate those impacts.	Draft completed
OPDC Walking, cycling, streets and public realm strategy	A strategy setting out recommendations for the public realm, public open space and walking and cycling infrastructure for the OPDC area.	To be developed
TfL North Acton Station study	This study investigates the options for enhancing the capacity and accessibility of North Acton station and options for improving the permeability of the site.	Draft completed

T1: Strategic policy for transport

KEY ISSUES

1. The key transport challenges across the development area include a congested strategic and local road network, limited access to public transport services and poor pedestrian and cycle environments mainly due to severance and limited provision of infrastructure.
2. The provision of the HS2/ Crossrail/ National Rail station will transform accessibility of this part of west London and will provide an opportunity to rethink transport provision in the OPDC area.
3. There is an inherent need to fully integrate new transport infrastructure into the regeneration area to ensure that development potential can be optimised around these new and improved accessible transport hubs.
4. Coupled with the significant general background growth and the increase in travel demand resulting from the new HS2, National Rail and Crossrail station, the additional homes and jobs created within the development area will add to the existing travel demand, both at the strategic and local level.
5. It is vital that high quality, safe and accessible transport infrastructure is provided to facilitate the planned growth and better connect the development area with its

surroundings and other areas of London.

6. Changes to public transport accessibility identified in this draft Local Plan may require changes to the spatial distribution of density in figure 18. See policy OSP4

POLICY CONTEXT

National

11.2 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.

Regional

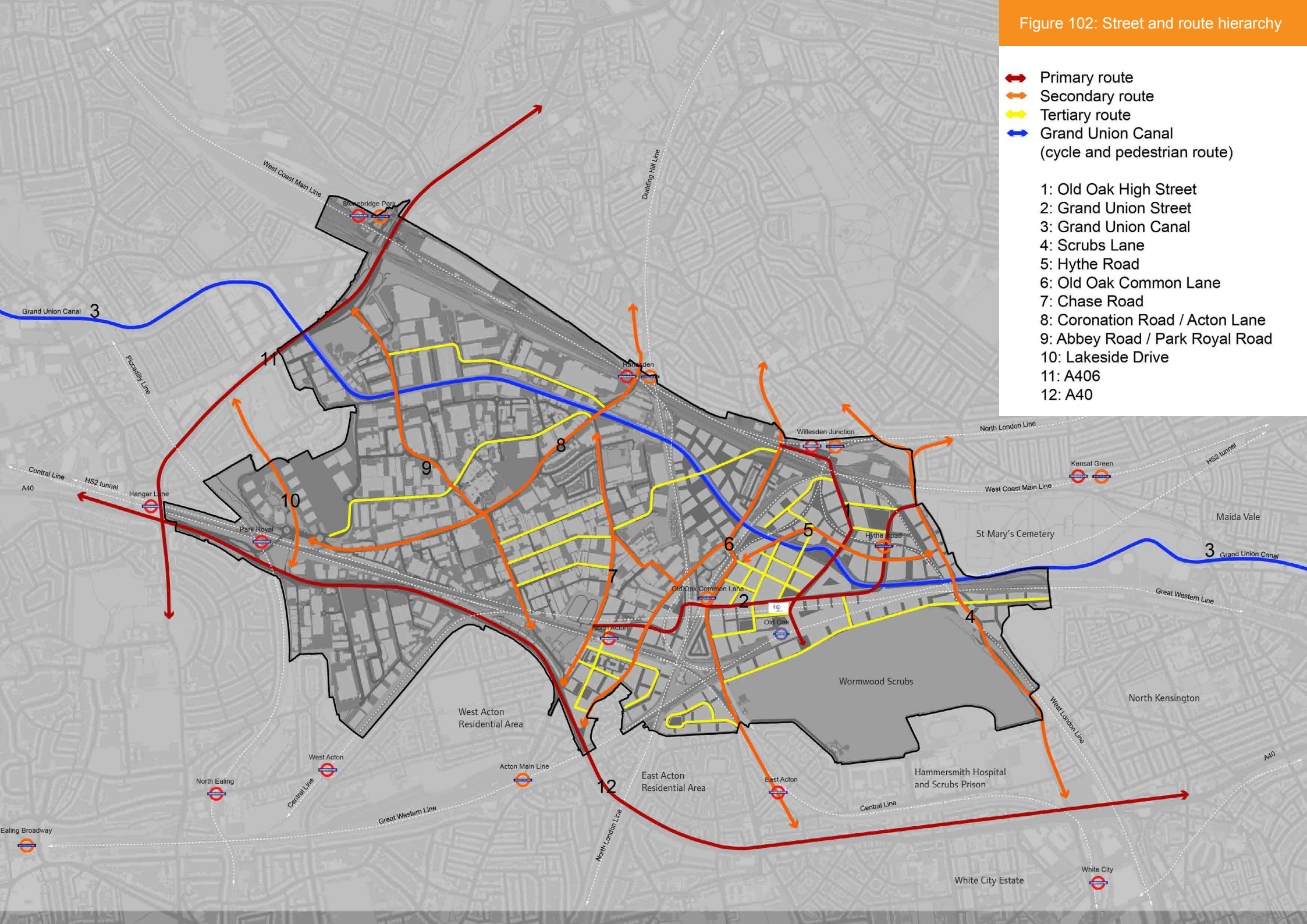
11.3 The Mayor's London Plan (2015) states the Mayor's commitment to improving the environment by encouraging more sustainable means of transport, through a cycling revolution, improving conditions for walking and enhancing public transport.

PREFERRED POLICY OPTION

OPDC will support proposals that:

- a) Deliver a state of the art, safe and accessible transport system, by providing infrastructure that connects communities and helps facilitate growth in and around the Old Oak and Park Royal area;
- b) Ensure new transport infrastructure is fully embedded into the area and that Old Oak and Park Royal is fully integrated with its surrounding areas.
- c) Prioritise sustainable transport modes and support modal shift from private cars; and
- d) Implement and safeguard future innovative and smart technologies that maximise the efficiency and interoperability of the transport network.

Figure 102: Street and route hierarchy



JUSTIFICATION

11.4 Old Oak Common HS2 station presents a once in a lifetime opportunity to catalyse the comprehensive regeneration and deliver a step change in public transport access across Old Oak and Park Royal. Providing quality connections to this transport super-hub through the delivery of state of the art transport infrastructure will be a key aspect in the success of the OPDC area.

11.5 There is and will be a large number of people working, living and moving within the area and to support this it is vital to relieve pressure on the road network and connect key origins and destinations with sustainable transport modes. Proposals should prioritise pedestrians and cyclists as the most important travel modes, followed by public transport and then, as appropriate, the private vehicle. This approach will support a shift towards sustainable transport modes by changing people's behaviour and attitude towards car use. It is recognised that businesses in Park Royal will require vehicle movement by road, particularly for servicing and deliveries and this should continue to be supported but also carefully planned so as to mitigate potential negative impacts from increased traffic. There are opportunities to optimise the number of journeys on more sustainable modes

in particular for employees travelling to work which will in turn free up capacity for essential freight movements and deliveries.

11.6 Encouraging transport improvements that are both sustainable and technologically innovative 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 exemplar NHS Healthy New Town and to gain WHO Healthy City status. Provision of healthy street environments that encourage walking, cycling and public transport use must be sought.

11.7 The scale of development at Old Oak and Park Royal offers an opportunity to deliver transport improvements that are at the vanguard of sustainability and innovation. Whilst advances in technology can have wide-ranging impacts, some major advances in transport are already being developed; including automated vehicles (trains, buses, cars, taxis) improved accuracy of passenger information, the proliferation of wearable technology, drones, ticketless technology and sensors to detect traffic congestion and cycling and vehicular parking availability. Smart transport solutions should be identified at an early stage and, where possible,

safeguarded for future implementation.

ALTERNATIVE POLICY OPTION

1. Giving priority to car travel

11.8 This policy option would support proposals which prioritise cars above more sustainable modes, which 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 impacting on health and well-being.



T2: Walking

KEY ISSUES

1. Walking is the most sustainable form of transport and encouraging increased walking will have many advantages including economic and health benefits, more connected neighbourhoods and fewer road traffic injuries. Through an increase in footfall, the vitality of an area is likely to increase and subsequently bring benefits to local businesses.
2. The propensity to walk is influenced not only by distance but also by the quality of the walking experience. 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.

POLICY CONTEXT

National

11.9 The NPPF states the requirement for planning principles to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling. It indicates that where practical key facilities such as primary schools and local shops should be located within walking distance of

most properties.

Regional

11.10 The London Plan indicates the requirement for transport proposals to bring about a significant increase in walking in London through emphasis on the pedestrian and street environment, promoting simplified streetscapes, decluttering and access for all users. In addition, TfL's Health Action Plan identifies the need for a whole street approach to make streets more inviting for walking and cycling and better for health.



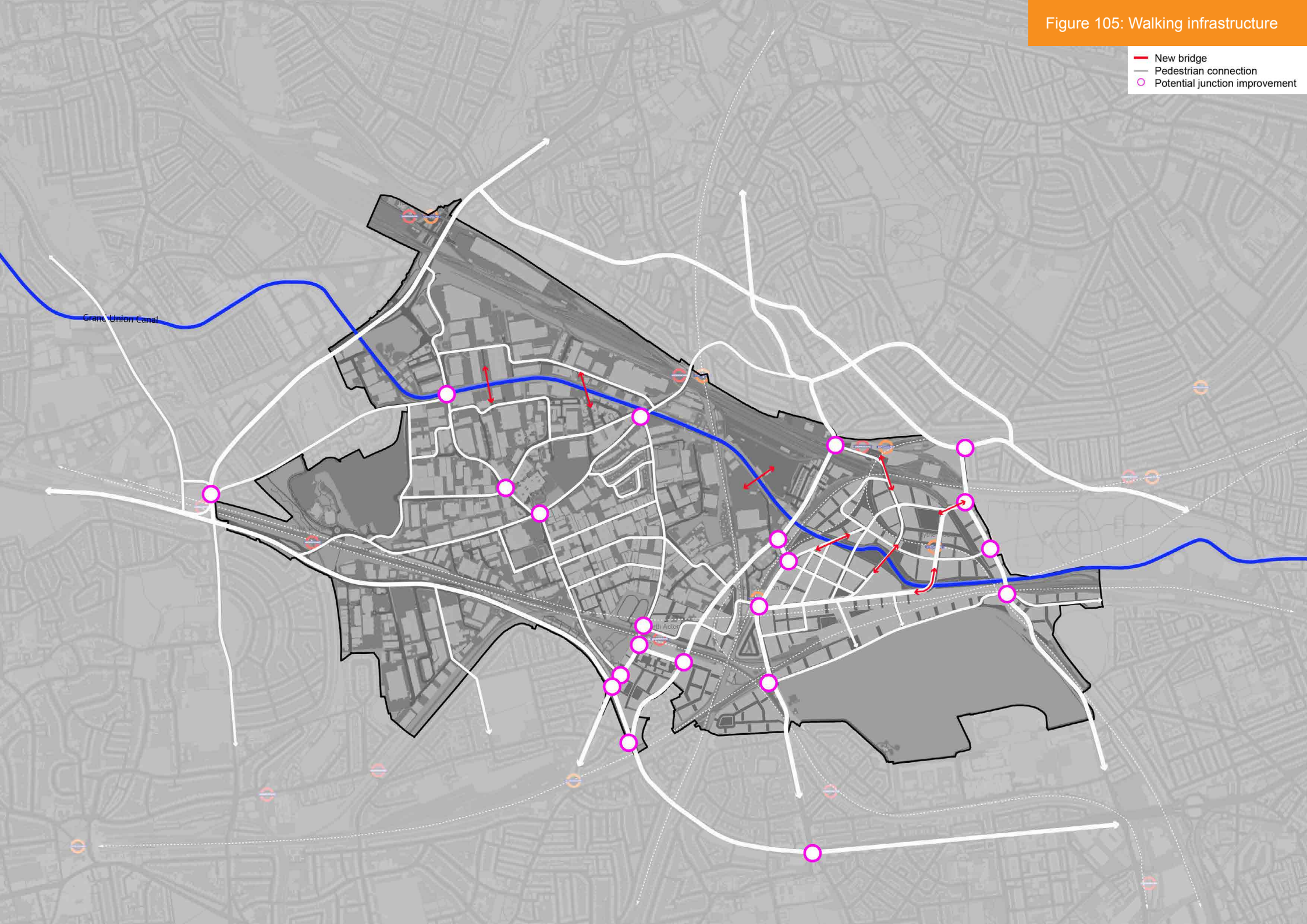
Figure 104: Walking route

PREFERRED POLICY OPTION

Development proposals will be required to:

- a) Provide high quality, safe, direct and accessible walking networks;
- b) Support healthy lifestyles;
- c) Provide new and enhance existing walking infrastructure;
- d) Maximise active frontages and promote a fine grain development that creates an interesting and varied streetscape;
- e) Connect to existing and planned pedestrian links in the wider area; and,
- f) Support and provide infrastructure for the Legible London scheme.

Figure 105: Walking infrastructure



- New bridge
- Pedestrian connection
- Potential junction improvement

JUSTIFICATION

11.11 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, workers and businesses can benefit from this new transport superhub. By 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.

11.12 Walking provision should be safe, well lit, direct, comfortable, coherent and attractive and should integrate well with the street environment and desire lines, minimising conflict between different users.

11.13 Legible London signage should be implemented throughout the area to provide clear, comprehensive and consistent wayfinding information and enable pedestrians to complete more journeys on foot. New connections and wayfinding to both existing and proposed strategic walking routes and to key destinations such as Harlesden, Park Royal and North Acton should also be provided.

11.14 To minimise severance and encourage permeable movement in Old Oak, it is important to provide a number of new links under or over existing barriers. Where possible the early delivery of these elements will help set a precedent for a shift towards sustainable transport modes.

ALTERNATIVE POLICY OPTION

11.15 No reasonable alternative policy options have been identified, as it is considered that an alternative approach to that outlined in the preferred policy option would not be consistent with the NPPF, in general conformity with the London Plan or supporting evidence base to the Local Plan (Old Oak Strategic Transport Study, PRTS), or deliver the required pedestrian improvements.

Questions:

QT2a: Do you agree with the proposed indicative walking connections set out in figure 105? If not, do you have any alternative suggestions?

You can provide comments directly through:

opdc.commonplace.is



Figure 106: Accessible street furniture



Figure 107: Legible London



Figure 108: Proposed bridge in Kings Cross, Moxon Architects

T3: Cycling

KEY ISSUES

1. After walking, cycling is the next most sustainable transport mode.
2. Cycling on London's main roads has risen by 173 per cent since 2001.
3. The expected growth of cycling up to 2026 is estimated to deliver £250m in economic health benefits annually.
4. The development area has a number of physical barriers to cycling including the rail lines, canals, roads (including the A40 and A406) and a lack of through routes. There is currently a lack of cycling infrastructure and wayfinding, which encourages a greater number of people to use their private cars.

POLICY CONTEXT

National

11.16 The NPPF states the requirement for planning principles to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling.

Regional

11.17 The London Plan indicates a target for cycling in London to account for at least 5% of modal share by 2026 and the Mayor of London's Cycling Vision sets out a target to double cycling over the next 10 years (March 2013).

PREFERRED POLICY OPTION

Development proposals should:

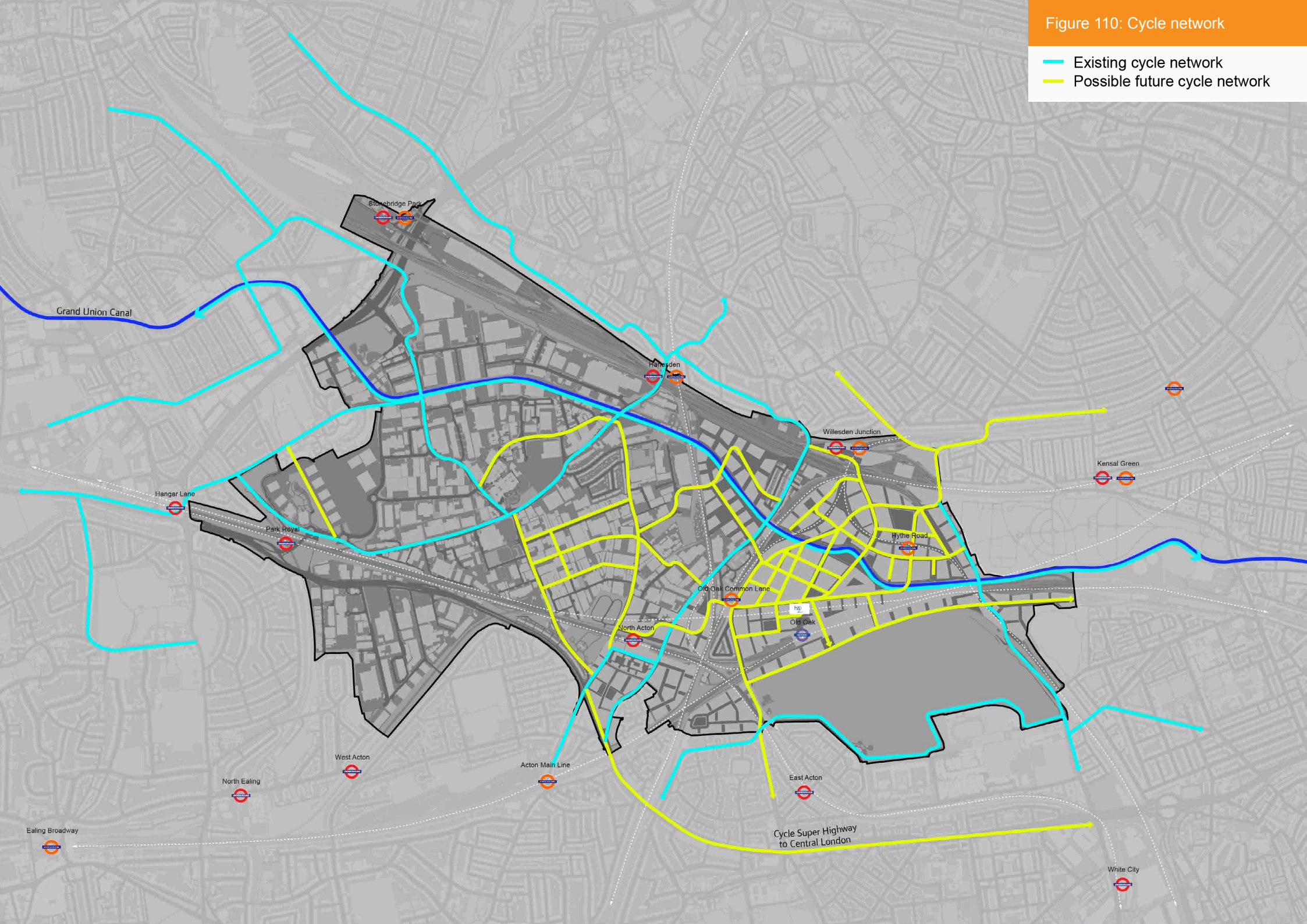
- a) Provide state of the art cycling infrastructure;
- b) Provide new and enhance and provide links to existing, cycle connections to ensure they are safe, convenient and direct, but not to the detriment of pedestrians;
- c) Implement signage to improve cycle wayfinding and legibility;
- d) Promote and help to deliver cycle hire schemes within the OPDC area;
- e) Promote safety and security measures for cyclists; and
- f) Require secure, integrated, convenient and accessible cycle parking facilities that at least meet the standards set out in the London Plan.



Figure 109: Illustrative cycle hire infrastructure in Old Oak

Figure 110: Cycle network

- Existing cycle network
- Possible future cycle network



JUSTIFICATION

11.18 The Mayor's Vision for Cycling and the London Cycling Design Standards, encourage a bold approach to making better, more attractive streets and spaces for pedestrians and cyclists. Higher levels of cycling can be achieved through the delivery of infrastructure that is safe, direct, comfortable, coherent, attractive and adaptable, whilst ensuring consideration is given to the impact of cycling infrastructure on pedestrians.

11.19 In Old Oak, redevelopment provides an opportunity to push the boundary and provide state of the art cycling infrastructure that can benefit everyone who lives and works in the area. Adoption of best practice from the mini-Holland projects should be the norm, with connections to existing and proposed commuter routes such as the proposed East-West cycle superhighway and to Quietways, such as along the Grand Union Canal.

11.20 The Park Royal Transport Strategy shows that the vast majority of employees live within 8km of Park Royal with a significant concentration within 5km or less. This distance is well within cycling distance subject to the appropriate infrastructure and safety measures being in place. It is important

to realise a shift towards cycle usage for commuters through good design of cycle routes, connections to existing and proposed cycle networks and better cycle infrastructure.

11.21 Interventions are also needed to reduce severance across the A40 and A406 and improve wayfinding in order to improve cycle connectivity to and from Old Oak and Park Royal from surrounding areas and nearby local centres such as Harlesden, White City, Queens Park and Ladbrooke Grove.

11.22 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. OPDC will work with businesses to develop training and guidance and improve awareness of the benefits of cycling to employees, to encourage more cycling.

11.23 Cycle parking should cater for future demand, in line with the quantitative and qualitative requirements set out in the London Cycling Design Standards (2014), providing numbers in excess of London Plan minimum standards.

This will include private cycle parking for residents and employees as well as generous provision for visitors and high quality facilities at public transport interchanges. The necessary spatial and design requirements will need to be factored in from the outset and should not impede pedestrian movement. Cycle wayfinding signage will be required to improve the legibility and navigation to, from and through the area.

11.24 A future extension of Cycle Hire into Old Oak and Park Royal would represent a logical expansion westwards. Subject to further analysis, a network of docking stations could be designed across the new development areas from the outset and built at the appropriate timings. Funding for the docking stations should be sought from contributions from developers as there are currently no plans by TfL to extend the network in this area. OPDC will also support proposals for infrastructure for other cycle hire schemes.

ALTERNATIVE POLICY OPTION

11.25 No reasonable alternative policy options have been identified, as it is considered that an alternative approach to that outlined in the preferred policy option would not be in conformity with the NPPF, London Plan or supporting evidence base to the Local Plan (Old Oak Strategic Transport Study, PRTS), or deliver the required cycling improvements.

Question:

QT3a: Do you agree with the proposed indicative cycling connections? If not, do you have any alternative suggestions?

You can provide comments directly through:

opdc.commonplace.is



Figure 111: Innovative below ground cycle storage, Ecocycle.

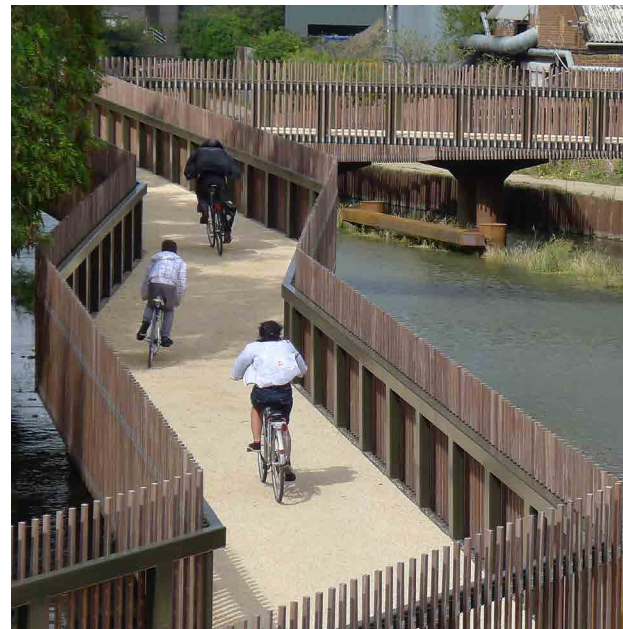


Figure 112: Cycle bridge, Bow

T4: Rail

KEY ISSUES

1. The new HS2, Crossrail and National Rail station at Old Oak Common will be a key driver for regeneration in the area.
2. 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.
3. The Old Oak area is currently served by Willesden Junction and North Acton stations, providing London Overground, Bakerloo and Central line services. Park Royal is served by North Acton, Park Royal, Hanger Lane and Stonebridge Park stations providing Central, Bakerloo, Piccadilly Line and London Overground services.
4. The stations are on the periphery of both areas and access to them by foot or by cycle is currently limited due to the lack of safe and appropriate routes.
5. Existing stations are well used with some crowding at North Acton and Willesden Junction which is predicted to increase without station improvements.
6. By 2030, it is predicted that existing services running through the area will be at capacity, without upgrades.

POLICY CONTEXT

National

11.26 The NPPF states the requirement for planning principles to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling.

Regional

11.27 The London Plan indicates the importance of improving public transport to increase its appeal relative to the private car. By improving accessibility and capacity within the south east of England and beyond, London will maintain its attractiveness as a place to work, visit and do business.

