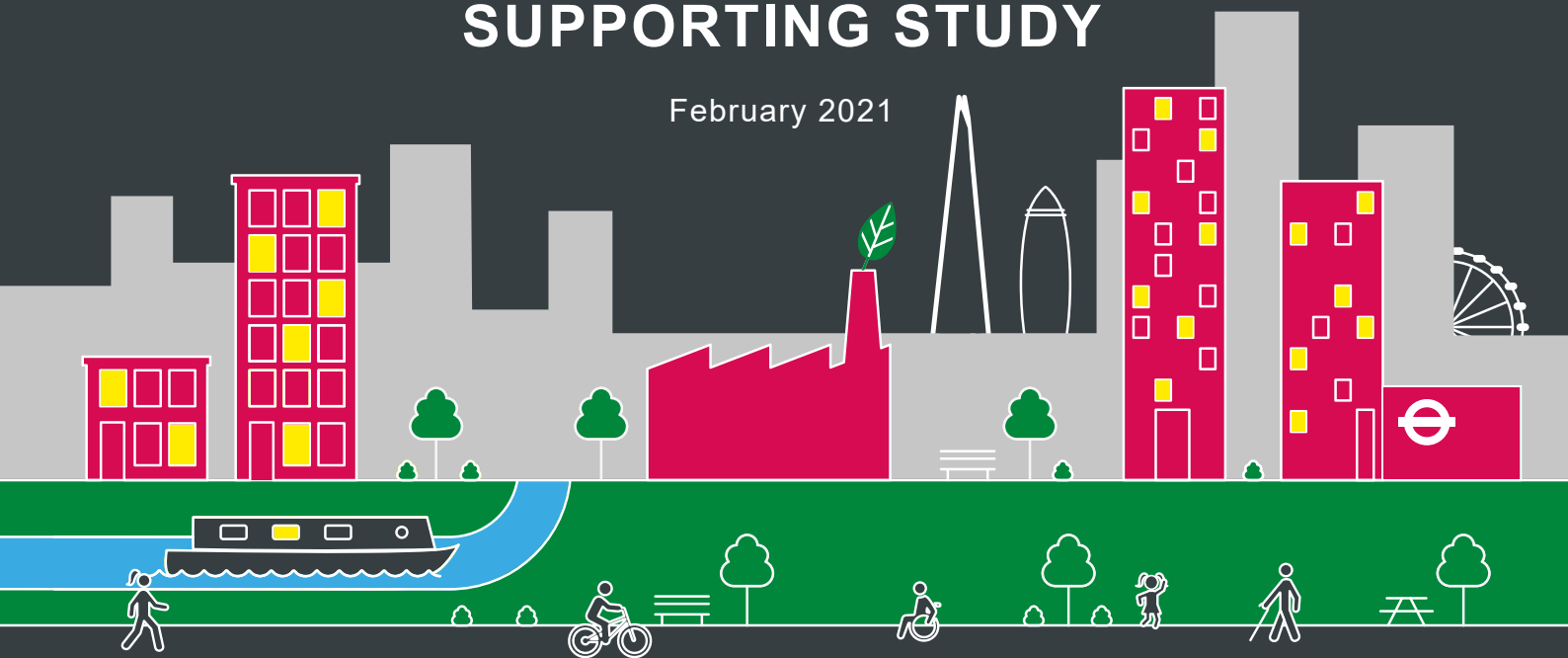


# Integrated Impact Assessment and Habitat Regulation Assessment Screening and other Interim Findings documents

## LOCAL PLAN SUPPORTING STUDY

February 2021



## Contents

This pack of documents contains:

- IIA Addendum (February 2021) of the Post Submission Proposed Modifications
- Habitats Regulations Assessment (February 2021) of the Post Submission Proposed Modifications
- Other documents as requested by the Inspector's Interim Findings comprising:
  - IIA Addendum (May 2019) (Appended to the IIA Addendum 2021)
  - Schedule of references to reasonable alternatives (OPDC-033) (June 2019)
  - Schedule summarising and explaining decisions taken on alternatives and rejected alternatives at previous stages of plan preparation (February 2021)
  - Schedule summarising and explaining the rejection as not reasonable alternatives for options considered in documents outside the IIA process (OPDC-034) (June 2019)

## Integrated Impact Assessment and Addendums and Habitats Regulation Assessment

Document Title	Integrated Impact Assessment (IIA) Addendums and Habitats Regulation Assessment (HRA)
Lead Author	Arcadis
Purpose of the Study	<p>To undertake an Integrated Impact Assessment of the proposed post submission modifications to the draft Local Plan. It integrates the following impact assessments to meet legal requirements and best practice approaches:</p> <ul style="list-style-type: none"> <li>• Sustainability Appraisal and Strategic Environmental Assessment;</li> <li>• Health Impact Assessment;</li> <li>• Equalities Impact Assessment; and</li> <li>• Habitats Regulations Assessment.</li> </ul>
Key outputs	<ol style="list-style-type: none"> <li>1. IIA Addendum (February 2021) comprising: <ul style="list-style-type: none"> <li>• Sustainability Appraisal and Strategic Environmental Assessment: Process for assessing the social, economic, and environmental impacts of the Local Plan and aims to ensure that sustainable development is at the heart of the plan-making process.</li> <li>• Health Impact Assessment: high-level assessment of the possible health impacts of the Local Plan.</li> <li>• Equalities Impact Assessment: high-level assessment of the possible equalities impacts of the Local Plan.</li> </ul> </li> <li>2. Habitats Regulations Assessment: A HRA screening exercise will be undertaken to determine if the Local Plan would generate an adverse impact upon the integrity of a Natura 2000 site (for the OPDC area, these are Richmond Park and Wimbledon Common).</li> <li>3. Other documents as requested by the Inspector's Interim Findings including: <ol style="list-style-type: none"> <li>A. IIA Addendum (May 2019) (Appended to the IIA Addendum 2021)</li> <li>B. Schedule of references to reasonable alternatives (OPDC-033) (June 2019)</li> <li>C. Schedule summarising and explaining decisions taken on alternatives and rejected alternatives at previous stages of plan preparation (February 2021)</li> <li>D. Schedule summarising and explaining the rejection as not reasonable alternatives for options considered in documents outside the IIA process (OPDC-034) (June 2019)</li> </ol> </li> </ol>
Key recommendations	<ol style="list-style-type: none"> <li>1. IIA confirms that the proposed modifications result in mainly positive outcomes on the sustainability and deliverability of the OPDC Local Plan.</li> <li>2. HRA confirms that the proposed modifications result in unlikely to have any significant effects on the European sites identified, either alone or in-combination with other plans or projects. As such, it is not proposed to undertake an 'Appropriate Assessment'.</li> </ol>

Key changes made since Submission	<ul style="list-style-type: none"><li>• Assessments of the proposed modifications to the Local Plan have been carried out.</li></ul>
Relations to other studies	Interfaces with all other evidence base studies through their input into the draft Local Plan.
Relevant Local Plan Policies and Chapters	<ul style="list-style-type: none"><li>• All the policies and chapters of the Local Plan</li></ul>



# OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION DRAFT LOCAL PLAN

Integrated Impact Assessment Addendum – Post  
Submission Proposed Modifications

FEBRUARY 2021



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## Version control

Version	Date	Author	Checker	Approver	Changes
1.0	15/01/2021	Ben Twiss	Sarah Tooby	David Hourd	First Draft for client review
2.0	25/01/2021	Ben Twiss	Sarah Tooby	David Hourd	Addressing client comments
3.0	08/02/2021	Sarah Tooby	Sarah Tooby	David Hourd	Final for publication

This report dated 08 February 2021 has been prepared for Old Oak and Park Royal Development Corporation (the “Client”) in accordance with the terms and conditions of appointment dated 20 March 2019(the “Appointment”) between the Client and **Arcadis (UK) Limited** (“Arcadis”) for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

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## **Appendix A**

**Updated IIA Assessment Proformas**

## **Appendix B**

**'Reasonable Alternatives' and Rejected Options**

## **Appendix C**

**May 2019 Proposed Modification Addendum (Supporting Information)**

# 1 Introduction

This Integrated Impact Assessment (IIA) Addendum provides an update to the published Strategic Environmental Assessment (SEA) and IIA of the Old Oak Common and Park Royal Corporation (OPDC) Submission Local Plan Policies IIA Report (May 2018) and the IIA Addendum Report (May 2019).

The Local Plan was submitted to the Secretary of State for independent Examination in October 2018. Examination hearings took place between April 2019 to July 2019 and subsequently a number of post-examination proposed Modifications are being proposed by OPDC in order to improve the soundness of the Plan. The proposed modifications are substantive changes which alter the meaning of a policy or strategy (e.g. rewording policies to change their meaning, adding new sites or deleting existing ones).

This addendum to the IIA Report considers whether the Proposed modifications alter the findings of the Submission IIA Report.

This addendum should be read in conjunction with the IIA Report (May 2018) the IIA Addendum (May 2019), Schedule of References to Reasonable Alternatives (June 2019) and Addendum (February 2021) and Schedule Considering Supporting Study Options as Reasonable Alternatives (June 2019). The May 2019 IIA Addendum remains relevant to this report and therefore it has been included in this report in Appendix C.

## 1.1 Local Plan Modifications

Proposed Modifications (both ‘minor’ and ‘main’) are required to resolve issues in order to make the Local Plan sound (paragraph 182 of the Framework) or to ensure its legal compliance. They involve changes or insertions to policies and text that are essential to enable the Plan to be adopted. Modifications are, therefore, changes to the plan that could potentially have significant impacts on the implementation of a policy.

The Post Submission Proposed Modifications represent all the changes made by OPDC in this round of modifications. Changes include updating and replacing policy wording, additional and amended site allocations and the consideration of reasonable policy and site allocation alternatives. New text added is shown underlined, deleted text is shown struck through.

Changes to policies and site allocations have been screened in order to ascertain whether or not an update to IIA assessment is required, these are presented in Table 2.1. The changes to the IIA assessment matrices have been evaluated and explained within the ‘significance to the IIA’ column. Revised matrices showing the assessments of the proposed modifications to the relevant policies and the site allocations are contained in Appendix A. It is important to note, that not all of the minor Proposed Modifications made by OPDC have been screened into the assessment and included in Table 2.1. A number of the modifications are editorial in nature i.e., clarification of language and/or terminology used or restructuring of sentences and therefore these have no impact on the outcome of the IIA and have been subsequently screened out. Only those modifications that could have potential on the outcome of the existing IIA outcomes have been screened in and included in Table 2.1.

The four reasonable alternatives considered by OPDC are presented in Table 2.2 of this report. The rejected options considered as alternatives are also presented in Appendix B of this report.

## 2 Post Submission Proposed Modifications

The Post Submission Proposed Modifications made to the Draft Local Plan by OPDC are presented in Table 2.1. The effect each change has had on the IIA outcomes have also been captured in the table.

The Post Submission Proposed Modifications made to the Draft Local Plan includes changes/removal of policies, additional site allocations, changes to a number of existing site allocations and four additional reasonable alternatives, to be considered within the Local Plan period.

The results of the IIA are presented in the updated appraisal table presented in Appendix A of this report. No major negative effects have been identified as a result of the policy changes, additional/ amended sites or the reasonable alternatives considered.

As mentioned previously, a number of small changes have been made to policy wording throughout the Local Plan. In most cases these have been editorial in nature and have not changed the results of the IIA. In other cases, the changes have resulted in a minor change to either the IIA findings in the form of IIA score updates and/or IIA assessment text updates. No major or minor negative effects have resulted from these changes and in most cases, where a change has occurred these have been small improvements in terms of their IIA score.

Key changes to the IIA outcomes brought about by the proposed modifications were the inclusion of references to Biodiversity Net Gain in Policy SP2 which resulted in a score change from neutral' to 'major positive' against IIA Objective 10 '*Create and enhance biodiversity and the diversity of habitats across the area and its surroundings*'. The inclusions of Neighbourhood Police Facilities in Policy TCC3 resulted in change of score from minor positive to major positive against IIA Objective 14 '*Improve safety and reduce crime and the fear of crime*'.

The changes to the IIA assessment outcome as a result of the Post Submission Proposed Modifications are summarised below:

### **Policies**

- Policy P2 has been completely replaced and therefore has been re-assessed;
- Policy P9 has been completely replaced and therefore has been re-assessed;
- A new cluster policy for the residential led area focused on the new Wormwood Scrubs Street has been added within the Scrubs Lane Place (P10C5). This Policy has been assessed and is included in the IIA tables in Appendix A of this Report; and
- Policy TCC3 has been removed from the Plan in response to the changes to the Use Class Order and so this policy assessment, and it's affects, have been considered in the overall assessment of the plan.

The IIA assessments of the following policies have been amended and are summarised in Table 2.1 and presented in Appendix A of this Report:

- SP2 – score change for IIA Objective 10 from neutral to major positive.
- SP5 - score change for IIA Objective 17 from major positive to minor positive.
- P1 – Minor amendments made to the assessment text against IIA Objectives 4 and 9.
- P2 – Minor amendments made to the assessment against IIA Objectives 1, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17 and 18.
- P7 – Minor amendments made to the assessment text against IIA Objectives 1 and 15.
- P8 – Minor amendment to IIA Objective 1.
- P10C2 - Minor amendment to IIA Objective 4
- D7 – Minor text amendment to IIA Objective 12.
- EU3 - Minor text amendment to IIA Objective 6.

- EU4 – Text changes to IIA Objective 4, 11 and 15
- EU5 – Minor change to IIA Objective 11 and 15
- H2 – Text change to IIA Objective 5
- TCC1 – Minor change to assessment text against IIA Objective 17
- TCC3 – change from minor to significant positive assessment against IIA Objective 14, following the commitment to deliver or contribute towards 3 Neighbourhood Police Facilities.

### **Site Allocations**

The assessment text and/or outcomes of site allocations 2 (Cargiant), 3 (The Triangle Business Centre), 4 (EMR) and 26 (Channel Gate) have been amended as a result of the Post Submission Proposed Modifications.

Site allocations 35 (4 Portal Way), 36 (3 School Road / 99 Victoria Road), 37 (Central Middlesex Hospital NE site), 38 (1 Lakeside Drive), 39 (Cargiant Scrubs Lane), 40 (North Pole East Depot), 41 (1 Portal Way (Carphone Warehouse)) and 42 (Acton Wells West) are new allocations and have been included in the assessment contained in Appendix A.

Assessments of site allocations not mentioned above have remained unchanged.

### **Reasonable Alternatives**

Four reasonable alternatives were proposed as part of the proposed modifications – three site alternatives and one policy alternative. The Reasonable Alternatives considered by OPDC, including justifications, are presented in Table 2.2. These have been assessed and included in the assessment tables in Appendix A of this report. The rejected 'reasonable alternative' options and the reasoning behind not bringing these forward are included in Appendix B of this Report.

On the whole, the reasonable alternatives considered presented positively in the IIA assessment. However, overall, the outcomes were not as strong in terms of overall sustainability of the preferred sites and policies and therefore they have not been brought forward for delivery.

**Table 2.1: Screening of proposed post-submission Proposed modifications to the Local Plan**

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
Policy Status	<p><u>On adoption of the Local Plan, the following existing borough Local Plan documents will be superseded for the OPDC area:</u></p> <p><u>London Borough of Brent</u></p> <ul style="list-style-type: none"> <li>• <u>Core Strategy</u></li> <li>• <u>Site Specific Allocation DPD</u></li> <li>• <u>Draft Development Management Policies DPD</u></li> <li>• <u>Saved UDP Policies</u></li> <li>• <u>Policies Map</u></li> </ul> <p><u>London Borough of Ealing</u></p> <ul style="list-style-type: none"> <li>• <u>Development (Core Strategy) DPD</u></li> <li>• <u>Development Management DPD</u></li> <li>• <u>Development Sites DPD</u></li> <li>• <u>Draft Planning for Schools DPD</u></li> <li>• <u>Policies Map</u></li> </ul> <p><u>Please note, that following the London Borough of Hammersmith and Fulham adopting their Local Plan in February 2018, their Core Strategy, Development Management Local Plan and associated Proposals Map were removed from the Development Plan.</u></p>	<p>The modification is of an editorial nature relating to the background of cooperation with London Borough of Brent and the London Borough of Ealing and does not change the conclusions of the IIA.</p>	<p>No</p>
Spatial Vision and throughout the Local Plan	<p>Old Oak and Park Royal will be a highly connected part of London, playing an important role in shaping west London’s future and driving national economic growth.</p> <p>It will comprise a network of places including an innovative industrial area in <del>Park Royal</del> and a high-density new vibrant part of London at <del>Old Oak</del>. It will be home to a diverse and intense mix of uses, places and people.</p> <p>Development will pioneer international excellence in sustainability, health and wellbeing and design quality to deliver tangible benefits for both local communities and London.</p>	<p>The modifications signify the proposed change in approach to land uses for Strategic Industrial Locations and mixed-use areas now being delivered in both Old Oak and Park Royal. Due to the high level nature of the IIA, the overall effects of the changes to the</p>	<p>No</p>



Integrated Impact Assessment Addendum – Post Submission Proposed Modifications

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
		plan on the assessment, have been negligible.	
Spatial Vision	<p>Figure 2.1 Economic Growth</p> <p><del>Alongside a protected and strengthened Park Royal,</del> the area has the capacity to deliver <del>7,600</del> <u>36,350</u> new jobs over the next 20 years.</p>	Although the proposed modification result in a large increase in jobs, the previous number of jobs were already high and therefore the IIA assessment score remains unchanged as the relevant IIA objectives are already assessed as major positive – the highest score possible.	No
Spatial Vision	<p>Figure 2.1 <del>Park Royal</del> <u>Industry</u></p> <p>The <del>Park Royal Industrial Estate</del> industrial land within OPDC’s boundary is a vital cog in the London economy and OPDC will work to protect, strengthen and intensify <u>Strategic Industrial Location in Park Royal and Old Oak North</u> <del>the role of Park Royal as a Strategic Industrial Location</del>. However, the nature of industry in London will continue to change and Park Royal needs to be able to continue to respond to these changes to remain competitive. Regeneration in <del>Old Oak</del> <u>the OPDC area</u> presents a dichotomy for <del>the estate industry</del>. <u>Park Royal Industry</u> can serve to support the needs of development in <del>Old Oak</del>, by providing ancillary services. This includes the potential for a circular economy, looking at ways that things <del>used in Old Oak</del> can be recycled and repurposed by businesses in <u>Park Royal</u>. However, regeneration in <del>Old Oak</del> could result in rent increases and increased pressure on infrastructure which if not managed could undermine what makes <u>the Old Oak and Park Royal area</u> a success.</p>	The modification is of an editorial nature relating to the wording around industrial uses in the OPDC area and does not change the conclusions of the IIA.	No
Spatial Vision	<p>Diversity of Housing</p> <p>The OPDC area is capable of accommodating an indicative capacity of <del>minimum 26</del> <u>25,500</u> homes, of which a minimum <del>20,400</del> <u>19,850</u> could be delivered in the next 20 years.</p>	The proposed modifications results in a small decrease in homes therefore the IIA assessment score remains unchanged.	No

Integrated Impact Assessment Addendum – Post Submission Proposed Modifications

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
SP1 – Supporting Text	<p>3.3 The development potential across Old Oak and Park Royal offers significant potential to deliver new homes, jobs and supporting ancillary uses. The Mayor's London Plan identifies that the OPDC area can deliver a minimum 25,500 homes and 65,000 jobs, making it one of London and the UK's largest regeneration projects. <del>20,400</del> <u>19,850</u> of these homes and <del>40,400</del> <u>36,350</u> of these jobs can be delivered <del>within the next 20 years of this Local Plan by 2038</del> (see policies SP4 and SP5).</p>	<p>The proposed modifications result in a very small decrease in homes over the plan period therefore the IIA assessment score remains unchanged.</p> <p>Although the proposed modification results in a slight decrease in jobs over the plan period, the IIA assessment score remains unchanged.</p>	No
SP2 – Supporting Text	<p>3.7 New development will need to consider and demonstrate how it can best address the substantial environmental challenges facing the planet. Requirements are set out in the Environment and Utilities chapter, providing locally specific policies that build on policies and standards in the Mayor's London Plan and London Environment Strategy, <u>and the principle of environmental net gain as set out in the government's 25 Year Environment Plan</u>. The application of these environmental policies and standards will understandably be challenging. In applying these, regard would always need to be given to the viability of development (see Policy DI1).</p>	<p>The proposed modifications result in the additional reference to the government's 25 Year Environment Plan and more specifically Biodiversity Net Gain. This has resulted in the score of the IIA being updated.</p>	Yes – IIA Objective 10 upgraded from neutral to major positive as a result of the modification.
SP2 – Supporting Text	<p>3.8 The marked change in public transport access makes the brownfield site at Old Oak a suitable location for new high density development. Buildings at high density must be of the highest quality (see Policy SP9) to ensure that potential place making and environmental challenges are addressed. OPDC's Precedents Study identifies a range of high quality, well-designed schemes that are considered to achieve these policy aspirations. High density development in <del>Park Royal</del> SIL will be different to <del>mixed use development in Old Oak</del>, but OPDC's Park Royal Intensification Study and <del>Old Oak North Intensification Study</del> demonstrates how <del>the Park Royal Industrial Estate SIL</del> could be regenerated to increase industrial floorspace and provide additional jobs, <del>to support Mayoral targets to deliver an additional 10,000 jobs in Park Royal.</del></p>	<p>The modification is of an editorial nature relating to mixed use development in the OPDC and does not change the conclusions of the IIA.</p>	No
SP3	Proposals should:	The modification is of an editorial nature	No

Integrated Impact Assessment Addendum – Post Submission Proposed Modifications

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>a) improve health and reduce health inequalities;</p> <p>b) design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles; <u>and</u>.</p> <p>c) ensure adequate access to facilities and services that support health, wellbeing and healthy lifestyles; <del>and</del></p> <p><del>undertake Health Impact Assessments (HIAs) as part of major development proposals, to assess the development's impacts on health. HIAs should include recommendations to mitigate any negative impacts of major developments on health and should be conducted early enough in the planning process to influence the design and/or implementation of the proposal.</del></p>	<p>where text relating to HIAs has been removed from the text and strengthened in the policy's supporting text and does not change the conclusions of the IIA.</p>	
<p>SP3 – Supporting Text</p>	<p>3.19 Health impact assessments (HIAs) <u>will be required for major development proposals</u>. HIAs help to ensure that health and wellbeing are fully considered as part of new development proposals. The process looks at the positive and negative impacts of a development as well as assessing the indirect implications for the wider community. The aim is to identify the main impacts and seek to maximise benefits and mitigate or avoid potential adverse impacts. HIAs should be undertaken at the earliest stage possible to ensure that any required alterations to proposals can be made with minimal disruption.</p>	<p>The modification is of an editorial nature where text relating to HIAs has been removed from the text and strengthened in the policy's supporting text and does not change the conclusions of the IIA.</p>	<p>No</p>
<p>SP4</p>	<p>Proposals should promote lifetime neighbourhoods, social cohesion and the integration of new and existing communities through:</p> <p>a) Protecting existing and providing new homes that help to meet a local and London-wide need by:</p> <p>i. providing a range of housing tenures, types and sizes that deliver mixed and inclusive communities; and</p> <p>ii. <del>delivering at least 20,100</del> <u>19,850</u> additional homes between 2018-38, <u>including 13,670 additional homes within the 2019-29 London Plan 0-10 year period</u>, and supporting the attainment of an overarching 50% affordable housing target, measured in habitable rooms and subject to viability.</p> <p>b) Delivering and/or contributing to new high quality social infrastructure and protecting and improving existing, to meet the needs of the population in terms of its location, scale and phasing.</p>	<p>The proposed modifications results in only a small decrease in homes being delivered over the plan period therefore the IIA assessment score remains unchanged.</p>	<p>No</p>

Integrated Impact Assessment Addendum – Post Submission Proposed Modifications

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
SP5	<p>Proposals should:</p> <ul style="list-style-type: none"> <li>a) support the delivery of <del>40,400</del> <u>36,350</u> new jobs between 2018-38;</li> <li>b) protect, strengthen and intensify the Strategic Industrial Location (SIL) in Park Royal <u>and Old Oak North</u>;</li> <li>c) create a new major commercial centre around Old Oak Common station;</li> <li>d) deliver a range of appropriate employment uses within designated town centres;</li> <li>e) support the provision of small workspaces across Old Oak and Park Royal;</li> <li>f) provide employment space across a range of sizes, types, tenures, forms and affordability's;</li> <li>g) design employment space to ensure it is flexible and adaptable to changing needs;</li> <li>h) secure employment and training opportunities for local people and procurement opportunities for local businesses; and</li> <li>i) strongly encouraging contractors and building occupants to sign up to the London Living Wage.</li> </ul>	<p>The proposed modification results in a slight decrease in jobs however, the IIA assessment score for IIA Objective 17 of major positive remains as SP5 is still providing a significant amount of employment in the OPDC area.</p>	No
SP5 – Supporting text	<p>3.25 The scale of change planned across the OPDC area will make a significant contribution to the local, regional and national economy. The area has the capacity to accommodate <del>60,700</del> <u>56,250</u> new jobs, <del>40,400</del> <u>36,350</u> new jobs over the next 20 years. It is estimated that these new jobs could generate a minimum £7.6 billion GVA per annum to the UK economy, thereby driving economic prosperity both locally and nationally.</p>	<p>The proposed modification results in a slight decrease in jobs however, the IIA assessment score for IIA Objective 17 of major positive remains as SP5 is still providing a significant amount of employment in the OPDC area.</p>	No
SP6	<p>Proposals should:</p> <ul style="list-style-type: none"> <li>a) support a coordinated and phased approach to place making that: <ul style="list-style-type: none"> <li>i. creates a series of high quality and distinctive places and clusters as set out in chapter 4;</li> <li>ii. delivers a range of meanwhile and catalyst uses; and</li> <li>iii. supports the creation of a new Cultural Quarter <del>in Old Oak</del>;</li> </ul> </li> </ul>	<p>Although the modification removes the reference to the delivery of the Atlas Junction neighbourhood town centre this does not change the</p>	No