PREFERRED POLICY OPTION

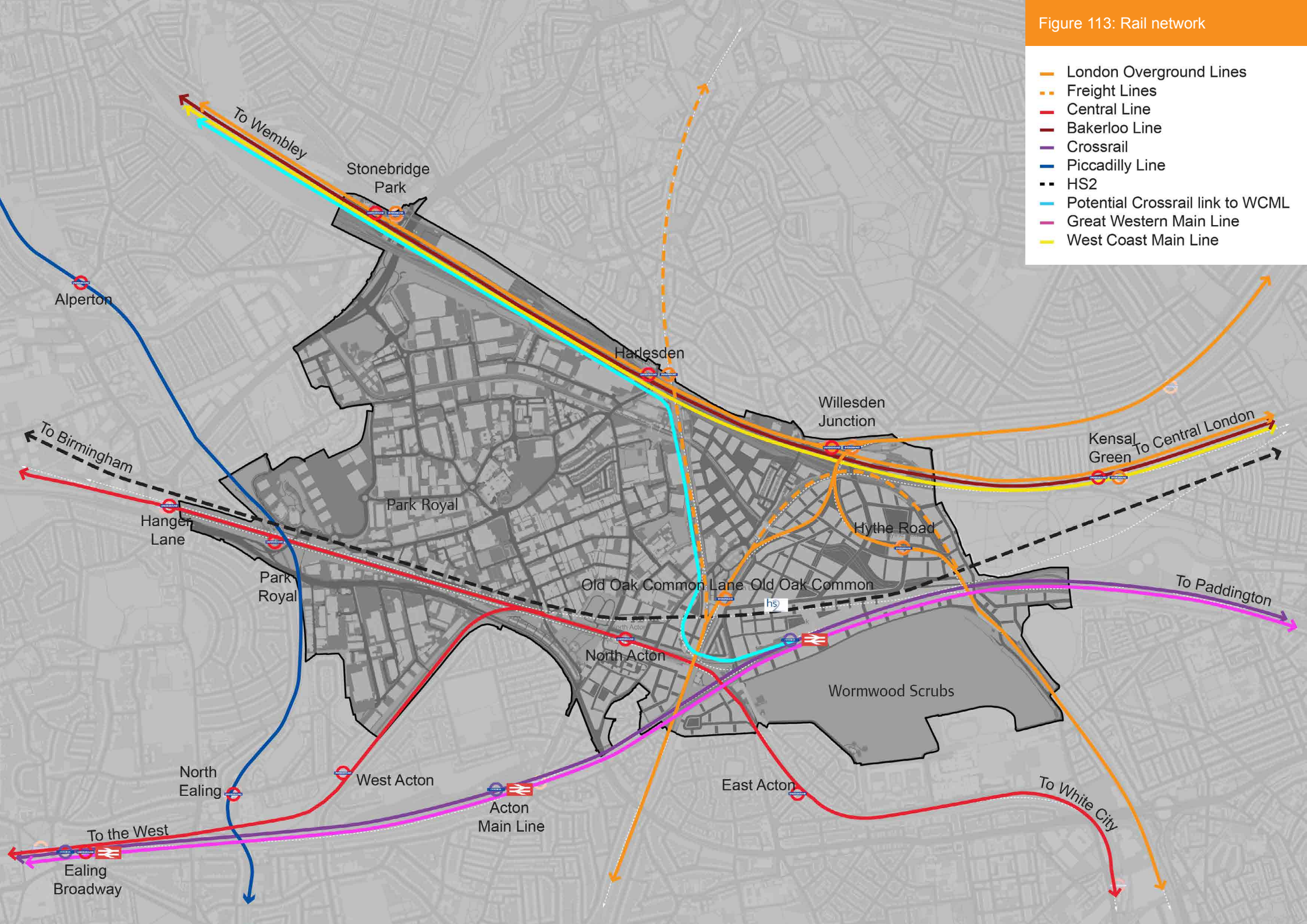
Development proposals will be supported where they:

a) Facilitate the delivery of:

- i. a state of the art rail station at Old Oak Common with the highest quality architecture that provides interchange between HS2, Crossrail and National Rail services;

- ii. two new London Overground stations and supporting infrastructure including high quality links to the HS2/ Crossrail station;
 - iii. substantial capacity improvements to existing London Underground and Overground stations, particularly Willesden Junction and North Acton;
 - iv. an exceptionally designed intermodal interchange;
 - v. links between stations that facilitate the safe, efficient and sustainable movement of passengers;
 - vi. improved services on existing infrastructure;
 - vii. a rail connection between the Great Western Mainline (GWML) and the West Coast Mainline (WCML);
- b) Ensure that the impact on existing rail infrastructure is minimised during construction;
 - c) Enable new rail routes to improve connections to the OPDC area; and
 - d) Enable future proofing of station design and services to enable smart technology to be implemented.

Figure 113: Rail network



JUSTIFICATION

11.28 The new Old Oak Common Station and surrounding interchange will be a key driver for regeneration in the area and will be the focus of future transport connections. It will provide better connections to west London and the rest of the UK. The station is being designed to accommodate 250,000 passengers a day, which is comparable in capacity to Waterloo station.

11.29 This could be further supported by a potential link from Crossrail to the West Coast Main Line (WCML), which could provide additional connections from north-west London and Hertfordshire including, potentially, Wembley Central. This would also provide opportunities for Crossrail trains to run northbound towards Tring. At the time of writing this plan no feasibility work has been carried out into the benefits, business case or delivery.

11.30 Two new London Overground stations will also be built at Old Oak Common Lane and Hythe Road. The new London Overground stations will provide excellent local and subregional connections and will support development by extending the catchment area for new commercial activities bringing 250,000 additional people and 150,000 additional jobs

within an hour's journey of Old Oak. OPDC will ensure the delivery of high quality links between the London Overground stations and the Old Oak Common HS2/ Crossrail and National Rail station. The challenges associated with delivering these stations should not be underestimated. At the time of writing this draft Local Plan the proposed London Overground stations are at initial feasibility stage only. Funding has now been secured to further progress the design and business case for these. However, currently there is no capital funding secured for the delivery of these stations. The final arrangements for these stations will be dependent on the outcome of this work.

11.31 The Park Royal Transport Strategy identifies the need to improve the public realm, accessibility and permeability of stations in Park Royal in order to encourage a higher rail mode share.

11.32 All of the stations within the area will need to incorporate a legible, safe and accessible transport interchange between different modes of travel and particularly between public transport, pedestrians and cyclists. High quality walking and cycling routes between stations will also be important.

11.33 A strategic rail study will be carried out to determine how rail connections to the OPDC area from a range of rail corridors across Central London and beyond can be improved. This will include consideration of fare zones and rail links to airports.

11.34 There are a range of potential smart rail innovations that could be achieved with advances in technology, many of which are already being trialled across the world today. These include ticketless and security technology which eliminates gate-lines in stations and enables 360° access, intelligent robots to repair and maintain infrastructure, energy flooring that generates electricity from footfall, virtual shopping walls, underground freight pipelines for moving goods, real-time passenger information for seamless journey planning, monitoring drones for predictive maintenance and improved security, intelligent robots to unload and sort cargo and automated passenger trains. There are significant opportunities now to embed flexibility into rail design to support smart technology in the future.

ALTERNATIVE POLICY OPTION

11.35 No reasonable alternative policy options have been identified, as it is considered that an alternative approach to that outlined in the preferred policy option would not support the necessary rail capacity requirements, nor be consistent with the NPPF, London Plan or supporting evidence base to the draft Local Plan.

Question:

QT4a: Do you have any suggestions of additional rail connections to the OPDC area that should be provided?

You can provide comments directly through:

opdc.commonplace.is

Figure 114: London Overground stock



Figure 115: Illustrative view of Old Oak Common Station

T5: Buses

KEY ISSUES

1. Five bus routes serve Old Oak and 15 bus routes serve Park Royal with frequencies of between approximately 6-15 minutes.
2. The bus routes provide links to surrounding areas including: Acton, Harlesden, Hammersmith, Shepherds Bush, White City and local London Underground/ National Rail stations.
3. Today there are a number of parcels of land in both Old Oak and Park Royal which are inaccessible to the bus network because they are outside the recommended 400m walk distance to bus stops.
4. Buses are well used particularly to access Willesden Junction and North Acton stations and to access local services such as the Asda supermarket located in Park Royal Centre.
5. Bus journey time reliability in the area is affected by congestion on the local and strategic road network. It will be important to ensure bus journey time reliability is improved and then protected from development impacts in the future.
6. There is a need to deliver a comprehensive new bus network to serve new developments at Old Oak and to improve services within Park Royal.

POLICY CONTEXT

National

11.36 The NPPF states the requirement for planning principles to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling.

Regional

11.37 The London Plan indicates the importance of buses in London and therefore, how important it is to deliver improved journeys for bus passengers which will lead to increased bus use.

PREFERRED POLICY OPTION

Proposals should deliver/contribute to:

- a) Increases in bus frequencies on existing routes and new and extended bus routes;
- b) Infrastructure to improve bus journey time reliability including bus priority measures;
- c) New and improved bus stops, including access to real-time travel information at bus stops;
- d) Supporting the roll out of greener

buses; and
e) Clear and legible signage for bus users.



JUSTIFICATION

11.38 Good provision of bus services and bus infrastructure is a key contributor to a high public transport modal share and reduces the impact of developments on the surrounding road network. Bus services will be particularly important in the early phases of development before the new rail stations are delivered.

11.39 A review of the bus network in the Old Oak and Park Royal areas will be carried out in conjunction with TfL London Buses. 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.

11.40 Connections to new rail 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.

11.41 New bus routes should provide direct links from other parts of London on corridors not served directly by rail or underground services and ensure that surrounding residential areas benefit

from the new opportunities brought by development.

11.42 All new roads to be used by buses must allow appropriate highway clearance for the largest double deck vehicles and be built to an adoptable standard with sufficient widths. 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.

11.43 London's green bus fleet is the largest in the world, combining the roll out of new hybrid buses, the early introduction of new Euro VI buses and the retrofit programme, leading to significant improvements in emissions throughout London. OPDC will work with TfL and bus operators to promote the roll out of greener buses and ensure that the design of transport infrastructure in the OPDC area facilitates environmental improvements to the bus fleet.

Figure 116: Illustration of smart bus infrastructure



ALTERNATIVE POLICY OPTION

11.44 No reasonable alternative policy options have been identified, as it is considered that an alternative approach to that outlined in the preferred policy option would not support the necessary bus improvements required.

Questions:

QT5a: Do you have any suggestions for how the bus network could be developed in the future to serve the OPDC area?

QT5b: Should OPDC seek to encourage low emission and zero emission buses?

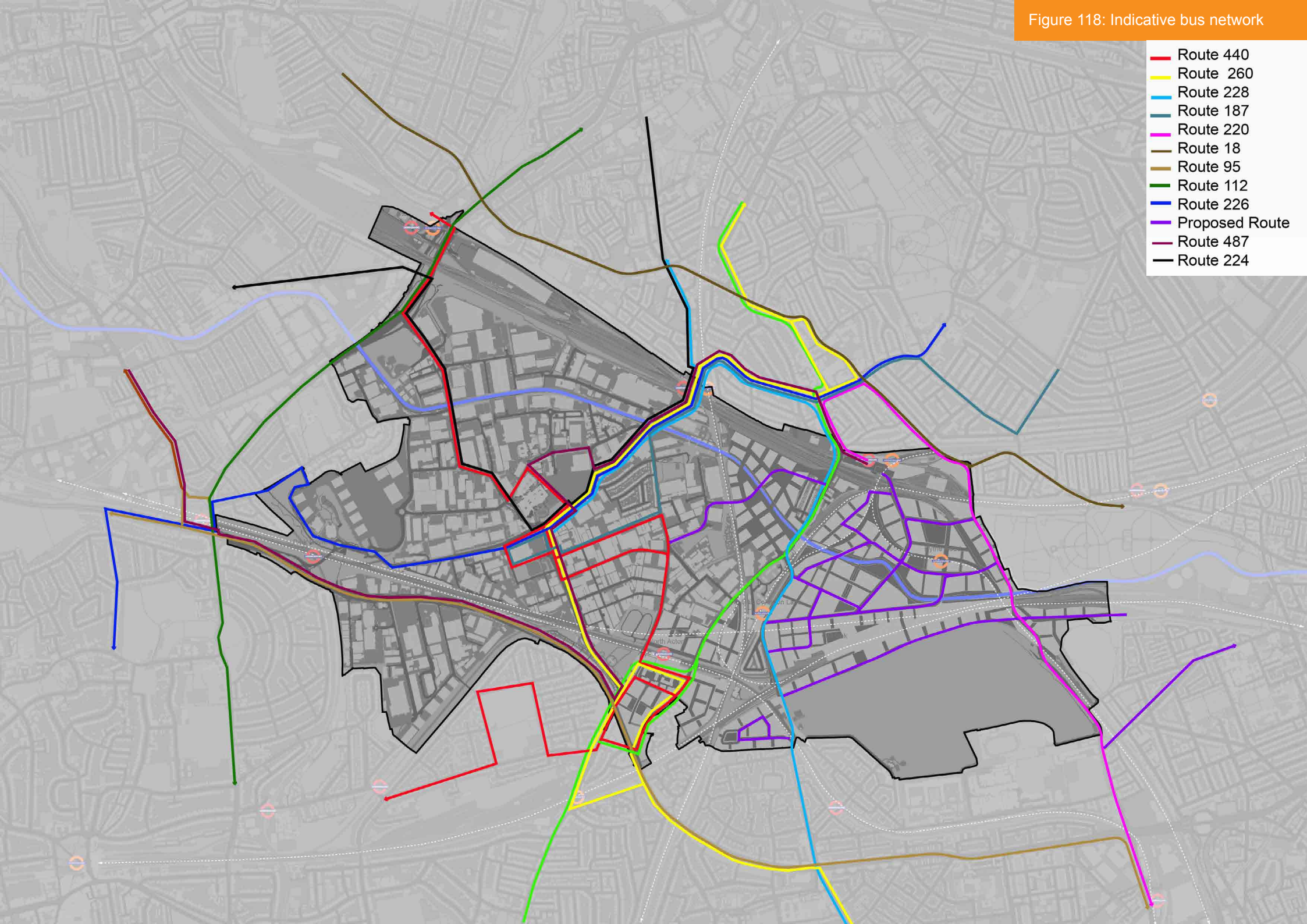
You can provide comments directly through:

opdc.commonplace.is

Figure 117: New Routemaster



Figure 118: Indicative bus network



T6: Roads and streets

KEY ISSUES

1. The regeneration area is within close proximity to a number of key strategic road corridors including the A40 and A406. These corridors experience significant congestion.
2. The local road network is limited and in many cases does not meet current highway design standards due to narrow lanes and poor sight lines. The limited local road network already forces local traffic to use the strategic network unnecessarily, while the extent and usefulness of bus routes is also impeded by the limited road network close to and within the OPDC area.
3. As with walking and cycling, the rail lines and the Grand Union Canal restrict vehicular movements.
4. Localised congestion is also an issue with most roads and junctions operating at or close to capacity.
5. Congestion at key junctions and on links providing access to strategic routes is a barrier to business growth.
6. New bridges providing new links to join up areas severed by the rail lines and the Grand Union Canal may be required.

POLICY CONTEXT

National

11.45 The National Planning Policy Framework indicates a need to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.

Regional

11.46 The Mayor supports the need for improvements to London's road network where it is required to improve or extend existing capacity and provide new links. Congestion is estimated to cost the economy £4 billion a year and stalled traffic in London has been found to lead to 8% more CO₂, 6% more particulates (PM₁₀) and 9% more nitrogen dioxide (NO₂) emissions than free-flowing traffic.

development on the surrounding local and strategic road network;

- c) Deliver high quality streets with robust and coordinated materials that integrate effectively with the wider public realm;
- d) Ensure that streets give priority to pedestrians, cyclists and buses; and
- e) Promote effective and integrated management of streets to future-proof for innovations in technology.

PREFERRED POLICY OPTION

Development proposals should:

- a) Provide a range of new streets that help overcome severance and optimise connectivity;
- b) Enhance existing streets and junctions to mitigate the impacts of

JUSTIFICATION

11.47 The road network within Old Oak and Park Royal should better serve local communities, contribute positively to the urban realm and facilitate improved pedestrian, cycle and bus connections.

11.48 The Roads Task Force (RTF) Street Types classification, adopted by TfL, recognises that different roads have different “moving” and “living” functions and therefore require different approaches. RTF Street Types will be used to identify the movement and place functions of the existing and future network of streets across Old Oak and Park Royal.

11.49 In Old Oak, measures to prioritise bus movements, provide segregated facilities for cyclists and create pedestrian priority areas will be supported. In Park Royal, the road network will need to support the movement of freight to facilitate business growth by implementing measures to address the existing congestion issues. This will need to be carefully planned alongside the need to improve bus movements, pedestrians and cyclists and deliver a healthy street environment. Any through routes used by general traffic should be designed to avoid “rat-running” including traffic calming and controlled



Figure 119: Elements of the public realm



crossing facilities. 20 mile per hour speed limits will be explored. Managing vehicle movement and speed should be achieved through good design, rather than merely signage. All new and improved roads must be built to adoptable standards and any decision to adopt streets would need to be made in collaboration with the relevant local councils.

11.50 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, both during construction and once the area is developed. OPDC will work with TfL and relevant local councils to realise improvements to the A40 junctions and corridor.

11.51 It will be important that the amount of traffic generated during construction and development activity is limited to what the strategic road network including the A40 and A406 can handle without having a negative impact on the strategic function of these routes. OPDC will be developing a Construction and Logistics strategy, which will help to inform, plan for and minimise the impact of construction and development activity.

11.52 It will also be important to

improve the connectivity across the A40 for pedestrians, buses and cyclists. A study of the A40 junctions close to the development area (Savoy Circus, Gypsy Corner, Hanger Lane), is being carried out to understand the cumulative impact of growth at Old Oak and Park Royal and to identify potential long-term solutions, including tunnelling options.

ALTERNATIVE POLICY OPTION

11.53 No alternative policy options have been identified that meet the requirements of the guidance set out in the Local Plan and the aspirations for the development area.

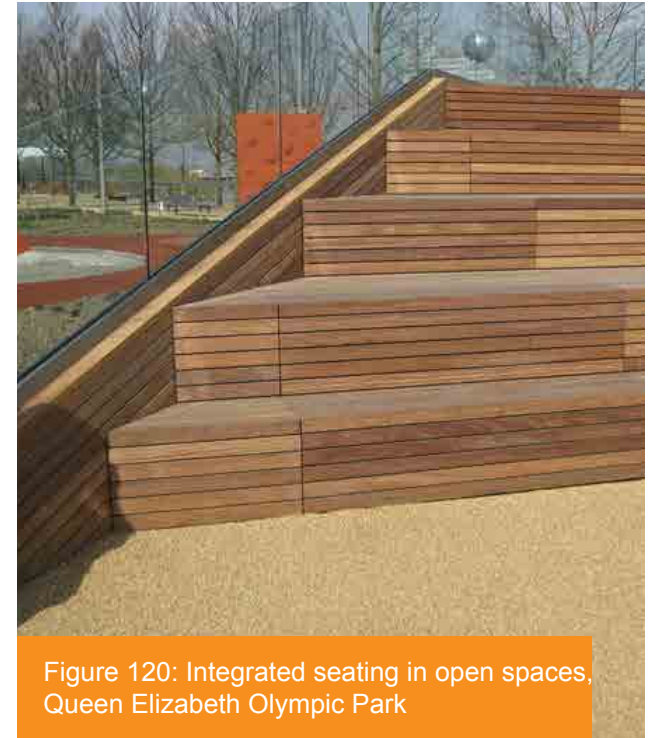


Figure 120: Integrated seating in open spaces, Queen Elizabeth Olympic Park

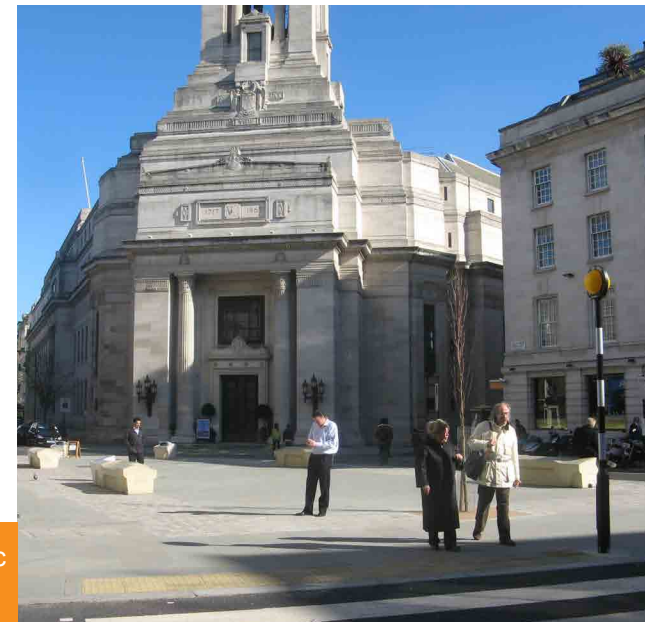


Figure 121: New public realm in Holborn

Figure 122: Seating in Windrush Square, Brixton



T7: Car parking

KEY ISSUES

1. Managing car parking plays an important role in controlling the number of cars generated from a development and minimising the development's impact on the surrounding highway network.
2. The modelling work completed for the Old Oak Strategic Transport Study indicates that the road network would not be able to accommodate additional development related traffic unless parking was restricted to very low levels across the Old Oak development area.
3. Today the Park Royal estate has around 12,000 off-street parking spaces. The mode share is 53% by car (including driver and passengers) with average vehicle occupancy of 1.06. On-street parking is largely uncontrolled and causes obstructions to freight traffic, buses, cyclists and pedestrians. This needs a thorough review and sensitive regulation.

POLICY CONTEXT

National

11.54. The NPPF requires local authorities to consider accessibility, availability of public transport, car ownership levels and the importance of reducing emissions when setting parking standards.

Regional

11.55. All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit. It also states that developments must ensure that 1 in 5 spaces provide an electric charging point to encourage the uptake of electric vehicles.

PREFERRED POLICY OPTION

OPDC will ensure the development area is an exemplar of low carbon development and will promote a modal shift towards more sustainable modes by:

- a) In Old Oak:
 - i. Limiting car parking to 0.2 spaces per unit for residential developments;
 - ii. Promotion of car free development close to public transport hubs; and
 - iii. Securing zero car parking for non-residential developments, except for blue badge holders.
- b) In Park Royal:
 - i. Limiting car parking to 0.2 spaces per unit for residential developments; and

- ii. Allowing limited car parking for non-residential development taking into account access to public transport and operational or business needs.

- c) When providing car parking, proposals should:
 - i. incorporate electric charging points for electric vehicles at all new parking spaces;
 - ii. include and promote provision for car club vehicles and car sharing;
 - iii. be sensitively designed; and
 - iv. not take precedence over other street level users or the incorporation of open space, public realm or open space.

- d) Proposals should provide suitable facilities to cater for anticipated demand for taxis and coaches.



JUSTIFICATION

11.56 Low levels of car parking will be essential to ensure that traffic congestion does not reach unacceptable levels. Where justified, some car parking will be provided to meet the essential needs of development. However, this will need to be carefully planned and managed to ensure that there are suitable places for disabled people, car clubs and electric cars and to facilitate the successful operation of the Park Royal industrial estate. Where possible car parking should be located underground.

11.57 This approach is justified by the very high level of public transport accessibility resulting from the planned and proposed public transport investment. The need for access to a car can be met in part by dedicated car club spaces together with parking for disabled people. Spaces designated for blue badge holders should be located on firm level ground and as close as feasible to the accessible entrance to the building.

11.58 OPDC will work with the local highway authorities, businesses and local groups to achieve a co-ordinated approach to the potential implementation of Controlled Parking Zones (CPZs) across the area to protect residents living close to stations and

high streets and to discourage journeys made by car, which could be made by more sustainable transport modes. Car club vehicles spread across the site will provide access to a car when needed for specific journeys and car club bays will need to be designed into the new development areas at the outset.

11.59 Providing sufficient charging points will be essential in encouraging the uptake of electric vehicles. All new private parking should be provided with electric charging points. In addition, on-street charging point locations will need to be carefully planned to ensure they minimise street clutter and allow for adequate clearance on the footway.

11.60 There is likely to be a strong demand for taxis and private hire vehicles (PHVs) generated by the HS2/ Crossrail/ National Rail interchange. The interchange will be designed with fully accessible taxi ranks and facilities for PHVs. It will be important to carefully manage onward journeys from stations to avoid large numbers of people using taxis and PHVs instead of walking, cycling or using the bus network. Where specific development types will attract a large number of visitors, facilities for coach parking and pick up and drop off areas will need to be provided.



Figure 123: Car share clubs

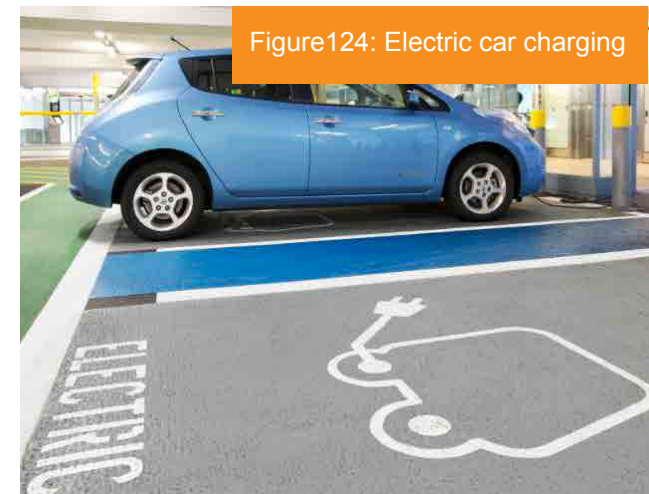


Figure 124: Electric car charging

ALTERNATIVE POLICY OPTIONS

1. Setting less stringent car parking standards.

11.60 This policy option would offer greater choice. However, transport modelling outputs indicate 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 increase emissions. As such this policy goes against OPDC's aspirations and the transport policies detailed in this draft Local Plan.

2. Car free – no residential car parking. Only blue badge.

11.61 This policy option would enable a modal shift towards the use of more sustainable transport modes and would reduce traffic flow and congestion. However a low amount of car parking spaces is considered necessary to meet the essential needs of development, particularly ensuring that there are suitable places for disabled people, car clubs and electric cars. A car free policy option would also negatively impact businesses that rely on private vehicles, particularly in Park Royal.

3. Take a more flexible approach to parking standards for new commercial developments in Old Oak.

11.62 A more flexible approach to providing parking spaces for new commercial developments could be more beneficial for businesses, helping to attract them to Old Oak. However, allowing a more flexible approach to parking would be incredibly difficult to manage given the potential number of businesses and their varying uses. The high level of public transport accessibility negates the need for dedicated parking spaces for businesses and the additional vehicles would add to congestion, noise and air quality issues.

Questions:

QT7a: Do you agree that all parking spaces should include an electric charging point?

QT7b: Should the level of car parking for commercial space be increased?

You can provide comments directly through:

opdc.commonplace.is

Figure 125: Congested parking in Park Royal



T8: Freight, servicing and deliveries

KEY ISSUES

1. Light freight journeys are responsible for 80% of freight miles on London's roads. TfL estimates that by 2030 this will grow by 43%. The growth in e-commerce and personal deliveries is a major contributor.
2. Freight activity is a significant feature of the development area due to the needs of the Park Royal industrial estate, the proximity to Heathrow Airport and the strategic road network (A40 and A406) providing links to Central London.
3. 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.
4. The volume of freight and servicing movements also raises challenges in terms of maintenance and management of the road network and the safety and environment for other road users.
5. Coordination of HGV activity across the development area will be important in order to mitigate those impacts.
6. There is also 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, mail and, until recently, scrap metal.

7. Currently there is unrealised potential for water borne freight on the Grand Union Canal with a wharf facility located on the Powerday site.

POLICY CONTEXT

National

11.63 The NPPF indicates that planning authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of infrastructure necessary to support sustainable development, including rail freight interchanges.

Regional

11.64 London Plan policy indicates a need to ensure deliveries are efficient and highlight the use of consolidation centres, not just for construction purposes, but also for deliveries.

PREFERRED POLICY OPTION

OPDC will require proposals to:

- a) Secure Delivery and Servicing

Plans (DSPs) through planning agreements;

- b) Identify potential sites for consolidation centre(s) and lorry holding areas;

- c) Require off-street servicing facilities within new developments, ensuring this does not impact on the public realm;

- d) Encourage the provision of facilities for home deliveries within residential developments;

- e) Provide opportunities for click and collect sites;

- f) Identify more efficient and sustainable ways of delivering goods including encouraging the use of cargo bikes;

- g) Ensure that the operators of all freight vehicles operating in the area have attained the Gold Fleet Operator Recognition Scheme (FORS) accreditation so that they have made proven efforts to reduce emissions; and

- h) Implement and safeguard for future innovative and smart technologies in relation to freight that maximise the efficiency and interoperability of the transport network.

JUSTIFICATION

11.65 Servicing and delivery requirements in Old Oak and Park Royal need to minimise the impact on the surrounding road network. In new developments, off street solutions for servicing should be adopted, where possible, utilising different ground levels including basement and void areas within multi storey structures. Street frontage servicing should be minimised and restricted to small individual units located on lightly trafficked streets which can be serviced by small delivery vehicles. A number of sites within the OPDC area have good access to the canal and rail lines. Opportunities to use rail and water transport for freight should be explored.

11.66 A Delivery and Servicing Plan (DSP) will manage deliveries to reduce the number of trips, particularly during peak hours and identify safe and legal loading locations and ensure the use of delivery companies who can demonstrate their commitment to best practice such as FORS members. The DSP will help to identify more efficient ways of delivering goods, including:

- Delivery booking systems which could be implemented to ensure that deliveries are managed according to the capacity of the loading facilities available;
- Moving deliveries outside of peak or

normal working hours. This approach was successfully used during the London 2012 Olympic Games;

- Suggest alternative routings to avoid congestion;
- Encourage the adoption of low emission vehicle options (buying or leasing); and
- Promote white labelling and encourage collaboration amongst companies.

11.67 A consolidation centre would help to minimise vehicle journeys, while also improving delivery reliability and efficiency. This would reduce the number of journeys needed and minimise disruption for the recipient. The preferred policy option for Policy P9 (Chapter 4) identifies the potential to use the High Speed 2 works sites as temporary consolidation centre to support the construction of Old Oak and explore the potential to use the northern High Speed 2 works site as a longer term rail freight consolidation centre (see Question QP9f, page 113). The potential for a consolidation centre in west London is also being explored through Westrans' West London Freight Study.

11.68 OPDC is inviting stakeholders (see question QT8b) to suggest other potential sites in the OPDC area that could accommodate a freight

consolidation centre or lorry holding area, which would be used to minimise HGV movements within the OPDC area and potentially also the surrounding area and help have positive benefits for the highway network and the environment.

11.69 FORS is an overarching scheme that encompasses all aspects of safety, fuel efficiency, economical operations and vehicle emissions. FORS accreditation encourages freight operators to become safer, greener and more efficient and has been achieved by operators across London. The highest standards should be applied in the Old Oak and Park Royal area.

ALTERNATIVE POLICY OPTIONS

1. No controls over deliveries and servicing.

11.70 This policy 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.

2. Ban deliveries and servicing by larger vehicles.

11.71 This policy option would provide benefits to the public realm, pedestrians and cyclists and would reduce the congestion sometimes caused by HGVs. However, banning larger vehicles completely would negatively impact businesses.

Questions:

QT8a: Do you think the HS2 work sites could be a suitable location for a construction and freight consolidation centre?

QT8b: Are there any other potential sites within the OPDC area that you would suggest could operate as a construction and freight consolidation centre?

You can provide comments directly through:

opdc.commonplace.is

Figure 126: Existing rail freight in Park Royal



T9: Construction

KEY ISSUES

1. There will be a number of concurrent construction projects associated with delivering the HS2 and Crossrail proposals as well as the developments proposed across the area.
2. 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 and to ensure that it's as safe as possible, particularly for cyclists and pedestrians.
3. A Construction Logistics Strategy will be developed by TfL and OPDC to ensure a coordinated approach, which will minimise the disruption to surrounding residents and business.

POLICY CONTEXT

National

11.72 The National Planning Policy Framework does not include any specific policies relating to construction.

Regional

11.73 The congestion and environmental impacts from freight activity should be minimised and innovative approaches to

manage London's freight needs should be explored.

PREFERRED POLICY OPTION

Development proposals should:

- a) Provide for measures to reduce freight and construction trips, by:
 - i. Securing a Construction Logistics Plan and Construction Code of Practice from major developments;
 - ii. Promoting the use of freight and construction consolidation centres;
- b) Make maximum use of rail and water transport for construction and freight; and
- c) Co-ordinate and phase construction projects to enable the transport impacts to be effectively mitigated.

JUSTIFICATION

11.74 Redevelopment in Old Oak alongside major infrastructure projects will generate a large amount of construction vehicle movements, exporting waste and importing

materials over a number of decades. The amount of construction activity planned for the area provides an opportunity for sustainable transport solutions to be adopted. 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. For residual movements, there 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.

11.75 To coordinate construction transport across the development area, OPDC will require Construction Codes of Practice and Construction Logistics Plans to be submitted by developers. These will need to be aligned to the overarching Construction Logistics Strategy that OPDC and TfL will prepare, which will set in place the area wide requirements for construction transport.

ALTERNATIVE POLICY OPTIONS

1. There is no control or co-ordination of construction transport

11.76 This would enable individual projects to programme construction works without any co-ordination with other projects. However, given the number of construction projects, a lack of coordination would lead to very high volumes of construction vehicles on the road network which would also have noise and environmental disbenefits.

2. All freight has to be moved by rail or water

11.77 This policy option would reduce the impacts of construction on the road network and therefore provides noise and environmental benefits. However, there are a number of reasons why this policy option may not be practical, including the high costs associated with using only rail and water freight, the lack of capacity for rail and water to take on all of the construction activity and the need for local transfer from the railhead or wharf.

T10: Transport Assessments and Travel Plans

KEY ISSUES

1. Major developments are likely to generate high levels of movement and have an effect on the operation of the transport network. As such it is essential that developments' access requirements are planned and their impacts mitigated.

POLICY CONTEXT

National

11.79 The NPPF states that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment which assesses the extent to which the development will support opportunities for sustainable travel, provide safe access for all users and limit its impact on the existing transport system.

Regional

11.80 Any planning application which is referable to the Mayor is accompanied by a Transport Assessment. It is expected that any Transport Assessment is carried out in accordance with the TfL Transport Assessment Best Practice Guidance, published in 2014.

PREFERRED POLICY OPTION

- a) Transport assessments and travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance.
- b) Construction logistics plans and delivery and servicing plans should be secured in line with the London Freight Plan and should be co-ordinated with travel plans.

JUSTIFICATION

11.81 The Transport Assessment will need to assess the transport impact of the development and ensure that measures to reduce and manage a development's transport impact are identified and planned. The Travel Plan will provide a long-term strategy to deliver sustainable transport objectives through an action plan that is regularly reviewed. The Travel Plan should set objectives and monitoring requirements along with the measures, management plan and funding details

required to meet those objectives. The Travel Plan should be secured by a planning obligation and include ongoing management. All proposals for new or significantly expanded schools or other education or institutional uses should be accompanied by a Travel Plan.

11.82 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.

11.83 Proposals for development may come forward which fall below the thresholds for referring applications to the Mayor of London, but may have a significant effect on highway or public transport capacity. In these cases, a Transport Assessment may also be sought. Effective and early pre-application discussions will help to identify whether such a requirement is likely and will be particularly encouraged where a proposal may fall just below the relevant thresholds.

ALTERNATIVE POLICY OPTIONS

1. Requiring a transport assessment for all developments.

11.84 This policy option would enable more scrutiny over developments to ensure they comply with best practice. In addition it would enable more control over the cumulative impact of developments on the transport network. However, very small-scale developments are likely to have a minimal impact on the transport network. Early engagement through the pre-application advice stage will help to identify any transport planning issues associated with the development.

2. Increasing the threshold for schemes that require a transport assessment.

11.85 If the threshold was increased developments could be planned without assessing the impact of the development on the transport system. This could lead to access issues, a congested road network and insufficient public transport infrastructure to cope with the demands of the new development.



12

ENVIRONMENT AND UTILITIES



Environment and utilities

11.1 This chapter contains policies addressing the following policy themes:

- EU1: Strategic policy for the environment and utilities
- EU2: Smart technology
- EU3: Water
- EU4: Waste management
- EU5: Circular Economy and resource efficiency
- EU6: Decentralised Energy
- EU7: Digital communications infrastructure
- EU8: Green Infrastructure & biodiversity
- EU9: Extraction of minerals
- EU10: Air Quality
- EU11: Noise
- EU12: Land contamination

Questions:

QEUa: Are there any other environment and utilities policy themes that you think OPDC's Local Plan should be addressing?

QEUb: Do you agree with the chapter's preferred policy options? If not, what might you change?

QEUc: Are there any other policy alternatives that could replace the chapter's preferred policies?

You can provide comments directly through:

opdc.commonplace.is

EVIDENCE BASE

Table 12: Environment and utilities Evidence base

Supporting study	Description	Status
OPDC Draft Smart Strategy Interim Report	Sets out key challenges, opportunities and recommendations in relation to emerging smart technology.	Draft completed
OPDC Integrated Water Management Strategy	Review of water infrastructure requirements for water demand, drainage, and flood risk (including OPDC's SFRA) and options and costs for integrated water management.	Draft completed
OPDC Old Oak Decentralised Energy Strategy	Review of the potential for a heat network to supply the Old Oak Common Opportunity Area with competitive low to zero carbon heat.	Draft completed
OPDC Waste Strategy	A strategy outlining OPDC's approach to waste apportionment, to accord with the requirements of paragraph 5.80 of the London Plan (2015), which requires mayoral development corporations to cooperate with local authorities to ensure their waste apportionment requirements are met.	Draft completed
OPDC Air Quality Study	Review of the existing and anticipated air quality issues across the construction and built-out phases of development and recommendations for mitigation and measures to ensure the highest possible air quality for future residents and workers.	Draft completed
OPDC Green Infrastructure Strategy	A strategy reviewing existing GI assets, future GI requirements, and identifying opportunities for improving function, connectivity and integration with other infrastructure.	To be developed
OPDC Walking, cycling, streets and public realm strategy	A strategy setting out recommendations for the public realm, public open space and walking and cycling infrastructure for the OPDC area.	To be developed

EU1: Strategic policy for the environment and utilities

KEY ISSUES

1. OPDC is in a position to work with developers and other stakeholders, to push the boundaries in best practice sustainable development and co-ordinated infrastructure planning and delivery. In doing so, there is an opportunity to exceed Mayoral targets for sustainable development and environmental performance and to support London's transition to the circular and low/zero carbon economy.
2. There is potential for OPDC to enhance the natural environment integrating it with new development and infrastructure to improve resilience to the effects of climate change and helping to optimise the efficient use and re-use of previously developed land.

POLICY CONTEXT

National

- 12.1 The NPPF sets out a number of core principles achieving sustainable development, including;
- support for the transition to a low carbon future in a changing climate, taking account of flooding and encouraging the re-use of existing and renewable resources;
 - contributing to conserving and enhancing the natural environment and minimising

- pollution to land, air, and water; and
- promoting healthy communities, taking account of strategies to improve health, social and cultural wellbeing.

Regional

12.2 The London Plan outlines London's challenges in responding to a changing climate, ensuring that there is infrastructure to support growth and focussing on providing the highest quality of life. The Mayor's objective is that the city becomes a world leader in improving the environment.

PREFERRED POLICY OPTION

OPDC will support proposals that:

- a) Promote environmentally sustainable development that utilises the highest standards of design, delivery and operation;
- b) Deliver best practice in utilising innovation and the application of emerging technologies;
- c) Maximise their contribution to a healthy and safe environment for people and for nature;
- d) Increases the area's resilience to the effects of a changing climate and minimises carbon emissions;
- e) Contribute to the achievement of environmental standards set by OPDC (see Table 13); and
- f) Support delivery of coordinated and area-wide utilities infrastructure.

Table 13: Environmental sustainability targets for development in the OPDC area

Topic Area	Current targets in London Plan / Mayoral Strategies
Reduce greenhouse gas emissions	<ul style="list-style-type: none"> ■ Reduce CO2 emissions by 60 per cent from 1990 levels by 2025, and 80% by 2050 ■ All new homes to be zero carbon by 2020 ■ Reduce London’s waste management to save one mega tonne of CO2 equivalent per year by 2031 ■ Application of the Energy (and cooling) Hierarchy in the London Plan.
Local energy supply	<ul style="list-style-type: none"> ■ Supply 25 per cent of London’s energy locally, including the use of decentralised energy networks.
Waste reduction and recycling	<ul style="list-style-type: none"> ■ Work towards zero biodegradable/recyclable waste to landfill by 2026. ■ 90% reuse re-cycling/re-purposing of construction materials. ■ Recycling 70% of commercial/industrial waste by 2020. ■ Recycling of 50% of municipal waste by 2020, and 60% by 2031. ■ 1% reduction in municipal waste per capita per annum.
Green infrastructure	<ul style="list-style-type: none"> ■ increase tree coverage by at least 25 to 30%. ■ All major buildings to include a green, solar or cool roof and a minimum of 50% of the built environment footprint to include urban greening measures. ■ Achieve net gains for nature.
Water management	<ul style="list-style-type: none"> ■ Minimising use of mains water. ■ Use SuDS to achieve run-off rate equivalent to a greenfield. ■ Water efficiency of 105 litres per household per day to match higher requirements of Building Regulations.
Air quality	<ul style="list-style-type: none"> ■ Meet EU values for air pollutants. ■ Seek to achieve Air Quality Neutrality. ■ Apply Ultra Low Emissions Zone standards to Non-Road Mobile Machinery as given in Mayoral SPG on The Control of Dust and Emissions.
Digital communications	<ul style="list-style-type: none"> ■ To deliver a world-class network. ■ Embed Smart solutions.
Circular economy	<ul style="list-style-type: none"> ■ Support job creation linked to re-manufacturing, repair, reuse, and recycling. ■ Consider the application of the GLA’s Responsible Procurement Policy to the OPDC area.

JUSTIFICATION

12.3 OPDC is in a position to push the boundaries of UK best practice in development and infrastructure and has an objective to be recognised as a leader in sustainability. The preferred policy option reflects this and aims to deliver a place shaped by innovation that showcases exemplar sustainable regeneration. Table 13 above identifies existing environmental targets in the London Plan and in Mayoral strategies which OPDC will be looking to benchmark itself against when setting its own environmental targets which will be included in the next draft Local Plan. As part of the next stage of work, OPDC will assess to what extent these targets can be met or exceeded thereby giving rise to a set of area-specific standards and targets.

12.4 Achieving these targets will require:

- collaboration between OPDC, developers, infrastructure providers and other stakeholders, taking advantage of the scale of development and the opportunities this presents;
- an integrated approach to the design, delivery and operation of development and infrastructure;

- taking advantage of the highest standards of design, innovation and the latest technologies; and
- better integration of the built and the natural environment.

12.5 In Old Oak there is a particular opportunity to create a new sustainable community. Within Park Royal there are opportunities to tackle current issues of pollution, surface water drainage and digital connectivity. Across both, there is a need to address resilience to climate change. As part of OPDC's environmental target and performance-setting OPDC will explore the opportunity to achieve a low or zero carbon development, including the delivery of low-carbon networks, decentralised energy supply and district-wide systems for sustainable drainage and for waste.

ALTERNATIVE POLICY OPTION

12.6 No alternative policy options have been identified, as alternatives would not be consistent with the NPPF or in general conformity with the London Plan.

Questions:

QEU1a: Do you agree with those areas identified for setting environmental and sustainability performance targets for the development and infrastructure? If not, what other areas should be identified?

QEU1b: Which of these areas do you see as a priority and why?

You can provide comments directly through:

opdc.commonplace.is

Figure 127: Local allotments



EU2: Smart technology

KEY ISSUES

1. London's continuing growth alongside the transformative scale of regeneration at Old Oak and Park Royal creates significant opportunities to integrate smart city technology solutions and approaches.
2. Smart city technology is a rapidly changing field and OPDC should seek to encourage flexibility and adaptability.
3. Digital information and data needs to be open and able to be shared and used to support innovation in the design, implementation and operation of development and efficient delivery of services post-development.

POLICY CONTEXT

National

12.7 The NPPF identifies that advanced, high quality communications infrastructure is essential for sustainable economic growth and that high speed broadband technology and other communications networks also play a vital role in supporting the delivery of local community facilities and services.

Regional

12.8 The London Plan recognises that smart city technology plays a role in supporting the delivery of a number of policy areas

including economic growth, smoothing traffic flow and energy generation.

PREFERRED POLICY OPTION

- a) OPDC will work with partners and stakeholders to position Old Oak and Park Royal as a world-leading location for the exploration, exploitation and implementation of smart city technology, approaches and systems.
- b) OPDC will require proposals to provide interoperable open and usable data to inform OPDC activities and processes.



JUSTIFICATION

12.9 A smart Old Oak and Park Royal will be a place where innovation and technology is explored and harnessed to create opportunities and address challenges / barriers.

12.10 The transformative change proposed across Old Oak and Park Royal and the timescales involved requires that OPDC considers how the area will function over the ensuing decades and what role smart city technology and approaches will have.

12.11 Smart City technology and practices are not an end in themselves. They present a huge opportunity (as enabling elements) to address a diverse range of challenges. The use of new and innovative technologies may, for example, reduce the need to travel and / or encourage the use of low /zero emissions modes of transport, thus enhancing the area's resilience to climate change by reducing greenhouse gas emissions.

12.12 OPDC is developing a Smart Strategy with input from a range of

industry experts. It seeks to identify opportunities and challenges to embed Smart City approaches, concepts, technologies, and systems from the outset across Old Oak and Park Royal.

12.13 The Smart London Board and other stakeholders, including the GLA, #HyperCatCity, Future Cities Catapult, Imperial College, University College London and London's tech communities will have a key role in helping OPDC to establish Old Oak and Park Royal as a demonstrator and scale-up location for smart city technology and approaches.

12.14 OPDC will work with partners and stakeholders to position Old Oak and Park Royal as a world-leading location for the exploration, exploitation, evaluation and implementation of smart city technology, approaches, concepts and systems to help:

- i. plan, deliver and manage development;
- ii. improve the quality of life of local people and Londoners;
- iii. create and capture economic, social and environmental opportunities; and
- iv. address challenges and barriers.

12.15 New development proposals will be expected to provide open, usable

and inter-operable data, including appropriate digital Building Information Management (BIM) models. This will help OPDC achieve its aspiration to deliver an open and secure digital environment. Specifically, this will aid OPDC to plan, deliver and manage development while creating business opportunities, including application (app.) development for a range of technologies and services during development and for the communities that live, work and visit there.

12.16 Data provided to OPDC will be kept in a secure environment and where appropriate will be used to help inform and shape the development of the emerging OPDC digital model.

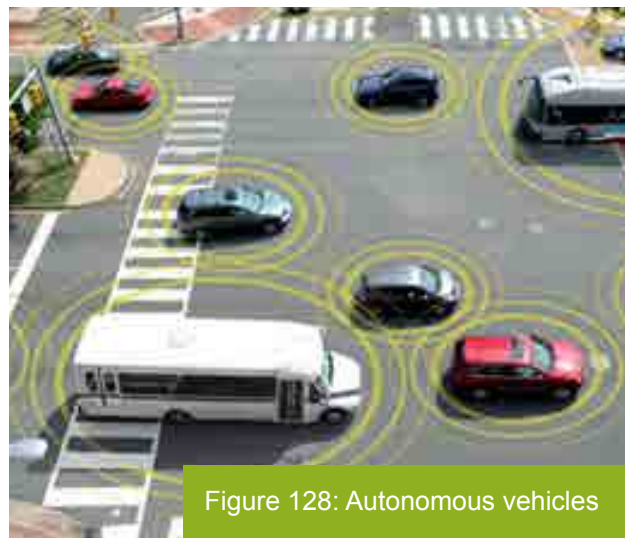


Figure 128: Autonomous vehicles

ALTERNATIVE POLICY OPTION

1. That the provision of inter-operable, open and usable data is not specifically required.

12.17 The benefit to this approach would be that applicants are able to provide information in the format of their choice. The disadvantage is that this would inhibit OPDC in creating an open digital environment to inform the development management process and wider activities.

Questions:

QEU2a: Are there any other challenges and opportunities in addition to those stated in the draft Smart Strategy that smart city technology could address?

QEU2b: Should the Local Plan and OPDC provide stronger requirements for proposals to provide relevant interoperable and open data?

You can provide comments directly through:

opdc.commonplace.is

EU3: Water

KEY ISSUES

1. The area's sewer network is old and has insufficient capacity in places to serve the planned growth and regeneration for the purposes of foul-water and surface water drainage.
2. There is a need to manage the increasing demand for clean 'potable' water resulting from new development and population growth, to reduce the deficit in water supply-demand balance and improve water security in London.
3. There is a need to manage flood risk from the River Brent and from localised surface water flooding.
4. There is a need to protect the water environment and waterways from the risks of contamination and improve the ecological condition of the waterways.
5. As the OPDC area is regenerated, area-wide and site-specific solutions will be needed.

POLICY CONTEXT

National

12.18 The NPPF requires local planning authorities to adopt proactive strategies to mitigate and adapt to climate change over the longer term, with Local Plans taking full account of flood risk, water supply and demand and wastewater considerations.

Regional

12.19 London Plan policies set the context

for sustainably managing water, including: managing flood risks; sustainable drainage; ensuring the adequacy of water quality and wastewater infrastructure; and managing water supply-demand. Further information is set out in the Mayor's Water Strategy and Climate Change Adaptation Strategy.

PREFERRED POLICY OPTION

Development proposals will be required to:

- a) demonstrate a collaborative approach to working with OPDC and its development partners to implement and manage area-wide water infrastructure options identified in the Integrated Water Management Study (IWMS) that address surface and waste-water disposal capacity issues and sustainable management of water supply and that connect or contribute towards a local rain/grey/storm water management system;
- b) minimise water consumption by seeking to get as close to neutrality in water use and consumption as possible and achieve the water management standards that will be set through this Local Plan;
- c) use sustainable drainage techniques to achieve at least 'greenfield' rates

- d) implement the flood risk management measures identified in the relevant borough's Surface Water Management Plans and protect existing flood management assets;
- e) due to the limited capacity of the combined sewer serving the Counters Creek catchment, demonstrate that the scheme would result in the release of network capacity, or includes the provision of capacity improvements sufficient to meet its needs without adversely impacting on existing development, or compromising the ability of other developers to meet the future needs of development planned for in the Local Plan;
- f) in the Park Royal area, support the actions identified in the Thames River Basin Management Plan for the River Brent; and
- g) include measures to protect and improve the water environment, water quality and ecological value of the Grand Union Canal and other watercourses.

Table 14: IWMS Strategic options

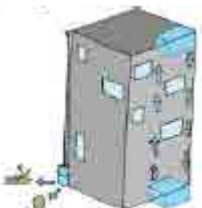



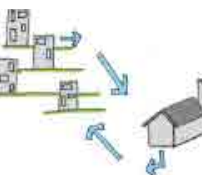
















Option	Pros/Cons	Water recycling	Storm water management		Demand management	
1	<p>+ Infrastructure provided on-site aiding deliverability and provides a climate resistant means of providing non-potable water for toilet flushing.</p> <p>- Lacks environmental/ecological benefits of other options and less efficient in terms of build costs compared to options with strategic measures.</p>	<p>Building scale grey-water recycling</p> 	<p>Residual attenuation provided underground</p> 			
2	<p>+ Provides for environmental/ecological benefits from above ground water storage and provides a climate resistant means of providing non-potable water for toilet flushing.</p> <p>- Requires a significant amount of space for above ground water storage, which is challenging to deliver and the plot based approach to re-use is much less efficient in terms of build and operational costs.</p>		<p>Residual attenuation provided above ground</p> 	<p>Streetscape strategic SuDs network providing conveyance, filtration and attenuation of stormwater from development plots to attenuation of discharge locations.</p>	<p>Green source control features to manage the quality and quantity of surface water generated on site.</p>	<p>Maximising demand management through water efficiency, community engagement and utilisation of smart network technologies.</p>
3	<p>+ Phasing and deliverability of storm water management measures more straightforward, provides a climate resistant means of providing non-potable water for toilet flushing and the re-use option would be area-wide and hence offer build and operational cost efficiencies.</p> <p>- Lacks environmental/ecological benefits of other options, strategic infrastructure required to provide wastewater re-use is more challenging to deliver and also requires more intensive treatment when compared to greywater or stormwater.</p>	<p>Strategic scale wastewater recycling</p> 	<p>Residual attenuation provided underground</p> 			
4	<p>+ Provides for environmental/ecological benefits from above ground water storage, provides a climate resistant means of providing non-potable water for toilet flushing and build and cost efficiencies as water re-use and most of the storm water management is provided by strategic area-wide infrastructure.</p> <p>- Requires a significant amount of space for above ground water storage and strategic infrastructure to manage both stormwater and provide re-usable water, which are challenging to deliver.</p>		<p>Residual attenuation provided above ground</p> 			

Table 14: IWMS Strategic options

Option	Pros/Cons	Water recycling	Storm water management			Demand management
5	<p>+ Phasing and deliverability of stormwater management measures more straightforward. Central treatment unit option would require less intensive treatment than the greywater and wastewater option and would be area-wide with build and operational cost efficiencies.</p> <p>- Lacks environmental/ecological benefits of other options, strategic stormwater infrastructure is challenging to deliver and may not be available for re-use during dry, or drought conditions, offering less climate resilience.</p>	<p>Strategic scale stormwater recycling</p> 	<p>Residual attenuation provided underground</p> 	<p>Streetscape strategic SuDs network providing conveyance, filtration and attenuation of stormwater from development plots to attenuation of discharge locations.</p> 	<p>Green source control features to manage the quality and quantity of surface water generated on site.</p> 	<p>Maximising demand management through water efficiency, community engagement and utilisation of smart network technologies.</p> 
6	<p>+ Phasing and deliverability of stormwater management measures more straightforward, the re-use option would require less intensive treatment than the greywater and wastewater option and provides for environmental/ecological benefits from above ground water storage.</p> <p>- Requires a significant amount of space for above ground water storage and strategic infrastructure to manage both stormwater and provide reusable water, which is challenging to deliver and re-use may not be feasible during dry, or drought conditions, offering less climate resilience.</p>		<p>Residual attenuation provided above ground</p> 			

JUSTIFICATION

12.20 In setting environmental standards, OPDC wishes to be recognised as a leader in sustainability and delivering sustainable, resilient development. To achieve this it will be necessary to ensure adequate water supply, surface water and foul drainage and sewerage treatment capacity to serve both existing and new development, and to sustainably manage the risks of flooding on-site and within the wider drainage catchment.