Integrated Impact Assessment Addendum – Post Submission Proposed Modifications

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>b) deliver and support a new town centre hierarchy, that offers a range of town centre uses, serving the needs of the development and that complements surrounding town centres. Proposals should support the delivery of the following hierarchy:</p> <p>a. Old Oak – a major town centre <del>across Old Oak</del>, that delivers a wide range of town centre and community uses. The policy requirements for this centre can be found in policies P1, <del>P2</del>, P3, P7, P8 <u>and P9 and P14</u>;</p> <p>b. North Acton – a neighbourhood town centre, focussed around North Acton station, Victoria Road and along Portal Way. The policy requirements for the centre can be found in Policy P7C1;</p> <p>c. Park Royal Centre – a neighbourhood town centre in the heart of the Park Royal Industrial Estate. The policy requirements for the centre can be found in Policy P6; and</p> <p>d. Atlas Junction – <del>a neighbourhood town centre serving existing and new communities around Old Oak Lane, Old Oak Common Lane and Victoria Road. The policy requirements for this centre can be found in Policy P8C1.</del></p>	<p>conclusions of the IIA as even without Atlas Junction as a defined centre it will still form part of the wider Old Oak major town centre and the policy still delivers other neighbourhood town centres</p>	
SP7	<p>Proposals should contribute to a high quality, safe and accessible movement network which:</p> <p>a) delivers sufficient transport infrastructure to support the planned growth in the OPDC area;</p> <p>b) supports the delivery of OPDC’s Sustainable Transport Hierarchy by:</p> <p>i. minimising the need to travel;</p> <p>ii. delivering healthy streets, that appropriately prioritise walking and cycling to encourage active travel;</p> <p>iii. delivering a high quality, frequent, reliable and well connected public transport network, that optimises Public Transport Accessibility Levels (PTALs);</p> <p>iv. discouraging the use of private motorised vehicles and limiting car parking;</p> <p>v. ensuring the efficient servicing of sites; and</p> <p>vi. supporting the successful functioning and operation of <del>the Park Royal Industrial Estate</del> <u>Strategic Industrial Location (SIL)</u>, by implementing carefully planned servicing arrangements;</p> <p>c) delivers an efficient, safe and accessible transport network that embraces innovations in technology;</p>	<p>Although, the delivery of Union Way has been removed, the IIA score of major positive against IIA Objective 4 remains unchanged as the Policy still delivers significant connectivity improvements without Union Way.</p>	No

Integrated Impact Assessment Addendum – Post Submission Proposed Modifications

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>d) embeds transport infrastructure into the built environment and carefully plans and coordinates utility infrastructure provision as part of the delivery of the transport network;</p> <p>e) delivers and/or contributes to a new and enhanced street network that connects the Places of Old Oak and Park Royal together and connects into the surrounding areas including:</p> <ul style="list-style-type: none"> <li>i. enhancements to existing streets;</li> <li>ii. a new movement network <del>across Old Oak</del> comprised of the key routes as shown in figure 3.10;</li> <li>iii. new connections to Old Oak Common Station; and</li> <li>iv. new and enhanced pedestrian and cycle connections <del>into</del> Wormwood Scrubs;</li> </ul> <p>f) supports upgrades to the strategic road network and Transport for London Road Network, including the A40 and A406;</p> <p>g) supports delivery of Old Oak Street <del>and Union Way Park Road</del>:</p> <ul style="list-style-type: none"> <li>i. as early as is feasible and practicable;</li> <li>ii. as new though routes for walking cycling and where feasible, buses and providing access only for private vehicles;</li> <li>iii. as <u>an</u> active streets, providing town centre, employment and community uses and primary shopping areas at the intersections with other key routes and around rail stations; and</li> </ul> <p>h) promotes the use of the Grand Union Canal as a movement route.</p>		
<p>SP7 – Supporting text</p>	<p>3.50 OPDC's Sustainable Transport Hierarchy (see figure 3.9) promotes the creation of Healthy Streets and a transition to an environmentally sustainable city. The priority is to minimise people's need to travel and need for and use of private vehicles. This approach is supported through other policies in this plan, which promote the creation of a high density and highly compact, layered city form that puts local services within easy reach. The Healthy Streets Approach will be championed to ensure that where people do need to travel, they choose healthy, environmentally friendly ways to do so (see Policy T1). This should be achieved by delivering a high quality, attractive, accessible and inclusive public realm that not only provides people with the choice to walk and cycle but that actively incentivises these more sustainable types of movement, through the quality of the environment and supporting infrastructure (see Policy D2). <u>OPDC's sustainable transport hierarchy should not be viewed as a mechanism to restrict the essential delivery of new and enhanced public transport</u></p>	<p>The proposed modifications result in no change to the conclusions of the IIA.</p>	<p>No</p>

Integrated Impact Assessment Addendum – Post Submission Proposed Modifications

Policy / Chapter	Proposed Modification						Significance to the IIA	Further Appraisal Required?
	<u>infrastructure given the significant investment required to deliver this infrastructure and the resultant benefits for the area and communities.</u>							
SP8	<p>Proposals should deliver and/or positively contribute towards a varied, well-designed, integrated and high quality green infrastructure and open space network, by:</p> <p>a) providing for the needs of people living, working and visiting the area by:</p> <p>i. conserving and enhancing existing green infrastructure and open spaces identified in the Policies map. Any loss or relocation should accord with the requirements of Policy EU1;</p> <p>ii. providing sensitive enhancements and improvements to access existing open spaces; and</p> <p>iii. appropriately providing and/or positively contributing to new green infrastructure and open spaces, that meet the needs of the development in terms of their quantum, quality, access and function, including delivering 30% of the developable area outside of Strategic Industrial Locations (SIL) as publicly accessible open space in accordance with Policy EU1, including delivering 3 2 new local parks in Old Oak, each of at least 2ha;</p> <p>b) improving the ecology of the area and ensuring an overall net gain in biodiversity by:</p> <p>i. conserving and enhancing existing biodiversity habitats. Any loss or relocation should accord with the requirements of Policy EU2; and</p> <p>ii. delivering and/or positively contributing to new biodiversity habitats; and</p> <p>c) successfully integrating with the wider green infrastructure and open space network, including the Grand Union Canal, Wormwood Scrubs and All London Green Grid.; and</p> <p><del>ensuring that major development proposals are delivered in accordance with an appropriate Green Infrastructure and Open Space Strategy and Management Plan.</del></p>						<p>Although the total number of Local Parks has been reduced from 3 to 2, the requirement for development to deliver 30% of area as public open space has been retained.</p> <p>The proposed modifications result in no change to the conclusions of the IIA as the relevant IIA objectives are already assessed as positive.</p>	No
Site Allocation (Place Policies)	The housing and commercial or industrial floorspace targets are expressed as minimums and jobs figures are indicative.	Place Policy	Net additional housing units over the first ten years of the plan period	Net additional housing units during the 11 to 20 years of the plan period	Minimum commercial or industrial floorspace over the plan period	New jobs resulting from the provision of commercial or industrial floorspace over plan period	<p>Site allocation table updated with amended capacities and phasing. Relevant site allocation appraisals to be updated.</p> <p>The following site allocations assessment text</p>	Yes – Site Allocation assessments have been updated following updated housing and employment figures and

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Policy / Chapter	Proposed Modification							Significance to the IIA	Further Appraisal Required?
	1	Old Oak Common Station and surroundings	P1	0	<del>350</del> <u>100</u>	<del>178,400</del> <u>200,500</u>	<del>45,200</del> <u>17,100</u>	<p>and/or outcomes have been amended as a result of the change:</p> <ul style="list-style-type: none"> <li>• Site 2</li> <li>• Site 3</li> <li>• Site 4</li> <li>• Site 26</li> </ul> <p>The following site allocations are new and have been included in the assessment contained in Appendix A:</p> <ul style="list-style-type: none"> <li>• Site 35</li> <li>• Site 36</li> <li>• Site 37</li> <li>• Site 38</li> <li>• Site 39</li> <li>• Site 40</li> <li>• Site 41</li> <li>• Site 42</li> </ul> <p>The following site allocation assessment outcomes remain unchanged for:</p> <ul style="list-style-type: none"> <li>• Site 1</li> <li>• Site 11</li> <li>• Site 15</li> </ul>	<p>additional sites have been assessed.</p>
	2	Cargiant	P2/P10	<del>5,300</del> <u>0</u>	<del>48,800</del> <u>0</u>	<del>2,650</del> <u>170,800</u>	<del>2,600</del> <u>2,600</u>		
	3	The Triangle Business Centre	P2	<del>600</del> <u>0</u>	0	<del>2,800</del> <u>20,500</u>	<del>460</del> <u>350</u>		
	4	EMR	P2	<del>4,100</del> <u>0</u>	0	<del>24,330</del> <u>21,200</u>	<del>4,100</del> <u>300</u>		
	11	Acton Wells East	P7	<del>0</del> <u>4,200</u> <u>1,650</u>	0	<del>17,200</del> <u>8,000</u>	<del>4,500</del> <u>700</u>		
	15	Perfume Factory South	P7	<del>286</del> <u>326</u>	0	<del>4,970</del> <u>4,970</u>	430		
	19	Portal West	P7	<del>578</del> <u>651</u>	0	3,200	200		
	26	Channel Gate	P9	<del>0</del> <u>3,100</u> <u>0</u>	0	<del>10,700</del> <u>424,000</u>	<del>600</del> <u>7,600</u>		
	29	Mitre Yard	P10	<del>200</del> <u>241</u>	0	<del>4,100</del> <u>1,123</u>	66		
	30	North Kensington Gate South	P10	<del>464</del> <u>206</u>	0	750	50		
	35	4 Portal Way	P7	<del>702</del> <u>702</u>	<del>0</del> <u>0</u>	<del>1,946</del> <u>1,946</u>	<del>140</del> <u>140</u>		
	36	3 School Road / 99 Victoria Road	P7	<del>250</del> <u>250</u>	<del>0</del> <u>0</u>	<del>800</del> <u>800</u>	<del>40</del> <u>40</u>		



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Policy / Chapter	Proposed Modification							Significance to the IIA	Further Appraisal Required?
	37	Central Middlesex Hospital NE site	P6	<u>158</u>	<u>0</u>	<u>0</u>	<u>0</u>	<ul style="list-style-type: none"> <li>• Site 19</li> <li>• Site 29</li> <li>• Site 30</li> </ul> <p>The above sites have remained unchanged as the changes to employment provision and housing delivery figures, within the context of the strategic nature of the IIA, are not significant, and therefore not enough to cause a score to change.</p>	
38	1 Lakeside Drive	P4	<u>300</u>	<u>0</u>	<u>500</u>	<u>40</u>			
39	Cargiant Scrubs Lane	P10	<u>600</u>		<u>2,400</u>	<u>120</u>			
40	North Pole East Depot	P10	<u>750</u>	<u>0</u>	<u>500</u>	<u>40</u>			
41	1 Portal Way (Carphone Warehouse)	P7	<u>764</u>	<u>0</u>	<u>3,500</u>	<u>200</u>			
42	Acton Wells West	P7	<u>0</u>	<u>555</u>	<u>30,000</u>	<u>2,500</u>			
P1	<p>Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:</p> <p>Development and Phasing</p> <p>a) Supporting the comprehensive redevelopment of Old Oak South by working positively with stakeholders;</p> <p>b) Supporting the relocation, reconfiguration and/or development, on, over and/or around, existing and future railway infrastructure including:</p> <p>i. the Old Oak Common Station and tracks; and</p> <p>ii. in the longer term, the Elizabeth Line Depot, sidings and the Intercity Express Programme Depot, where feasible.</p> <p>Land Uses</p> <p>c) Supporting the creation of a thriving mixed use, high-density place that contributes to the delivery of:</p>							<p>Although the number of Homes has significantly increased overall and the number of Jobs has significantly decreased overall, the proposed modifications result in no change to the conclusions of the IIA as the relevant Housing IIA objective are already assessed as major positive and the relevant employment IIA</p>	<p>Yes – minor amendments made to the appraisal text of IIA Objectives 9 and 10.</p>

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>i. <del>45,200</del> 17,100 new jobs and a minimum of <del>350</del> 100 new homes in the plan period; and</p> <p>ii. <del>34,000</del> 35,700 new jobs and a minimum of <del>4,100</del> 3,700 new homes for the full development period.</p> <p>d) Establishing a commercial centre around Old Oak Common Station, that supports London’s growth, by delivering a significant amount of Use Class <del>B1a</del> E floorspace <u>that is appropriately designed and serviced to support the commercial centre;</u></p> <p>e) Contributing to the delivery of Old Oak major town centre by delivering a range of town centre uses, including top-up convenience stores, cafés, bars, restaurants, social infrastructure, business hotels and comparison retailers, that meet needs of employees, residents and interchange passengers;</p> <p>f) Contributing to the activation of this place and creation of a Cultural Quarter <del>in Old Oak</del>, delivering cultural and catalyst uses within Old Oak South;</p> <p>Public Realm and Movement</p> <p>g) Contributing to and/or enabling, the delivery of a permeable, inclusive and accessible street network as shown in figure 4.2 <u>including Old Oak Street as an all modes route and a walking and cycling route from Old Oak Common Station to Scrubs Lane</u><del>which is access only for private vehicles;</del></p> <p>h) Delivering active and positive frontages along the edge of the Elizabeth Line Depot <u>and along the walking and cycling route from Old Oak Common Station to Scrubs Lane</u> where feasible;</p> <p>Green Infrastructure and the Environment</p> <p>i) Delivering a high quality, well-connected, network of multifunctional publicly accessible open spaces, including:</p> <p>i. the Old Oak South Local Park of a minimum of 2 hectares in size, provided as a series of connected spaces;</p> <p>ii. <del>Grand Union Canal Local Park provided between Old Oak North and Old Oak South including the Canal Park and Canalside spaces Birchwood Nature Reserve that are linked by bridges and is a minimum of 2 hectares in size;</del></p> <p>iii. a publicly accessible open space over the western portion of the HS2 Station Box if demonstrated to be feasible; and</p>	<p>objectives are already assessed as minor positive. Therefore, both objectives would remain as unchanged.</p>	

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>iv. enhancing the Birchwood Nature Reserve if retained in its current location or provided in accordance with policies EU1 and EU2.</p>		
<p>P1 – supporting text</p>	<p>4.16 The delivery of connections to Old Oak Common Station from the surrounding places will be critical in fully connecting Old Oak South into its surroundings in a clear and legible manner. Delivering Old Oak Street as a high quality route will be particularly important for connectivity <u>as well as providing walking and cycling access to the Scrubs Lane.</u></p> <p>4.17 Old Oak Common Station should not preclude a connection to Wormwood Scrubs in the future and development should safeguard for and if relevant and appropriate, contribute to and / or deliver a bridge to <u>Wormwood Scrubs in the future and development should safeguard for and if relevant and appropriate, contribute to and / or deliver a bridge to Wormwood Scrubs.</u> Any connection will need to consider how it will cross and provide passive provision for future development on the IEP Depot.</p>	<p>Although the loss of access to Old Oak North and change from delivering to safeguard for a bridge to Wormwood Scrubs is perceived to be negative the policy stills contribute significantly to permeability and public transport through the delivery of Old Oak Common Station. As a result, the score remains major positive for IIA Objective 4</p>	<p>Yes – policy assessment text has been updated to reflect the change.</p>
<p>P2</p>	<p><u>VISION</u></p> <p><u>A high quality, intensively used and vibrant industrial area, which is better connected to surrounding neighbourhoods. Redevelopment with new multi storey intensified industrial typologies will respond sensitively to the area’s heritage, including the Canal and the Rolls Royce Building. High density industrial activities will be supported by better connections and ancillary facilities as well as canal side open spaces that can support businesses, employees and visitors, making Old Oak North a vibrant industrial location that people will want to work in, visit and pass through.</u></p> <p><u>POLICY</u></p> <p><u>Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:</u></p> <p><u>Land uses</u></p>	<p>Policy P2 has been completely replaced and therefore requires reassessment.</p> <p>Key modifications include:</p> <ul style="list-style-type: none"> <li>• Vision – Refocused as a high quality industrial area</li> <li>• Homes – decrease – 0 from 6,500</li> </ul>	<p>Yes – new policy has been reassessed</p>

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>a) <u>Delivering a minimum 212,500 sqm non-residential floorspace and an indicative 3,300 new jobs by taking opportunities to intensify sites for SIL compliant broad industrial type activities in line with the identified site allocations;</u></p> <p>b) <u>Delivering ancillary services and facilities where they support place-making and activate key routes.</u></p> <p><u>Public Realm and movement</u></p> <p>a) <u>Contributing towards and / or delivering improvements to the function and quality of the transport network for all users by:</u></p> <p>i. <u>Improving the existing pedestrian and cycle route from Old Oak North to Willesden Junction station</u></p> <p>ii. <u>Delivering a new, high quality inclusive access pedestrian and cycle bridge over the canal to replace and relocate Bulls Bridge and to connect into Oaklands or, if this is not feasible or agreeable with landowners, upgrading the existing bridge to ensure inclusive access for all users;</u></p> <p>iii. <u>Delivering enhanced pedestrian and cycle infrastructure along key routes, including segregated cycle lanes where feasible, where this does not have a significant adverse impact on the functioning of the highway;</u></p> <p>iv. <u>enhancing the highways capacity of routes into and through Old Oak North necessary to support industrial intensification;</u></p> <p>v. <u>safeguarding for and, if relevant and appropriate, contributing to Laundry Lane Bridge, a new vehicular connection with bridges/underpasses from Scrubs Lane into Old Oak North;</u></p> <p>b) <u>Contributing towards and / or delivering improvements to the function and quality of the public realm for all users through:</u></p> <p>i. <u>Enhanced street greening and public realm along all key routes</u></p> <p>ii. <u>Ensuring industrial uses support the activation of the public realm by delivering positive frontages along;</u></p> <ul style="list-style-type: none"> <li>• <u>the Grand Union Canal;</u></li> <li>• <u>Hythe Road</u></li> <li>• <u>Salter Street</u></li> </ul>	<ul style="list-style-type: none"> <li>• Jobs – decrease – 3,300 from 3,600</li> <li>• Connections – Removal of Union Way connection to south west and replacement with potential Laundry Lane, removal of Old Oak Street connection to south</li> <li>• Connections – removal of proposed new walking and cycling bridges across the canal and to Willesden Junction Station; relocated/new walking and cycling bridge to the south west and enhancements to the existing bridge to the north to Willesden Junction Station.</li> <li>• Connections – delivery of new walking and cycling routes</li> </ul>	

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>iii. <u>Ensuring ancillary uses support the activation of the public realm by delivering active frontages, particularly around Bulls bridge canal crossing and to aid navigation along key routes</u></p> <p>iv. <u>improved wayfinding, signage and lighting, prioritising routes to/from Willesden Junction station, Scrubs Lane and the Grand Union Canal.</u></p> <p><u>Green infrastructure and the environment</u></p> <p>c) <u>Making efficient use of Old Oak Sidings by:</u></p> <p>i. <u>safeguarding the site for continued use as a waste management site;</u></p> <p>ii. <u>supporting and/or enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area, where this accords with other relevant policies including Policy EU4; and</u></p> <p>iii. <u>supporting the delivery of an integrated utility hub on the site.</u></p> <p>d) <u>Contributing towards and/or delivering new publicly accessible open spaces, including:</u></p> <p><u>new canalside public open spaces where compatible with existing and/or proposed industrial operational requirements.</u></p> <p><u>Heritage and Character</u></p> <p>e) <u>Strengthening local identity and character by:</u></p> <p>i. <u>conserving and enhancing heritage assets including the Grand Union Canal Conservation Area, Grade I Listed Kensal Green Cemetery Registered Park and Garden, the Rolls Royce Building and their settings;</u></p> <p>ii. <u>ensuring character is informed by the area’s existing heritage including the railways, Grand Union Canal and industrial heritage.</u></p> <p><u>Building heights and massing</u></p> <p>f) <u>delivering increased building heights and multi storey industrial typologies where this will deliver industrial intensification and SIL compliant broad industrial type activities</u></p> <p>g) <u>Appropriately responding to the Grand Union Canal Conservation Area</u></p>	<ul style="list-style-type: none"> <li>• Connections - Hythe Road Overground Station is no longer identified to be delivered due to the reinstatement of SIL within Old Oak North.</li> <li>• Environment / Open spaces – relocation of Old Oak North Local Park to Channel Gate and removal of half of the Grand Union Canal Local Park (other half remains as the Birchwood Nature Reserve in Old Oak South). Delivery of new canalside open spaces.</li> <li>• Social Infrastructure – requirements relocated to other locations outside of SIL</li> <li>• Building heights – range of heights to</li> </ul>	

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
		support intensification and respond to sensitive locations (e.g., heritage and biodiversity designations)	
P3	<p>n) Contributing to a variety of building heights <del>that respond to the canal's heritage, character, biodiversity and amenity roles by delivering heights and massing</del> that support the functioning, designations, amenity and character of the canal and canalside spaces by:</p> <ul style="list-style-type: none"> <li>i. <u>subject to the impact on the heritage, character, biodiversity and amenity of the Grand Union Canal, within Old Oak Channel Gate</u>, delivering heights of generally 6 to 8 storeys fronting directly onto the Grand Union Canal with opportunities for tall buildings at key crossing points such as <del>Old Oak Channel Gate Street, Park Road</del>, Old Oak Lane and Scrubs Lane; and</li> <li>ii. within Park Royal <u>and Old Oak North</u>, delivering appropriate heights <del>that balance the need to conserve and enhance the heritage, character, biodiversity and amenity of the Grand Union Canal with to support the</del> functioning and intensification of the Strategic Industrial Location.</li> </ul>	The proposed modifications result in no change to the conclusions of the IIA.	No
P4	<p>Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:</p> <p>Land Uses</p> <ul style="list-style-type: none"> <li>a) Delivering <del>3,540</del> <u>3,390</u> new jobs within SIL, by taking opportunities to intensify the use of all sites, but in particular on identified site allocations, and having regard to the locations and typologies identified in OPDC's Park Royal Intensification Study;</li> <li>b) Delivering <del>€120</del> new jobs and a minimum <del>1,200</del> <u>1575</u> homes on sites outside of SIL, achieving early delivery of housing to contribute towards OPDC's 0-10 year housing supply, in line with the Brewery Cluster, <del>and</del> First Central <u>and Lakeside Drive</u> site allocations.</li> <li><del>b)c)</del> <u>Safeguarding Twyford Waste Transfer Station site in accordance with the West London Waste Plan;</u></li> </ul> <p>Public Realm and movement</p>	The proposed modifications result in no change to the conclusions of the IIA.	No

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p> <del>e</del>d) Contributing towards and / or delivering improvements to the function and quality of the transport network for all users by:                     <ul style="list-style-type: none"> <li>i. rationalising, minimising or removing on-street car parking, where possible and practicable, to enable walking, cycling and public realm improvements;</li> <li>ii. creating new or upgraded continuous walking and cycling routes particularly along key routes, to/from stations, Park Royal Centre and the Grand <u>Union</u> Canal; and</li> <li>iii. supporting traffic calming measures along Chase Road.</li> </ul> </p> <p> <del>d</del>e) Contributing towards and / or delivering enhanced bus infrastructure to support existing and planned bus services between Park Royal, Old Oak and other key destinations;                 </p> <p> <del>e</del>f) Contributing towards and / or delivering improvements to the road network to support more efficient business operations and servicing including:                     <ul style="list-style-type: none"> <li>i. <del>Supporting</del> <u>supporting safeguarding for and if relevant and appropriate, contributing to and/or delivering</u> a new vehicular, pedestrian and cycle route to link Park Royal to Channel Gate;</li> <li>ii. supporting improvements to junctions to facilitate improved traffic flow, pedestrian and/or cycle enhancements; and</li> <li>iii. contributing towards enhancements to the A40 and A406 which improve flow of traffic; support the movement of freight and/or reduce severance.</li> </ul> </p> <p> <del>f</del>g) Contributing towards and / or delivering improvements to the function and quality of the public realm for all users through:                     <ul style="list-style-type: none"> <li>i. enhanced street greening, public realm and active and/or positive frontages, particularly along the key routes identified in Figure 4.13;</li> <li>ii. delivering more generous pavements widths, where this does not have a significant adverse impact on the functioning of the highway; and</li> <li>iii. improved wayfinding, signage and lighting, prioritising routes to/from Park Royal, Hanger Lane, Stonebridge Park and Harlesden stations; and the to/from the Grand Union Canal.</li> </ul> </p>		
P5 – supporting text	<p>4.77 Although this is the most intensively used part of Park Royal, there is a significant opportunity to deliver more jobs within Old Park Royal Place, particularly within site allocations. Site allocations have been identified for two sites in Old Park Royal – land at Bashley Road and <del>40-54a</del> <u>32-36 &amp; 38-42</u> Minerva Road. The land at Bashley Road is a particularly key site. It covers over 3.8 ha and has been identified as having the capacity to</p>	The proposed modifications result in no change to the conclusions of the IIA.	No

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>deliver a minimum 30,100 sqm of broad industrial type activities. A comprehensive and coordinated approach should be taken to the delivery of this site to unlock its potential, in accordance with Policy SP10. Smaller scale intensification will also be achievable in Old Park Royal on other sites<sup>3</sup>, to capitalise on the area’s higher PTALs and to take advantage of Old Park Royal’s proximity to Old Oak. Delivering this intensification within site allocations and other sites could equate to 1,600 new jobs and growth opportunities across with a range of sectors in Old Park Royal although this figure is highly indicative and is dependent on site specific constraints. <u>The Chase Road site is identified as an existing waste site in the West London Waste Plan 2016 (see Policy EU6) so the policy also supports the safeguarding and protection of this site in accordance with the West London Waste Plan. If the site were redeveloped for a non-waste use then compensatory provision would need to be made in line with the London Plan Policy SI9, WLWP and Local Plan Policy EU6.</u></p>		
P6	<p>Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:</p> <p>Land uses</p> <p>a) Supporting the delivery of a thriving mixed use neighbourhood centre by contributing to the delivery of 1,400 new jobs and a minimum of <del>650</del> <u>800</u> new homes to support OPDC’s 0-10 year housing supply;</p> <p>b) Delivering and maintaining a quantum and mix of <del>A-class</del> <u>town centre</u> floorspace <u>with ground floor active frontages that are appropriately designed and serviced to support the town centre</u>, including smaller units, to meet anticipated future demand in the most up to date Retail and Leisure Needs Study;</p> <p>c) Supporting a co-ordinated approach to optimising the Central Middlesex Hospital (CMH) site as a health and care hub by delivering new healthcare and uses related to the hospital function;</p> <p>d) Ensuring a comprehensive and co-ordinated approach is taken to the development of the ASDA site to support the delivery of retail led mixed use development that:</p> <p>i. delivers a mix of town centre use floorspace, including small <del>A-class</del> units, as ground floor active frontages facing onto Park Royal Road and Coronation Road;</p> <p>ii. delivers residential uses above ground floor frontages; and</p>	<p>The proposed modifications result in no change to the conclusions of the IIA, as the policy still seeks to deliver strategic level improvements that score positively against the IIA objectives.</p>	<p>No</p>



Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>iii. delivers new intensified industrial uses as active and/or positive frontages fronting onto Western Road and Coronation Road.</p> <p>e) <del>Delivering social infrastructure appropriate to Diversifying the services, amenities, D-class and other appropriate town centre uses within the Neighbourhood Centre</del> and to supporting new and existing industrial, health and residential uses;</p> <p>Public realm and movement</p> <p>f) Contributing to and/or enabling the delivery of high quality public realm, healthy streets and new or improved connections to surrounding areas shown in figure 4.19, particularly through the CMH and ASDA sites;</p> <p>g) Delivering more continuous, active and/or positive and legible frontages along the key routes with well defined building lines, particularly within the ASDA site fronting onto Park Royal Road;</p> <p>h) Contributing to and/or enabling delivery of new and improved cycling routes, to create:</p> <p>i. continuous <del>two-way</del> cycle lanes in both directions, particularly <del>on</del> along Coronation Road, Park Royal Road, Abbey Road and Acton Lane; and</p> <p>ii. an alternative east-west cycle route linking Park Royal station via Park Royal Centre to the Grand Union Canal and Old Oak.</p> <p>i) Contributing to, enabling and/or delivering the rationalisation of bus movements around Park Royal Centre, in particular within the CMH site, and enhanced bus infrastructure to support existing and planned bus services between Park Royal, Old Oak and other key destinations;</p> <p>j) Minimising and, where feasible removing on-street car parking, particularly along Coronation Road, Park Royal Road, Abbey Road and Acton Lane;</p> <p>k) Contributing to, enabling and/or delivering <del>a major realignment of the</del> <u>improvements to Coronation Road/Park Royal Road/Abbey Road /Acton Lane junction that remove through traffic and improve their function for local business related freight, public transport, walking and cycling.</u></p> <p>Green Infrastructure and the environment</p> <p>l) Delivering high quality multifunctional publicly accessible open spaces;</p> <p>i. within the Central Middlesex Hospital site; and</p>		

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>ii. <del>within the ASDA site and in associated with the realignment of the Coronation Road/Park Royal Road / Abbey Road / Acton Lane Junction.</del> Heritage and character</p> <p>m) Strengthening local identity and character by ensuring local character is informed by the area’s existing heritage, including the significance of the hospital and industrial related heritage.</p> <p>Building heights</p> <p>n) Contributing to a variety of building heights including a single tall building at the north-eastern corner of the ASDA site to support local legibility <del>and where this facilitates the delivery of the realigned road junction.</del></p>		
P7	<p>Development and phasing</p> <p>a) Working positively with stakeholders to mitigate the impacts of HS2 construction facilities and associated traffic;</p> <p>b) Supporting the use of Acton Wells to facilitate High Speed 2 construction activities as secured by the HS2 London – West Midlands Act (2017);</p> <p>Land uses</p> <p>c) Supporting the delivery of mixed use high density residential and student accommodation by:</p> <p>i. contributing to the delivery of <del>4,600</del> <u>6,200</u> new jobs and a minimum of <del>6,000</del> <u>8,000</u> new homes, including early delivery of a minimum of <del>3,200</del> <u>5,250</u> new homes to support OPDC’s 0-10 year housing supply;</p> <p>ii. delivering appropriate levels of student accommodation in accordance with policy H10; and</p> <p>iii. locating non-residential uses on the ground floor fronting onto the busy streets of Victoria Road, Wales Farm Road, the A4000, School Road and the A40;</p> <p>d) Focusing town centre, employment, <del>social infrastructure community,</del> <u>and Use Class E uses that are appropriately designed and serviced to support the cultural and catalyst uses within North Acton Neighbourhood Town Centre <u>within the town centre</u> and along Old Oak Street;</u></p>	No change to IIA score but minor wording change to the assessment of P7 to reflect the modification.	Yes – Minor amendments made to IIA Objectives 1 and 15.

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>e) Encouraging the activation of the area by working with stakeholders to deliver a range of meanwhile uses across:</p> <ul style="list-style-type: none"> <li>i. North Acton including around the southern station square and along Portal Way; and</li> <li>ii. Acton Wells including along School Road.</li> </ul> <p>Public realm and movement</p> <p>f) Contributing to and/or enabling delivery of a permeable, inclusive and accessible street network with new connections to surrounding areas as shown in figure 4.21 <u>including Old Oak Street as an all modes route west of the proposed potential Old Oak Common Lane Station;</u></p> <p>g) Contributing to and/or enabling improvements to Victoria Road and Wales Farm Road as key movement routes for walking, cycling, buses and vehicular traffic during construction and operation phases;</p> <p>h) Contributing to and/or enabling the delivery of a network of new and enhanced streets with a walking and cycling focus:</p> <ul style="list-style-type: none"> <li>i. along Portal Way;</li> <li>ii. along Old Oak Street to Old Oak South;</li> <li>iii. along Jenner Avenue; and</li> <li>iv. through North Acton Station to School Road and Victoria Road.</li> </ul> <p>Green infrastructure and the environment</p> <p>i) Contributing to and / or delivering high quality well-connected publicly accessible open spaces across North Acton and Acton Wells. This should include:</p> <ul style="list-style-type: none"> <li>i. North Acton Station Squares;</li> <li>ii. School Road Square;</li> <li>iii. Victoria Gardens;</li> <li>iv. connected open spaces along Portal Way;</li> <li>v. Old Oak Common Lane Overground Station Square;</li> <li>vi. Acton Wells Square;</li> </ul>		

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>vii. green infrastructure along Victoria Road, Wales Farm Road, Chase Road, Old Oak Street and new streets; and</p> <p>viii. sensitive enhancements to Acton Cemetery.</p> <p>j) Contributing to and/or delivering mitigation measures that help support OPDC, the London Borough of Ealing and where relevant TfL, to address air quality issues in the Local Air Quality Focus Areas along the A40, Wales Farm Road and Victoria Road;</p> <p>Heritage and context</p> <p>k) Strengthening local identity and character by:</p> <p>i. conserving and enhancing the Castle Public House, other heritage assets and their settings; and</p> <p>ii. ensuring the future local character of buildings and the public realm is informed by the positive elements of the area’s industrial and railway heritage.</p> <p>Building heights</p> <p>l) Contributing to a variety of building heights that includes:</p> <p>i. tall buildings across North Acton <u>and Acton Wells</u> in appropriate locations in accordance with policies SP9, D5 and figure 3.15 that do not result in an overbearing wall of development;</p> <p>ii. within Acton Wells East, generally 10 to 12 storeys along Victoria Road <u>north of Old Oak Street</u>;</p> <p>iii. increased heights and massing adjacent to the A40 and railway lines; and</p> <p>iv. generally lower heights adjacent to sensitive locations including Acton Cemetery, existing residential neighbourhoods at Wells House Road, Midland Terrace and along Jenner Avenue.</p> <p>Infrastructure</p> <p>m) <u>Safeguarding for and if relevant and appropriate, contribute to and / or deliver the potential Old Oak Common Lane Station and land for the delivery of the West London Orbital Line station and services within Acton Wells; and</u></p> <p>n) Providing on-site heating systems <del>and</del>.</p> <p><del>n</del>)o) <u>Safeguarding Quattro site in accordance with the West London Waste Plan.</u></p>		

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
P8	<p>VISION</p> <p>Old Oak Lane and Old Oak Common Lane will be a place that sensitively integrates transport routes, existing neighbourhoods and new development. It will be a place that mediates between <del>the comprehensive mixed use redevelopment of Old Oak and the industrial intensification in Park Royal and Channel Gate.</del></p> <p>POLICY</p> <p>Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:</p> <p>Land uses</p> <p>a) Supporting the delivery of a vibrant mixed use place by:</p> <p>i. contributing to the delivery of <del>4,600</del> <u>1,700</u> new jobs and a minimum of <del>2,800</del> <u>2,750</u> new homes over the plan period including early delivery of a minimum of 1,200 homes to contribute to OPDC's 0-10 year housing supply; and</p> <p>ii. delivering ground floor town centre uses within <del>Atlas Junction neighbourhood town centre</del> <u>Old Oak major town centre</u>.</p> <p><del>b) Supporting the functioning of SIL while delivering active and positive frontages on sites facing onto Victoria Road and Old Oak Lane;</del></p> <p>e)b) Supporting the functioning of the Willesden Junction Bus Depot site as SIL by:</p> <p>i. retaining the bus depot use unless it is no longer demonstrated to be required or a suitable alternative location is agreed with Transport for London; and</p> <p>ii. providing broad industrial type activities with active frontages facing on to Station Road and positive frontages on to Harley Road;</p> <p><del>d)c) Supporting the delivery of a mixed used neighbourhood within the Westway Estate and adjacent sites facing on to Wormwood Scrubs by:</del></p> <p>i. delivering a mix of housing and compatible <del>employment</del> <u>industrial and/or town centre</u> floorspace, including space for small businesses, to make use of the close proximity to Old Oak Common Station in accordance with policy E2; and</p> <p>ii. delivering <del>employment</del> <u>town centre uses, social infrastructure</u> and/or community <del>uses</del> facilities on the ground floor with residential above directly facing Wormwood Scrubs.</p> <p>Public realm and movement</p>	<p>No change to IIA score but minor wording change to the assessment of P8 to acknowledge the key changes outlined below:</p> <ul style="list-style-type: none"> <li>• Jobs – increase – 1600 from 1700</li> <li>• Homes – decrease – 2,750 from 2,800</li> <li>• Connections – Removal of Union Way connection to Old Oak North and replacement with walking and cycling route to Grand Union Canal towpath</li> <li>• Building heights – Removal of potential for a tall building at the former canal crossing point of Union Way.</li> </ul>	<p>Yes – Minor amendment to appraisal of IIA Objective 1.</p>

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>e)d) Contributing to and /or enabling improvements to existing routes and junctions and delivery of new routes as shown in figure 4.27;</p> <p>f)e) Ensuring new and improved routes can accommodate walking, cycling, bus and other vehicular traffic during the construction and operational phases by:</p> <ul style="list-style-type: none"> <li>i. delivering improvements to underpasses;</li> <li>ii. delivering segregated cycle lanes along Victoria Road, Old Oak Common Lane, <del>Union Way Park Road</del> and where possible on Old Oak Lane; and</li> <li>iii. widening Old Oak Common Lane to include generous footpaths and segregated cycle lanes.</li> </ul> <p>Green infrastructure and the environment</p> <p>g)f) Delivering a high quality, well-connected, network of multifunctional publicly accessible open spaces. This should include contributing towards and/or the delivery of:</p> <ul style="list-style-type: none"> <li>i. enhancements to Cerebos Gardens and Midland Terrace child play space;</li> <li>ii. enhancements to and expansion of Old Oak Community Gardens within the Island Triangle;</li> <li>iii. Brunel Gardens within the Westway Estate;</li> <li>iv. new and improved spaces within <del>Atlas Junction neighbourhood</del> <u>Old Oak major town centre</u>; and</li> <li>v. green infrastructure and linear spaces along Old Oak Lane, Old Oak Common Lane, Victoria Road.</li> </ul> <p>h)g) Support amenity and health and well-being by:</p> <ul style="list-style-type: none"> <li>i. ensuring development mitigates the impacts of noise and air pollution generated by the Old Oak Sidings waste facility, SIL uses within the Willesden Junction Bus Garage site and construction activities including associated vehicle movement; and</li> <li>ii. contributing to and/or delivering measures that help support OPDC, the local authorities and, where relevant TfL, to address air quality issues in the Local Air Quality Focus Areas along Victoria Road and Old Oak Lane, including street greening.</li> </ul>		
P8C1	<p>VISION</p> <p><del>This neighbourhood town centre</del> <u>As part of Old Oak Major Town Centre, Atlas Junction will provide local services for communities centred on an improved Atlas Junction and Union</u></p>	The proposed modifications result in no change to the	No

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p><del>Way Park Road that provides a key route into Old Oak.</del> Active uses will sit beside high quality canalside spaces helping to establish this stretch of the canal as a place to visit and enjoy.</p> <p>POLICY</p> <p>Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:</p> <p>Land uses</p> <p>a) Supporting the delivery of <del>the neighbourhood</del> <u>this portion of the Old Oak major town centre by clustering active town centre and employment Use Class E uses, that are appropriately designed and serviced to support the town centre,</u> along existing streets and new routes shown in figure 4.30 <del>outside of SIL on ground and lower floors with residential above;</del></p> <p>b) <del>Supporting the functioning of SIL by delivering high density high quality SIL compliant broad industrial type activities with active frontages at the Rowan House site on the western corner of Atlas Junction;</del></p> <p>e)b) Supporting the activation of the canal and canalside spaces by delivering and/or enabling:</p> <p>i. <del>leisure, eating and drinking</del> <u>Use Class E uses, that deliver high levels of activation</u> fronting on to the Grand Union Canal;</p> <p>ii. new residential, leisure and visitor moorings adjacent to The Collective, Willesden Junction Maintenance Depot, triangle site and Oaklands North; and</p> <p>iii. meanwhile uses within the neighbourhood town centre and Oaklands North.</p> <p>Public realm and movement</p> <p>c) Delivering a high quality public realm by contributing to and/or delivering:</p> <p>i. <del>Union Way as an important all modes access route providing walking and cycling access to the Grand Union Canal towpath which is access only for private vehicles</del> <u>Park Road;</u> and</p> <p>ii. public realm improvements and high quality footpaths, segregated cycle lanes and street level crossings along Victoria Road, Old Oak Lane, Old Oak Common Lane and Atlas Road.</p>	<p>conclusions of the IIA. The change in town centres has been considered as part of the Strategic Policies Assessment.</p>	

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>d) Delivering a high quality walking and cycling route to the canal from Old Oak Lane that mediates level changes.</p> <p>Green infrastructure and the environment</p> <p>e) Supporting health and well-being and resilience to climate change by delivering and/or contributing to new high quality publicly accessible canalside open spaces:</p> <ul style="list-style-type: none"> <li>i. as part of the Willesden Junction Maintenance Depot site;</li> <li>ii. within the triangle site;</li> <li>iii. as part of Oaklands North; and</li> <li>iv. on the north of the canal.</li> </ul> <p>Heritage and design</p> <p>f) Conserving and enhancing local character by:</p> <ul style="list-style-type: none"> <li>i. ensuring wider railway heritage is used to inform the character of new development; and</li> <li>ii. supporting views along the railway at Old Oak Common Lane bridge and along the canal at Old Oak Lane bridge.</li> </ul> <p>Building heights</p> <p>g) Contributing to a variety of building heights including:</p> <ul style="list-style-type: none"> <li>i. on the eastern side of Old Oak Lane, building heights should be taller close to the canal, comparable to the existing height of The Collective, and should decrease in height to respond appropriately to the existing Victoria Terrace;</li> <li>ii. on Oaklands North, generally 6 to 8 storeys facing on to the Grand Union Canal, with generally 10 storeys along Union Way Park Road with an opportunity for a tall building onto Union Way Park Road that defines its role as a key north-south route and canal crossing point; and</li> <li>iii. at Rowan House on the western corner of Atlas Junction, heights of generally 8 to 10 storeys.</li> </ul>		
P9	<u>VISION</u>	Policy P9 has been completely replaced and therefore requires reassessment.	Yes – New policy has been reassessed



Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p><u>Channel Gate will be a high quality residential led neighbourhood centred on the Grand Union Canal. A new Local Park, town centre and community uses and linkages with the adjacent existing neighbourhoods will ensure that Channel Gate is a vibrant new place.</u></p> <p><u>POLICY</u></p> <p><u>Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant the following:</u></p> <p><u>Development and Phasing</u></p> <p><u>a) Supporting the use of the area to facilitate High Speed 2 construction activities as secured by the High Speed London – West Midlands Act (2017):</u></p> <p><u>b) Supporting the early delivery of development on lands not required to facilitate High Speed 2 construction activities.</u></p> <p><u>Land Uses</u></p> <p><u>c) Supporting the creation of a thriving, residential led mixed use neighbourhood that contributes to the delivery of a minimum of 3,100 new homes and 600 new jobs during the plan period.</u></p> <p><u>d) Contributing to the delivery of the Old Oak major town centre by delivering vibrant town centre uses, appropriately designed and serviced to support the town centre, at Atlas Junction, Channel Gate Street and along the Grand Union Canal;</u></p> <p><u>e) Contributing to the activation of this place and creation of a Cultural Quarter, delivering cultural and catalyst uses.</u></p> <p><u>f) Supporting the local economy by delivering a range of employment workspaces across Channel Gate, including:</u></p> <p><u>a. within the Old Oak major town centre;</u></p> <p><u>b. along Victoria Road;</u></p> <p><u>c. in areas of transition between primarily residential character and primarily industrial character;</u></p> <p><u>g) Supporting the retention or potential relocation/reincorporation of the Willesden Freight Terminal and Park Royal Bus Depot.</u></p>	<p>Key modifications include:</p> <ul style="list-style-type: none"> <li>• Vision – Residential led canalside area with portion of the major town centre and new Local Park</li> <li>• Homes – increase – 3,100 from 0</li> <li>• Jobs – decrease – 600 from 7600</li> <li>• Connections – Relocation of canal bridge closer to town centre activities</li> <li>• Environment / Open spaces – New Local Park and smaller open spaces</li> <li>• Social Infrastructure – requirements transferred to Channel Gate</li> <li>• Building heights – policy sets out a range of heights</li> </ul>	<p>including amendments to text of IIA Objectives 1, 2, 5, 6, 7, 15, 17 and 18.</p>

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p><u>h) Ensuring that industrial uses deliver an appropriate level of amenity for residential neighbourhoods and activate the public realm by delivering appropriate uses, positive, and where possible, active frontages at ground and lower floors and high quality façade design:</u></p> <ul style="list-style-type: none"> <li><u>i. adjacent to residential led development and existing residential neighbourhoods;</u></li> <li><u>ii. facing the Grand Union Canal; and</u></li> <li><u>iii. along existing and enhanced key routes and pedestrian and cycle routes.</u></li> </ul> <p><u>Public realm and movement</u></p> <ul style="list-style-type: none"> <li><u>i) Contributing to, and enabling, the delivery of a high quality, legible, permeable, inclusive and accessible street network by:</u></li> <li><u>i. contributing to, and enabling, the delivery of the new street network shown in figure 4.9A;</u></li> <li><u>ii. delivering new and improved walking and cycling routes throughout Channel Gate, including new accesses to Old Oak Lane and Victoria Road;</u></li> <li><u>iii. ensuring permeability through the site along Channel Gate Street for all transport modes, including for double decker buses;</u></li> <li><u>iv. safeguarding for and if relevant and appropriate, contributing to and / or delivering potential future connections to Park Royal in the west, and to Old Oak Lane in the north; and</u></li> <li><u>v. retaining existing and /or providing sufficient alternative access capacity to the Willesden Freight Terminal and Park Royal Bus Depot; and</u></li> <li><u>vi. supporting opportunities for freight consolidation;</u></li> </ul> <p><u>Green infrastructure and the environment</u></p> <ul style="list-style-type: none"> <li><u>j) Contributing to and/or delivering an integrated network of high quality, multi-functional publicly accessible open spaces and green infrastructure across Channel Gate. This should include:</u></li> <li><u>a. Channel Gate Local Park of a minimum 2 hectares in size;</u></li> <li><u>b. supporting the amenity of existing residential communities by delivering and /or contributing to the expansion and enhancement of Old Oak Community Gardens, and other spaces adjacent to the Island Triangle area;</u></li> </ul>	<p>dependent on location.</p>	

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>c. <u>delivering other new areas of publicly accessible open space across Channel Gate, including new canalside spaces, and spaces to support new community uses.</u></p> <p>k) <u>Locating sensitive uses away from pollution sources and mitigating the impacts of noise and air pollution generated by rail and road transport or other industrial activities;</u></p> <p>l) <u>Supporting and/or enabling opportunities for heat recovery from adjacent industrial activities that could contribute to a decentralised energy network within Channel Gate and the wider area.</u></p> <p><u>Heritage and character</u></p> <p>m) <u>Strengthening local identity and character by conserving and enhancing the Grand Union Canal Conservation Area, the adjacent Old Oak Lane Conservation Area and their settings.</u></p> <p>n) <u>Ensuring future local character is informed by the areas existing heritage, including the Grand Union Canal and the industrial heritage of the area.</u></p> <p><u>Building heights</u></p> <p>o) <u>Contributing to a variety of building heights across Channel Gate that respond to sensitive locations and optimise development capacity by delivering:</u></p> <p>i. <u>generally, 6 to 10 storeys along Victoria Road;</u></p> <p>ii. <u>generally, 6 to 8 storeys fronting the Grand Union Canal;</u></p> <p>iii. <u>lower heights and appropriate massing adjacent to the Island Triangle;</u></p> <p>iv. <u>increased heights and massing adjacent to rail lines and freight activity to mitigate impact on residential amenity;</u></p> <p>v. <u>tall buildings at appropriate locations throughout Channel Gate in accordance with Policies SP9 and D5; and</u></p> <p>vi. <u>heights appropriate to support intensified industrial uses on the Willesden Junction Depot.</u></p>		
P10	<p>VISION</p> <p>Scrubs Lane will be a characterful and well connected <del>street linear</del> <u>neighbourhood</u> sitting as a hinge between <u>surrounding areas</u> east and west helping to integrate Old Oak with <del>surrounding areas</del>. Development will continue its employment heritage and will integrate space for living, creating and working.</p>	The proposed modifications result in no change to the conclusions of the IIA.	No

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	<p>POLICY</p> <p>Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:</p> <p>Land Uses</p> <p>a) Supporting the delivery of a range of residential-led mixed use development along Scrubs Lane by contributing to the delivery of <del>4,200</del> <u>1,100</u> new jobs and a minimum of <del>2,600</del> <u>3,500</u> new homes including <del>4,950</del> <u>2,450</u> new homes within the first 0-10 years;</p> <p>b) <u>Delivering a range of 'walk to' town centre uses focussed within the identified five clusters, providing local services for people living and working in the Scrubs Lane Place;</u></p> <p>b)c) Supporting the local economy and strengthening local identity by delivering high quality ground and lower floor employment floorspace on sites fronting Scrubs Lane and existing or proposed yard spaces, consisting of <u>appropriately designed and serviced</u> small business units for <del>B4a, B4c,</del> <u>Use Classes E</u>, B2 and B8 uses along its length;</p> <p>e)d) Supporting residential amenity by locating housing:</p> <p>a. above the ground and lower floors onto Scrubs Lane and railway lines;</p> <p>b. at the ground floor away from Scrubs Lane where appropriate; <del>and</del></p> <p>e. <del>in a residential-led area south of the canal to the east of Scrubs Lane.</del></p> <p>Infrastructure</p> <p><del>Contributing to and/or enabling the delivery of an energy centre along Scrubs Lane;</del></p> <p>Public realm and movement</p> <p>e)e) Contributing to and/or enabling the delivery of improved connectivity by:</p> <p>a. supporting Scrubs Lane's role as a connector route;</p> <p>b. contributing to the delivery of a new continuous generous 5 metre wide footpath along the west of Scrubs Lane;</p> <p>c. contributing to the delivery of high quality segregated cycle lanes with associated junction requirements;</p> <p>d. contributing to the delivery of an improved footpath, with widening where possible, along the east of Scrubs Lane;</p>	<p>The additional tall building should provide benefits to IIA objectives 1, 2 and 3, which already score significantly positive in the assessment for this policy. There is uncertainty over whether the tall building would affect IIA objective 12 (historic environment), and this would be down to the specific design adopted at the project stage.</p> <p>Similarly, the policy already scores significantly positively against minimising the need to travel (IIA objective 4) and place making (IIA objective 1). Therefore, while the delivery of town centre uses might enhance this, the scoring would not change.</p>	