12.21 There is insufficient current capacity in the combined sewer network served via the Counters Creek catchment to receive anything more than the black-water flows from development in the OPDC area. This provides a technical imperative for development to achieve run-off rates equivalent to a green field.

12.22 OPDC's preferred approach is therefore for the area to aim to be as close to water neutral as is feasible. Water neutrality is where the demand for water from development is no greater after it is built than it was before. OPDC's aim to move development towards neutrality will require exemplary design and operation and may require developers to consider off-setting the impacts of their development by making existing homes and buildings in

the area more water efficient, beyond the requirements of the London Plan.

12.23 OPDC wants to realise the sustainability and cost benefits from an integrated approach to water management and has commissioned an Integrated Water Management Strategy (IWMS) to set a framework for how water and wastewater should be managed within the area. The IWMS has considered several water management measures, which have been assessed against a range of criteria, covering deliverability as well as sustainability.

12.24 There are common water management measures which would make up the base of any approach to sustainably managing water in the OPDC area. These are:

- Achieving the highest standards of water demand management, through installation of high specification water efficient fixtures and fittings and use of smart network and metering technologies;
- Management of as much storm water as possible at the place it falls for individual plot development, through the use of 'source control' SuDS measures such as green roofs on buildings. This intervention provides a small amount of rainfall attenuation during smaller, less intense storms; and

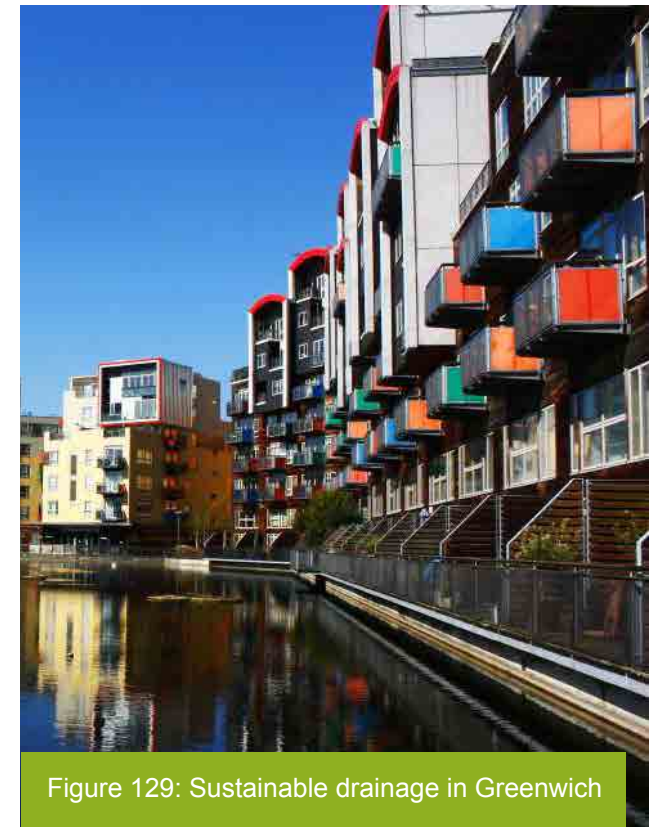


Figure 129: Sustainable drainage in Greenwich

- Management of storm water runoff within a connected network of SuDS systems located at all public open areas, streets and roads.

12.25 These measures by themselves are not enough to achieve run-off rates equivalent to a green field and the IWMS includes a series of other measures that could help to achieve this. The IWMS incorporates these measures into six 'strategy options' (see table 14), showing how these measures could be packaged up with

the common measures outlined in paragraph 12.24 above.

12.26 Of the six potential strategy options proposed, the IWMS identifies option 4 as the preferred solution and includes recommendations for how this strategy could be taken forward. The IWMS is in draft at this stage and views are sought on this preferred solution (see Question QEU3a below).

12.27 Flood risk within Old Oak and Park Royal is generally low, albeit with some localised higher risk areas around the River Brent, and from localised surface water flooding. These risks will need mitigation, and surface water run-off from the OPDC area will require alternative and sustainable means of management.

12.28 The London Boroughs of Brent, Ealing and Hammersmith and Fulham, as Lead Local Flood Authorities have Surface Water Management Plans (SWMP's) in place. A SWMP is prepared by the boroughs in their role as Lead Local Flood Authority. It is a study to understand the flood risk that arises from local flooding, defined by the Flood and Water Management Act 2010 as flooding from surface runoff, groundwater, and ordinary watercourses. The boroughs identify actions which they and others must

take to mitigate and manage flood risks. Such actions where relevant to the OPDC area have been accounted for in the IWMS and are mainly in regard to the need to mitigate localised areas of surface and storm water flooding, and flooding from sewers.

12.29 Major development will be expected to alleviate localised surface water drainage problems. A site specific flood risk assessment may be required to ensure that the development will remain safe and will not increase flood risk to others.

12.30 Locally, smaller-scale projects that help to separate foul and surface water drainage will also be important to help mitigate the 'poor water quality' status of the River Brent, and poor water quality of the Grand Union Canal, helping to meet the requirements of the EU Water Framework Directive (2000/60/EC) and the objectives and actions of the Thames River Basin Management Plan 2015.

12.31 The opportunities for integrating the delivery of other forms of infrastructure, notably green infrastructure, with water infrastructure will also be needed to realise wider benefits to people and nature, improve climate resilience and secure cost efficiencies.

ALTERNATIVE POLICY OPTION

12.32 No reasonable alternative policy options have been identified, as an alternative would be to not achieve greenfield run-off rates, or exemplary standards of water efficiency. This would have an unacceptable impact on the sewer network within and downstream of OPDC and on the demand for water resources.

Questions:

QEU3a: Do you agree with the preferred water management option identified in the IWMS? What might you change? Please refer to the IWMS for additional information if required.

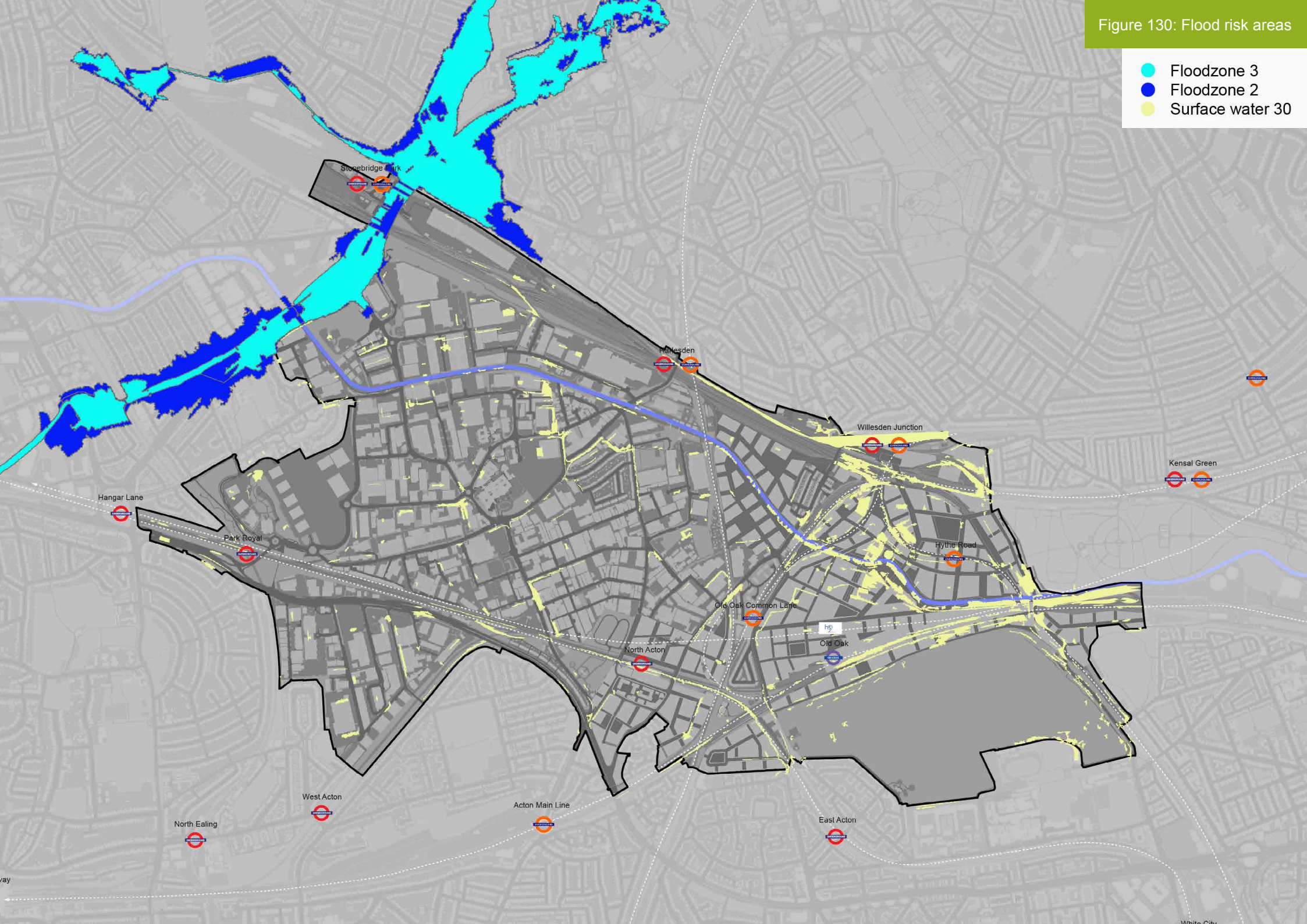
QEU3b: Where might features be located outside the core development area to help water management?

You can provide comments directly through:

opdc.commonplace.is

Figure 130: Flood risk areas

- Floodzone 3
- Floodzone 2
- Surface water 30



EU4: Waste management

KEY ISSUES

1. As well as being a Local Planning Authority (LPA), OPDC is a Waste Planning Authority (WPA).
2. OPDC is therefore responsible for waste development planning applications and has a statutory duty to prepare a local waste plan, either individually or as part of a joint plan.
3. Although OPDC does not have a waste apportionment target in the current London Plan, the London Plan requires Mayoral Development Corporations to work with boroughs to ensure that borough apportionments are met.
4. There are existing waste facilities that need to be either re-located, retained or re-orientated

POLICY CONTEXT

National

12.33 The NPPF states that Councils should set out the “strategic priorities” for their area in the Local Plan, which includes delivering “waste management” infrastructure.

12.34 The National Planning Policy for Waste (NPPW) provides further detailed policy on waste and the National Planning Practice Guidance (NPPG) on Waste states that

“WPAs should have regard to the apportionments set out in the London Plan when developing their policies. The Local Waste Plan will need to be in general conformity with the London Plan”

Regional

12.35 The London Plan apportions waste arisings to each London Borough for them each to allocate sufficient land to deal with the apportioned amount of waste per year. This is to work towards net self-sufficiency of waste management in London by 2026.

12.36 Paragraph 5.80 requires that where a Mayoral Development Corporation (MDC) exists or is established within a Borough the MDC will co-operate with the Borough to ensure that the Borough’s apportionment requirements are met. OPDC’s approach to waste site management must therefore accord with this policy requirement across its area.

PREFERRED POLICY OPTION

- a) continue to safeguard existing waste and recycling sites in Park Royal in accordance with the West London

- Waste Plan;
- b) safeguard the Powerday (Old Oak Sidings) waste site in Old Oak;
 - c) work with other waste operators in Old Oak to coordinate their relocation to other suitable and accessible sites; and
 - d) ensure that proposals for waste facilities adequately mitigate their impact on amenity, air quality, noise and other relevant environmental considerations.

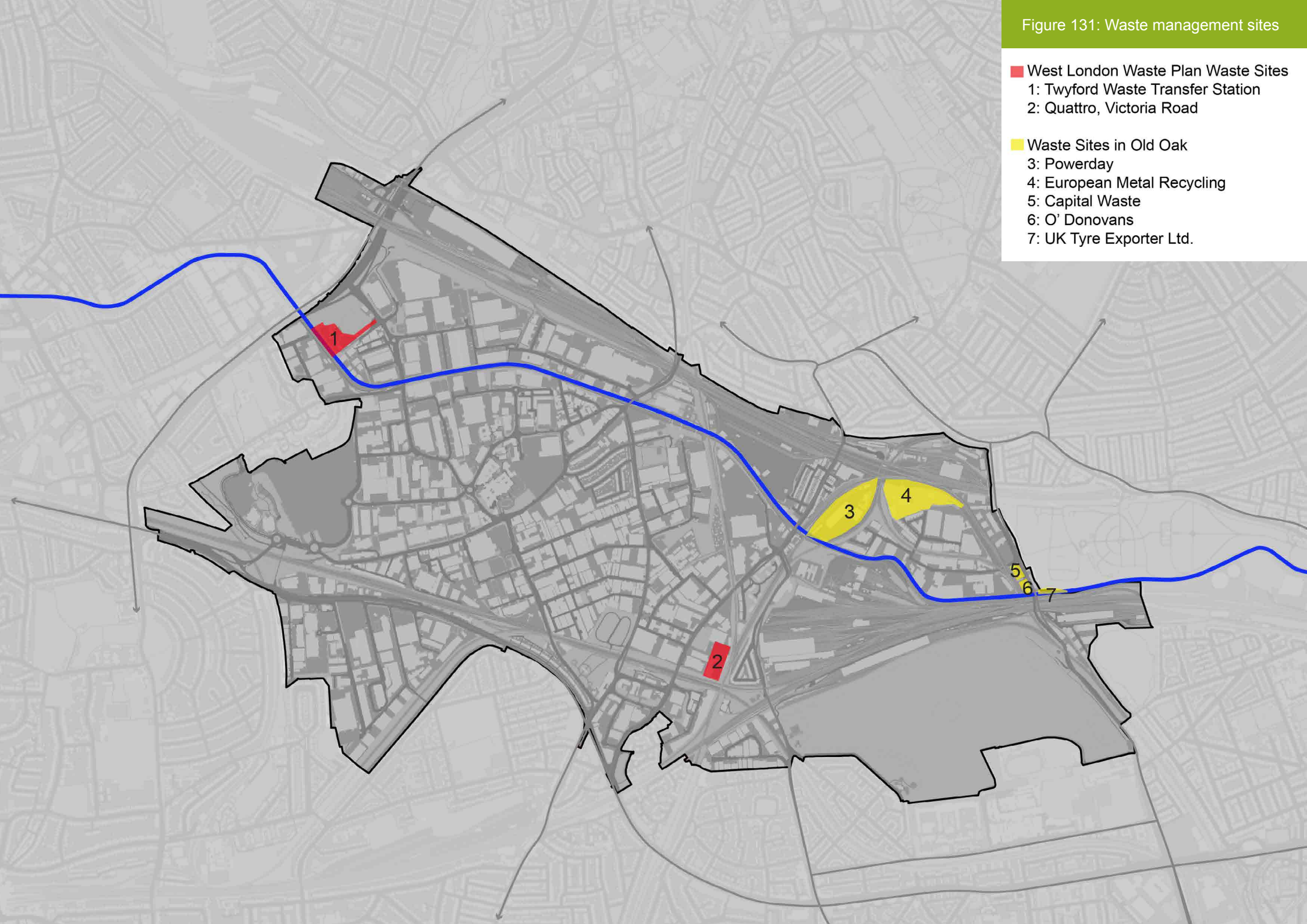
JUSTIFICATION

12.37 For the part of the OPDC area covered by the London Boroughs of Brent and Ealing, OPDC has been working jointly with these boroughs to prepare the West London Waste Plan (WLWP), which was adopted by OPDC in July 2015 as a Development Plan Document and part of OPDC’s Local Plan. The plan identifies two specific sites within Park Royal (see figure 131) that should be safeguarded for waste:

- Twyford Waste Transfer Station; and
- Quattro, Victoria Road.

Figure 131: Waste management sites

- West London Waste Plan Waste Sites
- 1: Twyford Waste Transfer Station
- 2: Quattro, Victoria Road
- Waste Sites in Old Oak
- 3: Powerday
- 4: European Metal Recycling
- 5: Capital Waste
- 6: O' Donovans
- 7: UK Tyre Exporter Ltd.



12.38 OPDC will work closely with the London Boroughs of Ealing and Brent and other WLWP authorities to safeguard these waste sites.

12.39 The part of the OPDC area in the London Borough of Hammersmith and Fulham is not covered by the West London Waste Plan. Hammersmith and Fulham is part of the Western Riverside Waste Authority (WRWA), which also covers the London Boroughs of Lambeth and Wandsworth and Royal Borough of Kensington and Chelsea. Within the Hammersmith and Fulham part of the OPDC area there are currently five waste sites (see Figure 131), which are:

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

12.40 OPDC has produced a Waste Strategy as a supporting study to this draft Local Plan which outlines how these sites contribute to Hammersmith and Fulham Council's apportionment and in accordance with the London Plan, how OPDC can co-operate with the Council to ensure that the Council's apportionment requirements are met. The Waste Strategy identifies that the

Powerday waste site is capable of meeting Hammersmith and Fulham's apportionment (both in terms of tonnage capacity and land) for the London Plan period up to 2036 and this draft Local Plan therefore proposes that this site is safeguarded.

12.41 The Waste Strategy identifies that Powerday currently exports its products overseas; however, the draft Local Plan promotes the use of waste as a resource on-site through processes such as energy from waste and / or the re-use of spoil for construction (see Policies EU5 and EU6). This could see these materials being re-used within the OPDC area in future, helping to transition the OPDC area to a circular economy.

12.42 Within Old Oak, it will be necessary to relocate other identified waste sites to accommodate new development and realise the homes and jobs targets set for the area in the London Plan. OPDC is keen to ensure that existing waste management activities in Old Oak continue to operate in the OPDC area where possible, whilst ensuring that this would not adversely impact on local communities, heritage assets or the natural environment, and will work with waste providers to explore ways in which sites could be relocated. Any

relocation deemed necessary will be done in line with London Plan waste policy.

ALTERNATIVE POLICY OPTION

1. Safeguard all waste sites in Old Oak.

12.43 This approach would ensure that borough apportionment targets are exceeded, but would prevent development from being brought forward within the 'Old Oak North' place and would undermine the delivery of homes and jobs in the OPDC area.

Figure 132: Existing Powerday waste site



EU5: Circular economy and resource efficiency

KEY ISSUES

1. OPDC aspires to enable a more competitive, resource efficient circular economy, across a range of economic sectors, including waste.
2. The scale of new development and regeneration proposed at Old Oak and Park Royal, both in its construction and operation, provides challenges and opportunities to minimise the use of natural resources and waste and to maximise the re-cycling and economic re-use of these resources.
3. Existing and new development will need to consider how it can increase its contribution to reducing waste, to the more efficient use of natural resources, and to provide resilience to the effects of a changing climate.

POLICY CONTEXT

National

12.44 The NPPF does not deal with waste matters directly, but refers to the Waste Management Plan for England. This plan sets out:

- the Government's ambition to work towards a more sustainable and efficient approach to resource use and management;
- to get the most environmental benefit

by increased recycling of resources and recovery of energy from residual waste; and

- the Waste Hierarchy, which identifies disposal as the least desirable option and waste reduction and then reuse as the most desirable options.

12.45 The National Planning Policy for Waste (NPPW) provides further detailed policy on waste.

Regional

12.46 The London Plan sets out the Mayor's policies for London's waste net self-sufficiency, waste capacity, construction-related waste, hazardous waste and aggregates. The Mayor's policies encourage a collaborative approach to working between stakeholders to implement the waste hierarchy embedded in EU and national waste plans, and to enable resource recovery. The Plan sets out the Mayor's aims for London's waste net self-sufficiency, achieved by minimising waste, setting targets for waste recycling, re-use, and composting, and reducing waste export outside the capital.

PREFERRED POLICY OPTION

Development proposals, in promoting a circular economy, will be required to:

- a) demonstrate how they have as far as possible designed out waste and ensured the efficient use of building materials through:
 - i. lean design, minimising the use of primary materials and the production of excess or waste material during construction;
 - ii. maximising the use of secondary materials and the opportunities for reuse, remanufacture or recycling of materials; and
 - iii. considering the end-of-operational life use of materials, or if not viable, on-site energy recovery from waste;
- b) make adequate provision for convenient domestic and commercial waste storage and for collection within the development that allows for a range of future collection options;
- c) investigate the potential for the movement of waste and recyclable materials during construction by

sustainable means of transport, including by rail, and the Grand Union Canal; and
d) promote other on-site waste management and communal composting.

JUSTIFICATION

12.47 A circular economy (CE) is one that keeps products, components and materials at their highest use and value at all times. It is an alternative to the current linear economy, where we make, use and then dispose of products, components and materials. By adopting a circular economy approach OPDC can help London unite business interests with the city's wider development needs, and assist London to remain globally competitive.

12.48 EU and national policy sets out a Waste Hierarchy, which identifies disposal as the least desirable option, and waste reduction and then reuse as the most desirable options. The London Plan reinforces the Waste Hierarchy, setting out the Mayor's policy for London's waste net self-sufficiency through managing as much of London's waste as is practicable within London, and for this to equate to 100 per cent by 2026 (within the lifetime of this

Local Plan). OPDC aims to support this objective and London's transition to a circular economy, including turning London's used materials and waste into an economic opportunity.

12.49 Our aim is to promote a local economy which is waste-free, and resilient and remanufacture-able by design to ensure products and materials are kept at their highest utility for as long as possible. This approach together with waste recycling and reprocessing offer clear benefits for the local economy, the environment and our resilience to climate change including, the creation of 'green' jobs in the area make new products, contribute to local energy requirements, reduce carbon emissions and avoid the use of virgin materials and associated adverse environmental impacts.

12.50 The scale of construction can be expected to result in significant amounts of construction waste and excavated material. OPDC's expectation is that this material will be re-cycled and re-processed, and re-used on-site, wherever practicable. Applicants will be expected to demonstrate how they support this aspiration.

12.51 The use of recycled materials and waste minimisation in construction

can offset the requirement for energy intensive production of primary materials. The scale of regeneration within OPDC may support the capability for producing heat from waste for local district heating schemes, thus further contributing to OPDC's aims for decentralised energy and local energy generation, and help us move towards a low carbon economy.

12.52 CE thinking is evolving especially in the area of built environment. OPDC will review further, which elements of the circular economy would be most beneficial for Old Oak Park Royal. New development at Old Oak and Park Royal affords the opportunity to explore how existing waste facilities can be incorporated in to solutions for the treatment, re-processing and transfer of the area's waste, and potentially provide for local energy needs. The Powerday waste site for example could be refurbished over time to contribute to district-scale energy generation from waste (refer also to Policies EU4 and EU6).

12.53 OPDC will, in making planning decisions, require new development proposals to demonstrate how they have adopted the Waste Hierarchy and CE principles in their design for construction and operation stages and

how they will enable their residents and users to minimise waste and maximise reuse, recycling and composting.

12.54 The provisions made within new development should not simply seek to meet the requirements of existing waste collection and management practices, but should also provide sufficient on-site space for waste storage and access, to allow for future practices and innovation. These include exploring the provision of separate collection of general waste, recyclable materials and other waste streams.

12.55 Communal composting facilities should be operated in association with proposals for urban food growing and green infrastructure.

ALTERNATIVE POLICY OPTION

1. Safeguard all waste sites in Old Oak.

12.56 This approach would ensure that borough apportionment targets are exceeded, but would prevent development from being brought forward within the 'Old Oak North' place and would undermine the delivery of homes and jobs in the OPDC area.

EU6: Decentralised energy

KEY ISSUES

1. Large-scale regeneration at Old Oak and intensification in Park Royal will place increasing demands on the energy network. The current network is not capable of accommodating future energy requirements and this will need to be addressed to enable timely delivery.
2. Integrated delivery of a decentralised energy network at the scale that could be achieved at Old Oak presents a significant opportunity for sustainability.

POLICY CONTEXT

National

12.57 The NPPF, supplemented by guidance on renewable and low carbon energy in the National Planning Practice Guidance, supports the move to a low carbon future, setting out local planning authorities' and communities' roles in supporting greenhouse gas reduction, energy efficiency, decentralised energy supply, reducing energy consumption and increasing the supply and use of renewable and low carbon energy.

Regional

12.58 London Plan polices set out aims for residential buildings to be zero carbon from 2016, and non-residential buildings from

2019. Mayoral expectations are for 25% of London's heat and power generation to be from local decentralised energy by 2025.

PREFERRED POLICY OPTION

OPDC will support and facilitate:

- a) provision of energy supply infrastructure that enables development (electricity and gas);
- b) the provision of infrastructure to deliver a decentralised energy network;
- c) proposals which contribute to the delivery of a decentralised energy network subject to:
 - i. providing evidence that appropriate management mechanisms will be put in place to ensure that end customers are protected in respect of the price of energy provided; and
 - ii. ensuring that heat losses from the network are minimised.