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>e. improving existing, <u>safeguarding for</u> and creating new east–west routes at each cluster and along Wormwood Scrubs Street that provide access to Old Oak North, Old Oak South, the Grand Union Canal, St. Mary’s Cemetery and Kensal Canalside Opportunity Area;</p> <p>f. contributing to delivering new walking and cycling connections to Wormwood Scrubs and Little Wormwood Scrubs; and</p> <p>g. working positively with stakeholders to deliver new connections over and/or under railways and the Grand Union Canal.</p> <p>Green infrastructure and the environment</p> <p>e)f) Delivering a high quality, well-connected, network of multifunctional open spaces. This should include:</p> <p>a. contributing to and/or delivering new publicly accessible open spaces and public realm improvements at each cluster;</p> <p>b. high quality green infrastructure, including street greening, along the length of Scrubs Lane;</p> <p>e. <del>new publicly accessible open space adjacent to Little Wormwood Scrubs; and</del></p> <p>d.c. yards as open spaces <del>to the north of the canal</del> <u>along Scrubs Lane</u> to support employment uses and as communal or private open spaces for housing.</p> <p>Heritage and character</p> <p>f)g) Strengthening local identity and character by</p> <p>a. conserving and enhancing the St. Mary’s Cemetery, Grand Union Canal and Cumberland Park Factory conservation areas, and Kensal Green Cemetery Grade I Listed Historic Park and Garden and their settings; and</p> <p>b. ensuring future local character is informed by the area’s existing heritage including the cemeteries, railways, Grand Union Canal and industrial heritage.</p> <p>Building heights</p> <p>g)h) Contributing to a variety of building heights which respond to public transport access and sensitive locations by delivering:</p> <p>a. north of the Grand Union Canal, generally 6-8 storey heights onto Scrubs Lane and the Grand Union Canal and 6-10 storey heights onto Harrow Road;</p>		

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	<p>b. south of the Grand Union Canal, generally 6-10 storey heights onto Scrubs Lane with lower heights adjacent to Little Wormwood Scrubs;</p> <p>c. generally lower heights opposite the Cumberland Park Factory Conservation Area;</p> <p>d. increased heights adjacent to the railway; <del>and</del></p> <p>e. <u>within clusters, a variety of building heights including generally a single tall building in each cluster;</u> and.</p> <p>e.f. <u>visual permeability between tall buildings.</u></p>		
<p>P10 – supporting text</p>	<p><u>4.166 Cargiant own and operate 18 hectares of adjoining land in Old Oak North as a contiguous car plant employing directly and indirectly over 2,000 people. Cargiant's operational land includes properties located on Scrubs Lane. Therefore, it is appropriate that the sites owned and occupied by the Cargiant operation in Scrubs Lane will be safeguarded from other uses whilst those sites are used in conjunction with the main Cargiant operations on Hythe Road and Salter Street. Equally, development proposals to support the intensified operational use of these sites will be supported.</u></p>	<p>The proposed modifications result in no change to the conclusions of the IIA as the policy already scores major positive against IIA Objective 18.</p>	<p>Yes – IIA assessment text for Objective 18 as been amended as a result of this modification as it supports existing local business.</p>
<p>P10C1</p>	<p>Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:</p> <p>Land uses</p> <p>a) Supporting the delivery of a community and employment focused cluster by:</p> <p>i. <u>clustering active employment Use Class E, B2 and B8 uses and community uses along Harrow Road and Ellisland Way;</u></p> <p>ii. delivering residential uses above the ground floor adjacent to the railway, Scrubs Lane and Harrow Road; and</p> <p>iii. re-providing the floorspace of a church use and associated community use at 2 Scrubs Lane on site including new fitted out building space at community use rent levels.</p> <p>Public realm and movement</p>	<p>The proposed modifications result in no change to the conclusions of the IIA as the policy refers to use classes making it more specific than just 'employment' as previously reference by the policy but the principle that has been appraised remains the same.</p>	<p>Yes – updates to IIA assessment text against IIA Objective 4.</p>

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	<p>b) Supporting local connectivity by delivering Ellisland Way as a new walking and cycling route <u>and safeguarding for a long-term providing a new route to the new connection to Willesden Junction Station;</u></p> <p>c) Supporting activation of the public realm by creating a well-defined active frontage onto Scrubs Lane, Harrow Road and Ellisland Way;</p> <p>d) Contributing to the improvement of public realm on Harrow Road to support access to Harlesden town centre.</p> <p>Green infrastructure and the environment</p> <p>e) Supporting health and well-being and resilience to climate change by delivering new publicly accessible open space on Ellisland Way;</p> <p>f)e) adjacent to 2 Scrubs Lane; and</p> <p>i. <del>at the entrance to Old Oak Street if demonstrated to be feasible.</del></p>		
P10C2	<p>VISION</p> <p><u>A residential led cluster with employment and town centre uses centred on Laundry Lane as a publicly accessible open space / potential new route into Old Oak North and to the east enhanced connections to St Mary's Cemetery.</u></p> <p>POLICY</p> <p>Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:</p> <p>Land uses</p> <p>a) Supporting the delivery of a mixed use cluster by:</p> <p>i. focusing employment and town centre uses at ground and lower floor levels; and</p> <p>ii. delivering residential uses above employment and town centre uses where appropriate standards of amenity can be provided.</p> <p>Public realm and movement</p> <p>b) Supporting local connectivity by:</p> <p>i. <u>safeguarding for and if relevant and appropriate, contributing to and / or delivering Laundry Lane access road and bridge delivering Park Road, connecting Old Oak South</u></p>	No change to IIA score but minor wording change to the assessment of P10C2 as a result of the modification.	Yes - Minor amendment to IIA Objective 4

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p><del>North to Scrubs Lane, as a high quality <u>all modes vehicular route</u> as a priority, or a walking and cycling connection if this is demonstrated not to be feasible;</del></p> <p><del>ii. subject to Park Road being an all modes route, supporting the potential to deliver a vehicular access route from Park Road to the Haul Road, to serve the Old Oak Sidings Waste site and European Metal Recycling site, whilst operational;</del></p> <p>ii. delivering a high quality crossing across Scrubs Lane and safeguarding land to deliver improved access into St. Mary’s Cemetery; and</p> <p>iii. delivering active frontages along <del>Park Road</del> <u>Laundry Lane</u> and the western side of Scrubs Lane.</p> <p>Green infrastructure and the environment</p> <p>c) Supporting health and well-being and resilience to climate change by contributing <u>to and / or delivering:</u></p> <p>i. <u>Laundry Lane as a publicly accessible open space in advance of the potential delivery of Laundry Lane as a new route to Old Oak; and</u></p> <p><del>i. a towards publicly accessible open space at the junction of Scrubs Lane and Union WayPark RoadLaundry Lane, that:</del></p> <p><del>ii. addresses level changes in its design; and</del></p> <p><del>iii. mitigates impacts of noise and air quality pollution generated by Union WayPark RoadLaundry Lane and Scrubs Lane.</del></p> <p>Heritage and character</p> <p>d) Enhancing local character by:</p> <p>i. delivering views along the railway from the Laundry <u>Lane</u> Bridge; and</p> <p>ii. conserving and enhancing the heritage significance of 26-30 Scrubs Lane and existing ghost signage in accordance with Policy D8.</p> <p>Building heights</p> <p>e) Contributing to a variety of building heights including locating a single tall building on the northern side of <del>Park Road</del> <u>Laundry Lane</u> to support local legibility.</p>		
P10C3	Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:	The proposed modifications result in	No



Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>Land uses</p> <p>Supporting the delivery of a retail, leisure, employment and community focused cluster by :</p> <p>a) clustering <u>these</u> active uses at the junction of Hythe Road, Scrubs Lane and any other access routes required into Old Oak North; and</p> <p><del>i. delivering a range of active meanwhile uses that complement the activation of the Rolls Royce Building during the early phases of development.</del></p> <p>Public realm and movement</p> <p>c)b) Supporting local connectivity by:</p> <p>i. enhancing Hythe Road as an all modes key route, with significant enhancements to the walking and cycling environment; <del>into Old Oak North that is successfully integrated with the Rolls Royce Building, adjacent railway structures and associated spaces;</del></p> <p>ii. providing a crossing across Scrubs Lane to deliver a new walking and cycling route and supporting a future access point into St. Mary’s Cemetery from Hythe Road;</p> <p><del>iii. supporting another access into Old Oak North, if required. Applicants should engage early with OPDC to understand if this is necessary and the transport functions to be provided; and</del></p> <p>iii. in the long term, support the potential relocation of the vehicular access to Old Oak Sidings and, if operational, EMR sites in accordance with Policy P10G2Bii, to release the existing route for publicly accessible open space and/or yard space.</p> <p>Green infrastructure and the environment</p> <p>c) Supporting health and well-being and resilience to climate change by delivering new publicly accessible open space at the new access point into St. Mary’s Cemetery;</p> <p>Heritage and character</p> <p>d) Enhancing local character by conserving and enhancing the heritage of the railway infrastructure and associated spaces;</p> <p>Building heights</p> <p>e) Contributing to a variety of building heights including <del>locating a single</del> <u>two</u> tall buildings at the <del>south western corner</del> of the Scrubs Lane and Hythe Road junction.</p>	<p>no change to the conclusions of the IIA.</p> <p>The additional tall building should provide benefits to IIA objectives 1, 2 and 3, which already score positively in the assessment for this policy. There is uncertainty over whether the tall building would affect IIA objective 12 (historic environment), and this would be down to the specific design adopted at the project stage.</p>	

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
P10C5	<p><u>VISION</u></p> <p><u>A residential-led neighbourhood centred on Wormwood Scrubs Street.</u></p> <p><u>POLICY</u></p> <p><u>Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:</u></p> <p><u>Land uses</u></p> <p>a) <u>Supporting the delivery of a mixed use cluster by:</u></p> <p>i. <u>Focusing Use Class E uses, that are appropriately designed and serviced for small business units small scale walk to town centre uses at ground floor levels; and;</u></p> <p>ii. <u>delivering residential uses above employment and town centre uses;</u></p> <p><u>Public realm and movement</u></p> <p>a) <u>Supporting local connectivity by:</u></p> <p>i. <u>contributing to and / or delivering Wormwood Scrubs Street;</u></p> <p>ii. <u>contributing to and / or delivering a new walking and cycling route from Wormwood Scrubs Street to Scrubs Lane;</u></p> <p>iii. <u>Safeguarding land for the longer-term delivery of the western portion of Wormwood Scrubs Street;</u></p> <p>iv. <u>Safeguarding land for the longer-term delivery of an all modes connection from Mitre Way to Scrubs Lane;</u></p> <p>v. <u>delivering new streets including walking and cycling routes to Little Wormwood Scrubs;</u></p> <p>vi. <u>locating active frontages on Scrubs Lane, Wormwood Scrubs Street and Mitre Way.</u></p> <p><u>Green infrastructure and the environment</u></p> <p>b) <u>Supporting health and well-being and resilience to climate change by contributing to the delivery of a new publicly accessible open space in the east of the cluster to support walking and cycling access from Scrubs Lane to Wormwood Scrubs Street;</u></p> <p><u>Heritage and character</u></p> <p>c) <u>Enhancing local character by:</u></p>	<p>Policy P10C5 is a new cluster policy for the residential led area focused on the new Wormwood Scrubs Street and therefore requires assessment.</p>	<p>Yes – Policy has been assessed</p>

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>a. <del>delivering views from Scrubs Lane along Wormwood Scrubs Street;</del></p> <p>b. <del>positively responding to the Historic Scrubland and Open Space heritage theme;</del></p> <p><u>Building heights</u></p> <p>d) <u>Contributing to a variety of building heights including locating a single tall building on the North Pole East Depot at the junction of Mitre Way and Wormwood Scrubs Street;</u></p>		
P11	<p>POLICY</p> <p>Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:</p> <p>Land uses</p> <p>a) Supporting earlier delivery of new homes and jobs within the plan period including by:</p> <p>i. <del>optimising development on and/or adjacent to the station and tracks;</del></p> <p>ii. <del>supporting the long term redevelopment of the Willesden Train Maintenance Depot provided an appropriate solution for the relocation, reconfiguration and/or development can be agreed; and</del></p> <p>iii. <del>supporting development on the western side of Willesden Junction station that contributes to a coordinated delivery of Willesden Junction Station upgrades and, the enhancement of Station Approach and delivery of Old Oak Street.</del></p> <p>b) <del>Delivering a range of high quality B1 workspaces and employment and/or town centre uses across Willesden Junction where residential uses are less appropriate;</del></p> <p>c) <del>Encouraging activation of the area by delivering a range of meanwhile uses with active and/or positive frontages on ground floors, particularly along Station Approach, Old Oak Street, the connection to Harrow Road and around Willesden Junction Station.</del></p> <p>Public realm and movement</p> <p>d) <del>Ensuring station upgrades are delivered in a phased and co-ordinated manner to best facilitate a comprehensive station redevelopment;</del></p> <p>e) <del>Contributing to and/or delivering a permeable, inclusive and accessible movement network as shown in figure 4.44 including Old Oak Street as a walking and cycling route north of Park Road to Willesden Junction Station;</del></p>	<p>The proposed modifications result in no change to the conclusions of the IIA. The strategic nature of the IIA means that although the new Old Oak Street has been removed, this specific effect does not counteract the overall improvement in connectivity and place making scored within the IIA.</p>	No

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>Green infrastructure and environment</p> <p>f) Delivering a high quality, well-connected, network of multifunctional publicly accessible open spaces, including:</p> <p>g) <del>Willesden Junction Station Square; and</del>                      embedding green infrastructure along <del>Old Oak Street</del>, Station Approach and within other streets.</p>		
Design	<p><del>POLICY D1</del> <u>Principles for</u> securing high quality design</p> <p>OPDC will support development proposals where they have been subject to a high quality and comprehensive design process resulting in high quality design outcomes. To deliver this <u>the following design principles have been developed to help guide development.:</u></p> <ol style="list-style-type: none"> <li>1. For all development proposals, they should, where relevant and appropriate:                             <ol style="list-style-type: none"> <li>i. commit to using mechanisms to secure delivery of design quality, as defined in submission documents, where these elements are not approved on the grant of planning permission;</li> <li>ii. make use of the OPDC Place Review Group and OPDC Community Review Group; and</li> <li>iii. engage positively and proactively with OPDC and relevant statutory consultees as early as possible in the design process.</li> </ol> </li> <li>2. For major development proposals, they should, where relevant and appropriate:                             <ol style="list-style-type: none"> <li>i. demonstrate use of best practice in developing project briefs;</li> <li>ii. clearly demonstrate how different options for site development have been considered as part of the pre-application process;</li> <li>iii. undertake proactive engagement with the community and potential end users to inform design in line with OPDC's Statement of Community Involvement (SCI);</li> <li>iv. consider committing to providing a Section 106 monitoring contribution if the original design team is not retained for the detailed design stage; and</li> <li>v. for outline or hybrid applications, include binding design codes with the application material to inform design within development parameters at the reserved matters stage.</li> </ol> </li> </ol>	<p>Policy D1 provides process guidance to secure high quality design. As per General Modification 6, policy D1 will remain in the Local Plan but be defined as a Principle for Securing High Quality Design. Numbering has been amended but for the IIA continue to use the former numbering.</p>	<p>Yes – update to policy numbering within Policies assessment</p>

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>3. For proposals referable to the Mayor, they should, where relevant and appropriate provide digital modelling and supporting data in an agreed format with OPDC officers during the development of design and at submission.</p>		
Design	<p>POLICY D32: Accessible and inclusive design Proposals will be supported where they:</p> <ul style="list-style-type: none"> <li>a) deliver development that is compliant with the latest guidance on accessible and inclusive design as an integral part of their design;</li> <li>b) deliver accessible design solutions that meet the requirements of all users at all stages of their lives and contribute positively to removing barriers that currently exist; and</li> <li>c) <u>demonstrate whether engagement</u> with relevant stakeholders <u>has to be informed</u> proposals <del>at the earliest opportunity</del></li> </ul>	The proposed modifications result in no change to the conclusions of the IIA.	Yes – update to policy numbering within Policies assessment
Design	<p>POLICY D54: Tall buildings Proposals for tall buildings will be supported as an appropriate form of development in principle where they:</p> <ul style="list-style-type: none"> <li>a) accord with latest relevant national guidance, London Plan policies, Policy SP9 and relevant policies within the Places Chapter;</li> <li>b) deliver significant benefits for the surrounding area and communities including promoting legibility to destinations;</li> <li>c) <u>demonstrate whether undertake</u> proactive engagement with the community and other relevant stakeholders, including the Greater London Authority and Historic England <u>has informed the design of proposals</u>; and</li> <li>d) accord with relevant guidance for RAF Northolt safeguarding zones <del>including consulting with the Defence Infrastructure Organisation on any proposals of 91.4m above ground level.</del></li> </ul>	The proposed modifications result in no change to the conclusions of the IIA.	Yes – update to policy numbering within Policies assessment
Design	<p>POLICY D65: Amenity Proposals will be required to deliver an appropriate standard of amenity by:</p> <ul style="list-style-type: none"> <li><del>a) submitting a Daylight, Sunlight and Microclimate Assessment where the scale of proposed buildings has the potential to affect the amenity of sensitive neighbouring uses;</del></li> <li>a) achieving the benchmarks for amenity set out in table 5.1 or alternatives agreed with OPDC;</li> </ul>	The proposed modifications result in no change to the conclusions of the IIA.	Yes – update to policy numbering within Policies assessment

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<ul style="list-style-type: none"> <li>b) implementing the Agent of Change principle so that:                             <ul style="list-style-type: none"> <li>i. new development does not materially affect the ongoing functioning of existing employment uses and/or town centre uses; and</li> <li>ii. new development does not cause unacceptable harm to the amenity of existing uses;</li> </ul> </li> <li>c) maximising the quality and availability of daylight and direct sunlight within buildings and to the public realm;</li> <li>d) delivering appropriate levels of privacy;</li> <li>e) ensuring bedrooms are located away from and / or designed to mitigate light pollution;</li> <li>f) ensuring proposals that include residential private and / or communal open space:                             <ul style="list-style-type: none"> <li>i. receives direct sunlight for a reasonable period of the day;</li> <li>ii. supports integrated solutions for food growing; and</li> <li>iii. are located away from and/or designed to mitigate air, light and noise pollution.</li> </ul> </li> <li>g) minimising the effects of the urban heat island effect <u>including</u> by:                             <ul style="list-style-type: none"> <li><del>i. requiring proposals referable to the Mayor of London to undertake modelling to identify potential impacts on the urban heat island effect; and</del></li> <li>i. mitigating overheating of public realm where impacts are identified by utilising appropriate mitigation measures.</li> </ul> </li> <li>h) minimising excessive wind speeds generated by development by:                             <ul style="list-style-type: none"> <li>i. requiring proposals referable to the Mayor of London to undertake wind tunnel modelling early in the design process; and</li> <li>ii. mitigating negative impacts on buildings and the public realm where identified including through the use of green infrastructure.</li> </ul> </li> </ul>		
Design	<p><del>POLICY D67: Key views</del>                      Proposals that impact on a key view will be supported where they <del>a)</del> contribute positively to the character and composition of identified key views relevant to the proposal.;                      and</p>	As a result of the modification and the policy has become less specific around key views however,	Yes – update to policy numbering in assessment

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	<p><del>b) — define, assess and justify their impact on any other views relevant to the proposal and clearly demonstrate how it delivers a positive contribution to the relevant key views.</del></p>	<p>the conclusions of the IIA remain unchanged</p>	
<p>Design</p>	<p>POLICY D87: Heritage</p> <p>a) Proposals should conserve and enhance the historic environment;</p> <p>b) OPDC will give great weight to the conservation and enhancement of the significance of designated heritage assets, including their settings. Proposals harming the significance of a designated heritage asset <u>will require clear and convincing justification</u> should be justified having regard to their heritage interest, reasonable alternatives to avoid or mitigate harm and delivery of public benefits;</p> <p>c) Proposals should:</p> <p>i. <u>reflect in their design a positive response to non-designated heritage assets; and</u></p> <p>ii. <u>avoid an unjustified adverse effect on the significance of non-designated heritage assets;</u></p> <p>d) <u>Proposals to demolish a building in a Conservation Area will only be permitted after approval of and commitment to the construction of a replacement building;</u></p> <p><del>b) — e) Proposals that affect or have the potential to affect archaeological heritage assets will be supported, where they demonstrate the appropriate level of investigation and recording.</del></p> <p>e) <del>Proposals which have the potential to affect the significance of non-designated heritage assets, set out in table 5.2, should undertake the following sequential approach:</del></p> <p>i. <del>positively responding to non-designated assets in their design; or</del></p> <p>ii. <del>avoiding unjustifiable harm to non-designated heritage assets; or</del></p> <p>iii. <del>demonstrating the rationale for any justifiable harm to non-designated heritage assets; or</del></p> <p>iv. <del>for proposed demolition of all or part of a non-designated heritage asset, provide a justification that all reasonable attempts have been made to retain all or part of the asset and demonstrate how the asset has been used to inform the character of new development;</del></p> <p>d) <del>Proposals which have the potential to impact upon any affected heritage assets and their settings will should be supported where they submit aby a Heritage Impact Assessment that sets out:</del></p>	<p>The proposed modifications result in no change to the conclusions of the IIA.</p>	<p>Yes – Minor text amendment to IIA Objective 12.</p>

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p><del>i. a description of the significance of any affected heritage assets and their settings;</del></p> <p><del>ii. how they accord with the latest relevant national guidance and London Plan policies;</del></p> <p><del>iii. how they justify any harm to the significance of designated heritage assets and accord with the sequential approach for managing harm to the significance of non-designated heritage assets at c);</del></p> <p><del>iv. how they promote the significance of any affected heritage assets and their settings;</del></p> <p><del>v. how they positively respond to the relevant OPDC heritage themes in their design; and</del></p> <p><del>vi. if relevant, a commitment to demolishing a building in a conservation area only after approval of a replacement building.</del></p> <p><del>e) Proposals that affect or have the potential to affect archaeological heritage assets will be supported, where they demonstrate the appropriate level of investigation and recording within an Archaeology Impact Statement.</del></p>		
Environment	<p>POLICY EU3: Water</p> <p>Development proposals will be supported where they:</p> <p>a) work positively with OPDC and its development partners to deliver an integrated strategy for managing foul and surface water and for supplying potable and non-potable water;</p> <p>b) Provide sufficient attenuation storage capacity to ensure the peak rate of surface water runoff generated during rainfall events up to the 1 in 100 years plus a 40% climate change allowance, does not exceed greenfield run-off rates by applying the following hierarchy:</p> <p><del>i. delivering where appropriate and through agreement with the Canal and River Trust, outfalls to the Grand Union Canal, where the water is of an adequate quality, in accordance with the Water Framework Directive or any subsequent standards, and would not have a detrimental effect on the ecological and chemical status of waterbodies;</del></p> <p>ii.i. providing on-site source control to attenuate on-site. The priority for on-site attenuation should be the provision of vegetated Sustainable Drainage Systems (SuDS), with other solutions, including below ground attenuation, only deemed acceptable where all vegetated options have been fully explored; and</p>	No change to IIA score but minor wording change to the assessment of EU3 as a result of the modification.	Yes - Minor text amendment to IIA Objective 6.



Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>ii. Where source control SuDS features cannot achieve sufficient attenuation, delivering and/or contributing to strategic SuDS, which should be incorporated into streets, open spaces and other public realm areas;</p> <p>iii. <u>delivering where appropriate and through agreement with the Canal and River Trust, outfalls to the Grand Union Canal, where the water is of an adequate quality, in accordance with the Water Framework Directive or any subsequent standards, and would not have a detrimental effect on the ecological and chemical status of waterbodies;</u></p> <p>iii.iv. <u>controlled release of water into the combined sewer, through agreement with the borough and Thames Water;</u></p> <p>c) <del>ensure sufficient capacity within the sewerage network by, as part of applicants' Water Efficiency, SuDS and Drainage Statement,</del> demonstrate how the development will enable capacity to be released within the existing combined sewer network to accommodate additional foul water flows, without compromising the ability of other developers to meet future development needs;</p> <p>d) comply with any relevant requirements of local authority Surface Water Management Plans (SWMPs) and the Thames River <del>Basement</del>Basin Management Plan;</p> <p>e) <del>undertake Flood Risk Assessments (FRAs) for schemes meeting the thresholds set out in DEFRA and EA guidance or within the critical drainage areas (CDA) identified in figure 6.4;</del></p> <p>f)e) alleviate localised surface water drainage problems, identified within the Integrated Water Management Strategy (IWMS), SWMPs and/or in the Site Specific FRA;</p> <p>g)f) demonstrate that development within the area at risk of fluvial flooding from the River Brent (see figure 6.4), reduces flood risk and improves flood storage in the area;</p> <p>h)g) address potential flood risk associated with any changes to topography or hydrology; and</p> <p>i)h) maximise the efficient use of <del>potable</del> water by:</p> <p>i. <del>delivering on-site water recycling technologies particularly in non-residential developments,</del> including rainwater harvesting and/or greywater recycling, where these are shown to be viable;</p> <p>ii. for all non-residential developments, seeking to achieve the maximum score for water use in the BREEAM ratings (or an equivalent in any future nationally recognised assessment scheme); and</p>		

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>iii. designing residential development to minimise the use of mains water to better the Mayor's per capita water consumption targets, where viable.</p>		
<p>Environment</p>	<p>POLICY EU4: Air Quality</p> <p>Development proposals will be supported where they appropriately minimise air pollution during the demolition, construction and operational phases of development on the site and on neighbouring sites and make a positive contribution to overall improvement in air quality by:</p> <p>a) <del>submitting an Air Quality Assessment:</del></p> <p>i. <del>for all major planning applications; and/or</del></p> <p>ii. <del>where the proposed development includes new uses or buildings that have the potential to generate air pollution; and/or</del></p> <p>iii. <del>where a sensitive use is proposed in close proximity to an existing source of air pollution;</del></p> <p>b) <del>ensuring the Air Quality Assessment required under a) considers:</del></p> <p>i. <del>the potential impacts of pollution from the development on the site and on neighbouring sites;</del></p> <p>ii. <del>potential exposure to pollution above the Government's air quality objective concentration targets; and</del></p> <p>iii. <del>the impacts of demolition, construction and operational phases of development;</del></p> <p>c) <del>a) delivering ensuring the Air Quality Assessment required under a) identifies mitigation measures to be implemented to reduce:</del></p> <p>i. emissions, particularly of nitrogen oxide and particulate matter, including PM10 and PM2, to meet the Air Quality Positive objective; and</p> <p>ii. exposure to acceptable levels;</p> <p>d) <del>b) implementing the recommendations of the Old Oak and Park Royal Air Quality Study (AQS) summarised in table 6.1;</del></p> <p>e) <del>c) helping to reduce pollution in air quality focus areas, identified in figure 6.6, to comply with the most up to date national air quality standards;</del></p>	<p>No change to IIA score but minor wording change to the assessment of EU4 as a result of the modification.</p>	<p>Yes – Text changes to IIA Objective 4, 11 and 15</p>

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>f)d) delivering and/or contributing to the provision of new automatic monitors and diffusion tubes, with equipment to monitor NO2 and PM10 at locations identified in figure 6.6;</p> <p>g)e) complying with the relevant borough's Air Quality Action Plans (AQAPs) and the mitigation measures identified therein;</p> <p>h)f) meeting EU or subsequent nationally established health-based standards and objectives for NO2 and PM10 and other particulates;</p> <p>i)g) designing and positioning buildings, civic and open spaces to minimise exposure to elevated levels of pollution by avoiding creating street canyons, or building configurations that inhibit effective pollution dispersion. In particular, bus and taxi facilities should be designed to avoid the build-up of pollution;</p> <p>j)h) minimising emissions from any combustion based sources of energy that are deployed by ensuring low emission plant is used and where appropriate suitable after treatment technologies are adopted; and</p> <p>k)i) designing and positioning any energy facilities within the development area to minimise harmful emissions and maximise the rapid dispersion of any residual pollutants to minimise impact.</p>		
Environment	<p>POLICY EU5: Noise and Vibration</p> <p>Development proposals will be supported where they:</p> <p><del>a) submit a Noise and Vibration Assessment (NVA) which will be required for all major developments and in respect of all applications where the location is likely to be particularly sensitive to noise. The NVA should cover both the construction and operation phases of development and include predictive noise and vibration modelling to:</del></p> <p>i.a) avoid significant adverse impacts of noise and vibration on health and quality of life as a result of <u>both the construction and operational phases of</u> new development;</p> <p>ii.b) <del>demonstrate development</del> complies with the most relevant and current building standards (BS); and</p> <p>iii.c) <del>identify unacceptable impacts and secure the appropriate delivery of mitigation measures to address unacceptable impacts;</del></p> <p>b)d) appropriately reduce exposure to existing noise generators such as waste sites, cultural facilities, strategic roads, rail or industrial uses, whilst ensuring the continued effective operation of those uses;</p>	No change to IIA score but minor wording change to the assessment of EU5 as a result of the modification.	Yes – Minor change to IIA Objective 11 and 15

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>c)e) ensure plant and/or machinery can be operated without causing harm to amenity;</p> <p>d)f) ensure noise and vibration is minimised from demolition and construction phases of development and from delivering and servicing of development once occupied; and</p> <p>e)g) include features of positive soundscape interest and deliver high quality soundscapes.</p>		
Environment	<p>POLICY EU7: Circular and Sharing Economy</p> <p>Major development proposals will be <u>supported where required to submit a Circular and Sharing Economy Statement, demonstrating:</u></p> <p>a) <del>how</del> the design and construction of the development enables buildings and their constituent materials, components and products to be disassembled and reused at the end of their useful life;</p> <p>b) <del>where</del>, so far as is possible, the circular and sharing economy has been promoted through leasing or rental arrangements for building systems, products and materials;</p> <p>c) <del>how</del> sharing economy principles have been adopted in the design, construction and on-going operation of the development; and</p> <p>d) <del>how</del> circular economy principles have informed the design and implementation of energy (including heating and cooling), water and waste infrastructure.</p>	The proposed modifications result in no change to the conclusions of the IIA.	No
Environment	<p>POLICY EU9: Minimising Carbon Emissions and Overheating</p> <p>a) Major development proposals will be supported where they:</p> <p>i. meet or exceed the on-site carbon emissions targets set out in the London Plan energy hierarchy;</p> <p>ii. where they cannot deliver the London Plan CO2 reduction targets on-site, they make a sufficient financial contribution towards carbon reduction in line with the OPDC’s carbon off-set policy;</p> <p>iii. design buildings to use low carbon heat sources and when connecting into heat networks, design building services to achieve low flow return temperatures to optimise network efficiency;</p> <p>iv. <del>carry out post construction audits to demonstrate that the carbon reduction measures have been fully implemented and are achieving the calculated CO2 reduction targets;</del></p>	The proposed modifications result in no change to the conclusions of the IIA.	No

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>iv. demonstrate that the risks of overheating have been addressed through the design of the development and accord with the Mayor's cooling hierarchy. <del>To address the risks of overheating, applicants for major developments should accord with the Mayor's cooling hierarchy and carry out modelling in line with the most up to date guidance from the GLA and CIBSE. Modelling should take account of the predicted risks of climate change; and</del></p> <p>vi.v. provide appropriate smart technologies and guidance to enable occupiers to monitor and manage their energy use.; <del>and</del></p> <p><del>submit an energy statement which shows compliance with this policy.</del></p>		
Environment	<p>POLICY EU10: Energy Systems</p> <p>To promote the delivery of low carbon, energy efficient and integrated electricity, heat and cooling networks, major development proposals should:</p> <p>a) support the delivery of local smart energy grids including generation and storage of power from multiple sources;</p> <p>b) support and contribute to/and or deliver low carbon heat networks. Development should prioritise connecting to strategic area wide low temperature district heating networks when and where available and where not available, provide on-site heating solutions and future proof the development so that it can connect into a low carbon low temperature district heat network if and when it becomes available;</p> <p>c) support and contribute to/and deliver low carbon cooling networks where feasible and appropriate. Development should prioritise connecting to strategic area wide district cooling networks when and where cooling is required and where these networks are available and contribute to reducing energy and CO2 emissions. Where a network is not available, provide on-site cooling solutions and future proof the development so that it can connect into a low carbon district cooling network if it becomes available;</p> <p>d) provide evidence that appropriate management mechanisms will be put in place to ensure that the end customers are protected in respect of the price of energy provided and the level of service and ensure heat loss from the network is minimised;</p> <p>e) demonstrate that there is capacity in the network to facilitate delivery of their development at the time of the application and the expected delivery period; and</p> <p>f) contribute to and/or deliver new heat, cooling and electricity networks <u>and infrastructure</u> to accord with the specification requirements set out in <del>OPDC's Infrastructure</del></p>	The proposed modifications result in no change to the conclusions of the IIA..	No

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p><del>Delivery Plan (IDP) the policies of this plan. within Old Oak North and Scrubs Lane and in other locations where networks are in place before development commences on site.</del></p>		
Environment	<p>POLICY EU13: Land Contamination</p> <p>Development proposals will be supported where they effectively treat, contain or control any contamination so as not to:</p> <ul style="list-style-type: none"> <li>a) 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;</li> <li>b) threaten the structural integrity of any building built, or to be built, on or adjoining the site;</li> <li>c) lead to the contamination of any watercourse, water body or aquifer; or</li> <li>d) cause the contamination of adjoining land or allow such contamination to continue;</li> </ul> <p>When development is proposed on or near a site that is known to be, or there is good reason to believe may be, contaminated, or where a sensitive use is proposed, development proposals will be required:</p> <p><del>prior to permission being granted to:</del></p> <p><del>carry out a Preliminary Risk Assessment, including a desk top study and production of a conceptual site model; and</del></p> <p><del>produce a Site Investigation Scheme</del></p> <ul style="list-style-type: none"> <li>e) following planning permission being granted, to effectively treat, contain or control any contamination, in the following sequential manner: <ul style="list-style-type: none"> <li>i. undertake necessary site investigations;</li> <li>ii. refine the conceptual model;</li> <li>iii. undertake an options appraisal and evaluate options to define a remediation strategy;</li> <li>iv. produce a remediation strategy;</li> <li>v. implement the remediation strategy;</li> <li>vi. submit a verification study; and</li> <li>vii. monitor how well remediation has worked;</li> </ul> </li> </ul>	The proposed modifications result in no change to the conclusions of the IIA.	No

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	<p>f) work collaboratively with OPDC and with other developers to consider the feasibility of a strategic approach to the remediation of land; and</p> <p>g) treat any contaminated materials on-site and re-use or recycle debris and/or treated materials.</p>		
Transport	<p>POLICY T5: Rail</p> <p>Development proposals will be supported where they:</p> <p>a) deliver/ contribute towards rail infrastructure and capacity, <del>including the range of rail interventions identified within the Infrastructure Delivery Plan, and place policies which aim to enhance rail capacity within Old Oak and Park Royal;</del></p> <p>b) design new rail stations to deliver outstanding design quality and future proof station designs to facilitate future technological advances, rail connections and service changes;</p> <p>c) ensure stations contribute to the creation of a destination where people want to spend time by including retail, culture, leisure, town centre and meanwhile uses;</p> <p>d) appropriately manage the demands of competing transport modes and interchange requirements for walking, cycling, buses and taxis, ensuring adequate space is provided and embedded into the public realm;</p> <p>e) ensure all station entrances have a prominent and positive street presence;</p> <p>f) ensure routes and spaces within stations are integral parts of the local street and movement network, and incorporate active frontages, where feasible and appropriate;</p> <p>g) provide step free access from all entrances to platforms to ensure any route to, from or through the station is accessible to all;</p> <p>h) optimise development opportunities on and/or adjacent to the stations and tracks, where feasible and appropriate;</p> <p>i) ensure the impact of new development adjacent to rail infrastructure appropriately mitigates its impacts on rail services;</p> <p>j) ensure new rail infrastructure is sensitively designed to integrate with surrounding development and existing communities; and</p> <p>k) support the design operation of stations in Old Oak and Park Royal by ensuring they pioneer and respond to technology, innovation and behavioural change.</p>	The proposed modifications result in no change to the conclusions of the IIA.	No

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
Transport	<p>POLICY T7: Freight, Servicing and Deliveries</p> <p>Development proposals will be supported where they:</p> <ul style="list-style-type: none"> <li>a) provide measures to coordinate and reduce freight, servicing and delivery trips by <u>implementing a Delivery and Servicing Plan including utilising freight consolidation centres where feasible and appropriate;</u></li> <li><del>b) providing a forecast of delivery activity associated with the development and relevant movement data that OPDC and TfL can use for dynamic modelling purposes;</del></li> <li><del>producing and implementing a Delivery and Servicing Plan; and</del></li> <li><del>e)a) utilising freight consolidation centres where feasible and appropriate;</del></li> <li>b) where possible, provide off-street servicing facilities within all existing and new developments;</li> <li>c) deliver and/ or contribute towards the provision of click and collect space;</li> <li>d) maximise the use of more efficient and sustainable ways of delivering goods including consolidation, the use of rail, water, electric vehicles, cargo bikes and last mile deliveries by sustainable modes;</li> <li>e) ensure that the operators of all freight vehicles operating in the area have attained the Silver Fleet Operator Recognition Scheme (FORS) accreditation; and</li> <li>f) implement and safeguard for future innovative and smart technologies in relation to freight, servicing and delivery that maximise the efficiency and interoperability of the transport network, including measures such as holding bays optimisation and demand responsive deliveries.</li> </ul>	The proposed modifications result in no change to the conclusions of the IIA.	No
Transport	<p>POLICY T8: Construction</p> <p>Development proposals will be supported where they:</p> <ul style="list-style-type: none"> <li>a) provide measures to reduce construction trips by: <ul style="list-style-type: none"> <li><del>i. providing forecast vehicle trip information;</del></li> <li>i. <del>producing and implementing a Construction Logistics Plan and Construction Code of Practice, consistent with TfL guidance;</del></li> <li>ii. utilising construction consolidation centres and lorry holding areas, where appropriate; and</li> </ul> </li> </ul>	The proposed modifications result in no change to the conclusions of the IIA.	No



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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>iii. managing construction traffic by making use of larger construction vehicles, re-timing deliveries, route planning, and reducing trip generation by using centralised batching plants where feasible;</p>		
Housing	<p>POLICY H1: Housing Supply</p> <p>OPDC will support delivery of a minimum of <del>20,400</del><u>19,850</u> new homes during the Plan period. This new housing will be achieved through:</p> <p>a) supporting proposals that contribute to the delivery of a minimum annual housing target of <del>4,005</del><u>993</u> homes, where these accord with other Local Plan policies;</p> <p>b) supporting the delivery of <del>the ten-year net housing delivery targets for the OPDC area,</del> <u>13,670 homes between 2019 and 2029</u> as set out in the most up-to-date London Plan;</p> <p>c) delivering a minimum of <del>18,500</del><u>18,900</u> homes on Site Allocations, supporting the achievement of the housing targets identified within the Place policies;</p> <p>d) supporting planning applications for self-build and custom-build, where these accord with other Local Plan policies;</p> <p>e) optimising the use of existing housing, in accordance with Policy H5;</p> <p>f) monitoring delivery annually and publishing information on the rate of housing starts and completions and the trajectory of a deliverable and developable housing supply; and</p> <p>g) working with developers to ensure that wherever possible homes delivered are marketed to and occupied by people who live and work in London.</p>	<p>The modification results in a small decrease in housing being delivered across the plan period and therefore does not change the conclusions of the IIA.</p>	No
Housing	<p>POLICY H2: Affordable Housing</p> <p>All residential developments, with the capacity to provide more than 10 self-contained units (or have a gross internal residential floorspace of more than 1,000 sqm) will be required to provide affordable housing, subject to viability, in accordance with the overarching 50% target set out in Policy SP4, by:</p> <p>a) applying the threshold and viability approach as set out in the most up-to-date Mayoral policy and/or guidance;</p> <p>b) including early, <u>mid</u> and advanced stage review mechanisms in line with Mayoral guidance, to maximise the delivery of affordable housing and <u>in particular, social rent or London Affordable Rent</u>, where development viability improves;</p> <p>c) providing <u>a minimum of 30% of affordable housing as either social rent (including or London Affordable Rent and the remainder 70% as a range of social rent level housing</u></p>	<p>The proposed modifications results in no change to the conclusions of the IIA as the relevant IIA objectives are already assessed as positive.</p>	Yes – text change to IIA Objective 5

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	<p><del>(including or London Affordable Rent, Intermediate housing, including London Living Rent and London Shared Ownership (except for Build to Rent, see Policy H6);</del></p> <p>d) <del>and</del> ensuring intermediate homes are affordable to households on <del>average</del> <u>median</u> incomes in the host local authorities;</p>		
Employment	<p>POLICY E1: Protecting, Strengthening &amp; Intensifying the Strategic Industrial Location</p> <p>OPDC will protect, strengthen and intensify land within the designated SIL boundary by ensuring proposals:</p> <p>a) are comprised of uses suitable for broad industrial type activities, as defined in Mayoral policy and/or guidance, that contribute to meeting the strategic target of 36,350 new jobs in Policy SP5 and the relevant place jobs targets in chapter 4;</p> <p>b) achieve no net loss of industrial floorspace <u>capacity</u> and where feasible, intensify the use of sites, in particular on Site Allocations and on other sites identified in OPDC’s Park Royal <u>and Old Oak North</u> Intensification Studies;</p> <p>c) provide a mix of unit sizes <del>and in particular,</del> <u>including</u> small business units. Existing small business units should be reprovided;</p> <p>d) provide adequate servicing and delivery space in accordance with Policy T8. Particular consideration should be given to the need for appropriate yard space provision to allow for the viable function of businesses; and</p> <p>e) <del>demonstrate through a Design and Access Statement that they</del> are well designed for their intended purpose having regard to providing flexibility for a range of broad industrial type activities, including appropriate identified future employment growth sectors. Adequate floor to ceiling heights should be provided having regard to relevant evidence base studies.</p>	The proposed modifications result in no change to the conclusions of the IIA. The decrease in jobs has been considered as part of the Strategic Policies Assessment.	No
Employment	<p>POLICY E2: Employment Sites Outside SIL</p> <p>Outside of SIL, OPDC will support proposals that:</p> <p>a) deliver employment floorspace that:</p> <p>i. contributes to meeting the strategic jobs target of <del>40,400</del> <u>36,350</u> in Policy SP5 and the place jobs targets in chapter 4;</p>	The proposed modifications result in no change to the conclusions of the IIA. The decrease in jobs has been considered as part of the Strategic Policies Assessment.	No
Employment	POLICY E5: Local Access to Training, Employment and Economic Opportunities	The proposed modification introduces	No

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>For major development proposals, a Local Labour, Skills and Employment Strategy and Management Plan will be <u>secured</u>. This will to enable them to demonstrate how they: <del>required. The Local Labour, Skills and Employment Strategy and Management Plan must be developed in partnership with relevant stakeholders and subject to approval by the OPDC.</del></p> <p>a) <u>maximise the use of local labour;</u></p> <p>b) <u>provide construction apprenticeships and vocational training; and</u></p> <p>c) <u>ensure that small and medium sized local businesses and social enterprises have appropriate access to supply chain opportunities generated by the development.</u></p>	<p>more specific requirements into the policy which is positive however the modification results in no change to the conclusions of the IIA as the relevant IIA objectives are already assessed as major positive and therefore the scores cannot be increased any further.</p>	
<p>Town Centre and Community Uses</p>	<p>POLICY TCC1: Locations for and Impacts of Town Centre Uses</p> <p>To support, complement and avoid significant adverse impacts to the role and function of OPDC’s designated town centres and the surrounding town centre hierarchy, proposals for town centre uses:</p> <p>a) will be supported in OPDC’s designated town centres;</p> <p>b) will be supported outside of designated centres within clusters identified as appropriate for town centre uses in the Places chapter and in accordance with the clusters’ associated policy;</p> <p>c) will be supported on the edge of or outside of designated centres where the sequential approach to site identification has been applied in accordance with the NPPF sequential test, except for in the Strategic Industrial Location where town centre uses will only be supported where they do not have an unacceptable adverse impact on the functioning of SIL by:</p> <p>i. providing walk-to services for SIL workers, such as cafes or creches, which demonstrably meet a need for walk-to services within the proposed use class;</p> <p>ii. being of a small-scale by not exceeding 80sqm of floorspace;</p> <p>iii. not resulting in the clustering of town centre uses; and</p> <p>iv. where feasible, supporting the viability of the industrial businesses’ operation;</p>	<p>No change to IIA score but minor wording change to the assessment of TCC1 as a result of the modification.</p>	<p>Yes – minor change to assessment text against IIA Objective 17</p>

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>d) will be supported, where they provide meanwhile space, in accordance with Policy TCC9;</p> <p>e) <u>be delivered in phases, in accordance with demand created by the delivery of homes and jobs;</u></p> <p>f) <u>should have regard to the up to date retail and leisure needs study for the OPDC area, including the recommended distribution of town centre uses across the area;</u></p> <p>d)</p> <p>e) <del>should be supported by a Town Centre Uses Statement, where they provide over:</del></p> <p>i. <del>5,000sqm of town centre uses in the Old Oak Major Town Centre; or</del></p> <p>ii. <del>2,500sqm of town centre uses elsewhere;</del></p> <p>g) <u>deliver mitigation measures, where identified should be supported by an impact assessment in accordance with the NPPF and NPPG, where proposals are providing retail, leisure or office development that exceeds the thresholds set out in paragraph 10.9 in e) i. and ii.; and</u></p> <p>h) should contribute, where appropriate, to measures that will support the continuing vitality and viability of Harlesden District Town Centre, when providing town centre uses that exceed the thresholds <u>set out in paragraph 10.9 in e) i. and ii.</u></p>		
Town Centre and Community Uses	<p>POLICY TCC2: Vibrancy</p> <p>a) Applications for town centre uses will be supported where they:</p> <p>i. <u>are designed and serviced to support the role and function or the relevant town centre including maximising e-the proportion of the ground floor fronting a street as a positive and/or active frontage. Servicing areas and blank façade should be avoided on key routes; and</u></p> <p>ii. support flexibility and adaptability so that uses can expand and/or change between use classes subject to demand and appropriate permissions/agreements; <u>and</u></p> <p>iii. <u>include at least 10% of floorspace for units of 80 sqm or less when delivering more than 1,000 sqm of E -class uses at ground level.</u></p> <p>b) Applications providing outdoor uses such as eating and drinking uses with outdoor seating, event space or street markets will be supported where they do not detract from</p>	The proposed modifications result in no change to the conclusions of the IIA.	No

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>residential amenity and transport connectivity. <del>Any proposals for event space and/or street markets would need to be accompanied by an appropriate management plan;</del></p> <p>c) <u>Existing town centre uses should be protected, unless:</u></p> <p>i. <u>it is no longer economically viable as demonstrated by accounts data and through competitive marketing for a period of at least 12 months; or</u></p> <p>ii. <u>the facility can be appropriately replaced or provided elsewhere in the locality; or</u></p> <p>iii. <u>the facility is located within Park Royal SIL and exceeds the floorspace threshold in Policy TCC1 c) ii;</u></p> <p>d) Applications for new betting shops, pawnbrokers, payday loan stores and games arcades will be supported unless they would result in more than one betting shop, pawnbroker, payday loan store or games arcade within 400m walking distance of the same use; and</p> <p>e) Applications for new hot food takeaways will be supported where they:</p> <p>i. are located outside of 400 metres walking distance of the entrance/exit of an existing or permitted secondary school;</p> <p>ii. are located outside of 200 metres walking distance of the entrance/exit of an existing or permitted primary school;</p> <p>iii. result in no more than 6% of the units within a designated centre or frontage being hot food takeaway units;</p> <p>iv. result in no less than two <del>non-A5</del> <u>other</u> units between hot food takeaways; and</p> <p>v. operate in compliance with the Healthier Catering Commitment scheme and Government Food Buying Standards for food and catering services.</p>		
Town Centre and Community Uses	<p><del>POLICY TCC3: A-Class Uses</del></p> <p><del>A class uses should serve the needs of the area and complement existing town centres. To support this approach OPDC will require:</del></p> <p>a) <del>existing A-class uses (except for A4 uses) to be protected, unless:</del></p> <p>i. <del>it is no longer economically viable as demonstrated by accounts data and through competitive marketing for a period of at least 12 months; or</del></p> <p>ii. <del>the facility can be appropriately replaced or provided elsewhere in the locality; or</del></p>	Policy TCC3 has been removed from the Plan and relevant parts include in other Town Centre and Community Uses policies.	Yes – Policy has been removed from IIA assessment in Appendix A and the subsequent policy

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	<p>iii. <del>the facility is located within Park Royal SIL and exceeds the floorspace threshold in Policy TCC1 c) ii;</del></p> <p>b) <del>proposals for new A-class floorspace to have regard to the up to date retail and leisure needs study for the OPDC area including the recommended distribution of A-Class uses across the area;</del></p> <p>e) <del>primary shopping areas to comprise of at least 50% A1 (shop) units;</del></p> <p>d) <del>the delivery of A-class uses to be phased so that they are delivered in accordance with demand created by the delivery of homes and jobs; and</del></p> <p>e) <del>planning applications for A-class uses to provide a mix of unit sizes. Applications including more than 1,000sqm of A-class uses should include at least 10% of floorspace for units of 80sqm or less to support independent/start-up retailers. These should be focussed, where feasible, within secondary retail frontages and applicants should actively market these units within the local communities for a sustained reasonable period prior to letting.</del></p>		<p>numbers have been updated.</p>
<p>Town Centre and Community Uses</p>	<p>POLICY TCC3: Social Infrastructure</p> <p>OPDC will seek to secure a range of high quality social infrastructure facilities for existing and new residents and workers by:</p> <p>a) protecting existing social infrastructure facilities unless:</p> <p>i. the facility would be replaced or reprovided on-site or in an equal or better location to serve local needs and in both cases, to an equivalent or better quantum and quality; or;</p> <p>ii. there is demonstrably no longer an identified need for the current use of the facility. In such circumstances, the applicant must provide evidence to demonstrate:</p> <p>A. competitive marketing for a period of at least 12 months for alternative forms of social infrastructure without an appropriate offer being received; and</p> <p>B. that the loss of the facility would not lead to a shortfall in provision for the specified use for the population that it serves;</p> <p>b) supporting proposals for new and/or enhanced social infrastructure facilities where;</p> <p>i. it can be demonstrated that the facility is meeting needs in the local area; and</p> <p>ii. the proposal accords with other relevant planning policies and including the need to achieve homes and non-residential floorspace targets in Site Allocations;</p>	<p>The proposed modification would change the existing score against IIA Objective '14: Improve safety and reduce crime and the fear of crime' to a major positive following the inclusion for the potential of 3 additional Police Neighbourhood Facilities.</p>	<p>Yes – Changes to scores and text assessed against IIA Objective 14.</p>

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	<p>c) securing the delivery of, or contributions towards, enhanced or new social infrastructure facilities to meet the needs arising from development. Social infrastructure facilities should meet the specification requirements outlined in <u>supporting text to this policy and OPDC’s Infrastructure Delivery Plan (IDP)</u>, unless otherwise agreed by OPDC and the relevant service provider;</p> <p>d) locating new social infrastructure:</p> <p>i. in locations identified in the Places chapter and/or OPDC’s IDP, unless the on-site facility can be provided on an alternative site, if this is agreed by OPDC and the service provider and it is shown that the delivery of the facility on an alternative site meets the needs of the development and is deliverable;</p> <p>ii. in locations that are highly accessible by sustainable forms of travel to the populations that they serve;</p> <p>iii. <del>health facilities</del> community facilities within or in close proximity to designated town centres or clusters;</p> <p>iv. education facilities in areas with good access by foot, cycle and public transport and close to areas of publicly accessible open space; and</p> <p>v. emergency service facilities with direct access onto unrestricted highways;</p> <p>e) <del>securing the delivery of, or contributions towards 3 Police Ward Offices</del> <u>Neighbourhood Police Facilities within the OPDC area;</u></p> <p>e)f) requiring high quality design of new or enhanced social infrastructure that:</p> <p>i. is accessible and inclusive to all sections of the community;</p> <p>ii. adheres to the latest national and regional design guidelines; and</p> <p>iii. collocates facilities and uses where appropriate and feasible; and</p> <p>f)g) working with service providers and other stakeholders to identify funding sources for the long-term management and maintenance of social infrastructure and where necessary and viable, securing contributions towards this from development proposals.</p>		
Town Centre and Community Uses –	<p>Given the scale of regeneration and development envisaged, there are also significant needs for the on-site provision of social infrastructure.</p> <p>In respect of education, current modelling shows the need for on-site provision of:</p> <p>a <u>3</u> form entry (FE) primary school, including early years provision; <u>and</u></p>	The proposed modification would remain as a minor positive score, following the loss of a	Yes - Changes to text assessed

Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
supporting text	<p><del>a 9FE secondary school, including further education provision;</del> four super nurseries.</p> <p>The trigger years for required on-site facilities have been matched against OPDC's phasing trajectory in order to derive which sites are likely to be being constructed in the year the facility is required, which sites are available for their delivery and which sites are the most appropriate, based on an assessment against a set of criteria. The Social Infrastructure Needs Study identifies that based on current modelling, the primary school should be delivered <u>in 2031 within the latter half of the Local Plan period. To reflect this later phasing, a degree of flexibility is required when identifying an appropriate location in accordance with policy TCC3(d). Therefore, the location of the primary school will be kept under review., .</u></p> <p><del>The four super nurseries should be spread across the OPDC area, with one each in Old Oak South (P1), Old Oak North (P2) and North Acton and Acton Wells (P7) and Channel Gate (P9) with the location of the fourth nursery to be kept under review.</del></p> <p>In respect of health, <del>the</del> <u>modelling undertaken by the Clinical Commissioning Groups (CCGs) shows the need for 1,564sqm of on-site health facility space within the Local Plan period. The Local Authorities and Clinical Commissioning Groups CCGs have confirmed that the preferred approach for the delivery of the on-site floorspace is within one building, which allows the provision of health services at scale and provides for cost efficiencies. The Social Infrastructure Needs Study has assessed the on-site needs for this facility, which shows the need for this facility within the Cargiant site allocation different site options for the new facility and identifies North Acton and Acton Wells as the preferred option, based on current projections.</u></p> <p>In respect of community space, modelling shows the need for two community hubs, each of 2,600sqm. The community hubs should provide for a variety of community facilities, <u>including space for libraries,</u> and could include facilities such as public toilets, a community café, faith space, youth space and halls for hire. <u>New community spaces should be made appropriately available and affordable to the local community.</u> Current modelling shows that one of these community hubs should be located in <del>Old Oak North (P2) Channel Gate (P9) and the location of the other hub should be kept under review in Old Oak South (P4).</del> The Social Infrastructure Needs Study also identifies a need for on-site emergency service provision and expansion of existing facilities. <u>In relation to on-site provision, current modelling shows 3 Neighbourhood police facilities are required which can be co-located with other social infrastructure across the OPDC area see the IDP for further details.</u> Requirements for sports and leisure facilities are set out in further detail in Policy TCC6.</p>	secondary school, but inclusion of a 3 form entry (FE) primary school, including early years provision; and four super nurseries.	against IIA Objective 4.