Development proposals will be required to:

- d) demonstrate a collaborative approach to working with OPDC

and its development partners to contribute to the supply and capacity of the decentralised energy network unless it can be demonstrated that this is not technically feasible or economically viable;

- e) be designed to enable connection to the decentralised energy network, where there is no connection to a decentralised energy network yet available, and/or where CCHP or CHP would not be technically feasible or financially viable;
- f) demonstrate that provision is included to accommodate routes and land for energy centres and utilities networks; and
- g) submit an Energy Statement.

JUSTIFICATION

12.59 Development in Old Oak and Park Royal provides significant potential to contribute to the Mayor's target for reducing London's carbon dioxide emissions, through a co-ordinated and best practice approach to energy provision.

12.60 OPDC has produced a draft Old Oak Decentralised Energy Strategy, which shows how a decentralised energy network could be delivered to supply low or zero carbon heat. Further work will be carried out over the coming years, but initial findings show that this would be done on a phased basis, with initial energy production plant accommodated within three energy centre buildings, and potentially later consolidated into a single energy centre in the early 2030's, subject to development phasing. Proposals would be expected to align their own energy strategies in accordance with the strategic approach and safeguard land for energy centres, routes and infrastructure for new networks or extensions to any existing networks and to connect with these networks. The area's waste sites could contribute over time to the provision of energy from waste and so contribute to district-scale energy generation (refer also to Policy EU5).

12.61 Development will be expected to maximise its contribution to the delivery of, and connection to, the area network. Where this is not currently feasible, development should to be designed to be adaptable to enable future connection to the network.

12.62 Energy Statements should demonstrate that opportunities to connect to existing heat and energy networks and/or to construct and connect to new energy networks have been maximised through provision of localised network connections and Combined Cooling and Heating Power (CCHP) or Combined Heat and Power (CHP) infrastructure within buildings where it is feasible and viable to do so. They should address energy efficiency and renewables, aiming to minimise carbon dioxide emissions to the fullest extent possible by application of the Energy Hierarchy

12.63 OPDC will support development that minimises its need for mechanical heating and cooling, and its requirements for power by incorporating energy efficiency measures in buildings, and by careful consideration of the site layout and design.

12.64 Opportunities will be expected to be taken by developers for co-delivery

of energy supply with other utilities, and other infrastructure.

12.65 OPDC recognises the relationship between decentralised energy generation and the potential effects on local air quality, noise and light pollution on local communities, heritage assets and the natural environment. Proposals will be expected to demonstrate how they have minimised any negative impacts and be designed to be resilient to the risks of flooding.

ALTERNATIVE POLICY OPTION

1. To delete the policy reference to 'major' development, so that the policy requirements apply to 'all' development.

12.66 This would put the onus on all developments to contribute to the decentralised energy network. This option would deliver greater sustainability but could be difficult and costly to deliver, creating greater uncertainty of delivery and impact on the viability of smaller schemes.

EU7: Digital communications

KEY ISSUES

1. The majority of Old Oak and Park Royal have poor digital communications infrastructure and lacks access to 'next generation broadband' or 'superfast broadband' services.
2. Current digital communication infrastructure within Old Oak will not be sufficient to meet the envisaged rising demand for data capacity.
3. Current digital communications infrastructure within Park Royal is considered to negatively impact on the functioning of businesses within the estate.
4. To optimise development, support economic growth and provide high quality, efficient and agile services, new digital communications infrastructure needs to be provided within Old Oak and Park Royal.
5. Digital communications infrastructure will need to be flexible to accommodate technological change and evolution.

POLICY CONTEXT

National

12.67 The NPPF identifies that advance, high quality communications infrastructure is essential for sustainable economic growth and that high speed broadband technology and other communications networks also

play a vital role in providing local community facilities and services. Local Plans are required to support the expansion of electronic communications networks while seeking that new equipment is sympathetically designed and camouflaged where appropriate.

Regional

12.68 London Plan policies provide guidance to encourage a connected economy by facilitating the provision and delivery of the information and communications technology infrastructure.

PREFERRED POLICY OPTION

- a) OPDC will work with partners and infrastructure providers to deliver exemplar digital communications infrastructure by:
 - i. promoting the delivery of digital communications infrastructure;
 - ii. exploring innovative delivery and management models; and
 - iii. integrating contemporary technology and seeking to accommodate future technologies to address challenges and create opportunities.

b) Development proposals will be required to demonstrate how they will support and integrate the delivery of technology and communication infrastructure.

JUSTIFICATION

12.69 Digital communications infrastructure refers to a range of contemporary and future technologies and transmission media which currently include transmission lines (including copper, cable, fibre), terrestrial wireless (including fixed, mobile (such as 4G and 5G) and Wi-Fi) and satellites.

12.70 Next generation access or superfast broadband is defined by OFCOM as providing a download speed that is greater than 24 Mbps. This speed is commonly considered to be the maximum speed that can be supported by copper based networks. As such next generation access requires different technologies to deliver this speed.

12.71 Ultrafast broadband is defined by the Department of Culture and Media as providing a download speed of at least 100 Mbps.

12.72 To support OPDC's aspirations to be an exemplar in innovation, OPDC will work with a range of public, private and community sector stakeholders to deliver a world-class digital communications infrastructure network that meets the needs of existing and future residents, businesses, visitors and service providers.

12.73 The UK's digital economy grew over seven times faster than the economy as a whole between 2008 and 2013 with growth expected to continue. SMEs also consider that access to digital communications infrastructure is a critical element to their current and future economic success.

12.74 The demand for data capacity is also expected to rise with the emergence of new services, applications and devices being developed to meet a variety of demands alongside other services that have yet to be even considered. These expected new demands will relate to:

- Video services;
- Cloud services;

- Health services;
- Education services; and
- Smart City, utilities networks and Internet of Things requirements.

12.75 In light of the above, OPDC considers digital communications infrastructure to be fundamental to the long-term success of Old Oak and Park Royal.

ALTERNATIVE POLICY OPTION

1. OPDC does not specifically seek to integrate contemporary technology and accommodate future technologies to address challenges and create opportunities.

12.76 The benefit of this approach would be that existing technologies and systems are implemented at less risk to stakeholders. The disadvantage would be that existing challenges aren't addressed and new opportunities aren't created or captured.

Questions:

QEU7a: Are there any specific areas within Old Oak and Park Royal that currently have issues with access to digital internet services. Are there any other issues relating to access to internet services?

You can provide comments directly through:

opdc.commonplace.is

EU8: Green infrastructure & biodiversity

KEY ISSUES

1. The area is highly urbanised and affected by issues, such as poor air quality, higher temperatures, lack of green space and noise from traffic and commercial uses
2. The area's existing network of green spaces is limited in extent and functionality by fragmentation that is reinforced by major railway and road corridors and poor connection to its surroundings.
3. OPDC's existing green spaces require protection and / or enhancement. These include a hierarchy of sites of importance for nature conservation (SINC's) across the OPDC area.
4. The planned regeneration will increase urban density and 'grey' infrastructure, but also provides an opportunity to create new 'green infrastructure' that can provide a range of services.

POLICY CONTEXT

National

12.77 The NPPF identifies sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a 'core planning principle'. It also states that local plans should plan positively for the creation, protection, enhancement and management of networks

of biodiversity and green infrastructure, including moving from a net loss of biodiversity to achieving gains for nature.

Regional

12.78 London Plan policies set out Mayoral objectives for a multi-functional network of green and open spaces (i.e. green infrastructure), requires London's boroughs to set out a strategic approach by producing green infrastructure strategies, and sets out the Mayor's proactive approach to the protection, enhancement, creation, promotion, and manage of biodiversity and features such as trees, woodlands and waterways.

PREFERRED POLICY OPTION

Development will be required to:

- a) protect and/or enhance and create multi-functional green and water spaces and ensure they are connected by street greening and other green links;
- b) demonstrate how green infrastructure has been:
 - i. integrated with utilities infrastructure; and
 - ii. planned, designed and managed

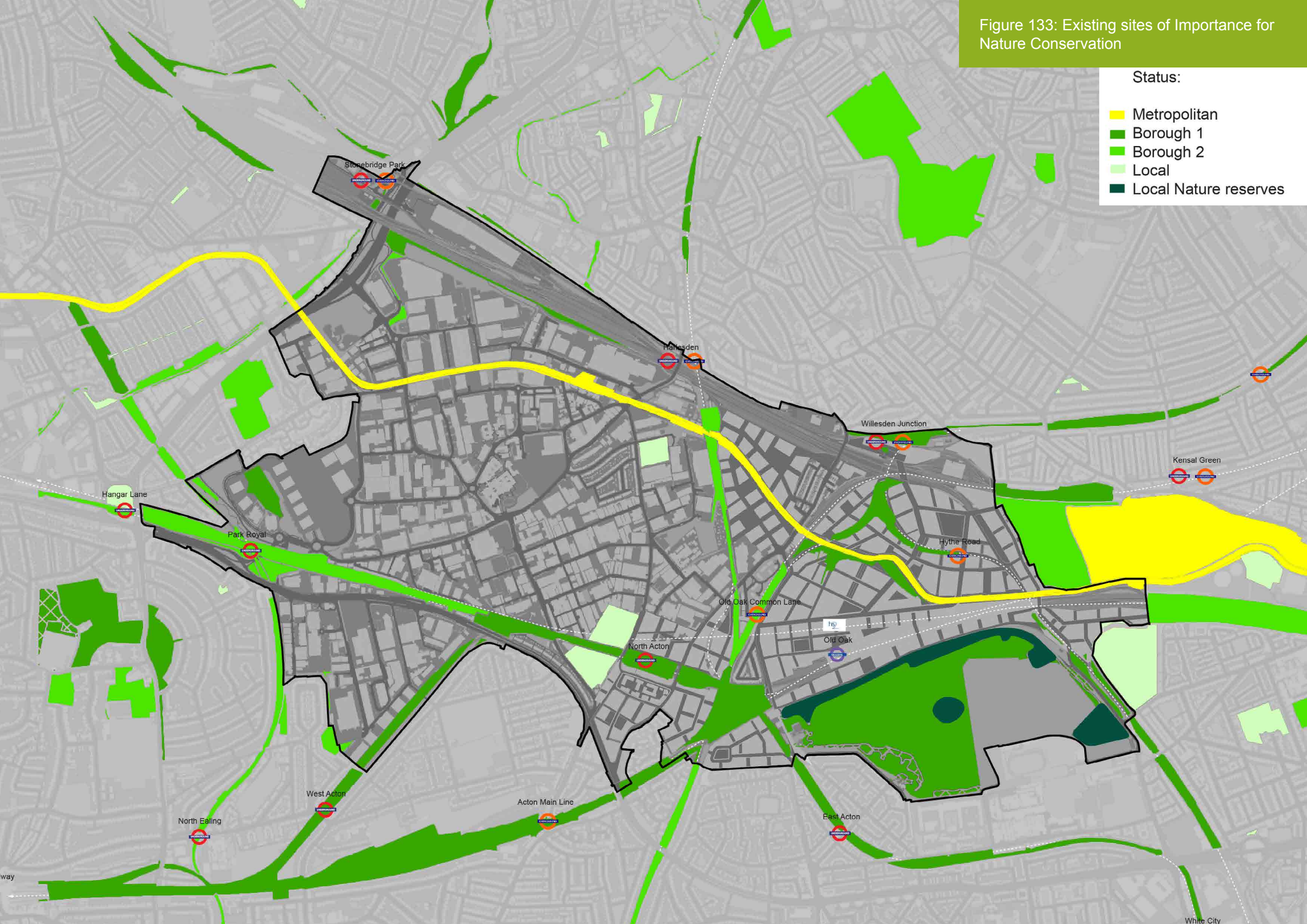
to contribute to and be integrated with, the wider green infrastructure network;

- c) take account of the proximity of SINCs, and the habitat and species targets in relevant Biodiversity Action Plans (BAPs);
- d) be accompanied by an Ecological Statement for major applications;
- e) have particular regard to the measures for the protection and enhancement of ecology and biodiversity in Wormwood Scrubs and for the Grand Union Canal.

JUSTIFICATION

12.79 Green infrastructure (GI) is the network of green spaces and waterways and features such as street trees and green roofs, that is planned, designed and managed to deliver a range of benefits, including recreation and amenity, healthy living, mitigating flooding, improving air quality, cooling the urban environment, encouraging walking and cycling and enhancing biodiversity and ecological resilience.

Figure 133: Existing sites of Importance for Nature Conservation



12.80 OPDC recognises that significant new development, especially at Old Oak will provide opportunities for working with developers and stakeholders to provide new GI, secure improved connections, to and within the GI network and to protect and /or enhance these assets. OPDC is developing a GI Strategy which will accompany the next draft of the Local Plan and will demonstrate how the area's GI network can be enhanced.

12.81 Developers will be expected to incorporate a GI approach from early in the design process through to considering management arrangements. Early adoption of a GI approach in development proposals will enable cost-effective, more efficient and more resilient infrastructure solutions to be considered by individual developers and by developers working in co-operation with each other. Incorporating a GI approach will also contribute to the ability of development to respond to the effects of a changing climate over the long-term.

12.82 Green infrastructure assets should be connected through the delivery of street greening. This may include soft landscaping, retaining existing trees and planting new trees to encourage healthy, active and walk-

able neighbourhoods incorporating green features (such as green roofs and walls, etc.) into buildings, and greening our streets and public realm will also help provide a liveable and healthy environment for people and nature. Regeneration also presents opportunities to realise the role of GI in enabling space for utilities and other infrastructure.

12.83 There are opportunities for the co-delivery of GI with other utilities such as SuDS, and district-wide systems for energy and for waste, in addition to providing routes for walking and cycling, which will have sustainability and potential cost benefits.

12.84 London's most important wildlife sites are recognised by the Mayor and London borough councils as Sites of Importance for Nature Conservation (SINCs). There is a hierarchy of SINC's in the area from the most significant of Metropolitan Importance, such as the Grand Union Canal, to those of Borough Importance, such as Wormwood Scrubs and to those of Local Importance, such as green corridors associated with the area's railways and with roads which intersect the area.

ALTERNATIVE POLICY OPTION

12.85 No alternative policy options have been identified as an alternative approach would be to not have proactive policies for the delivery of new and enhance existing GI and this would not be consistent with the NPPF or in general conformity with the London Plan.



Figure 134: Urban green corridor

Questions:

QEU8a: Where could new green infrastructure be incorporated into the layout of new development in the OPDC area?

QEU8b: Are there any biodiversity designations which could be amended and / or removed?

You can provide comments directly through:

opdc.commonplace.is



Figure 135: Integrating biodiversity

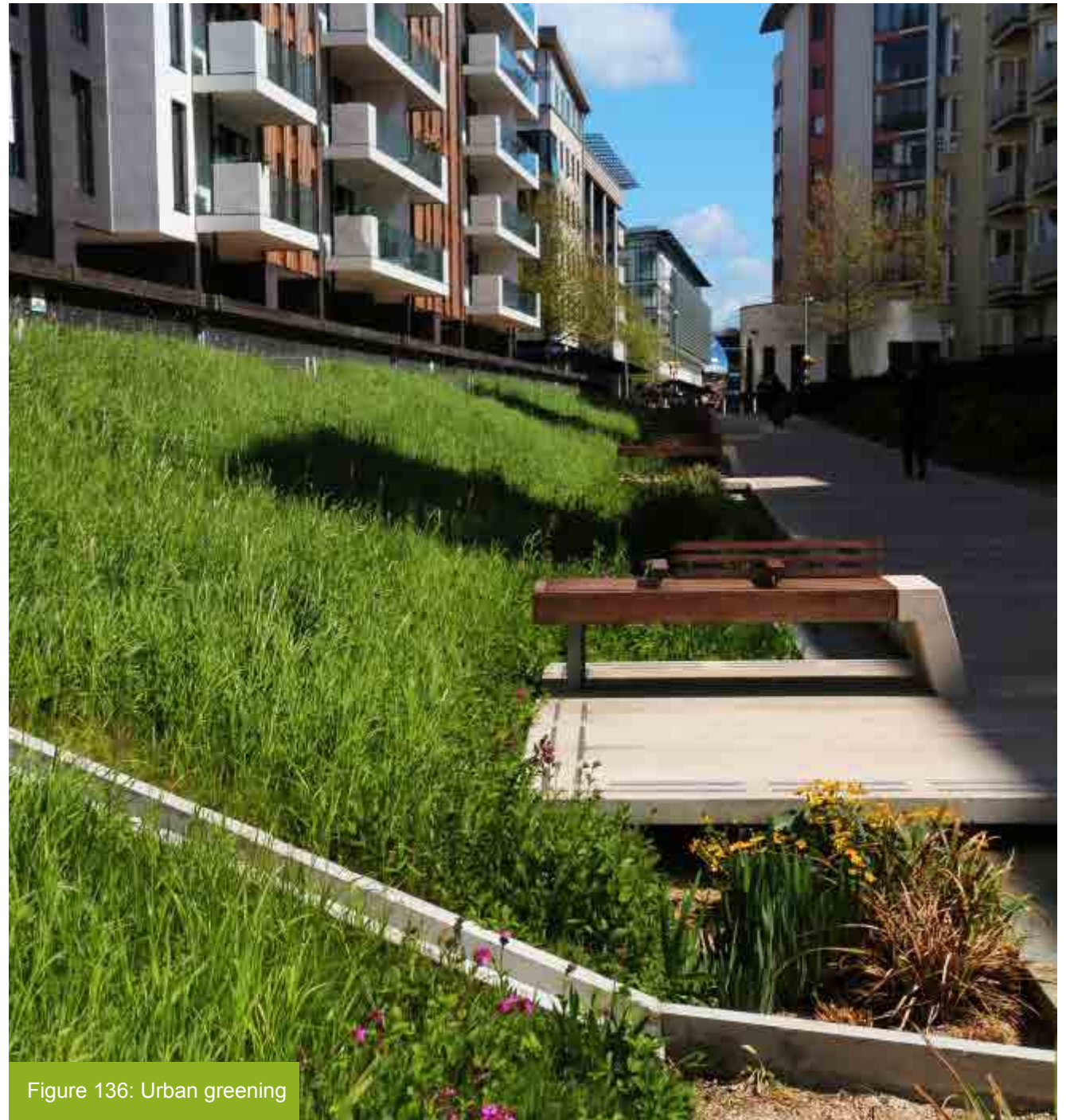


Figure 136: Urban greening

EU9: Extraction of minerals

KEY ISSUES

1. It is unknown whether there is potential for this activity in the plan area or if the geology is suitable.
2. Unconventional oil and gas resources may provide opportunities to contribute to meeting growing energy demands from development within OPDC and in wider London, if this represents sustainable development.

POLICY CONTEXT

National

12.86 The NPPF and the associated Technical Guidance addresses facilitating the sustainable use of minerals and states that in addressing local plans, local planning authorities should identify and include policies for the extraction of minerals and set out environmental criteria against which to assess applications for development.

Regional

12.87 The London Plan does not contain any policies that directly relate to oil and gas exploration.

PREFERRED POLICY OPTION

Applications for mineral extraction, including the exploration, appraisal and operation of unconventional oil and gas resources, will be considered against the following criteria:

- a) Protection of nearby residents and businesses from the effects of the operations, particularly in regard to air quality and noise;
- b) The operation's design, including its sensitivity to the character of the urban landscape and to features of national, London, and local importance;
- c) Site access, traffic generation and the routing of heavy vehicles;
- d) Safeguarding of water supplies and the water environment, the safe and sustainable disposal of waste water and flood risk management including surface water;
- e) The effects on public rights of way, open spaces or outdoor recreation;
- f) The control and mitigation of greenhouse gas emissions and dust during construction and operation;
- g) The efficient use of resources (such as construction materials or water);

- h) The contribution of the operation to the development of heat and energy recovery or low carbon technologies;
- i) Site restoration, and effective after-use following development; and
- j) the safeguarding of biodiversity, and sites of interest for nature conservation.

JUSTIFICATION

12.88 Mineral extraction is any process that involves isolating minerals from natural sources such as rock or soil. Minerals are essential to support sustainable economic growth and our quality of life. Minerals Planning Authorities such as OPDC are required by government to identify and include policies for the extraction of minerals. The sustainable use of the UK's own mineral resources is a key focus of national policy in securing energy supply. Consequently, this is an important issue for London and for the Old Oak and Park Royal area, as its communities and economy grow, supported by more sustainable, decentralised, local sources of energy supply.

12.89 The OPDC area is not currently covered by Department of Energy & Climate Change (DECC) licences allowing companies to search for minerals, including unconventional oil and gas. It is unknown whether there is potential for this activity in the OPDC area or if the geology is suitable. Nonetheless, should future exploration demonstrate the presence of oil and gas resources, these may provide opportunities to contribute to meeting growing energy demands from development planned both within OPDC's boundaries and in wider London, if this represents sustainable development.

12.90 OPDC will consult with the relevant boroughs in regard to any proposals for minerals extraction. Outside the planning system, licences for exploration are dealt with by the Oil and Gas Authority as an executive agency of DECC, again working with their regulatory partners.

ALTERNATIVE POLICY OPTION

12.91 No reasonable alternative policy options have been identified. The NPPF requires Local authorities to address minerals extraction.

EU10: Air Quality

KEY ISSUES

1. The London Boroughs of Ealing, Brent and Hammersmith and Fulham experience significant air pollution, directly attributable to emissions from road traffic, as in many parts of London.
2. The Old Oak and Park Royal area is particularly affected. The nature of industrial uses and the strategic road network in the area both give rise to air pollution.
3. The three local authorities have designated Air Quality Management Areas across the whole of the Old Oak and Park Royal for Nitrogen Dioxide (NO₂) and particulate matter (PM₁₀). They are each preparing Air Quality Management Plans covering the area.

POLICY CONTEXT

National

12.92 The NPPF requires planning to contribute to and enhance the natural and local environment by preventing development contributing to being put at risk by air pollution. Planning policies should sustain compliance to EU and national objectives for pollutants, taking into account Air Quality Management Areas and cumulative impacts and that decisions need to be consistent with local Air Quality Action Plans.

Regional

12.93 London Plan policies state that local plans should seek reductions in the levels of pollutants having regard to the Mayor's Air Quality Strategy and take into account their own air quality assessments and action plans, particularly where Air Quality Management Areas have been designated.

PREFERRED POLICY OPTION

Development will be required to demonstrate through an air quality assessment how it:

- a) implements the recommendations of the Old Oak and Park Royal Air Quality Study (summarised in Table 15 below);
- b) has regard to the relevant borough's Air Quality Management Plans and the mitigation measures identified therein;
- c) considers air quality impacts during construction and operation with the aim of being air quality neutral, with mechanisms for how this will be monitored over time; and
- d) seeks to minimise air quality impacts from surrounding uses.

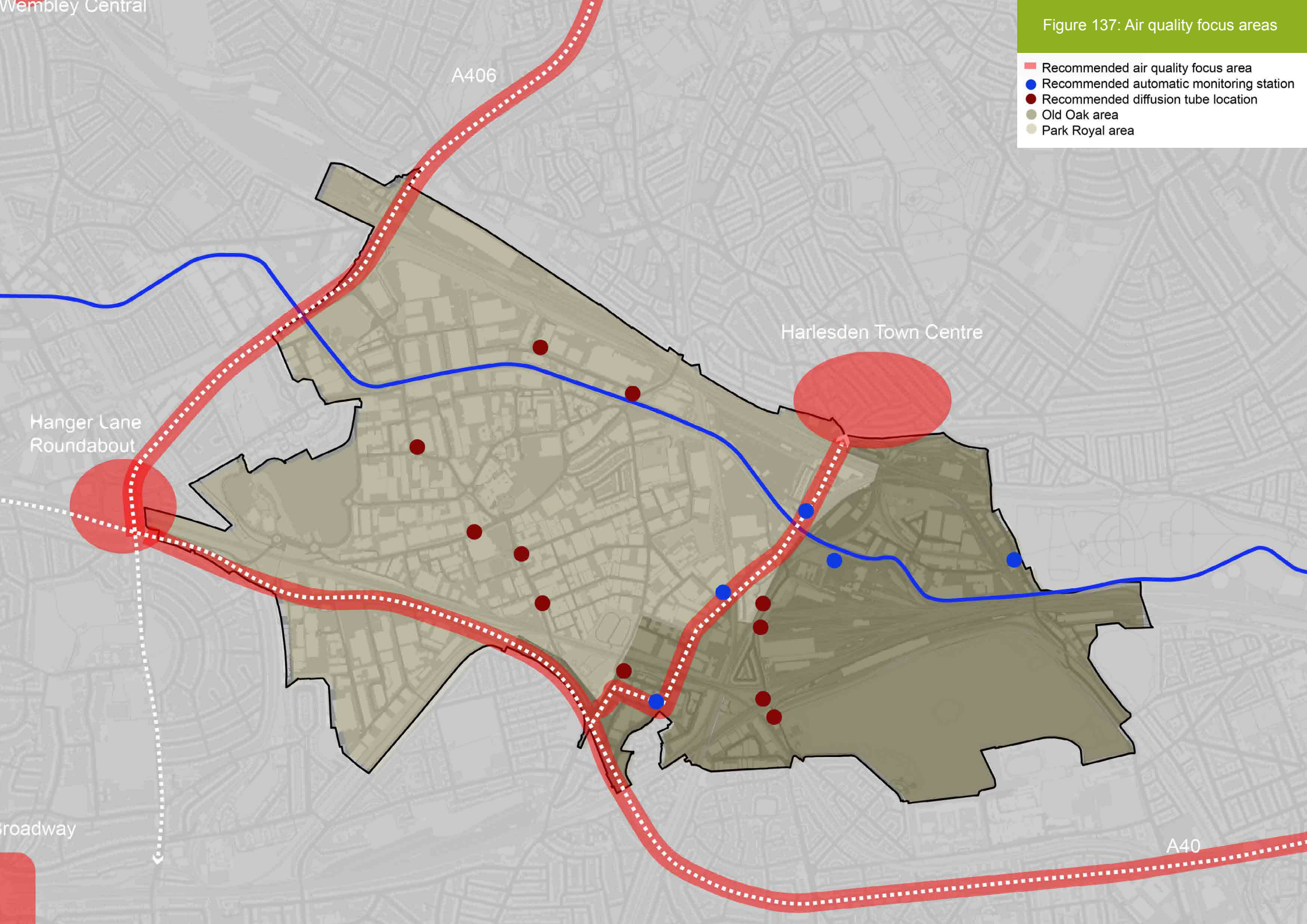
JUSTIFICATION

12.94 Air quality has a significant role to play in the health and wellbeing of occupants. The OPDC area is particularly affected by poor air quality, thanks to its high levels of traffic and industrial uses. The London Boroughs of Brent, Ealing and Hammersmith and Fulham have each identified incidences of poor air quality in OPDC are and have designated Air Quality Management Areas covering the entire OPDC area for Nitrogen Dioxide (NO₂) and particulate matter (PM₁₀).