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Town Centre and Community Uses	<p>POLICY TCC45: Culture and Art</p> <p>OPDC will support the provision of a high quality cultural offer in the OPDC area and Cultural Quarter in Old Oak by:</p> <ul style="list-style-type: none"> <li>a) protecting existing cultural space unless:                             <ul style="list-style-type: none"> <li>i. it is no longer economically viable as demonstrated by accounts data and through competitive marketing for a period of at least 12 months for alternative cultural uses without an appropriate offer being received; or</li> <li>ii. the facility is replaced or reprovided on-site or elsewhere in the locality to an equivalent or better quantum and quality;</li> </ul> </li> <li>b) supporting applications for new cultural space, where they meet meets current and/or future identified needs;</li> <li>c) supporting the retention of existing, and the provision of new, artist studios in accordance with the requirements of policies E1, E2 and E3; <u>and</u></li> <li>d) securing contributions towards and/or the provision of public art; <del>and requiring schemes providing over 2,500sqm of town centre uses to submit an appropriate Cultural Action Plan.</del></li> </ul>	The proposed modifications result in no change to the conclusions of the IIA.	No
Town Centre and Community Uses	<p>POLICY TCC67: Public Houses</p> <p>OPDC will support the loss of public houses where:</p> <ul style="list-style-type: none"> <li>a) the public house has been competitively marketed:                             <ul style="list-style-type: none"> <li>i. for 24 months as a public house <del>and for an alternative local community facility;</del></li> <li>ii. at an appropriate price following independent valuation;</li> <li>iii. in appropriate publications and through specialised licensed trade agents;</li> <li>iv. in a condition that allows the premises to continue operating as a pub <del>or as a community facility;</del> and</li> <li>v. with no interest in either the freehold or leasehold <del>either as a public house or as a community facility falling within the 'D1' use class;</del></li> </ul> </li> <li><u>b) an objective evaluation method has been employed to assess the viability of the business and the outcomes demonstrate that the public house is no longer economically viable;</u></li> </ul>	The proposed modifications result in no change to the conclusions of the IIA.	No

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>b)c) an assessment has been made of alternative licensed premises within easy walking distance of the public house and premises are identified which offer similar facilities and a similar community environment to the public house which is the subject of the application;</p> <p>c)d) the proposed alternative use will not detrimentally affect the character and vitality of the area and will, where appropriate, retain as much of the building’s defining external fabric and appearance as a pub as possible; and</p> <p>d)e) there has been public consultation to ascertain the value of the public house to the local community and the proposal does not demonstrably constitute the loss of a service of particular value to the local community.</p>		
Town Centre and Community Uses	<p>POLICY TCC78: Catalyst Uses</p> <p><del>a) Planning applications that satisfy the below criteria will be required to submit a Catalyst Uses Statement:</del></p> <p><del>i. a use and/or building or a cluster of uses/buildings that together would function as a single facility, that occupy inclusive of associated public realm, in excess of 10,000sqm and / or 0.25 hectares of land; and</del></p> <p><del>ii. within the following types of buildings and/or land uses:—</del></p> <p><del><input type="checkbox"/> Sports stadia and facilities;</del></p> <p><del><input type="checkbox"/> Retail and leisure;</del></p> <p><del><input type="checkbox"/> Culture, education and health; or</del></p> <p><del><input type="checkbox"/> Business and conference space.</del></p> <p><del>b) The Catalyst Uses Statement should demonstrate how the proposal performs positively against the five following objectives and associated criteria set out in Table 10.2</del><u>Proposals that comprise a use and/or building or a cluster of uses / buildings that occupy, inclusive of associated public realm, in excess of 10,000sqm and / or 0.25 hectares of land and are sports stadia and facilities; retail and leisure uses; culture, education and health uses; or business and conference space uses should perform positively against the following five objectives and associated criteria set out in Table 10.2:</u></p> <p>a) Is part of a holistic offer;</p> <p>b) Is financially sustainable;</p> <p>c) Complements the wider environment;</p>	The modification results in the policy being slightly more focused however it does not change the conclusions of the IIA as it is broadly along the same premise.	No

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Policy / Chapter	Proposed Modification	Significance to the IIA	Further Appraisal Required?
	<p>d) Generates momentum in delivering the comprehensive redevelopment of the area; and</p> <p>e) Leverages HS2 and the Elizabeth Line.</p>		
Town Centre and Community Uses	<p>POLICY <del>TCC89</del>: <u>Meanwhile Uses</u></p> <p>a) OPDC will support proposals for meanwhile uses where the proposed use:</p> <ul style="list-style-type: none"> <li>i. contributes positively to the character and early activation of an area;</li> <li>ii. reinforces the longer term uses planned for the area. Where appropriate, mechanisms should be put in place to support meanwhile occupiers securing permanent spaces within developments;</li> <li>iii. would not impact on the deliverability of Site Allocations identified in Table 3.1; and</li> <li>iv. does not give rise to an unacceptable impact on residential amenity and on the transport network;</li> </ul> <p><del>All major development proposals will be required to submit an appropriate Meanwhile Feasibility Study and if feasible, an appropriate Meanwhile Strategy.</del></p>	The proposed modifications result in no change to the conclusions of the IIA.	No

**Table 2.2: Reasonable alternatives considered by OPDC and included in the IIA**

Ref	Preferred modification approach	Relevant policy	Alternative modification option	Relevant supporting study	Reason for why the alternative modification option is appropriate to be assessed
1.	EMR reinstated as SIL	P2	EMR released from SIL for mixed use development including housing.	Industrial Land Review Addendum 2021	<p>Officers consider that the preferred approach is the most appropriate because:</p> <ul style="list-style-type: none"> <li>The site’s context has changed as a result of other proposed modifications. EMR would be surrounded by retained and intensified SIL, an existing waste site and busy railways to the north. Therefore, retaining this site as SIL is appropriate to the surrounding site context and means that SIL compliant development can be optimised on both the site itself and surrounding SIL sites.</li> <li>This approach can deliver an increase in industrial floorspace, which would help meet demand for this type of space and be able to contribute to delivering a net gain of industrial floorspace.</li> </ul> <p>This preferred option would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul> <p>The alternative option for releasing EMR from SIL to enable the delivery of housing with a mix of uses on the site is a reasonable alternative as it would meet the above plan objectives. The Local Plan would continue to be able to deliver a net gain of industrial floorspace with the removal of EMR from SIL for general mixed use or as a Locally Significant Industrial Site. This will enable the Local Plan to demonstrate general conformity with the London Plan.</p>
2.	Cargiant Scrubs Lane site allocation	P2/P10	Cargiant Scrubs Lane site allocation	Scrubs Lane Development Framework	<p>Officers consider that the preferred approach is the most appropriate because:</p> <ul style="list-style-type: none"> <li>The Cargiant Scrubs Lane sites are a suitable location for residential led mixed use development. They would be contiguous with other sites</li> </ul>

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	released from SIL		retained as SIL.	Principles Update 2021 Industrial Land Review Addendum 2021	<p>which would continue to be de-designated from SIL and allocated for residential led development. Therefore, these uses are appropriate to this context and development can be optimised.</p> <ul style="list-style-type: none"> <li>• The delivery of mixed use development will support the delivery of the place vision for Scrubs Lane.</li> <li>• This approach can deliver: <ul style="list-style-type: none"> <li>○ a high quality place along Scrubs Lane.</li> <li>○ optimised development capacity.</li> <li>○ a range of homes and housing tenures.</li> <li>○ a high quality public realm and active travel network.</li> <li>○ green infrastructure.</li> <li>○ an acceptable impact on the significance of nearby designated heritage assets.</li> <li>○ appropriate levels of amenity for residents.</li> </ul> </li> </ul> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP3 Proposed outcome: Creating a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities.</li> <li>• SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner’s, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor’s ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> <li>• SP8 Proposed outcome: Contributing to the All London Green Grid by delivering new and enhanced green infrastructure and open spaces</li> </ul>
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					<p>that provide for a range of functions, serving people and nature across the OPDC area.</p> <ul style="list-style-type: none"> <li>• SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul> <p>The alternative option for retaining Cargiant Scrubs Lane site allocation as SIL is a reasonable alternative as it would meet some of the above plan objectives but it would not help contribute towards delivering the London Plan housing targets and therefore the Plan would not be able to demonstrate general conformity.</p>
3.	One additional tall building is identified on the Cumberland House site, north of Hythe Road, within the Cargiant Scrubs Lane site allocation.	P2/P10	<p>Alternative form of increased massing is considered for the site or on other available development sites. The other sites comprise:</p> <ul style="list-style-type: none"> <li>• Harrow Road (Site allocation 2)</li> <li>• Cumberland Business Park (Site allocation 28)</li> <li>• Mitre Wharf (Site</li> </ul>	Scrubs Lane Development Framework Principles Update 2021	<p>Officers consider the preferred approach is the most appropriate approach to deliver:</p> <ul style="list-style-type: none"> <li>• local legibility enabling people to navigate to Hythe Road as the key route into Old Oak and beyond;</li> <li>• definition of the local spatial hierarchy of development;</li> <li>• optimised development capacity;</li> <li>• An appropriate sense of enclosure to the public realm and open spaces along Scrubs Lane while contributing to meeting London Plan housing targets;</li> </ul> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP3 Proposed outcome: Creating a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor’s ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> <li>• SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> </ul>

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			<p>allocation 31)</p> <ul style="list-style-type: none"> <li>• Big Yellow Storage (site allocation 32)</li> <li>• Tea Crate (site allocation 33)</li> <li>• Mitre Industrial Estate (site allocation 34)</li> <li>• North Pole Depot (new site allocation).</li> </ul>		<p>The alternative option for delivering an alternative form of increased massing on the Cargiant Scrubs Lane site allocation or other sites is a reasonable alternative as it would meet the above plan objectives and the Local Plan will continue to be able to meet its London Plan ten year housing target to demonstrate general conformity.</p> <p>Other sites outside of Scrubs Lane are not considered to be reasonable alternatives as these sites would not deliver the same benefits of supporting local legibility and wayfinding to key routes to access destinations as the sites along Scrubs Lane provide.</p> <p>This would not deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> </ul>
4.	Old Oak major town centre is redirected to include sites in Old Oak Common Lane, Old Oak Lane and Channel Gate. Absorbs Atlas Junction neighbourhood centre.	P2/P8/P9/TCC1	Old Oak major town centre is redirected to include further sites in North Acton. It absorbs North Acton neighbourhood centre instead of Atlas Junction neighbourhood centre. Atlas Junction neighbourhood centre remains and could be increased in	Channel Gate Development Framework Principles	<p>Officers consider the preferred approach is the most appropriate approach to deliver:</p> <ul style="list-style-type: none"> <li>• A range of town centre uses close to existing and planned neighbourhoods to benefit existing and future residents.</li> <li>• Town centre use floorspace to meet the needs of development.</li> <li>• A high quality town centre public realm.</li> <li>• town centre uses that complement the phasing of new residential neighbourhoods.</li> <li>• town centre uses that complement the existing range of town centre uses in Harlesden district centre located to the north in the London Borough of Brent.</li> </ul> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> </ul>

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			<p>size reflecting increased development capacity in Channel Gate.</p>		<ul style="list-style-type: none"> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>• SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul> <p>The alternative option for delivering a portion of Old Oak major town centre within North Acton is a reasonable alternative as it would meet the above plan objectives and would continue to deliver sufficient retail and leisure floorspace to meet the needs of development.</p>
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### 3 Conclusion

This Addendum has provided further clarity on how the IIA process accompanying the OPDC Local Plan has satisfied the various requirements of SEA and IIA and has made a meaningful contribution towards informing the plan-making process.

The Post Submission Proposed Modifications to Policies and site allocations (including the newly proposed site allocations) have, on the whole, resulted in positive changes to the IIA outcomes. No main modification proposed has resulted in a negative effect, minor or major, being recorded against any of the IIA Objectives.

The key changes to the IIA outcomes brought about by the proposed modifications were the inclusion of references to Biodiversity Net Gain in Policy SP2 which resulted in a score change from neutral' to 'major positive' against IIA Objective 10 'Create and enhance biodiversity and the diversity of habitats across the area and its surroundings'. The inclusions of Neighbourhood Police Facilities in Policy TCC3 resulted in change of score from minor positive to major positive against IIA Objective 14 'Improve safety and reduce crime and the fear of crime'.

With regards to reasonable alternatives, it is considered that the IIA has identified and evaluated the sustainability effects of reasonable alternatives insofar as this was considered to be possible. This includes the three reasonable alternatives sites and reasonable alternative town centre policy. On the whole, the reasonable alternatives considered scored positively in the IIA assessment. However, overall the outcomes were not as strong in terms of overall sustainability of the proposed policies and therefore they remain as reasonable alternatives.

The key spatial changes as a result of the post-submission proposed modifications are a slight decrease in housing being delivered across the plan period alongside an increase in employment floorspace being provided. Although, there has been an increase in employment floorspace there has been a slight decrease in the proposed number of jobs that would be delivered over the Plan period. This is due to the balance of industrial and office based jobs changing.

Overall, the Post Submission Proposed Modifications to identified Policies, site allocations and reasonable alternatives result in mainly positive outcomes on the sustainability and deliverability of the OPDC Local Plan.

## Appendix A

### Updated IIA Assessment Tables – Post -Submission Modifications

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## Table A-1: Strategic Policies

SP1: Catalyst for Growth  
 SP2: Good Growth  
 SP3: Improving Health and Reducing Health Inequalities  
 SP4: Thriving Communities  
 SP5: Economic Resilience  
 SP6: Places and Destinations  
 SP7: Connecting People and Places  
 SP8: Green Infrastructure and Open Space  
 SP9: Built Environment  
 SP10: Integrated Delivery

IIA Objective		Performance of Policy		Temporal Scale	Geographical Extent	Commentary and Recommendations
				Nature of Impact		
1	To enhance the built environment and encourage 'place-making'	SP1	+	S, M, L-T, D, R, M	West London	This policy scores positively against this objective as it optimises development, including a diverse range of land uses which support West London's Growth, contributes to meeting London's needs and supports London's role as a global city and position as a global economic and cultural capital.
		SP2	++	S, M, L-T, D, R, M	OPDC area	The policy states that it aims to create vibrant, liveable, mixed, and inclusive lifetime neighbourhoods, which is important in place-making. It also directly states an aim to deliver high standards of place-making.
		SP3	+	S, M, L-T, D, R, M	OPDC area	The provision of new spaces which are included in this policy will have a positive effect against the objective.
		SP4	+	S, M, L-T, D, R, M	OPDC area	The policy aims to provide social infrastructure which is important in place-making as this will help to create thriving communities.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	++	S, M, L-T, D, R, M	OPDC area	This policy supports a coordinated and phased approach to place-making that creates a series of distinctive places and clusters delivering a range of activation uses,

IIA Objective		Performance of Policy		Temporal Scale  Nature of Impact	Geographical Extent	Commentary and Recommendations
						including meanwhile and catalyst users. This will score positively against the objective.
		SP7	+	S, M, L-T, D, R, M	OPDC area	The supporting text discusses OPDC aiming to work with a variety of stakeholders to support the delivery of new rail stations and to ensure they are well connected into their surroundings, support surrounding development and achieve high standards of design that contributes to place-making.
		SP8	+	S, M, L-T, D, R, M	OPDC area	Green infrastructure can contribute to place-making as it enhances the quality of the built environment, enhances the experience and perception of place, provides visual amenity, and helps to knit together neighbourhoods.
		SP9	+	S, M, L-T, D, R, M	OPDC area	The delivery of buildings, public realm and infrastructure of the highest design quality and architecture can play an important role in place-making.
		SP10	+	S, M, L-T, ID, R, M	OPDC area	The supporting text discusses the need of a joined-up approach across the various developments which could have an indirect positive against the objective.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	SP1	0			There is no clear link between the policy and the IIA Objective.
		SP2	++	S, M, L-T	OPDC area	The policy supports the delivery of the spatial vision by ensuring development occurs at appropriately high densities.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	0			There is no clear link between the policy and the IIA Objective.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	+	S, M, L-T, D, R, M	OPDC area	This policy aims to deliver high density and taller buildings, but only in areas considered appropriate.
		SP10	0			There is no clear link between the policy and the IIA Objective.
3	Maximise the reuse of	SP1	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against

IIA Objective		Performance of Policy		Temporal Scale  Nature of Impact	Geographical Extent	Commentary and Recommendations
previously developed land and existing buildings, including the remediation of contaminated land						this objective.
	SP2	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.	
	SP3	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.	
	SP4	++	S, M, L, L-T, D, R, M	OPDC area	The policy states that 'the reservoir of supply of brownfield land means Old Oak and Park Royal can make a significant contribution towards meeting local and London-wide housing needs.' This implies that development will occur on previously developed land.	
	SP5	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.	
	SP6	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.	
	SP7	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.	
	SP8	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.	
	SP9	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.	
	SP10	+	SM L, L-T, D, R, M	OPDC area	The supporting text includes the treatment of contaminated land which increase the land space which can be built on, which will result in a positive against this objective.	

IIA Objective		Performance of Policy		Temporal Scale  Nature of Impact	Geographical Extent	Commentary and Recommendations
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	SP1	+	M, L-T, D, R, M	London Wide	The planned Old Oak Common station will reduce the need for travel by car and create an increased opportunity for rail transport. It will maximise the accessibility to other forms of public transport and reduce congestion traffic thus having a positive impact against the IIA objective.
		SP2	0			There is no clear link between the policy and the IIA Objective.
		SP3	+	M, L-T, D, R, M	OPDC area	The policy states that 'Development...should...contribute to improved health and wellbeing.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	++	M, L-T, D, R, M	OPDC area	The policy supports the aim to minimise the use of travel by delivering healthy, high quality streets, which appropriately prioritise walking and cycling and which connect existing and new communities. It also aims to deliver a high quality, frequent and well connected public transport network and minimise the need for use of private vehicles.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	0			There is no clear link between the policy and the IIA Objective.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a	SP1	+	M, L-T, D, R, M	London and Nationwide	The new station will improve access to new housing developments.
		SP2	+	M, L-T, D, R, M	OPDC area	The policy supporting text mentions the need for diverse housing, affordability and having a choice of housing for local residents. This will have a positive impact on housing being affordable and inclusive.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	++	M, L-T, D,	London wide	The policy aims to provide a range of housing tenures, types and sizes that deliver mixed and inclusive communities and to delivering at least 19,850 additional homes

IIA Objective		Performance of Policy		Temporal Scale  Nature of Impact	Geographical Extent	Commentary and Recommendations
	range of types and tenures, to meet identified local needs			R, M		over 2018-38 with 50%, measured in habitable rooms, as affordable homes, subject to viability which will score positively against this objective. This Policy also enables OPDC to meet its objectively assessed need as well as contribute towards meeting housing need in the London Boroughs of Brent, Ealing and Hammersmith and Fulham and London-wide housing need
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	0			There is no clear link between the policy and the IIA Objective.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	0			There is no clear link between the policy and the IIA Objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	SP1	+	L-T, I, R, M	London wide	The supporting text states that the new station will provide opportunities to set new standards for optimising sustainable development which may help improve climate change adaptation.
		SP2	++	M, L-T, D, R, M	London wide	The supporting text recognises the issues of flooding and the heat island effects and aims to address these issues during the regeneration of the OPDC area.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	0			There is no clear link between the policy and the IIA Objective.
		SP8	+	M, L-T, ID, R, H	OPDC area	The supporting text it shows that green infrastructure can provide a benefit against flood risk.
		SP9	0			There is no clear link between the policy and the IIA Objective.
SP10	0			There is no clear link between the policy and the IIA Objective.		
7	To minimise	SP1	0			There is no clear link between the policy and the IIA Objective.



IIA Objective		Performance of Policy		Temporal Scale  Nature of Impact	Geographical Extent	Commentary and Recommendations
contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	SP2	+	S, M, L-T, I, R, L	OPDC area	The supporting text states that resource efficiency is important and should be addressed through careful design of infrastructure, buildings, roads, public realm, and parks.	
	SP3	0			There is no clear link between the policy and the IIA Objective.	
	SP4	0			There is no clear link between the policy and the IIA Objective.	
	SP5	0			There is no clear link between the policy and the IIA Objective.	
	SP6	0			There is no clear link between the policy and the IIA Objective.	
	SP7	+	M, L-T, D, R, M	OPDC area	By minimising the use of private cars, and by encouraging sustainable transport, this can reduce reliance on natural resources and help reduce contributions to climate change.	
	SP8	+	M, L-T, I, R, M	OPDC area	Green infrastructure can reduce greenhouse gas emissions through material substitution.	
	SP9	0			There is no clear link between the policy and the IIA Objective.	
	SP10	+	M, L-T, I, R, M	OPDC area	By delivering site-wide infrastructure the policy can ensure that there are energy efficiencies realised which will have a minor positive indirect effect providing policy can be implemented effectively.	
	8 To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting	SP1	0			There is no clear link between the policy and the IIA Objective.
SP2		+	S, M, L-T, D, R, M	OPDC area	The inclusion of resource efficiency in design will help minimise production of waste thus scoring positively against this objective.	
SP3		0			There is no clear link between the policy and the IIA Objective.	
SP4		0			There is no clear link between the policy and the IIA Objective.	
SP5		0			There is no clear link between the policy and the IIA Objective.	
SP6		0			There is no clear link between the policy and the IIA Objective.	

IIA Objective		Performance of Policy		Temporal Scale  Nature of Impact	Geographical Extent	Commentary and Recommendations
	waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	SP7	+	S, M, L-T, D, R, M	OPDC area	The supporting text discusses circular economy and reuse of construction waste which will have a positive effect against this objective.
		SP8	0			
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	+	S, M, L-T, D, R, M	OPDC area	By looking at integrated strategies for the area (ie site wide or multi-developer) approaches, this could maximise efficiencies for waste streams and score positively against this objective.
9	Improve the quality of the water environment	SP1	-	S, M, L-T, D, R, M	OPDC area	New development can lead to the pollution of water bodies during construction and post construction. However, these negatives are mitigated against through SP6, SP8 and the Environment and Utilities Chapter.
		SP2	0			
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	+	S, M, L-T, D, R, M	OPDC area	The supporting text explores provisions for high quality environments which could help to improve the quality of the water environment.
		SP7	0			There is no clear link between the policy and the IIA Objective.
		SP8	+	S, M, L-T, D, R, M	OPDC area	The supporting text explores provisions for high quality SuDS which will help to improve the quality of the water environment.
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	0			There is no clear link between the policy and the IIA Objective.
10	Create and	SP1	-	S, M, L-T,	OPDC area	New development can lead to damage and destruction to biodiversity during

IIA Objective		Performance of Policy		Temporal Scale  Nature of Impact	Geographical Extent	Commentary and Recommendations
enhance biodiversity and the diversity of habitats across the area and its surroundings				D, R, M		construction and post construction. However, these negatives are mitigated against through SP6, SP8, SP10 and the Environment and Utilities Chapter...
	SP2	++		S, M, L-T, D, R, M	OPDC area	The policy includes the principle of environmental net gain as set out in the government's 25 Year Environment Plan which would contribute positively to biodiversity of the OPDC area.
	SP3	0				There is no clear link between the policy and the IIA Objective.
	SP4	0				There is no clear link between the policy and the IIA Objective.
	SP5	0				There is no clear link between the policy and the IIA Objective.
	SP6	+		S, M, L-T, D, R, M	OPDC area	The policy supports the creation of high-quality environments which could enable and enhance biodiversity and the diversity of habitats across the area and its surroundings.
	SP7	0				There is no clear link between the policy and the IIA Objective.
	SP8	++		S, M, L-T, D, R, H	OPDC area	Green infrastructure will create new areas of biodiversity. This will also enhance existing biodiversity and the diversity of habitats across the area and its surroundings. Policy also sets out to achieve an overall net gain in biodiversity resulting in a major positive score against this IIA objective.
	SP9	0				There is no clear link between the policy and the IIA Objective.
	SP10	+		S, M, L-T, I, R, M	OPDC area	The supporting text refers to strategic green space provision. Site wide integrated strategies can have in indirect positive effect against the IIA objective.
11 To minimise air, noise and light pollution, particularly for vulnerable	SP1	-		S, M, L-T, D, R, M	OPDC area	New development can lead to air, noise and light pollution during construction and post construction. However, these negatives are mitigated against through SP2, SP7, SP8, SP9, SP10, D6 and the Environment and Utilities Chapter.
	SP2	+		S, M, L-T, D, R, H	OPDC area	The supporting text recognises the issue of air pollution and aims to address these issues during the regeneration of the OPDC area.
	SP3	0				There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale  Nature of Impact	Geographical Extent	Commentary and Recommendations
	groups	SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	+	S, M, L-T, D, R, H	OPDC area	By encouraging sustainable transport this will help to reduce air and noise pollution in particular, as it encourages less people to drive. Less vehicles will result in reduced noise and air pollution.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	+	S, M, L-T, D, R, H	OPDC area	This policy states that minimisation of air, light and noise pollution is important in amenity, but this is explored more in the environment chapter.
		SP10	+	S, M, L-T, D, R, H	OPDC area	This policy will mitigate against any impacts it creates, this includes, light, noise and air pollution from construction. Details can be found in OPDC's infrastructure delivery plan.
12	To conserve and enhance the historic environment, heritage assets and their settings	SP1	-	S, M, L-T, D, R, M	OPDC area	New development can lead to damage of heritage assets and their setting if not appropriately designed and conserved. However, these negatives are mitigated against through SP6, SP9 and D8.
		SP2	0			There is no clear link between the policy and the IIA Objective.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	+	S, M, L-T, D, R, H	OPDC area	This policy recognises the heritage context within OPDC and aims to use the local heritage, along with other resources to ensure that new development creates vibrant and distinctive places and neighbourhoods, which respond to and celebrate existing features.
		SP7	0			There is no clear link between the policy and the IIA Objective.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	++	S, M, L-T, D, R, H	OPDC area	This policy aims to conserve and enhance the historic environment thus scoring a major positive against this objective.

IIA Objective		Performance of Policy		Temporal Scale  Nature of Impact	Geographical Extent	Commentary and Recommendations
		SP10	0			There is no clear link between the policy and the IIA Objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	SP1	+	S,M,L-T, I, R, M	London Wide	The new station can increase connectivity between areas to create social linkages with the surrounding communities and with the whole of London which will score positively against this objective.
		SP2	+	S,M,L-T, I, R, M	London Wide	The policy aims to proactively engage with and deliver benefits to local communities which will increase community cohesion and reduce social exclusion.
		SP3	+	S,M,L-T, I, R, M	London Wide	By promoting health and wellbeing this can help to encourage a sense of community and welfare and reduce social exclusion. It can encourage the population to go outside more and interact with others more frequently.
		SP4	+	S,M,L-T, I, R, M	London Wide	The policy is directly about thriving communities. It aims to achieve social integration. The new social infrastructure developments will act as meeting places for members of the public to meet and interact.
		SP5	+	S,M,L-T, I, R, M	London Wide	Employment and training opportunities for locals which are discussed in this policy can seek to reduce social exclusion within the community.
		SP6	+	S,M,L-T, I, R, M	London Wide	New infrastructure which includes shopping provision and open spaces can improve the quality of public realm and create social linkages.
		SP7	+	S,M,L-T, I, R, M	London Wide	Using the Healthy Streets Approach to improve the environment for walking and cycling and improving public transport linkages can enable cohesion. This will result in more space being dedicated to the provision of a high quality public realm and green infrastructure provision. This will increase community cohesion and reduce social exclusion.
		SP8	+	S,M,L-T, I, R, M	OPDC area	Provision of good quality green infrastructure can facilitate social interaction and increase community cohesion.
		SP9	+	S,M,L-T, I, R, M	London Wide	High quality design can help encourage community cohesion.
				SP10	0	
14	Improve safety and	SP1	+	S,M,L-T, I,	OPDC area	The majority of wards in the OPDC area are high crime rates. Increasing development and through careful consideration of design can help to improve safety and reduce

IIA Objective		Performance of Policy		Temporal Scale  Nature of Impact	Geographical Extent	Commentary and Recommendations
	reduce crime and the fear of crime			R, M		crime.
		SP2	0			There is no clear link between the policy and the IIA Objective.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	+	S,M,L-T, I, R, M	OPDC area	Delivery of a resilient and fair economy which increases employment and training opportunities for local people can contribute to reductions in crime and the fear of crime.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	+	S,M,L-T, I, R, M	OPDC area	Using the Healthy Streets Indicators to improve the environment for walking and cycling and improve public transport contributes to reductions in crime and the fear of crime. Policy also makes specific reference to delivering a safe transport network.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	+	S,M,L-T, I, R, M	London Wide	High quality design can incorporate safety measure in order to reduce the fear of crime.
		SP10	0			There is no clear link between the policy and the IIA Objective.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	SP1	+	S, M, L-T, D, R, L	London wide	The new station will help to improve access to employment and training which in turn will maximise the social and economic wellbeing of the local and regional population.
		SP2	+	S, M, L-T, D, R, M	OPDC area	One of the main objectives of this policy is to promote health, wellbeing and active lifestyles which will score positively against this objective.
		SP3	++	S, M, L-T, D, R, M	OPDC area	The whole policy is targeted at improving health, wellbeing and healthy lifestyles so will have a major positive score against this objective.
		SP4	+	S, M, L-T, D, R, M	OPDC area	Thriving communities and cohesion can benefit mental and physical health and well-being. Delivering a high percentage of affordable housing will contribute to reducing health inequalities.

IIA Objective		Performance of Policy		Temporal Scale  Nature of Impact	Geographical Extent	Commentary and Recommendations
		SP5	+	S, M, L-T, D, R, M	OPDC area	By improving economic resilience, this can have a positive benefit on physical and mental health. However, it is important that the development creates employment and training opportunities for local people, specifically focusing on disadvantaged groups otherwise the policy could widen health inequalities.
		SP6	+	S, M, L-T, D, R, M	OPDC area	A mix of uses will create a walkable environment and provide focal points for social interaction which will have positive impacts on mental and physical health and well-being.
		SP7	+	S, M, L-T, D, R, M	OPDC area	The provision of healthy streets mentioned in the supporting text can help to promote healthy living. This policy aims to deliver a high-quality environment for walking and cycling and minimise the need to travel by motorised vehicles. Improving the environment for walking and cycling enables people to increase their level of physical activity which improves mental and physical health and well-being.
		SP8	++	S, M, L-T, D, R, M	OPDC area	Green infrastructure provides spaces for people to relax, escape and re-connect with nature, encourages active life styles, promotes and provides spaces of play for all ages. Good quality green infrastructure can also facilitate social interaction and increase community cohesion.
		SP9	+/-	S, M, L-T, ID, R, M	OPDC area	Delivering high densities and tall buildings could limit amounts of daylight and sunlight, and cause overshadowing, lack of privacy and noise disturbance which can have a negative impact on mental and physical health and well-being. However, the policy specifies that appropriate standards of amenity are ensured in accordance with relevant OPDC Local Plan policies and also the Mayor's London Plan which aims to mitigate the negative impacts of high densities and tall buildings.
		SP10	0			
16	To improve the education and skills levels of all members of	SP1	+	S, M, L-T, D, R, L	London wide	The new station and surrounding commercial area will help to improve access to employment and training.
		SP2	0			There is no clear link between the policy and the IIA Objective.
		SP3	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale  Nature of Impact	Geographical Extent	Commentary and Recommendations
the population, particularly vulnerable groups	SP4	0				There is no clear link between the policy and the IIA Objective.
	SP5	+	S, M, L-T, D, R, M	OPDC area		The creation of new jobs will also lead to the increase of skills training for the local population. OPDC is working with educational institutions to support local training and employment initiatives, both during and post construction. It is important that the employment and training opportunities for local people are specifically focussed on disadvantaged groups otherwise the policy could widen inequalities.
	SP6	+	S, M, L-T, D, R, M	OPDC area		The supporting text of the policy explores potentials for education facilities which will help to improve education and skill levels for members of the public.
	SP7	0				There is no clear link between the policy and the IIA Objective.
	SP8	0				There is no clear link between the policy and the IIA Objective.
	SP9	0				There is no clear link between the policy and the IIA Objective.
	SP10	0				There is no clear link between the policy and the IIA Objective.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	SP1	+	S, M, L-T, D, R, L	London wide	The new station and surrounding commercial area will help to improve access to employment and training which in turn will maximise the social and economic wellbeing of the local and regional population.
		SP2	0			There is no clear link between the policy and the IIA Objective.
		SP3	+	S, M, L-T, D, R, L	London wide	The policy focuses on improving health and wellbeing, reducing health inequalities and enabling healthy lifestyles which will help to maximise the social and economic wellbeing of the local population.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	++	S, M, L-T, D, R, L	London wide	The creation of new jobs and employment centres will help maximise the economic wellbeing of the local and regional population.
		SP6	+	S, M, L-T, D, R, L	London wide	The supporting text states the aim to meet a jobs target which will have a positive effect on this IIA objective. The policy also plays an important role in place-making which can have benefits for social well-being.
		SP7	+	S, M, L-T,	OPDC area	Improving the environment for walking and cycling and improving public transport will



IIA Objective		Performance of Policy		Temporal Scale  Nature of Impact	Geographical Extent	Commentary and Recommendations
				D, R, L		improve access to employment and training.
		SP8	+	S, M, L-T, D, R, L	OPDC area	Green infrastructure can promote social interaction which is important in maximising the social wellbeing of the local population.
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	+	S, M, L-T, D, R, L	OPDC area	The policy plays an important role in place-making which can have benefits for social well-being.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	SP1	+	S, M, L-T, D, R, L	London wide	The proposals in the policy and in the supporting text states that the new investment will provide opportunities to deliver economic growth not just in the OPDC area but also in London as a global city and the UK.
		SP2	+	S, M, L-T, D, R, L	London wide	The policy recognises the need for the development of sustainable economic growth focusing on delivering high quality development in parallel with the environmental and social strands of sustainability.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	+	S, M, L-T, D, R, L	London wide	By creating new housing, areas which become more populated can attract investors and contribute to sustainable economic growth.
		SP5	++	S, M, L-T, D, R, L	London wide	By creating over 56,400 jobs in the OPDC area this will encourage inward investment alongside investment within existing communities to create sustainable economic growth.
		SP6	+	S, M, L-T, D, R, L	OPDC area	By delivering and supporting a new town centre hierarchy, it can encourage more inward investment in town centres within OPDC.
		SP7	+	S, M, L-T, D, R, L	OPDC area	More sustainable transport and better linkages throughout OPDC area and from OPDC to other areas can encourage inward investment.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	+	S, M, L-T, D, R, L	OPDC area	The policy supporting text discusses CIL and s106 payments which is a means of attracting inward investment. This will score positively against the objective.

## PLACES, CLUSTERS AND SITE ASSESSMENTS

Each policy, any associated clusters and their site allocations are in a separate tables below.

P1: Old Oak South

- P1C1 Old Oak Common Station

P2: Old Oak North

P3: Grand Union Canal

P4: Park Royal

- P4C1 Brewery Cluster

P5: Old Park Royal

P6: Park Royal Centre

P7: North Acton

- P7C1 North Acton Station
- P7C2 Old Oak Common Lane Station

P8: Victoria Road & Old Oak Lane

- P8C1 Atlas Junction

P9: Channel Gate

P10: Scrubs Lane

- P10C1 Harrow Road
- P10C2 Laundry
- P10C3 Hythe Road
- P10C4 Mitre Canalside
- P10C5 Mitre Way

P11: Willesden Junction

P12: Wormwood Scrubs

P1: Old Oak South

P1C1: Old Oak Common Station

Site Allocations 1

**Table A-2 – Old Oak South**

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P1	++	M, L-T, I, R, M	Old Oak South and OPDC area	The vision for the area highlights that Old Oak South will see a new commercial centre, centred on the new Old Oak Common Station. The station, along with a new London Overground station on Old Oak Common Lane, will be integrated into its surroundings, providing visitors, employees and residents with easy access to west London and the OPDC regeneration area. Bounded by Wormwood Scrubs and the Grand Union Canal, these may contribute to the creation of a unique sense of place. The land uses supported in the policy text should help to support the creation of a sense of place, leading to the prediction of significant positive effects against this objective. As the majority of Old Oak South is likely to come forward for development post-2026, medium to long term effects are predicted.
		P1C1	++	M, L-T, I, R, M	Old Oak South and OPDC area	This cluster policy provides more clarity on the interface aspects of the public realm of Old Oak Common Station with the station square and beyond. By providing a steer on how this should be delivered, a greater sense of place-making could be achieved.
		Site A 1	+	S, M-T, I, R, M	Old Oak South and OPDC area	By delivering new homes and space for new jobs, site allocations will support place-making.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P1	++	M, L-T, I, R, M	Old Oak South and OPDC area	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this IIA Objective.
		P1C1	0			There is no clear link between the policy and the IIA Objective.
		Site A 1	+	M, L-T, I, R, M	Old Oak South and OPDC area	The vision aims to encourage high density buildings. Therefore, it can be assumed that high density buildings for these site allocations will be encouraged.
3	Maximise the reuse of previously	P1	++	M, L-T, I, R, M	Old Oak South and OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		P1C1	+	M, L-T, I, R,	Old Oak South	All development in the OPDC area is on previously developed land, so will score

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	developed land and existing buildings, including the remediation of contaminated land			M	and OPDC area	positively against this objective.
		Site A 1	+	M, L-T, I, R, M	Old Oak South and OPDC area	
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P1	++	M, L-T, D, R, M	OPDC area, London wide	The vision for Old Oak South includes that the area will be focussed on a new Old Oak Common station and a new London Overground station. In addition, the policy aims to contribute to 'the delivery of a permeable, inclusive and accessible street network to improve access' This could lead to significant benefits against this objective through encouraging the use of non-motorised transport across the area.. The policy aims to ensure that Old Oak Common Station will be delivered on time.
		P1C1	++	M, L-T, D, R, M	OPDC area, London wide	The policy describes the further detail around the public realm and movement associated with the station which in turn would support the Objective around non-motorised transport
		Site A 1	+	M, L-T, I, R, M	OPDC area, London wide	Policies P1 and P1C1 aim to minimise the need to travel and provide new stations. The site allocations in this area will therefore be situated near good sustainable transport, walking, and cycling links. They aim to add alternative employment opportunities, service and amenities. This in turn will reduce needed to travel.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet	P1	++	M, L-T, D, R, M	OPDC area	The policy wording specifies that the delivery of new residential development across the whole of Old Oak South will be supported, which would lead to positive effects against this objective.
		P1C1	0			There is no clear link between the policy and the IIA Objective.
		Site A 1	+	S, M-T, D, R, M	OPDC area	The site allocations are situated in an accessible area and will be required to accord with affordable housing policies within the Housing Chapter.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	identified local needs					
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P1	+/-	S, M, L-T, D, IR, L	OPDC area	A significant increase in the development could lead to an increase in hardstanding and built development, which could have negative effects in relation to surface water and sewer flooding if not adequately mitigated through flood management and design as suggested in the Environment and Utilities Chapter. The policy text does not specifically refer to flooding or heat island though it mentions climate change mitigation and adaptation. This could lead to positive effects against this objective.
		P1C1	+/-	S, M, L-T, D, IR, L	Old Oak South	Open spaces are proposed to mitigate and adapt to climate change are discussed in policy text, but how this could be achieved is defined in the Environment and Utilities Chapter.
		Site A 1	+/-	S, M, L-T, D, IR, L	Old Oak South	The allocation sites are located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective is not appropriately mitigated through guidance in the Environment and Utilities Chapter.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and	P1	+/-	M, L-T, D, R, M	OPDC area, London wide and nationally	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		P1C1	+/-	M, L-T, D, R, M	OPDC area, London wide and nationally	The cluster aims to support the growth of the station and ensure it acts as a catalyst for wider neighbourhood development. Focussing development around new train infrastructure could minimise contributions to climate change. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		Site A 1	+/-	M, L-T, D, R, M	OPDC area, London wide and nationally	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	energy					
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P1	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P1C1	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 1	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
9	Improve the quality of the water environment	P1	+/-	M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to provide access to green infrastructure associated with the new railway interchange and away towards Wormwood Scrubs. This could provide an opportunity for the positive management of water quality in this area. However, new vehicle connections across the Grand Union Canal may lead to some negative effects from pollution run off if not appropriately mitigated through policies in the Environment and Utilities Chapter.
		P1C1	+/-	M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to provide access to green infrastructure associated with the new railway interchange and away towards Wormwood Scrubs and connections towards Grand Union Canal. This could provide an opportunity for the positive management of water quality in these areas. However, new vehicle connections across the Grand Union Canal may lead to some negative effects from pollution run off if not appropriately mitigated through policies in the Environment and Utilities Chapter.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 1	+/-	M, L-T, D, IR, M	OPDC area and surrounding boroughs	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and water management facilities. This could provide an opportunity for the positive management of water quality in these areas.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P1	+/-	M, L-T, D, IR, M	OPDC area	<p>The place includes a designated nature reserve to the southern edge of the Grand Union Canal. The policy seeks to enhance the Birchwood nature reserve as well as providing a network of connected open spaces for the diverse population. This could provide an opportunity for the positive management of biodiversity in these areas. However, new vehicle connections across the Grand Union Canal may lead to some negative effects from pollution run off if not appropriately mitigated through policies in the Environment and Utilities Chapter.</p> <p><i>The ongoing management of biodiversity in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects on biodiversity arise from its development. Appropriate policies in the Environment and Utilities chapter will ensure this.</i></p>
		P1C1	+/-	M, L-T, D, IR, M	OPDC area	The policy refers specifically the delivery of new public open spaces but makes no specific links with what biodiversity could be created and encouraged as a result (e.g. native species, species suitable for birds/bats and pollinators). By increasing pedestrian access to Wormwood Scrubs, the existing biodiversity in this nature reserve could be negatively impacted if not appropriately mitigated through policies in the Environment and Utilities Chapter.
		Site A 1	+	S, M-T, D, IR, M	OPDC area	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and deliver a net additional increase in biodiversity.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P1	+/-	S, M, L-T, D, R, M	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		P1C1	+/-	S, M, L-T, D, R, M	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 1	+/-	S, M, L-T, D, R, M	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
12	To conserve and enhance the historic environment, heritage assets and their settings	P1	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	Supporting text to the policy highlights that the Grand Union Canal is a designated Conservation Area. The policy specifically states that supported developments will conserve and enhance the Grand Union Canal, and that it becomes an accessible focal point for the area as well as historic railway context and Wormwood Scrubs. This could provide some benefits against this objective.
		P1C1	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy and supporting text states that the area's railway heritage will inform the context of future development of the immediate area surrounding the station. This could provide some benefits against this objective.
		Site A 1	+	S, M, L-T, I, IR, M	OPDC area and surrounding boroughs	Site allocations are situated near heritage assets which provides an opportunity for development conserve and enhance the historic environment.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P1	++	M,L-T, I, R, M	Old Oak South, OPDC area and neighbouring boroughs	The policy seeks to ensure future local character is informed by the area's existing character and improve connectivity across the area, which could improve community interaction. This could have positive benefits against this objective. Further benefits may also be realised through the supporting of the creation of community space as part of the town centre uses.
		P1C1	+	M,L-T, I, R, M	Old Oak South and OPDC area	The policy seeks to deliver a station destination that will ensure that people will want to congregate in the area, which could help increase a sense of community though it does explicitly refer to this.
		Site A 1	+	M,L-T, I, R, M	Old Oak South and OPDC area	It can be assumed that by delivering new homes and space for new jobs that these site allocations will positively contribute to this IIA objective.
14	Improve safety and reduce	P1	+	M,L-T, I, R, M	Old Oak South and OPDC area	The policy seeks to deliver a permeable street network that will help to create an accessible environment which indirectly could help to improve safety. Further benefits may also be realised through the supporting of the creation of community space as part



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	crime and the fear of crime	P1C1	+	M,L-T, I, R, M	Old Oak South and OPDC area	of the town centre uses, which could reduce the potential for anti-social behaviour. It can be assumed that in designing a new state of the art station, these elements will be taken into account in the station design and its evolving urban context.
		Site A 1	+	M,L-T, I, R, M	Old Oak South and OPDC area	It can be assumed that in high quality design which has been included in policy P1C1 supporting text will be applied to the allocation sites.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P1	++	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver social infrastructure which could contribute to positive impacts on mental health and physical wellbeing. Alongside measures to ensure the delivery of a sense of place and improve connectivity across the area this could have positive benefits against this objective. Further benefits may also be realised through the supporting of the creation of community space as part of the town centre uses. Accessibility to health services and physical activity may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. Long term potential air quality benefits may also have benefits for health. Access to green space could also provide both physical and mental health benefits. Some negative effects on health during the construction period may result from noise and air pollution if not adequately managed.
		P1C1	+	M, L-T, I, R, M	Old Oak South and OPDC area	The policy seeks to deliver a high quality environment within and around the station including green infrastructure. These elements could indirectly deliver benefits against this IIA Objective.
		Site A 1	+	M, L-T, I, R, M	Old Oak South and OPDC area	It can be assumed that site allocations delivering housing will include elements of affordable housing in accordance with the Housing Chapter and open space in accordance with the Environment and Utilities Chapter. The sites are also located near proposed sustainable transport opportunities and walking/cycling routes which may encourage exercise and also make access to health facilities more efficient. These elements can provide mental and physical health benefits.
16	To improve the education and skills levels of all	P1	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver social infrastructure. Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
members of the population, particularly vulnerable groups	P1C1	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.	
	Site A 1	+	M,L-T, I, R, L	OPDC area and surrounding boroughs	Delivery of housing set out in site allocations will support the delivery of educational facilities through planning contributions.	
	17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P1	+	M,L-T, I, R, M	OPDC area and surrounding boroughs
	P1C1	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to training facilities may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.	
	Site A 1	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	It can be assumed that site allocations that contributes housing will have some associated social infrastructure contained within it. The site allocations are located near employment opportunities and sustainable transport links. This will make jobs in other locations in London more accessible.	
	18	To encourage inward investment alongside investment within existing communities, to create sustainable	P1	++	M, L-T, I, R, L	OPDC area and surrounding boroughs
	P1C1	++	M, L-T, I, R, L	OPDC area and surrounding boroughs	This policy builds on the Place policy by providing additional clarity on how Old Oak Common station will become a major catalyst for the regeneration of the area.	
	Site A 1	+	M, L-T, I, R, L	OPDC area and	Providing new, high quality homes and space for jobs in the OPDC area can attract investment. The whole OPDC area itself is all about regeneration, transport and jobs and	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	economic growth				surrounding boroughs	will score positively against this objective.