12.95 As a result of these air quality issues, OPDC has published its own draft Air Quality Study (AQS) to inform the draft Local Plan. It identifies measures to support improvement in the area's air quality which are listed in Table 15 below. Where relevant these recommendations have also been incorporated in other preferred policy options in this draft Local Plan.

12.96 OPDC will need to work with others on the implementation of the measures necessary to address poor air quality as some measures require

Figure 137: Air quality focus areas



- Recommended air quality focus area
- Recommended automatic monitoring station
- Recommended diffusion tube location
- Old Oak area
- Park Royal area

Table 15: Summary of the draft Air Quality Study (AQS) recommendations

Policy Area	Policy action / mitigation measure
Transport	<ul style="list-style-type: none"> ■ Minimise demand for travel by private motor vehicles and encourage transport by shared, low and zero emission modes. ■ Provide no more than 1 car parking space per 5 residential units and ensure sufficient provision of electric charging points. ■ Encourage the uptake of Low and Zero Emission Vehicles by providing vehicle re-fuelling / charging infrastructure. ■ Design local roads to restrict vehicle speeds to 20mph.
Energy	<ul style="list-style-type: none"> ■ CHP / biomass should meet the highest emissions standards detailed in the Mayor of London's Supplementary Planning Guidance (SPG) on Sustainable Design and Construction. ■ Development design should be optimised to ensure adequate dispersion of emissions from discharging stacks and vents.
Waste	<ul style="list-style-type: none"> ■ All new waste treatment and handling facilities will require to be fully enclosed.
Overall Emissions	<ul style="list-style-type: none"> ■ Designate a Low Emissions Neighbourhood for the OPDC area. ■ Establish a Class C Clean Air Zone to encourage the use of low emissions vehicles. ■ Minimise air pollution making new developments 'air quality neutral' in accordance with the Mayor SPG on Sustainable Design and Construction. ■ Proposals should not increase the area of exceedance of EU established health-based standards and objectives for NO₂ and PM₁₀. Where new developments are introduced into area where the standards and objectives are exceeded, developments should be designed to minimise and mitigate against increased exposure to poor air quality. ■ Developers should produce an air quality assessment with the planning application. The AQS provides further recommendations on matters for inclusion within the air quality assessment.
Monitoring	<ul style="list-style-type: none"> ■ Support the installation of new automatic monitors for NO₂ and PM₁₀ on the main A-roads in the area (see figure 137)
Design / Public Realm	<ul style="list-style-type: none"> ■ Development and building design should not inhibit the effective dispersion of pollution. In particular, bus and taxi facilities should be designed to avoid the build-up of pollution. ■ Developments should provide adequate, appropriate and well located green space and infrastructure.
Construction and logistics	<ul style="list-style-type: none"> ■ Minimise emissions from freight, delivery and servicing during the demolition and construction phase. ■ Follow the guidance set out in the Mayor's SPG on 'The Control of Dust and Emissions during Construction and Demolition' to assess the impact on air quality during construction and to inform mitigation. ■ Localised AQ measures to tackle known issues in the OPDC area, particularly those associated with high NO₂ within the GLA's Air Quality 'Focus Areas' (see Figure 135). ■ Renewable, mains or battery powered plant items should be used for Non-Road Mobile Machinery (NRMM) on construction sites. ■ All demolition and construction sites should be monitored for the generation of air pollution. PM₁₀ monitoring should be carried out at medium and high risk sites.

broader changes in practice and behaviour. The matter is not confined to one planning authority area and development is often governed by separate regulatory regimes and legislation such as building regulations and environmental permitting.

ALTERNATIVE POLICY OPTION

12.99 No alternative policy options have been identified as alternatives would be to not have policies promoting improvements to air quality and this would not be consistent with the NPPF or in general conformity with the London Plan.

EU11: Noise

KEY ISSUES

1. The existing road and rail transport network and the predominance of industrial uses and heavy traffic associated with them means that the area suffers from significant ambient and background noise levels.
2. To a lesser extent, there is ambient noise from air traffic associated with the area's proximity to Heathrow airport and flight-paths.
3. Noise can impact on the quality of life and the natural environment. It will be important to carefully plan for this through development.

POLICY CONTEXT

National

12.98 The NPPF states that planning policies and decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions and identify and protect areas of tranquility which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

Regional

12.99 London Plan polices set out the Mayor's approach to the management and reduction of noise to improve health and the quality of life and to support the spatial planning objectives of the Mayor's published Ambient Noise Strategy.

PREFERRED POLICY OPTION

Development proposals should submit a noise assessment that demonstrates:

- a) how design has minimised adverse noise impacts from both surrounding and internal uses on future occupants. In high density development noise attenuation measures will be of particular importance; and
- b) where development is proposed close to existing noise generators such as waste sites, cultural facilities, strategic roads or uses within Strategic Industrial Locations (SIL), how it will ensure the continued effective operation of those uses.

JUSTIFICATION

12.100 Noise is an inherent part of everyday life. It contributes to the character of different places. High levels can have a considerable effect on human health, productivity, quality of life and amenity, and on wildlife.

12.101 The impact of noise is a material planning consideration in the determination of planning applications. Given the significant amount of regeneration and new development planned there is the potential for conflict between noise sensitive and noise generating developments. New development in the OPDC area may create more noise, but there may be opportunities to consider improvements to the acoustic environment.

12.102 Where a proposed development has the potential to negatively impact on a noise sensitive development or new noise sensitive development is proposed near major sources of noise, OPDC will require major development proposals to include a noise assessment to investigate noise levels and determine the effectiveness

of proposed mitigation measures. OPDC will apply 'agent of change' principles when considering the impact of noise, i.e. if there is an existing use that generates noise, such as a cultural facility or an industrial use, the onus will be on the new development to adequately mitigate against the impacts of this noise. When assessing proposals, OPDC will have regard to relevant noise exposure standards and internal noise standards which apply to particular uses.

ALTERNATIVE POLICY OPTION

12.103 No alternative policy options have been identified as alternatives would be to not have policies mitigating the impacts of noise and this would not be consistent with the NPPF or in general conformity with the London Plan.

EU12: Land contamination

KEY ISSUES

1. The OPDC area is 650ha of brownfield land with a long industrial history, alongside significant corridors of transport infrastructure.
2. Past uses are likely to have left a legacy of contamination within the ground. If not dealt with appropriately, it has the potential to affect human health and natural habitat, including the water environment and groundwater.
3. Remediation or clean up may be required for large development.

POLICY CONTEXT

National

12.104 The NPPF requires that local planning authorities, through Local Plans and planning decisions, ensure that a site is suitable for its use, having regard to ground conditions, including previous activity pollution and, remediation proposals. After remediation under planning, as a minimum, land should not be capable of being determined as contaminated.

Regional

12.105 London Plan Policies Identify the need for local planning authorities to encourage remediation and to set out policy to deal with contamination and prevent its spread and re-activation.

PREFERRED POLICY OPTION

OPDC will:

- a) assess development proposals in relation to the suitability of the proposed use for the conditions on that site;
- b) require applications for new development to be supported by:
 - i. a site investigation;
 - ii. an assessment to establish the nature, extent, and risk presented by contamination; and
 - iii. remediation proposals, to be agreed before planning permission is granted;
- c) expect, as a preferred approach, the treatment of contamination to take place on-site; and
- d) require developers to complete the implementation of agreed measures to assess and abate any risks to human health or the wider environment, prior to the first occupation and use of the development, or as otherwise agreed by planning conditions.
- e) Require development proposals to set out practicable and effective measures to manage the risks from contamination and decontamination by treating, containing or controlling any contamination so as not to:
 - i. expose the occupiers of the

development and neighbouring land uses including, in the case of housing, the users of open spaces and gardens to an unacceptable risk;

- ii. threaten the structural integrity of any building built, or to be built, on or adjoining the site;
- iii. lead to the contamination of any watercourse, water body or aquifer; or
- iv. cause the contamination of adjoining land or allow such contamination to continue.

JUSTIFICATION

12.106 The OPDC area contains a significant amount of brownfield land with a long industrial history. Much of this land is expected to be contaminated and remediation or clean up may be required on development sites. Given the scale of regeneration planned, OPDC wants to ensure the impacts of these past and future land uses do not affect the health of people and the environment.

12.107 Land contamination and remediation is the subject of planning and other regulatory regimes. A key to the successful redevelopment of brownfield land is therefore early and continual engagement between developers, planners and regulators. OPDC will expect developers to work

with OPDC, the relevant London Boroughs and the Environment Agency in assessing the risks and the management of contamination, in assessing the suitability of the proposed use for the conditions on that site, and in agreeing any necessary steps for remediation.

12.108 Regulatory advice and guidance is available to identify the principal matters which both the Planning Authority and environmental regulator look to be undertaken when approaching redevelopment and land contamination. The Environment Agency documents 'Model Procedures' and 'The Guiding Principles' are particularly useful as they highlight the main stages in the process, best practice and refer to further guidance.

12.109 Where land is known or found to be contaminated, or where a sensitive use is proposed or exists, developers will be expected to assess their proposals using the seven stage process below:

1. Preliminary Risk Assessment. Comprising a desktop study including details of past and present uses at the site and the surrounding area to identify any potential sources of contamination, potential risks and sensitive receptors. A conceptual site model should be produced to demonstrate where any

pathway connects any of these sources to the sensitive receptors.

2. Site Investigation Scheme. Based upon stage one, setting out how the site investigation will be carried out, how the sources of pollution identified in the conceptual site model will be targeted and to determine the existence of the pathway to the identified receptors.

3. Site Investigation. To be undertaken using current guidance and methods.

4. Risk Assessment. Based upon site investigations, to determine the degree and nature of any contamination on the site and the risks posed by any contamination to human health, controlled waters and the wider environment.

5. Remediation Strategy. A detailed method statement for required remediation works identified through stage four, with the aim of breaking any pollutant linkages. The Strategy should support waste minimisation and maximising resource use by promoting the sustainable remediation and re-use of contaminated soils.

6. Verification. A report which validates and verifies that all of the works outlined in stage five have been undertaken as agreed.

7. On-going monitoring. If during development, contamination not previously identified is found to be present at the site, the local authority should be immediately informed and no

further development should be carried out until a report indicating the nature of the contamination and how it is to be dealt with is agreed in writing.

12.110 Sending contaminated soils to landfill is no longer considered to be sustainable, or economic. Sustainable, economic and local alternatives are required. At OPDC the opportunity exists to promote strategic and sustainable risk based approaches to land assessment and remediation based upon current best practice and guidance.

12.111 In some cases, the polluted layers in a site may contain rubble, rubbish and coarse waste materials. Often, on-site recycling and re-use of debris and treated material is possible and can reduce demand for primary aggregate resources, the need to transport material off-site and reduce the potential risks from pollution. This will be encouraged wherever possible.

ALTERNATIVE POLICY OPTION

12.112 No reasonable alternative policy options have been identified. There are no options but to require the decontamination and remediation of 'brownfield' land to ensure its suitability for future uses.



19c

ZAD A

Car Care



13

DELIVERY AND IMPLEMENTATION



Infrastructure provision

INTRODUCTION

13.1 Given the scale of the proposed development and the range and number of stakeholders that are already and will be involved, ensuring that there are adequate mechanisms to secure and monitor delivery are essential to the success of the Local Plan. This chapter sets out what infrastructure is needed to support development and the mechanisms that OPDC has at its disposal to secure the delivery of infrastructure, redevelopment, regeneration and the creation of a high quality place.

CONTEXT

13.2 This Local Plan seeks to deliver a high quality new part of London. To support this, there will be a need to deliver:

- Infrastructure to support the needs of the new population, including transport, education, health, community space, open space and utilities;
- Affordable housing, to meet housing needs and promote the areas as a mixed, balanced and inclusive community;
- A very high standard of placemaking and integration with the surrounding area; and
- A mix of land uses that can help create a vibrant new destination, by providing a

range of uses and catalyst uses that will attract people to the area.

13.3 OPDC has produced an indicative masterplan that shows how this new place could be laid out and the infrastructure needed to support this. Early work is showing that not all of this infrastructure can be funded through contributions from private development alone. To help with this, OPDC is undertaking a number of work-streams to further inform the Delivery and Implementation Chapter in the next draft of the Local Plan, which will need to be kept under regular review to keep on top of changing market conditions. These work-streams include:

- looking at infrastructure prioritisation and phasing. In this chapter we pose a series of questions to help us make an informed decision on what infrastructure is needed and of this, which are the critical pieces needed to support a new population;
- testing a number of different development scenarios and investigating how much funding there is available to fund infrastructure and affordable housing;
- identifying our affordable housing need, through our Strategic Housing Market Assessment (SHMA); and
- exploring other funding options available to OPDC to help fund necessary

infrastructure.

13.4 The section below provides further detail on what infrastructure we think we need to make a high quality place and ways in which this could be funded, delivered and phased.

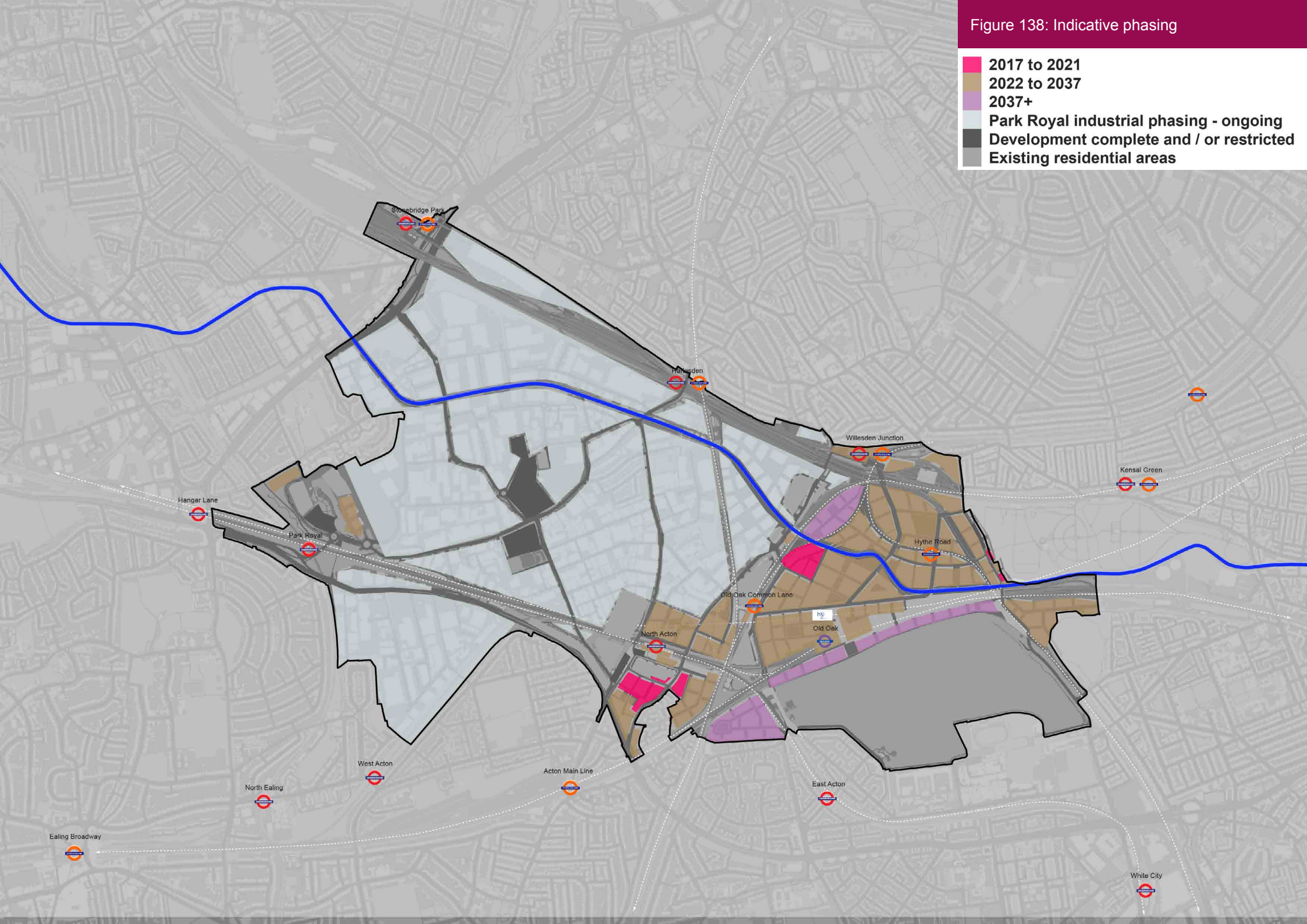
IDENTIFYING INFRASTRUCTURE NEEDS

13.5 OPDC has been working with the GLA, TfL and the London Boroughs of Brent, Ealing and Hammersmith & Fulham to produce an indicative masterplan for the area, as set out in Chapter 3 of the Local Plan. To assess the viability and deliverability of this masterplan, OPDC and the GLA produced a Development Infrastructure Funding Study (DIFS), which was prepared in consultation with the three boroughs and other stakeholders in 2014-15.

13.6 The DIFS identified the required infrastructure necessary to support the indicative masterplan and needs of the population and the phasing and costs of this infrastructure. The assumptions on phasing have now been further refined as part of OPDC's Development Capacity Study (DCS). Figure 138 presents the indicative phasing plan in the DCS.

Figure 138: Indicative phasing

- 2017 to 2021
- 2022 to 2037
- 2037+
- Park Royal industrial phasing - ongoing
- Development complete and / or restricted
- Existing residential areas



13.7 The indicative phasing is largely informed by the delivery of the Old Oak Common Station, which is expected to open in 2026. Some sites are capable of being brought forward in advance of the station whereas other sites are contingent on its opening. Given the length of time over which this project could be delivered it is anticipated that the exact phasing would vary; however, what is set out is considered to be a pragmatic programme based on current knowledge of development interests and infrastructure delivery. The programme will need to maintain flexibility and be regularly updated.

13.8 OPDC has undertaken a number of additional studies in support of this Local Plan which have identified additional infrastructure requirements in the OPDC area such as the Park Royal Transport Strategy (PRTS) and the Integrated Water Management Strategy (IWMS). OPDC is also developing its Socio-economic Regeneration Strategy which will identify additional infrastructure requirements in the OPDC area to promote sustainable economic growth, and maximise the benefits to local residents and businesses from the new opportunities that will come forward from the development.

13.9 Table 16 below identifies the infrastructure required to support development, alongside the indicative phasing of these infrastructure items and the relevance policies in this Local Plan that will secure their delivery. This infrastructure table

is largely based in the DIFS but also includes other infrastructure items identified as part of OPDC's draft evidence base.

FUNDING AND DELIVERING INFRASTRUCTURE

13.10 To support the needs of the new population and deliver a high quality place, appropriate mechanisms need to be put in place to secure the delivery of infrastructure. OPDC's DIFS has investigated potential mechanisms for funding this infrastructure, which are considered in more detail below. The early work as part of the DIFS identifies a substantial funding gap between the amount of infrastructure needed and the ability of private development to pay for all of this infrastructure. As a result, OPDC will consider a wide range of options to support the delivery of infrastructure.

Funding through development

13.11 Development within the OPDC area, if not supported by adequate infrastructure, would give rise to pressures on existing infrastructure and services and therefore may be unacceptable. Development should make appropriate contributions towards new infrastructure and improvements to existing infrastructure. The NPPF requires planning authorities to properly consider development viability when considering infrastructure delivery. If development is not viable, it will not proceed and this would impact on the provision of new homes and on new jobs to

support the economy.

13.12 There are generally four ways that infrastructure can be funded from development:

1. On-site development costs

13.13 These are works carried out on a site as part of the construction of the development. They tend to include (but not be limited to) items such as internal roads, public realm, open space and street greening.

2. Community Infrastructure Levy

13.14 The Community Infrastructure Levy (CIL) is a levy on new development 'of an amount per square metre' of net additional floorspace. It is usually set at a different rate for different types of intended uses of floorspace, and can be set at different rates for different areas. These variations in rates reflect differences in development viability and thus profitability for different types of land use and in different places. OPDC is the CIL charging authority for the OPDC area. The infrastructure that a CIL charging authority intends to spend CIL income on is set out in a 'Regulation 123' list. This infrastructure is generally strategic in nature and therefore benefits a wide number of users. Infrastructure in a Regulation 123 list cannot also be funded by money raised through Section 106 (S106) agreements, to avoid double dipping.

Figure 139: Existing footbridge



13.15 OPDC is in the process of setting a CIL charging schedule and plans to consult on its 1st draft during 2016, known as the 'Regulation 15' consultation. This will include OPDC's draft Regulation 123 list.

13.16 The Mayor of London's CIL is also chargeable in the OPDC area. This presently stands at £35/m² in Brent and Ealing boroughs and at £50/m² Hammersmith & Fulham and in broad terms applies to all development other than for education and health facility uses.

3. Section 106 Agreements

13.17 Section 106 of the Town and Country Planning Act 1990 allows a consenting authority such as OPDC to enter into legal agreements with developers to fund or deliver certain works to make development proposals acceptable in planning terms. This might include the amount of affordable housing which would be included in the development or an item of infrastructure or financial contribution towards it, such as a new school, employment and training support or increased transport network capacity.

13.18 No more than five financial contributions made under S.106 agreements can be pooled to fund or help fund any one item or category of infrastructure.

13.19 OPDC will be producing a Supplementary Planning Document (SPD) which sets out how S106 Planning

Obligations will be used in the OPDC's area and how they will be used alongside CIL to secure infrastructure and mitigate adverse impacts.

4. Section 278 Agreements

13.20 These are agreements made under the Highways Act 1980 for the developer to carry out scheme-specific highway works needed to satisfactorily tie in a scheme to the road network, or to mitigate adverse impacts which would otherwise arise in the immediate vicinity of the site. Examples of the works covered by S.278 agreements are vehicular crossovers and drop kerbs (standard for most developments), or more major highway works such as traffic lights or junction improvements, where a scheme is estimated to generate a large number of vehicular movements.

Funding through service providers, including public sector funding

13.21 New people living and working in an area means new income for service providers. When the service provider is a governmental body (i.e. the GLA or TfL), this funding comes from public taxes, whilst in the case of non-governmental service providers, this usually comes via a direct payment from the customer to the service provider (i.e. gas or electrical provision).

13.22 A service provider's business plan will set out how it intends to continue to deliver its

services subject to changing market needs. In the case of the OPDC area, there will be many service providers set to benefit from an increased market and OPDC is holding discussions with these service providers to make them aware of the anticipated new population coming to the area, the phased programme for delivery and the anticipated infrastructure needs.

Funding through borrowing

13.23 Where neither development nor public or private service providers can meet the anticipated costs of development, the public sector can look at borrowing monies to fund infrastructure. A recent example of this is the planned Northern Line extension in Vauxhall Nine Elms Battersea. Here, the GLA borrowed monies through a method called Tax Increment Financing (TIF), which is where an authority borrows money against anticipated future business rate income, to up-front fund the delivery of infrastructure and then repay this over time.

13.24 In the case of the OPDC area, early work shows a significant funding gap between the amount of infrastructure needed and the ability of development to pay for this infrastructure and OPDC has been in discussions with government about potential borrowing options to help finance this gap.

PRIORITISING INFRASTRUCTURE

13.25 The DIFS identifies a total

infrastructure bill of approximately £2 billion and additional infrastructure items emerging from other draft studies and strategies are likely to increase this figure. It is likely that many of the infrastructure items are likely to be critical to the successful regeneration of the OPDC area. The funding and delivering infrastructure section above identifies the challenges of funding infrastructure in a project of this scale. It is therefore important that there is a clear prioritisation of infrastructure so that there is certainty that pieces of critical infrastructure are funded and deliverable in a timely manner to support and unlock development. OPDC is undertaking further work in association with its Community Infrastructure Levy (CIL) and Section 106 SPD to identify what these critical pieces of infrastructure are. The consultation questions below invite stakeholders to make representations to identify those pieces that should be considered critical and this input from stakeholders will be invaluable for OPDC in refining the critical infrastructure list.

13.26 OPDC as part of this consultation would welcome:

- a. stakeholders views on what infrastructure OPDC should seek to prioritise; and
- b. if there are any pieces of infrastructure that should be added to the list.

Questions:

QDIa: What do you think are the highest priority pieces of infrastructure in Table 16?

QDIb: Are there any pieces of infrastructure identified in Table 16 that you don't think are a high priority or that you think may not be necessary to support development?

QDIc: Are there any additional pieces of infrastructure not in Table 16 that you think OPDC should be identifying?

QDI d: Do you think we have identified the infrastructure within the right phases (0-20 years being within this plan period and 20+ years being after this Local Plan)?

You can provide comments directly through:

opdc.commonplace.is

Figure 140: Infrastructure required to support development

- Infrastructure 2016-2036
- Infrastructure 2037 and after
- Land developable pre 2026
- Land developable post 2026
- Station
- Junction Improvement

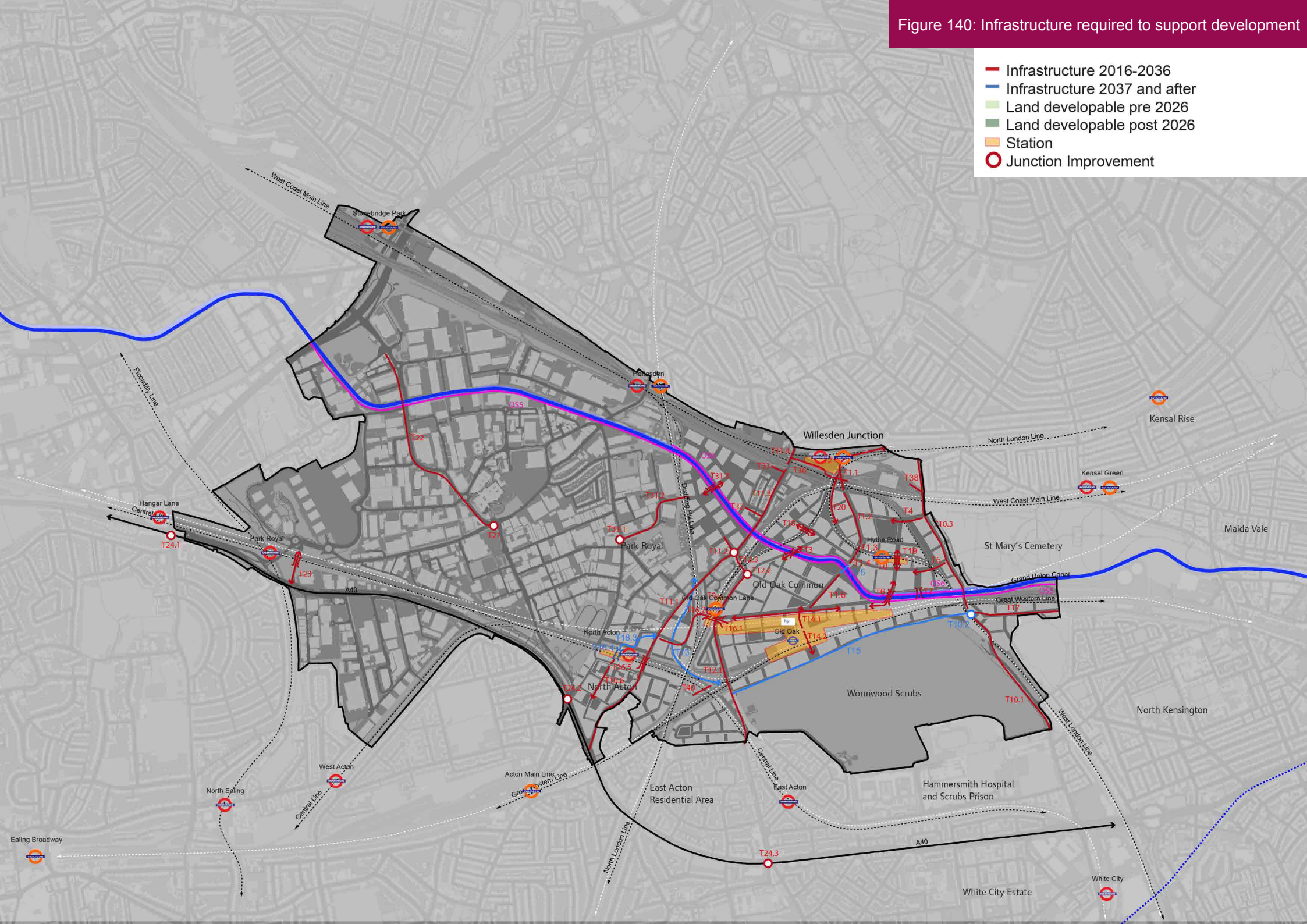


Figure 141: Social infrastructure

- Community hub
- Health Centre
- Primary school
- Area of search for all-through school

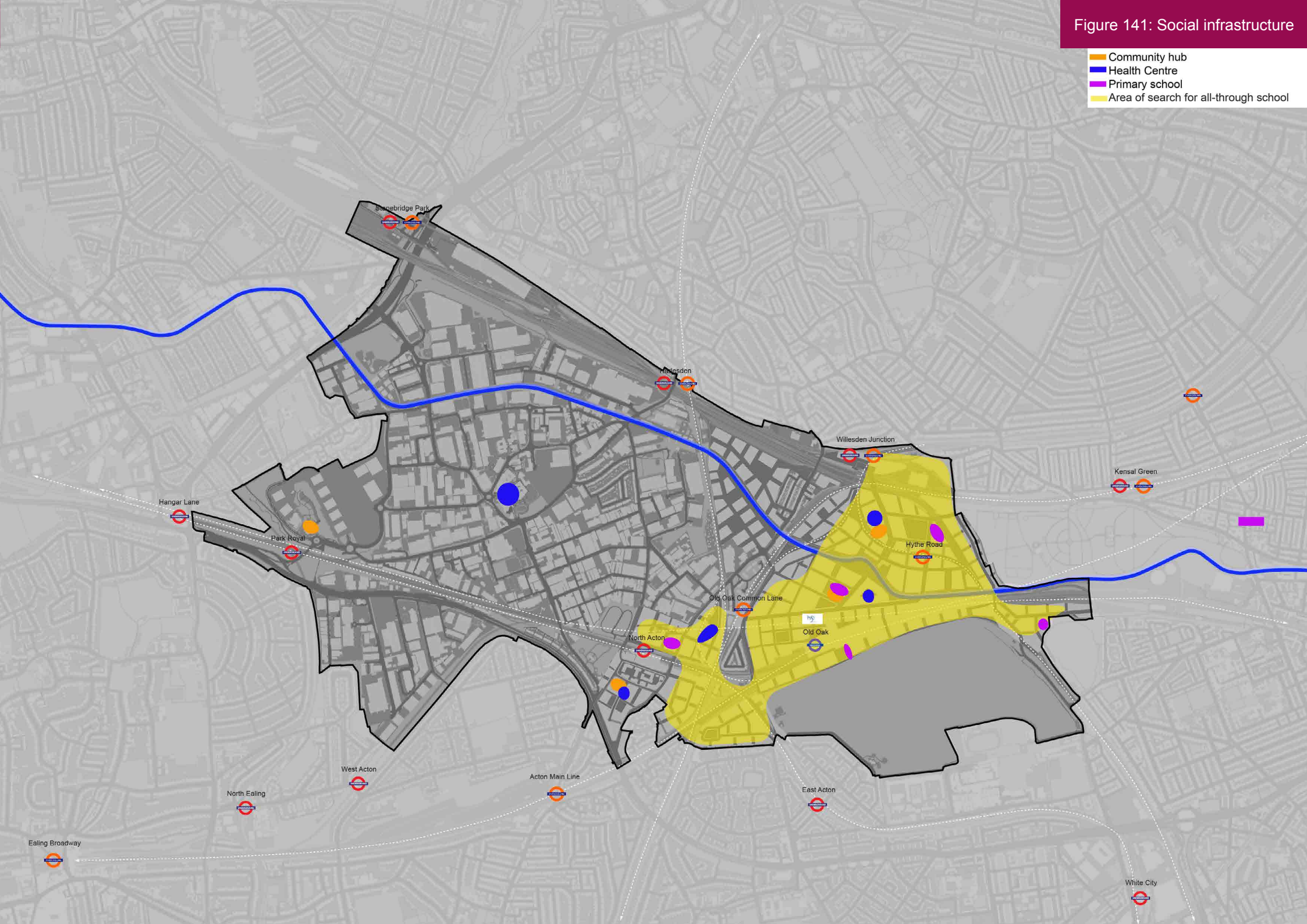


Table 16: Infrastructure requirements

Item No.	Shown on map?	Item	Phasing A: 0-20 yrs B: 20+ yrs	Relevant Local Plan Policy/ies
1. Transport Infrastructure				
T1	Y	Willesden Junction Station bridge over West Coast Mainline (minimum pedestrian and cycle)	A	P2, T1, T2, T3, T5
T2	Y	Improvements to Willesden Junction Station	A	P2, T1, T4
T3	Y	Vehicular bridge over Grand Union Canal, through Oaklands House site	A	P1, P2, T1, T2, T3, T5, T6, T8
T4	Y	Northern connection between Old Oak North & Scrubs Lane	A	P2, T1, T2, T3, T5, T6, T8, T9
T5	Y	Southern connection between Old Oak North & Scrubs Lane	A	P2, T1, T6
T6	Y	Eastern road link across Grand Union Canal	A	P1, P2, T1, T2, T3, T5, T6, T8, T9
T7	Y	Pedestrian/cycle bridge to Grand Union Canal towpath	A	P2, P4, T1, T2, T3
T8	Y	Hythe Road Overground station (West London Line)	A	P2, T1, T4
T9	Y	Old Oak Common Overground station (North London Line)	A	P1, T1, T4
T10	Y	Improvements to North Acton station - stage 1	A	P7, T1, T4
T10	Y	Improvements to North Acton station - stage 2	A	P7, T1, T4
T11	Y	Public realm and capacity enhancements on Old Oak Lane	A	P9, D2, T1, T2, T3, T5, T6
T12	Y	Public realm and capacity enhancements on Scrubs Lane	A	P8, D2, T1, T2, T3, T5, T6

Item No.	Shown on map?	Item	Phasing A: 0-20 yrs B: 20+ yrs	Relevant Local Plan Policy/ies
T13	Y	Public realm and capacity enhancements on Victoria Road	A	P7, P9, D2, T1, T2, T3, T5, T6, T8
T14	Y	Public realm and capacity enhancements on Old Oak Common Lane (including upgrade of Great Western & Chiltern lines underpasses)	A	P1, D2, T1, T2, T3, T5, T6, T8
T15	Y	Junction capacity improvement, Old Oak Common Lane at Oaklands House site	A	T1, T2, T3, T5, T6,
T16	Y	Connector railway between Crossrail and West Coast Main Lines	B	P1, T1, T4
T17	Y	High street bridge across Grand Union Canal	B	P1, P2, P3, T1, T2, T3, T5, T6
T18	Y	Access from Old Oak Common Station to Wormwood Scrubs open space	A	P1, T1, T2, T3
T19	Y	Street linking Old Oak Common Lane to Scrubs Lane	B	P1, D2, T1, T2, T3, T5, T6
T20	Y	Junction between Scrubs Lane and new road to Kensal Canalside Opportunity Area	B	P1, T1, T2, T3, T5, T6
T21	Y	Connection from Crossrail station to west side of Old Oak Common Overground station	A	P1, T1, T2, T3
T22	Y	Northern entrance to North Acton station	B	P7, T1, T4
T23	Y	Access to Powerday site	B	P2, P9, T1, T4
T24	Y	High street crossing of West London Overground line	A	P2, T1, T2, T3, T5
T25	Y	Pedestrian/cycle link across West London line at proposed Hythe Rd station	A	P2, T1, T2, T3

Item No.	Shown on map?	Item	Phasing A: 0-20 yrs B: 20+ yrs	Relevant Local Plan Policy/ies
T26	Y	Improved pedestrian/cycle bridge, CarGiant site to Willesden Junction Station	A	P2, T1, T2, T3
T27	Y	Park Royal Road/ Coronation Road junction improvements	A	P6, T1, T2, T3, T5, T6
T28	Y	Abbey Road junction improvements	A	P5, P6, T1, T2, T3, T5, T6
T29	Y	Improved pedestrian access towards Park Royal station from north	A	P5, T1, T2, T3
T30	Y	A40 junction improvements (Hanger Lane gyratory, Gypsy Corner and Savoy Circus)	A	P5, T1, T5, T6
T31	NA	General street improvements in Park Royal	A/B	P5, P6, T1, T2, T3, T5, T6
T32	NA	Junction improvements in surrounding areas	A/B	T1, T2, T3, T5, T6
T33	NA	Mini-Holland standards adopted across the OOC core area	A/B	T1, T3
T34	NA	Cycle hire; Legible London wayfinding and signage	A/B	T1, T3
T35	NA	Bus operating revenue support for new services and compensation during construction	A	T1, T5
T36	NA	New bus routes and bus infrastructure including bus stops, bus stands, welfare and maintenance facilities	A/B	T1, T5
T37	NA	Transport construction mitigation	A/B	T9, EU5
2. Utilities infrastructure				
UT1	NA	Delivery of optical fibre along road network	A	EU1, EU2, EU7
UT2	NA	Alternative technology, such as wireless point to point bridges	A	EU1, EU2, EU7
UT3	N	Not yet determined - further work to be undertaken by OPDC in 2016 through the Environment & Utilities Working Group with Thames Water	A	EU1, EU3

Item No.	Shown on map?	Item	Phasing A: 0-20 yrs B: 20+ yrs	Relevant Local Plan Policy/ies
UT4	N	Not yet determined - further work to be undertaken by OPDC in 2016 through the Environment & Utilities Working Group with Thames Water	A	EU1, EU3
UT5	N	Potential district-wide SuDS	A	EU1, EU3, EU8
UT6	N	Alternative technology, such as pneumatic waste collection systems and anaerobic digestion systems	A/B	EU1, EU4, EU5
UT7	N	Decentralised Energy heat network	A	EU1, EU6
UT8	N	Grid delivered energy – Electricity	A	EU1, EU6
UT9	N	Grid delivered energy – Gas	A	EU1, EU6
UT10	N	Tokington and Stonebridge Flood Alleviation Scheme	A	EU1, EU3
UT11	N	Strategic SuDS	A	EU1, EU3, EU8
UT12	NA	On-site sustainable urban drainage systems	A	EU1, EU3, EU8
3. Social Infrastructure				
SI1	N	One-form expansion of primary school (off-site; options to be explored)	A	SI1, SI2
SI2	N	Two-form expansion of secondary school (off-site; options to be explored)	B	SI1, SI2
SI3	Y	Two-form primary school #1 (Old Oak North)	A	P2, SI1, SI2
SI 4	Y	2 two-form primary schools #2 & #3 (Old Oak South)	B	P1, SI1, SI2
SI 5	Y	All-through (3-19 years) four-form school (site to be identified)	A	SI1, SI2
* Further work to be undertaken with councils and the EFA to understand capacity to expand schools. If this is not possible all additional school capacity will be needed to be provided in the OPDC area.				
SI 6	Y	Health centre # 1 (approximately 1,200sqm to accommodate 6 GPs, dentists, pharmacists and opticians)	A	OSP3, P1, SI1, SI3
SI 7	Y	Health centre # 2 (approximately 1,200sqm to accommodate 6 GPs, dentists, pharmacists and opticians)	A	OSP3, P1, SI1, SI3
SI 8	Y	Health centre # 3 (approximately 1,200sqm to accommodate 6 GPs, dentists, pharmacists and opticians)	A	OSP3, P1, SI1, SI3

Item No.	Shown on map?	Item	Phasing A: 0-20 yrs B: 20+ yrs	Relevant Local Plan Policy/ies
SI9	Y	Health centre # 4 (approximately 1,200sqm to accommodate 6 GPs, dentists, pharmacists and opticians)	B	OSP3, P2, SI1, SI3
SI10	Y	Health centre # 5 (approximately 1,200sqm to accommodate 6 GPs, dentists, pharmacists and opticians)	B	P7, SI1, SI3
* Health care provision will change reflecting the changing NHS landscape, the focus on the wider preventative agenda and as models of health and social care are reviewed, revised and amended. On-site health care provision will need to respond to these requirements and may be incorporated into fewer buildings that may also be mixed use.				
SI11	N	425sqm extension to existing police facility #1 (location to be determined)	A	SI1
SI12	N	425sqm extension to existing police facility #2 (location to be determined)	B	SI1
SI13	N	Intensification (1,500sqm) of Park Royal Fire Station	A	SI1, SI13
SI14	N	Additional capacity at existing ambulance stations	A	SI1
SI15	N	On-site contact point/police shop	A	SI1
SI16	N	25sqm on-site CCTV monitoring suite.	A	SI1
SI17	Y	Community hub #1 of 2,600sqm, which could be co-located with other services such as GPs, police and primary schools, or could be provided as a series of smaller centres	A	P1, SI1, SI4
SI18	Y	Community hub #2 of 2,600sqm	B	P2, SI1, SI4
4. Green infrastructure				
GI1	N	New on-site green open spaces	A	P1, P2, P3, P4, P5, P6, P7, D1, D3, EU8
GI2	N	Enhancing existing green open spaces	A	P1, P2, P4, P5, P10, D1, D3, EU8
GI3	N	New on-site hard landscaped open spaces	A	P1, P2, P3, P4, P5, P6, P7, P10, D1, D3

Item No.	Shown on map?	Item	Phasing A: 0-20 yrs B: 20+ yrs	Relevant Local Plan Policy/ies
GI4	Y	Improvements to the Grand Union Canal towpath	A	P1, P2, P4, D1, D3
GI5	N	Sensitive enhancements to existing open space, including Wormwood Scrubs and Birchwood	A	P10, D1, D3, EU8
GI6	Y	New path along north side of Grand Union Canal	B	P2, P4, D1, D3
GI7	N	Play space for under 5s within development plots	A/B	D1, D3
5. Socio-economic Infrastructure				
SE1	NA	Local employment, training & apprenticeship programmes	A/B	E5
SE2	NA	Local business support programmes and supply chain initiatives	A/B	E5
SE3	NA	Local entrepreneurship and innovation programmes	A/B	E4
SE4	NA	Affordable workspace and meanwhile uses promoting new business start-ups and providing support for SMEs and social enterprises	A/B	OSP5, P7, E4, TC3
SE5	NA	Cultural participation programmes and public art	A/B	TC5
SE6	NA	Sports participation programmes; Facilities and programmes to promote healthy lifestyles	A/B	TC5
SE7	NA	Schools engagement programmes	A/B	E5

Managing and promoting development

1. WORKING WITH STAKEHOLDERS

13.27 A wide range of public and private sector stakeholders as well as existing and new residential and business communities will each play an important role in facilitating the delivery of this Local Plan. There are a number of policy areas within the Local Plan that require joint working with adjacent local planning authorities and other public sector bodies. In accordance with the Duty to Cooperate, OPDC works closely with these authorities and bodies, liaising on policy, development management and infrastructure delivery matters.

13.28 Figure 142 shows land ownership within the core development area at Old Oak. Today, over 50% of this land is in public sector ownership and together with the HS2's construction work sites, this could rise to over 75% within the Local Plan period. This strong public sector interest provides opportunities for the public sector to act as a coordinator and potential master developer. OPDC has established a Public Sector Advisory Panel (PSAP) to draw together and co-ordinate these public sector bodies. Early work shows that this public sector land could deliver approximately 12,000 homes and 49,000 jobs, of which 10,000 homes

and 31,000 jobs could be within this Local Plan period (2017-37). This provides the public sector with significant opportunities to realise the optimal value for their assets and bring significant opportunities for investment in homes, jobs, infrastructure and other economic benefits.

13.29 Within Old Oak, there are a number of transport depots and land designated as rail freight sites. These include:

- Intercity Express Programme (IEP) depot;
- Powerday site;
- Crossrail depot and sidings;
- European Metal Recycling (EMR); and
- North Pole East depot.

13.30 Within the Local Plan period, it is unlikely that either the IEP depot or Powerday site will be brought forward for development, as the former is required operationally and the latter is an important waste site that contributes towards identified London Plan waste apportionment figures.

13.31 This Local Plan does seek to bring forward development on the Crossrail depots, EMR site and North Pole East depot. In the case of the Crossrail depot and sidings, the Mayor has publicly stated that he considers it critical that this site be redeveloped, either

through reconfiguration and/or relocation to coincide with the opening date of Old Oak Common Station. OPDC has been working with Transport for London (TfL) and the Department for Transport (DfT) to assess how this could be achieved. In the case of the EMR site and North Pole East depot, their release for development is contingent on them being de-designated as rail freight sites, which must go through its own separate consultation process.

13.32 Land ownership in the Park Royal industrial estate is much more disparate than Old Oak but OPDC has been engaging with a number of landowners in this area, as well as the Park Royal Business Group who represent the businesses on the estate to identify how intensification could be achieved through gradual redevelopment over time.

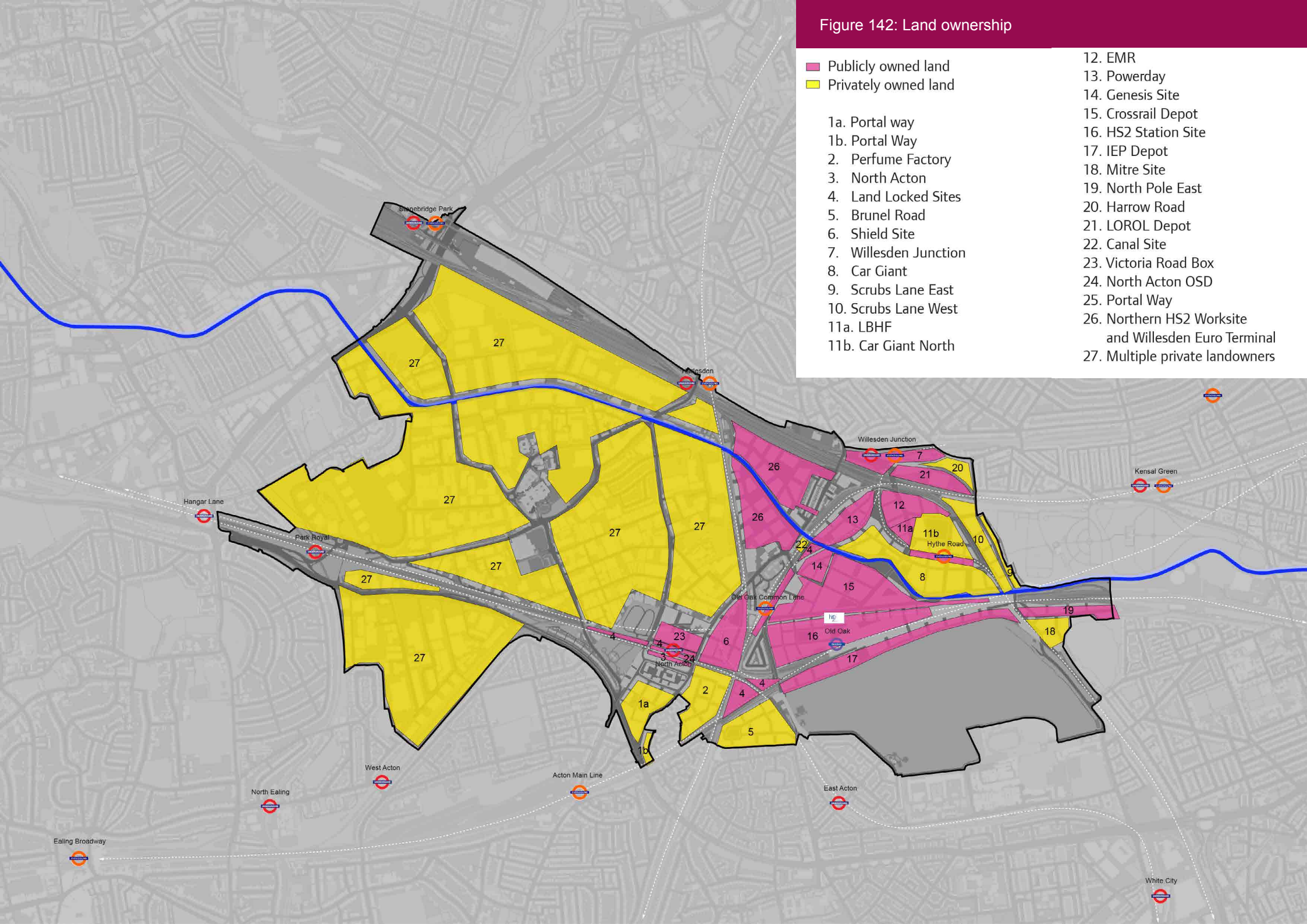
2. DETERMINING PLANNING APPLICATIONS

13.33 This Local Plan will form part of OPDC's development plan and will be a material consideration in the determination of planning applications in the OPDC area. The following outlines the process through which planning applications may take when being considered by OPDC.

Figure 142: Land ownership

- Publicly owned land
- Privately owned land

- 1a. Portal way
- 1b. Portal Way
- 2. Perfume Factory
- 3. North Acton
- 4. Land Locked Sites
- 5. Brunel Road
- 6. Shield Site
- 7. Willesden Junction
- 8. Car Giant
- 9. Scrubs Lane East
- 10. Scrubs Lane West
- 11a. LBHF
- 11b. Car Giant North
- 12. EMR
- 13. Powerday
- 14. Genesis Site
- 15. Crossrail Depot
- 16. HS2 Station Site
- 17. IEP Depot
- 18. Mitre Site
- 19. North Pole East
- 20. Harrow Road
- 21. LOROL Depot
- 22. Canal Site
- 23. Victoria Road Box
- 24. North Acton OSD
- 25. Portal Way
- 26. Northern HS2 Worksite and Willesden Euro Terminal
- 27. Multiple private landowners



Pre-application meetings

13.34 OPDC offers a pre-application advice service. The benefits of pre-application advice include providing clarity about planning policies, early identification of issues specific to a particular site. The process provides certainty at an earlier stage in the planning process. It is geared towards a proactive and positive engagement with applicants that seeks to improve the quality of design, and early discussions about matters such as affordable housing and section 106 agreements.

Local information requirements for the validation of planning applications

13.35 OPDC has a local list of information that must be submitted with a planning application. This list is published on the OPDC [website](#) and will be reviewed at least once every two years. This draft Local Plan suggests additional documents that applicants would be encouraged to submit and OPDC's Validation List will be updated to include these as this Local Plan is progressed.

PLACE Review Group

13.36 OPDC is committed to embedding placemaking within the plan making and development management process, and to achieving the highest standards of design in new development. As part of this, an independent and impartial Design Review

Panel called the PLACE Review Group ('OPRG') has been established to advise OPDC on planning policy and development proposals. 'PLACE' stands for planning, landscape architecture, architecture, conservation and engineering. Panel members are professionals with experience in architecture, landscape architecture, urban design, environmental sustainability, inclusive design, development economics and delivery. OPRG reviews proposals at pre-application stage and post-submission before they are reported to Planning Committee.

13.37 Further information about the PLACE Review Group's purpose and the way it works with OPDC can be found on OPDC's [website](#).

Determination of applications

13.38 Once a planning application has been submitted to, and validated by OPDC, it is considered against relevant planning policy and any other material considerations. This Local Plan, alongside NPPF, London Plan, the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF), any neighbourhood plans and Supplementary Planning Documents will form the basis for assessing and determining planning applications.

Enforcement Powers

13.39 Where necessary, OPDC will use its planning enforcement powers to ensure

that unacceptable development built without planning permission or other consents does not compromise the achieving of the policies set out in this Local Plan.

3. COMPULSORY PURCHASE POWERS

13.40 Compulsory purchase is the power that enables public bodies to acquire land, or rights over land, compulsorily in return for compensation. It is an important tool to assemble land needed to help deliver social, environmental and economic change. OPDC or the GLA's compulsory purchase powers were introduced by the Localism Act and the statutory basis is set out within Section 333ZA of the GLA Act 1999.

13.41 It may be in the interests of the proper and comprehensive planning of Old Oak and Park Royal for OPDC or the GLA to acquire land using these powers, if this would facilitate the regeneration of the OPDC area and if this regeneration could not be achieved without using these powers.

13.42 In exercising its CPO powers, OPDC or the GLA must have regard to the guidance in the DCLG Circular 'Compulsory Purchase and the Crichel Down Rules, October 2015' that a CPO 'should only be made where there is a compelling case in the public interest' and that the purposes for which an order is made 'sufficiently justify interfering with the human rights of those with an interest in the land affected'.

Monitoring Local Plan effectiveness

13.43 It is important to ensure that the policies in this Local Plan deliver regeneration for the area and tangible benefits to local communities and to Londoners. To ensure this, OPDC will identify indicators against which it can measure the success of the strategies and policies within this Local Plan and help to identify any potential need to review part or all of the Local Plan. Monitoring of these indicators will be reported through OPDC's annual Authority Monitoring Report (AMR).

13.44 OPDC will continue to undertake further work over the coming months to identify what these indicators might be. The indicators are likely to include the environmental targets identified in the Environment and Utilities Chapter and socio-economic targets and standards identified in OPDC's Socio-Economic Strategy, which OPDC plans to consult on in 2016. As part of this Local Plan consultation, we would like to invite stakeholders to suggest things that we should seek to monitor to help OPDC assess the effectiveness of Local Plan policies. This could include things such as:

- new homes permitted and delivered;
- non-residential floorspace permitted and delivered;

- town centre vacancy rates;
- cycle and car parking spaces approved; and
- new trees delivered.

Questions:

QD1e: What categories should OPDC look to monitor the effectiveness of the Local Plan against?

QD1f: What indicators should OPDC utilise to monitor the effectiveness of the Local Plan against?

You can provide comments directly through:

opdc.commonplace.is



ABUS 51



14

GLOSSARY

Term	Description
A-class uses	<p>Uses of buildings/land are categorised for planning purposes, these categories are known as use classes. A range of uses may fall within each use class.</p> <p>The 'A' use class includes the following uses:</p> <ul style="list-style-type: none"> • Shops (A1 use) • Financial and Professional (A2) • Food and Drink (A3) • Drinking Establishments (A4) • Hot Food Takeaways (A5) <p>Collectively, this document refers to these as 'A class uses'.</p>
Accessibility	<p>Refers to the extent to which employment, goods and services are made available to people, either through close proximity, or through providing the required physical links to enable people to be transported to locations where they are available. It also refers to the extent of barriers to movement for users who may experience problems getting from one place to another, including disabled people.</p>
Active frontages	<p>Making frontages 'active' adds interest, life and vitality to the public realm.</p> <p>This means:</p> <ul style="list-style-type: none"> • frequent doors and windows, with few blank walls; • narrow frontage buildings, giving vertical rhythm to the street scene; • articulation of facades, with projections such as bays and porches incorporated, providing a welcoming feeling; and, on occasion, • lively internal uses visible from the outside, or spilling onto the street.
Affordable housing	<p>This includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</p>
Agent of change	<p>Principle that whoever causes a change in the environment (agent of change) is responsible for managing the impacts of this change. Therefore, following this principle, incoming/new development should mitigate against potential issues arising from existing uses/development (i.e. new residential uses should address the noise impacts from existing entertainment/music venues)</p>
Air Quality Management Areas (AQMA)	<p>Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.</p>

Term	Description
Amenity	The desirable or useful features of a building or place which support its ongoing use and enjoyment by building occupants, residents, visitors, workers etc. It is usually understood to mean visual and aural amenity. Factors relevant to amenity include the general characteristics of the locality (including the presence of any feature of historic, architectural, cultural or similar interest), daylight, sunlight, outlook, privacy and noise. Amenity should be preserved, so potential impacts need to be assessed and managed.
Assets of Community Value (ACV)	Land determined to be of community value because it furthers the social wellbeing or social interests of the local community (which include cultural, sporting or recreational interests). Local groups can nominate land/buildings for listing, and can bid to buy listed assets when they are to be sold.
Autonomous/automated vehicles	Autonomous/automated vehicles are capable of navigating between destinations as a means of transport, with minimal or no (self-driving) human input.
Biodiversity	This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.
Blackwater	Wastewater generated from toilets, kitchen and laundry use. This has a higher concentration of contaminants than grey water.
Car club	A car club provides its members with quick and easy access to a car for hire. Members can make use of car club vehicles as and when they need them.
Catalyst uses	Uses which can stimulate significant and positive change.
Character	Character is created by the interplay of different elements, including the physical or built elements that make up the place, the cultural, social and economic factors which have combined to create identity, and the people associated with it through memories, association and activity.
Circular Economy	Circular economy is an alternative to a traditional linear economy (make, use, dispose) in which resources are kept in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and recycling products and materials at the end of each service life.
Clean Air Zones (CAZ)	The CAZ concept, developed by DEFRA to help the UK achieve compliance with EU NO2 limits, is an area-based initiative to encourage the cleanest vehicles through levels of access control and the application of vehicle emissions standards, with the local authority working in collaboration with others to achieve the necessary outcomes.
Combined Heat and Power/ Combined Cooling Heat and Power (CHP/CCHP)	The combined production of electricity and usable heat. Steam or hot water, which would otherwise be rejected when electricity alone is produced, is used for space or process heating.

Term	Description
Comparison retail	Floorspace dedicated to providing a range of comparison goods, including clothing, shoes, furniture, household appliances, tools, medical goods, games and toys, books and stationery, jewellery and other personal effects.
Community facilities	Facilities such as libraries, places of worship, halls for hire, youth space and training and meeting space. This list is not exhaustive and other uses can be included.
Community Infrastructure Levy (CIL)	Standard charge determined by the Local Planning Authority and levied on new development (an amount per square metre). The monies raised will be used to pay for infrastructure.
Connectivity	Refers to the number of connections and their integration, layout and relationship to one another and the impact this has on getting from A to B, by foot, bicycle and vehicle.
Conservation Area	This is an area of special architectural or historic interest (the character of which it is desirable to preserve or enhance) designated by a Local Planning Authority under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990. A Conservation Area is a type of heritage asset.
Construction Logistics Plan	Plans which aim to improve the sustainability of construction freight movements by establishing site management and procurement processes to reduce the impact of construction traffic on the road network.
Consolidation centres	Locations where larger vehicles unload materials and goods which are transported to their final destination by smaller vehicles.
Contaminated land	Previous industrial processes disposed of waste by tipping it on the land; raw materials and fuel were often spilt 'contaminating' the land at the sites. Pollution to rivers, groundwater, lakes etc can occur by the leaching of contaminants out of the soil into water courses through the natural drainage of the soil, or through surface runoff of water eroding and transporting contaminant materials into water courses. This in turn can have negative impacts on aquatic plant and animal life, and affect the quality of human drinking water. Typically, such sites are 'cleaned up' during the planning process.
Context	The way in which places, sites and spaces inter relate with one another whether physically, functionally or visually, or the way in which they are experienced sequentially and understood.
Convenience retail	Floorspace dedicated to providing a range of convenience goods such as food and non-alcoholic beverages, tobacco, alcoholic beverages, newspapers and periodicals and non-durable household goods.
Crossrail	Crossrail is the new high frequency, high capacity service linking stations in Reading, London and the South East. This includes new connections and stations between Reading and Heathrow in the West to Shenfield and Abbey Wood in the east.
Decentralised Energy	Networks supplying heat, cooling and electricity from a central/local source directly to homes and businesses.

Term	Description
Delivery and Servicing Plans	Plans which aim to improve the sustainability of freight and servicing by working with suppliers, clients and the freight industry to reduce the number of deliveries required, while ensuring remaining deliveries are made as safe and as environmentally friendly as possible.
Density (Density Matrix, plot ratio)	<p>Provided to interpret the London Plan sustainable residential quality density matrix for the Old Oak and Park Royal local context. The density ranges are:</p> <ul style="list-style-type: none"> • Highest - Old Oak Common Station and surrounds: in the region of 600 units per hectare; • High - Stations and key destinations: in the region of 550 units per hectare; • Medium - Residential led areas: in the region of 405 units per hectare; and • Lower - Sensitive edges: in the region of 300 units per hectare. <p>Commercial densities are measured using the Homes and Communities Agency Employment Densities Guide (2010).</p>
Development	Development, as defined under the 1990 Town and Country Planning Act, is “the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land”. Most forms of development require planning permission.
Development Plan Document (DPD)	Planning policy documents which make up the Local Plan. They guide development within a local planning authority area by setting out the detailed planning policies, which are used in determining planning applications.
District centre	Provide convenience goods and services for local communities and are accessible by public transport, walking and cycling. Typically they contain 10,000–50,000 sqm of retail, leisure and service floorspace.
Duty to Cooperate	The duty to cooperate is a legal requirement set out in the Localism Act 2011. It requires local planning authorities and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
Edge of centre	For retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange.
Energy hierarchy	The Mayor’s approach to reducing carbon dioxide emissions in the built environment. The first step is to reduce energy demand, the second step is to supply energy efficiently and the third step is use renewable energy.
Energy efficiency	Making the best or most efficient use of energy in order to achieve a given output of goods or services, for example in heating, lighting or providing other power output for use within buildings.

Term	Description
Family sized housing	Housing which has 3 or more bedrooms.
Green Belt	Policy designation that helps to contain development, protect the countryside and promote brownfield development.
Greater London Authority (GLA)	The GLA is the strategic citywide government for London. It is made up of a directly elected Mayor (the Mayor of London) and a separately elected Assembly (the London Assembly).
Green Grid	A network of green spaces and features such as street trees and green roofs that is planned, designed and managed to provide benefits to people and the environment.
Green Infrastructure	The multifunctional, interdependent network of open and green spaces and green features (e.g. green roofs). It includes the Blue Ribbon Network but excludes the hard-surfaced public realm. This network lies within the urban environment and the urban fringe, connecting to the surrounding countryside. It provides multiple benefits for people and wildlife including: flood management; urban cooling; improving physical and mental health; green transport links (walking and cycling routes); ecological connectivity; and food growing. Green and open spaces of all sizes can be part of green infrastructure provided they contribute to the functioning of the network as a whole.
Greywater	Wastewater generated from use in hand basins, baths and showers. Grey water generally excludes water used in toilets, the kitchen or for cleaning use, which has a greater concentration of contaminants.
Gross Value Added (GVA)	A measure in economics of the value of goods and services produced in an area, industry or sector of an economy.
Healthy New Town	An initiative launched by the NHS and Public Health England, to support new developments/towns to promote and deliver good health and wellbeing objectives.
Heavy Goods Vehicle (HGV)	Trucks/ Lorries with a maximum gross vehicle weight of more than 3.5 tonnes.
Heritage asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets fall into two categories: <ul style="list-style-type: none"> • designated (such as Conservation Areas and Statutory Listed Buildings); and • non-designated (such as Locally Listed Buildings)
High Speed 2 (HS2)	High Speed 2 is a planned rail line dedicated for high speed trains that will connect London to Birmingham from 2026 and then, along a Y shaped route, to Crewe and Manchester in the West and the East Midlands, South Yorkshire and Leeds in the East from 2033.
Houses in Multiple Occupation (HMO)	Small HMOs are shared dwelling houses occupied by between three and six unrelated individuals as their only or main residence, who share basic amenities such as a kitchen or bathroom. Where it is more than 6 people, this is classified as a large HMO.

Term	Description
Housing tenure	<p>Housing Tenure broadly falls into two categories: 1) Owner-occupied; and 2) Rented.</p> <p>Owner-occupied includes accommodation that is owned outright or with a mortgage. Shared ownership can also be included under this category.</p> <p>Rented Accommodation can be:</p> <ol style="list-style-type: none"> 1) privately rented – all non-owner occupied property other than that rented from a local authority or housing association. 2) Social rented from private registered providers or Local Authorities (these include social rent, affordable rent (up to 80% of the market) and intermediate rent).
Housing type	<p>Types of housing can include:</p> <ol style="list-style-type: none"> 1) House (detached, semi-detached, terraced); 2) Bungalow; and 3) Maisonettes (duplex flats) and flats (purpose build or converted).
Housing Zone	<p>Housing Zones are a partnership between the Mayor, the GLA and London Boroughs to accelerate new housing delivery in tightly defined locations. Stakeholder resources are aligned to speed up the delivery of new housing. There are currently 20 Housing Zones across London.</p>
Inclusive design	<p>Inclusive design creates an environment where everyone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers that create undue effort, separation or special treatment, and enables everyone to participate equally in mainstream activities independently, with choice and dignity.</p>
Industrial Business Park (IBP)	<p>Strategic Industrial Locations (SIL) that are particularly suitable for activities that need better quality surroundings including research and development, light industrial and high value general industrial, some waste management, utility and transport functions, wholesale markets and small scale distribution. They can be accommodated next to environmentally sensitive uses.</p>
Infrastructure	<p>Services that are necessary for the day-to-day functions of the community and economy such as roads, railways, and social and community facilities. Infrastructure includes open spaces, utility services, transport, schools, health and leisure services, and energy.</p>
Interchange	<p>The ability, and place, for people to efficiently transfer between transport modes. This can include transferring between different modes of transport such as rail/tube, bus, cycle, taxi etc.</p>
Internet of Things	<p>A network of devices (things) which can communicate with one another, and collect and exchange data. This could help to make it easier to control and automate tasks. For example, a fridge automatically generating a shopping list and sending a supermarket order (i.e via mobile phone) for approval.</p>

Term	Description
Interoperability	The ability of the component parts of a system to operate successfully together. For example, the ability for systems to communicate and share information and data openly. This is important for the emerging Smart Cities and Internet of Things sectors.
Lifetime neighbourhoods	A lifetime neighbourhood is designed to be welcoming, accessible and inviting for everyone, regardless of age, health or disability, is sustainable in terms of climate change, transport services, housing, public services, civic space and amenities making it possible for people to enjoy a fulfilling life and take part in the economic, civic and social life of the community.
Light Goods Vehicle (LGV)	Vans/ pick-ups with a maximum gross vehicle weight of up to 3.5 tonnes.
Legibility	The degree to which a person understands and recognises characteristics about an area which help them to navigate around an area.
Legible London	Legible London is an easy-to-use pedestrian signage system that presents information in a range of ways, including maps and directional information, to help people find their way and encourage walking journeys.
Local Plan	The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
London Plan	The Spatial Development Strategy for London prepared by the Mayor of London, which the Local Plan must be in general conformity with.
Low Emission Neighbourhood (LEN)	A Mayoral, area-based scheme that includes a package of measures focused on reducing emissions (and promoting sustainable living more generally). A LEN is delivered by a borough with support from Transport for London (TfL), the Greater London Authority (GLA) and the local community. The LEN concept was introduced in TfL's Transport Emissions Roadmap (TERM).
Masterplan	An illustrative depiction of how an area could be developed.
Major centre	Typically serve a boroughwide catchment, and contain over 50,000 sqm of retail, leisure and service floor-space with a relatively high proportion of comparison goods. They may also have significant employment, leisure, service and civic functions.

Term	Description
Major development	Development involving any of the following: 1) Mineral working and deposits; 2) Waste development; 3) The provision of dwellings where: • 10 or more dwellings are being provided; or • if number not given, development on a site of over 0.5ha; 4) the creation of more than 1,000sqm of floorspace; or 5) development on a site of 1 or more hectares.
Mayoral Development Corporation	An organisation created by the Mayor of London under the Localism Act 2011.
Meanwhile (interim) uses	Uses introduced for a temporary/short period of time.
Metropolitan centre	Serve wide catchment areas which can extend over several Boroughs. Typically they contain at least 100,000 sqm of retail, leisure and service floorspace, and a significant proportion of comparison retail. These centres generally have a very good accessibility and significant employment, leisure, service and civic functions.
Metropolitan Open Land	Strategic open land within the urban area that contributes to the structure of London with the same planning status as Green Belt.
Mixed use development	A well integrated mix of different land uses which may include retail, employment, leisure and other service uses) with decent homes of different types and tenures to support a range of household sizes, ages and incomes.
National Planning Policy Framework (NPPF)	Published on 27 March 2012, the NPPF sets out the government's planning policy framework for England and how these are expected to be applied. It sets out the government's requirements for the planning system. It provides a framework within which local people and their accountable local planning authorities can produce their own distinctive Local and Neighbourhood Plans, which reflect the needs and priorities of their communities.
National Planning Policy Guidance (NPPG)	The NPPG provides more detailed information on topics covered by the National Planning Policy Framework.
Neighbourhood centre	Typically serves a localised catchment often most accessible by walking and cycling and includes local parades and small clusters of shops, mostly for convenience goods and other services. It may include a small supermarket (typically up to around 500 sqm), sub-post office, pharmacy, laundrette and other useful local services. They are below District Centres in the Town Centre Hierarchy so they could contain up to 10,000 sqm.

Term	Description
Neighbourhood Plans	A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).
Neighbourhoods	Potential smaller areas within the suggested ten places (see Chapter 4). These have yet to be identified and will emerge over time.
Open space	All land that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a broad range of types of open space, whether in public or private ownership and whether public access is unrestricted, limited or restricted.
Open workspace	Workspace typologies designed and managed to support small, medium and micro enterprises. These typologies are usually flexible, with shared facilities and low-cost or managed workspaces and can include office space with flexible rental terms, co-working spaces, incubator spaces, accelerator spaces, creative/artist spaces and makerspaces. They tend to be flexible and affordable and are ideally managed by an appropriate workspace provider.
Opportunity Area	London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, each typically has capacity for more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.
Permitted development	Permitted development rights are a national grant of planning permission which allow certain building works and changes of use to be carried out without having to make a planning application. Permitted development rights are subject to conditions and limitations to control impact and to protect local amenity.
Place	The result of a complex interplay of different elements, e.g. the cultural and social factors which have combined to create identity, the physical or built elements that make up the place and the people associated with it through memories, association and activity. Also referred to as 'sense of place'.

Term	Description
Places	<p>Areas which currently and / or have the potential to exhibit local distinctiveness that creates a unique sense of place. For the OPDC area, these are suggested to be:</p> <ul style="list-style-type: none"> • Old Oak South • Old Oak North • Old Oak High Street • Grand Union Canal • Park Royal • Park Royal Centre • North Acton • Scrubs Lane • Old Oak West • Wormwood Scrubs
Place making	<p>Recognising the distinctiveness of individual locations in plans, policies and proposals, and responding accordingly.</p>
Preferred Industrial Location (PIL)	<p>Strategic Industrial Locations (SIL) that are particularly suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities, wholesale markets and other industrial related activities.</p>
Public realm	<p>This is the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.</p>
Public Transport Accessibility Level	<p>A detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. PTALs reflect: walking time from the point-of interest to the public transport access points; the reliability of the service modes available; the number of services available within the catchment; and the level of service at the public transport access points - i.e. average waiting time.</p> <p>PTALs do not consider: the speed or utility of accessible services; crowding, including the ability to board services; or, ease of interchange.</p>
Review mechanism	<p>Legal clauses which provide trigger points to review planning obligations and the ability to re-assess the level of relevant affordable housing contributions (i.e. if viability improves due to increases in land/sales values).</p>
Roads Task Force	<p>The Roads Task Force (RTF) is an independent body set up by the Mayor of London in 2012 to tackle the challenges facing London's streets and roads. They have developed a long term vision for how London can cope with major population growth and remain one of the most vibrant, accessible and attractive world cities.</p>

Term	Description																
Section 106 agreement	Section 106 of the Town and Country Planning Act 1990 allows a consenting authority such as OPDC to enter into legal agreements with developers to fund or deliver certain works to make development proposals acceptable in planning terms. This might include the amount of affordable housing which would be included in the development or an item of infrastructure or financial contribution towards it, such as a new school, employment and training support or increased transport network capacity.																
Section 278 agreement	These are agreements made under the Highways Act 1980 for the developer to carry out scheme-specific highway works needed to satisfactorily tie in a scheme to the road network, or to mitigate adverse impacts which would otherwise arise in the immediate vicinity of the site. Examples of the works covered by S.278 agreements are vehicular crossovers and drop kerbs (standard for most developments), or more major highway works such as traffic lights or junction improvements, where a scheme is estimated to generated a large number of vehicular movements.																
Site of Importance for Nature Conservation (SINC)	<p>SINCs are a non-statutory designation, designated by the local planning authority.</p> <p>In London, SINCs are designated as one of a hierarchy of types:</p> <ul style="list-style-type: none"> • Sites of Metropolitan Importance are selected on a London-wide basis. • Sites of Borough Importance (grade 1 and 2) are selected from candidates within each borough, so ensuring that each borough has some sites identified. • Sites of Local Importance are the lowest tier of sites, selected to redress any remaining local deficiencies. 																
Small and Medium Enterprises (SME) and Micro Enterprises	<p>Defined by the European Commission as:</p> <table border="1" data-bbox="607 1011 1789 1190"> <thead> <tr> <th></th> <th>Staff headcount</th> <th>Turnover</th> <th>Balance sheet total</th> </tr> </thead> <tbody> <tr> <td>Medium</td> <td>< 250</td> <td>≤ € 50 m</td> <td>≤ € 43 m</td> </tr> <tr> <td>Small</td> <td>< 50</td> <td>≤ € 10 m</td> <td>≤ € 10 m</td> </tr> <tr> <td>Micro</td> <td>< 10</td> <td>≤ € 2 m</td> <td>≤ € 2 m</td> </tr> </tbody> </table>		Staff headcount	Turnover	Balance sheet total	Medium	< 250	≤ € 50 m	≤ € 43 m	Small	< 50	≤ € 10 m	≤ € 10 m	Micro	< 10	≤ € 2 m	≤ € 2 m
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Medium	< 250	≤ € 50 m	≤ € 43 m														
Small	< 50	≤ € 10 m	≤ € 10 m														
Micro	< 10	≤ € 2 m	≤ € 2 m														
Smart (city) technology	Considered to be a diverse range of contemporary and emerging technologies which can be utilised to improve the quality of life for local people, support economic growth and enhance the environment.																
Social Infrastructure	Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people’s play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.																

Term	Description
Starter Homes	A government initiative that aims to help first time buyers under 40 to buy a home. The new homes will be sold at a discount of at least 20% of the local market value, and at less than the price cap of £450,000.
Strategic Industrial Location (SIL)	These comprise Preferred Industrial Locations (PILs) and Industrial Business Parks (IBP) and exist to ensure that London provides sufficient quality sites, in appropriate locations, to meet the needs of industrial and related sectors including general and light Industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions.
Streetscape	Streetscape is a term used to describe the natural and built fabric of the street, and defined as the design quality of the street and its visual effect, particularly how the paved area is laid out and treated. It includes buildings, the street surface, and also the fixtures and fittings that facilitate its use – from bus shelters and signage to planting schemes.
Sustainability (sustainable development)	<p>This covers development that meets the needs of the present without compromising the ability of future generations to meet their own needs.</p> <p>The NPPF sets out three elements of sustainable development: economic, social and environmental.</p>
Sustainable Drainage Systems (SuDs)	<p>Sustainable drainage systems (SUDS) are a natural approach to managing drainage in and around properties and other developments. Sustainable drainage measures are ones which avoid adding to flood risks both at a development site and elsewhere in the catchment by replicating natural drainage processes.</p> <p>SUDS work by slowing and holding back the water that runs off from a site, alleviating flooding and allowing natural processes to break down pollutants.</p>
Supplementary Planning Document (SPD)	Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.
Supplementary Planning Guidance (SPG)	An SPG (sometimes called supplementary guidance) gives guidance on policies in the London Plan. It does not form a part of the statutory plan. It can take the form of design guides or area development briefs, or supplement other specific policies in the plan. However, it must be consistent with national and regional planning policy. It should be clearly cross-referenced to the relevant plan policy or proposal that it supplements. Public consultation should be undertaken and SPGs should be regularly reviewed. While only the policies in the London Plan can have the status that the GLA Act 1999 (as amended) provides in considering planning applications, SPGs may be taken into account as a further material consideration.
Tall buildings	Buildings that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor of London.

Term	Description
Town centre hierarchy	<p>Town centres are identified according to their role and function as part of the following hierarchy:</p> <ul style="list-style-type: none"> • International centres • Metropolitan centres • Major centres • District centres • Neighbourhood/local centres <p>The scale and catchment of the centres (amount of retail floorspace, distance people are prepared to travel to them) decreases as you move down the hierarchy.</p>
Transport Assessment	<p>This is prepared and submitted alongside planning applications for developments likely to have significant transport implications.</p>
Travel Plans	<p>Plans promoting and providing guidance on sustainable transport options for a given location with the aim of promoting sustainable and environmentally friendly modes</p>
Town centre uses	<p>Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities; the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</p>
Typology	<p>A form or type of development, for example mews, terraces, stacked maisonettes and mansion blocks are examples of residential typologies.</p>
Use Class	<p>Uses of buildings/land are categorised for planning purposes, these categories are known as use classes. A range of uses may fall within each use class (as sub categories), as follows:</p> <ul style="list-style-type: none"> • A use class – shops (A1); financial and professional services (A2); food and drink (A3); drinking establishments (A4); and hot food takeaways (A5). • B use class – business (B1); general industry (B2); and storage or distribution (B3). • C use class – hotels (C1); residential institutions (C2); dwelling houses (C3); and houses of multiple occupation (C4). • D use class – non-residential institutions (D1); and assembly and leisure (D2). • Sui Generis – uses which do not fall within other use classes.
Waste apportionment	<p>A target (tonnes per annum) set by the Mayor of London for the amount of waste which needs to be managed by individual London boroughs.</p>

Term	Description
Wayfinding	Better wayfinding means improving the ease with which people can navigate themselves to, from and within an interchange facility or zone.

Photography and Acknowledgements

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