**Table A-3 – Old Oak North**

**P2: Old Oak North**  
**Site Allocations 2, 3 and 4**  
**Reasonable Alternative (RA) 1 (EMR released from SIL for mixed use development including housing)**

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P2	++	S, M-T, I, R, M	OPDC and surrounding area	The vision for the area highlights the high-quality redevelopment planned for the area. The development will be industrial-led and takes into account the areas heritage assets. The future industrial uses will benefit from enhanced streets, ancillary active uses and open spaces to serve employees and visitors... This could lead to significant benefits against this objective.
		Site A 2	+	S, M-T, I, R, M	OPDC and surrounding area	By delivering space for new jobs, site allocations will support place-making.
		Site A 3	+	S, M-T, I, R, M	OPDC and surrounding area	
		Site A 4	+	S, M-T, I, R, M	OPDC and surrounding area	
		RA 1	-	S, M-T, I, R,	OPDC and	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				M	surrounding area	placemaking could be negatively impacted by the operation of surrounding uses.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P2	++	S, M-T, I, R, M	OPDC and surrounding area	The vision for the area highlights that densities in Old Oak North will include high density development in areas with good public transport access and facilities, with lower density development in sensitive areas such as the canal. This could lead to the efficient use of land in this area.
		Site A 2	+	S, M-T, I, R, M	OPDC and surrounding area	The space for new jobs within Old Oak North suggests that development within site allocations will be of high density. This could lead to the efficient use of land in this area.
		Site A 3	+	S, M-T, I, R, M	OPDC and surrounding area	
		Site A 4	+	S, M-T, I, R, M	OPDC and surrounding area	
		RA 1	+/-	S, M-T, I, R, M	OPDC and surrounding area	
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P2	+	S, M-T, I, R, M	OPDC and surrounding area	The whole of OPDC is in an area of previously developed land. It is likely that remediation will be required given the historic uses present on site, but this isn't stated in the policy or the supporting text.
		Site A 2	+	S, M, L-T, I, R, M	OPDC and surrounding area	All development in the OPDC area is on previously developed land, so these allocations will score positively against this objective.
		Site A 3	+	S, M, L-T, I, R, M	OPDC and surrounding area	
		Site A 4	+	S, M, L-T, I, R, M	OPDC and surrounding area	
		RA 1	+	S, M, L-T, I, R, M	OPDC and surrounding area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M	surrounding area	
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P2	++	M, L-T, D, R, M	OPDC and surrounding area	At present, access from the existing Willesden Junction Station to Old Oak North is poor. Old Oak North also doesn't include any continuous east-west links. The policy seeks to facilitate the delivery of a intensified industrial uses supported by new and enhanced vehicular, walking and cycling routes providing connections to public transport. The policy also commits to delivering enhanced pedestrian and cycle infrastructure along key routes, including segregated cycle lanes where feasible and enhancing the highways capacity of routes into and through Od Oak North.
		Site A 2	+	M, L-T, D, R, M	OPDC and surrounding area	The new jobs provided by the site allocations will facilitate enhancements to the street network.
		Site A 3	+	M, L-T, D, R, M	OPDC and surrounding area	
		Site A 4	+	M, L-T, D, R, M	OPDC and surrounding area	
		RA 1	+	M, L-T, D, R, M	OPDC and surrounding area	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local	P2	++	S, M-T, D, R, M	OPDC area	The policy does not make specific reference to the delivery of housing however Old Oak North will make a 'significant' contribution to the area's housing need through the proposed site allocations.
		Site A 2	O	S, M-T, D, R, M	OPDC area	The site allocations do not propose housing therefore there is no clear link between the policy and the IIA Objective
		Site A 3	O	S, M-T, D, R, M	OPDC area	
		Site A 4	O	S, M-T, D, R, M	OPDC area	
		RA 1	+	S, M-T, D, R, M	OPDC area	The RA would provide housing through mixed-use development if brought forward as a

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	needs			M		preferred option.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P2	+/-	S, M, L-T, D, R, L	OPDC area	The policy identifies that canalside open spaces and green infrastructure will be delivered in Old Oak North.
		Site A 2	+/-	S, M, L-T, D, IR, L	OPDC and surrounding area	The allocation sites are located in a flood zone 1 area so have a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective is not appropriately mitigated through guidance in the Environment and Utilities Chapter.
		Site A 3	+/-	S, M, L-T, D, IR, L	OPDC and surrounding area	
		Site A 4	+/-	S, M, L-T, D, IR, L	OPDC and surrounding area	
		RA 1	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport,	P2	+/-	S, M-T, D, R, M	Old Oak North and OPDC area	Enabling access to public transport infrastructure and delivering walking and cycling routes should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		Site A 2	+/-	S, M-T, D, R, M	Old Oak North and OPDC area	Enabling access to public transport infrastructure and delivering walking and cycling routes should help to reduce the reliance on fossil fuels in the long term. The policy also aims to enable Old Oak Sidings to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area scoring positively towards this SA objective. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		Site A 3	+/-	S, M-T, D, R, M	Old Oak North and OPDC area	
		Site A 4	+/-	S, M-T, D, R, M	Old Oak North and OPDC area	
		RA 1	+/-	S, M-T, D, R, M	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	heating and energy			M	and surrounding boroughs	
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P2	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP1 regarding innovation, including supporting the Circular Economy. The policy seeks to safeguard the Old Oak Sidings site for continued use as a waste management site, which could reduce the potential impact from the regeneration on the surrounding boroughs as these may otherwise have received the displacement of such as facility however no specific mention is made to recycling and/or reuse of waste at this facility. The delivery of an energy centre within the area may comprise an energy from waste facility, which could help to reduce waste arising from regeneration from the OPDC area.
		Site A 2	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development will increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP1 regarding innovation, including supporting the Circular Economy.
		Site A 3	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 4	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	
		RA 1	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	
9	Improve the	P2	+/-	S, M-T, D, IR, L	OPDC area and	Delivering building heights that appropriate respond to sensitive uses such as the Grand Union Canal, may help to reduce the potential impact from development on water quality

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
quality of the water environment					surrounding boroughs	in this area. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment.
	Site A 2	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs		Through the implementation of policies within the Environment and Utilities Chapter, site 2 will be required to deliver a range of canalside open spaces that could include water management facilities. This could provide an opportunity for the positive management of water quality in these areas.
	Site A 3	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs		
	Site A 4	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs		
	RA 1	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs		
10 Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P2	+/-	S, M, L-T, D, IR, M	Old Oak North		Delivering building heights that appropriate respond to sensitive uses such as the Grand Union Canal, may help to reduce the potential impact from development on biodiversity in this area. Open spaces to be provided may include enhancements for biodiversity in the 'soft' spaces to be provided.
	Site A 2	+	S, M, L-T, D, IR, M	Old Oak North		Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a net additional increase in biodiversity.
	Site A 3	+	S, M, L-T, D, IR, M	Old Oak North		
	Site A 4	+	S, M, L-T, D, IR, M	Old Oak North		
	RA 1	+	S, M, L-T, D, IR, M	Old Oak North		



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P2	+/-	S, M, L-T, D, R, M	Old Oak North	Enabling access to public transport infrastructure and delivering walking and cycling routes should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance. The development of a potential energy from waste facility within the area as identified in the justification text may also increase air pollution locally if not mitigated adequately.
		Site A 2	+/-	S, M, L-T, D, R, L	Old Oak North	Enabling access to public transport infrastructure and delivering walking and cycling routes should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance
		Site A 3	+/-	S, M, L-T, D, R, L	Old Oak North	
		Site A 4	+/-	S, M, L-T, D, R, L	Old Oak North	
		RA 1	+/-	S, M, L-T, D, R, L	Old Oak North	
12	To conserve and enhance the historic environment, heritage assets and their settings	P2	++	S, M, L-T, D, IR, M	Old Oak North	Supporting text to the policy highlights that the Grand Union Canal is a designated Conservation Area. The policy specifically states that supported developments will conserve and enhance heritage assets including the Grand Union Canal and Rolls Royce Building. This could provide some benefits against this objective.
		Site A 2	+	S, M, L-T, D, IR, M	Old Oak North	Site allocations and RA 1 are situated near heritage assets which provides an opportunity for development conserve and enhance the historic environment.
		Site A 3	+	S, M, L-T, D, IR, M	Old Oak North	
		Site A 4	+	S, M, L-T, D, IR, M	Old Oak North	
		RA 1	+	S, M, L-T, D, IR, M	Old Oak North	
13	Increase community cohesion and	P2	+	S, M, L-T, D, IR, M	Old Oak North	The policy seeks to deliver high quality, industrial-led development alongside active ancillary uses which will support community cohesion for both the employee and nearby residential communities. The policy also includes the delivery of new publicly accessible open spaces, including new canalside public open spaces if feasible
		Site A 2	+	S, M, L-T, D, IR, M	Old Oak North	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	reduce social exclusion to encourage a sense of community and welfare	Site A 3	+	S, M, L-T, D, IR, M	Old Oak North	It can be assumed that by delivering new jobs and active ancillary uses that these site allocations will positively contribute to this IIA objective.
		Site A 4	+	S, M, L-T, D, IR, M	Old Oak North	
		RA 1	+	S, M, L-T, D, IR, M	Old Oak North	It can be assumed that by delivering new homes and space for new jobs that RA 1 will positively contribute to this IIA objective.
14	Improve safety and reduce crime and the fear of crime	P2	+	S, M, L-T, D, IR, M	Old Oak North	The policy seeks to deliver a permeable street network that will help to create an accessible environment with ancillary uses providing active frontages which indirectly could help to improve safety.
		Site A 2	+	S, M, L-T, D, IR, M	Old Oak North	It can be assumed that in high quality design which has been included in policies D2 and D4 supporting text will be applied to the allocation sites and RA 1.
		Site A 3	+	S, M, L-T, D, IR, M	Old Oak North	
		Site A 4	+	S, M, L-T, D, IR, M	Old Oak North	
		RA 1	+	S, M, L-T, D, IR, M	Old Oak North	
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P2	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver access to new canalside open spaces where feasible that could also provide both physical and mental health benefits. Accessibility to health services and physical activity may be improved through the increased connectivity within and to the surrounding areas by walking and cycling. Long term potential air quality benefits may also have benefits for health. Some negative effects on health during the construction period may result from noise and air pollution if not adequately managed.
		Site A 2	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The sites are located near sustainable transport opportunities and walking/cycling routes which may encourage exercise and also make access to health facilities more efficient. These elements can provide mental and physical health benefits. As the sites propose new jobs for the area this could bring health-related benefits as part of the employment compensation package although this would only benefit those employed by the companies operating from these sites.
		Site A 3	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 4	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		RA 1	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	It can be assumed that delivering housing will include elements of affordable housing in accordance with the Housing Chapter and open space in accordance with the Environment and Utilities Chapter. The sites are also located near sustainable transport opportunities and walking/cycling routes which may encourage exercise and also make access to health facilities more efficient. These elements can provide mental and physical health benefits. As the sites propose new jobs for the area this could bring health-related benefits as part of the employment compensation package although this would only benefit those employed by the companies operating from these sites.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P2	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. The addition of 3,300 jobs in the area may also offer entry-level roles providing training such as apprenticeships, as required in policy E5, although this is not specifically referenced within the policy.
		Site A 2	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by walking and cycling. As the sites propose new jobs for the area this could bring education and training opportunities in the form of apprenticeships or internships for example.
		Site A 3	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 4	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		RA 1	+	S, M, L-T, I, R, M	OPDC area and	It can be assumed that site allocation that contributes housing will have some associated social infrastructure, such as education facilities, contained within it, but it's uncertain at

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding boroughs	this level of detail how likely this will be. However, accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by walking and cycling. As the sites propose new jobs for the area this could bring education and training opportunities in the form of apprenticeships or internships for example.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P2	+	M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver 3,300 additional jobs that could include training facilities. Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		Site A 2	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	The site allocations provide opportunities for new jobs and are located near employment opportunities and sustainable transport links. This will make jobs in other locations in London more accessible.
		Site A 3	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 4	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	
		RA 1	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	
18	To encourage inward investment alongside investment within existing	P2	++	M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy aims to deliver an industrial-led redevelopment of the area including 3,300 additional jobs which increases the potential for inward and sustainable investment in the area and therefore contributes positively to SA objective.
		Site A 2	+	M, L-T, I, R, M	OPDC area and surrounding	The whole OPDC area itself is all about regeneration, transport and jobs and will score positively against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	communities, to create sustainable economic growth				boroughs	
		Site A 3	+	M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 4	+	M, L-T, I, R, M	OPDC area and surrounding boroughs	
		RA 1	+	M, L-T, I, R, M	OPDC area and surrounding boroughs	Providing new, high quality homes in the OPDC area can attract investment. The whole OPDC area itself is all about regeneration, transport and jobs and will score positively against this objective.

**Table A-4 – Grand Union Canal**

**P3: Grand Union Canal**

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P3	++	S, M, L-T, I, R, L	OPDC area and London wide	The vision for the Grand Union Canal states that it will be a defining feature of both Old Oak and Park Royal. The policy states that the land along the canal will deliver housing, employment uses along its length in Channel Gate, and industrial uses and ancillary uses with active and positive frontages at ground floor level in Old Oak North and Park Royal. This should help to create a sense of place.
2	To optimise the efficient use of land through	P3	++	S, M, L-T, I, R, M	OPDC area	The policy specifies areas for different uses and a range of building heights reflecting the canal's heritage and biodiversity designations and the street network. This could lead to benefits against this Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	increased development densities and building heights, where appropriate					
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P3	++	S, M, L-T, I, R, M	OPDC area	The OPDC area is already on previously developed land. This means that the majority of new developments will maximise the reuse of previously developed land.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P3	++	S, M, L-T, I, R, M	OPDC area	The canal itself is not currently extensively used for transport and is home to a community of residential moorings. The policy sets out that development in this area will provide a high quality walking and cycling route enabling people to access the length of Old Oak, Park Royal and beyond. New bridge crossings will support easier north/south movement while the canal itself will be promoted and used for the transport of people and freight. This is reflected in the policy wording, with the addition of the use of the canal for leisure uses. This could lead to significant benefits against this objective.
5	Improve access to well designed, well-located, market, affordable and inclusive	P3	+/-	S, M, L-T, D, R, M	Grand Union Canal	The canal itself is not currently extensively used for transport and is home to a community of residential moorings. The policy sets out that new bridge crossings will support easier north/south movement while the canal itself will be promoted and used for the transport of people and freight. The policy states that new development will be supported where it supports the delivery of residential and visitor moorings in appropriate locations that do

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	housing of a range of types and tenures, to meet identified local needs					not adversely impact on the regeneration of the wider area or navigational function of the canal. It also identifies that residential uses with front doors on to the canal edge will be supported. This could lead to both positive and negative effects against this objective, as some existing residential moorings may be lost, where they are not considered to be in conformity with the regeneration proposals of the Local Plan. However, the overall net delivery of housing supply will be higher.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P3	+	S, M, L-T, D, IR, L	OPDC area	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P3	+/-	S, M, L-T, D, R, M	Old Oak South and Old Oak North	Minimising the need to travel and focussing development around new public transport infrastructure such as walking and cycling, should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
8	To minimise production of	P3	+/-	S, M, L-T, D, R, M	OPDC area and	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste				surrounding boroughs	programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
9	Improve the quality of the water environment	P3	+/-	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy wording seeks to ensure that the use of the Grand Union Canal for passenger and freight transport and leisure uses should take into account any impact on drainage functions. Furthermore, the Policy also states that any water entering the canal should be of adequate quality in line with the Water Framework Directive or any subsequent standards This could have some benefits against this objective. However, an increase in the use of the canal could increase the potential for negative effects on the water quality of this resource if not appropriately mitigated through policies in the Environment and Utilities Chapter.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P3	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The vision for the area states that the ecological role of the canal will be enhanced and used to support the delivery of the green infrastructure network. The policy wording seeks to ensure that the use of the Grand Union Canal for passenger and freight transport and leisure uses should take into account any impact on biodiversity. The delivery of towpath lighting should also consider the potential impact on biodiversity, as set out in the policy wording. This could have some benefits against this objective. Supporting text highlights that the canal is designated as a Site of Importance to Nature Conservation (SINC) that will be integral to the OPDC green infrastructure network.
11	To minimise air,	P3	+/-	S, M, L-T, D,	OPDC area	Minimising the need to travel and focussing development around new public transport



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	noise and light pollution, particularly for vulnerable groups			R, M		infrastructure such as walking and cycling as well as the creation of green infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
12	To conserve and enhance the historic environment, heritage assets and their settings	P3	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy wording seeks that development proposals strengthen local identity and character by conserving and enhancing the Grand Union Canal Conservation Area and other associated heritage assets. It seeks to deliver a range of 6-8 storeys within Channel Gate responding to its heritage significance. This could lead to significant benefits against this objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P3	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to provide a range of green and civic spaces, that could contribute to increasing a sense of community wellbeing locally, leading to positive effects against this objective.
14	Improve safety and reduce crime and the fear of crime	P3	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy states that bridge infrastructure and associated spaces should be designed to be integrated into the built environment and are accessible, safe and include active and positive frontages where possible. It also states that overlooking, security and safety along the canal and canalside spaces within Park Royal and Old Oak North should be delivered via positive frontages. The policy also specifically sets out the need for towpath lighting, which could reduce the fear of crime along the canal, leading to positive effects.
15	Maximise the health and wellbeing of the	P3	+	S, M, L-T, D, IR, M	OPDC area and surrounding	The policy seeks to deliver Channel Gate Local Park, other smaller spaces, improvements to existing spaces and new basins and waterspaces. This could have benefits for physical and mental health through physical activity, increased community

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	population, reduce inequalities in health and promote healthy living				boroughs	interaction and improved air quality in this area.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P3	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P3	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The vision and policy seek to support educational and commercial moorings which could lead to some positive benefits against this objective arising from its implementation.
18	To encourage inward investment alongside investment within existing communities, to create sustainable	P3	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy could increase the connectivity of the employment and residential areas across the plan area, as well as improving the local environment. This could be attractive to inward investors, leading to potential benefits against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	economic growth					

**Table A-5 – Park Royal West**

**P4: Park Royal West  
P4C1: Brewery Cluster  
Site Allocation 5 and 38**

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P4	++	S, M, L-T, I, R, L	Park Royal	The policy supports additional development which is appropriate to the industrial context across Park Royal as well as improvements to the transport network, including key routes, and enhanced greening and public realm. These policy objectives could lead to an improvement in the sense of place. In addition, heritage related design considerations could help to reinforce a sense of local distinctiveness.
		P4C1	+	S, M, L-T, I, R, L	Park Royal	The policy will ensure that new development is designed and located to support the activation of streets walking/ cycling routes and open space – all of which can play an important role in enhancing the built environment and encouraging place-making.
		Site A 5	+	S, M, L-T, I, R, L	Park Royal	The new residential and commercial floorspace proposed, as well as access to open space, will contribute to the area's sense of place.
		Site A 38	+	S, M, L-T, I, R, L	Park Royal	
2	To optimise the efficient use of land through increased development	P4	++	S, M, L-T, I, R, M	Park Royal	The policy supports intensification, responding to the need to make optimum use of land to create more jobs and support more businesses and also supports increased building heights. This should lead to the optimisation of land in this location.
		P4C1	+	S, M, L-T, I, R, M	Park Royal	The policy explores the idea of taller structures which will optimise the use of land through increased development densities.
		Site A 5	+	S, M, L-T, I,	Park Royal	Policy P4 aims to optimise use of land therefore, it can be assumed that this would apply

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	densities and building heights, where appropriate	Site A 38	+	R, M S, M, L-T, I, R, M	Park Royal	for this site allocation.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P4	++	S, M, L-T, I, R, M	Park Royal	The policy supports intensification, responding to the need to optimise the reuse of this land to create more jobs and support more businesses.
		P4C1	+	S, M, L-T, I, R, M	Park Royal	The policy directs development to appropriate locations in this area, including previously developed land.
		Site A 5	+	S, M, L-T, I, R, M	Park Royal	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 38	+	S, M, L-T, I, R, M	Park Royal	
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P4	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The increased delivery of employment uses would help minimise the need for local people to travel to find work. Park Royal West currently suffers from high levels of road congestion generated by industrial functions and a reliance on private vehicular transport. Improvements to the movement network, particularly walking and cycling routes, to connect surrounding residential neighbourhoods and routes from stations into Park Royal could lead to significant benefits against this objective.
		P4C1	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy supports high quality walking and cycling routes which will improve accessibility and reduce the need to travel by car.
		Site A 5	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	Policies P4 and P4C1 aim to minimise the need to travel and improve walking and cycling provision. The site allocation in this area will therefore have access to good sustainable transport links.
		Site A 38	+	S, M, L-T, I, R, M	OPDC area and	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding boroughs	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P4	+	S, M, L-T, D, R, M	Park Royal	The policy aims to facilitate the delivery of housing which could deliver some benefits against this objective.
		P4C1	+	S, M, L-T, D, R, M	Park Royal	The policy aims to facilitate the delivery of housing which could deliver some benefits against this objective.
		Site A 5	+	S, M, L-T, D, R, M	Park Royal	The site allocation supports the delivery of housing. It is unclear what types of housing this would include at this stage, but it is likely positive effects against this objective.
		Site A 38	+	S, M, L-T, D, R, M	Park Royal	
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P4	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	Impacts of the urban heat island effect and surface water can be minimised by greening the area. Policies in the Environment and Utilities chapter will also ensure these impacts are adequately mitigated. This could lead to positive effects against this objective.
		P4C1	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	Possible impacts of the urban heat island effect and surface water flooding could be mitigated by the policies in the Environment and Utilities Chapter.
		Site A 5	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The allocation site is located in a flood zone 1 area so has a low risk of flooding. New development will use energy and produce heat which may have a negative impact against this objective. Mitigation for this is covered in the Environment and Utilities Chapter.
		Site A 38	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P4	+/-	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	The policy supports improvements to the transport network to address congestion, as well as the delivery of improvements to walking and cycling routes. These changes could lead to an improvement in local emissions levels. Development proposals could help to improve energy efficiency through improving the performance of buildings. This may balance out a potential increase in demand for energy from new development, although the exact mix of uses and potential energy balance is unknown, leading to uncertainty in the prediction of effects.
		P4C1	+/-	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	Minimising the need to travel and focussing development around sustainable transport infrastructure should help to reduce the reliance on fossil fuels in the long term as discussed in policy P4 and cluster P4C1. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		Site A 5	+/-	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	
		Site A 38	+/-	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and	P4	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme. The Environment and Utilities chapter include policies on waste management and waste minimisation which should mitigate against these. Also, the Twyford Waste Transfer station will be protected through this policy to ensure there is sufficient capacity across the West London Waste Plan area to manage waste.
		P4C1	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 5	+/-	S, M-T, D, R, M	OPDC area and	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	recovery rates as well as composting of all green waste	Site A 38	+/-	S, M-T, D, R, M	surrounding boroughs OPDC area and surrounding boroughs	programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
9	Improve the quality of the water environment	P4	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	The new development from policy P4 may lead to some negative effects from pollution run off. However, urban greening (green roofs/walls etc) and the implementation of policies within the Environment and Utilities Chapter, could provide an opportunity for the positive management of water quality.
		P4C1	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	The new development from policy P4 may lead to some negative effects from pollution run off. However, urban greening (green roofs/walls etc) and the implementation of policies within the Environment and Utilities Chapter, could provide an opportunity for the positive management of water quality.
		Site A 5	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	The new development from policy P4 may lead to some negative effects from pollution run off. However, urban greening (green roofs/walls etc) and the implementation of policies within the Environment and Utilities Chapter, could provide an opportunity for the positive management of water quality.
		Site A 38	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P4	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy supports the introduction of more green infrastructure. This should enhance existing biodiversity and could lead to significant positive effects locally.
		P4C1	+	S, M, L-T, I, R, M	Park Royal	The policy aims to contribute towards or deliver improvements to green infrastructure assets. This should enhance existing biodiversity and could lead to significant positive effects locally.
		Site A 5	+	S, M, L-T, I, R, M	Park Royal	The allocation site is in close proximity to green open space so impacts to this area need to be mitigated. Improvements to this open space should enhance existing biodiversity and could lead to significant positive effects locally.
		Site A 38	+	S, M, L-T, I, R, M	Park Royal	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M		
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P4	+	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	The policy supports improvements to the road network to address congestion, as well as delivering improvements to walking and cycling routes. Therefore, the policy should lead to an improvement in air, noise and light pollution locally. The delivery of industrial uses may mean that pollution levels remain higher in the SIL compared with the surrounding areas. The policy aims to improve air quality monitoring and address any issues which arise from the monitoring results. This should also be monitored and regulated by the regulatory control system, which is outside the remit of the Local Plan.
		P4C1	+	S, M, L-T, I, R, M	Park Royal	Focussing improvements to routes to/from stations should help encourage more sustainable travel and reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated. Implementation of the Design, Environmental policies and London Plan guidance should ensure impacts are adequately mitigated.
		Site A 5	+	S, M, L-T, D, R, L	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated. Implementation of the Design, Environmental policies and London Plan guidance should ensure impacts are adequately mitigated.
		Site A 38	+	S, M, L-T, D, R, L	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated. Implementation of the Design, Environmental policies and London Plan guidance should ensure impacts are adequately mitigated.
12	To conserve and enhance the historic environment, heritage assets and their settings	P4	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy will help to protect proposed designated heritage assets and their setting. This could provide some benefits against this objective.
		P4C1	+	S, M, L-T, I, R, M	Park Royal	The policy aims to ensure proposal positively respond to heritage assets and help to reinforce a degree of local distinctiveness – both of which could provide some benefits against this objective.
		Site A 5	+	S, M, L-T, I, R, M	Park Royal	Policies P4 and P4C1 apply to this site allocation so implementation of all of these policies should deliver benefits against this objective.
		Site A 38	+	S, M, L-T, I, R, M	Park Royal	



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P4	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	The policy seeks to continue the function of the industrial land and support improvements to the movement network. Access to work opportunities resulting in people living and working in the same area could provide some benefits against this objective.
		P4C1	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	New residential and commercial floorspace as well as use of shared open space could encourage people to mix and promote community cohesion.
		Site A 5	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	New residential and commercial floorspace as well as use of shared open space could encourage community cohesion and positively contribute to this IIA objective.
		Site A 38	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	
14	Improve safety and reduce crime and the fear of crime	P4	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	The policy supports improvements to the movement network to help improve safety and address congestion, as well as improving the public realm through the introduction of active and/or positive frontages. These could provide benefits in terms of reducing crime and the fear of crime.
		P4C1	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	The policy will ensure that new development is designed and located to support the activation of streets walking/ cycling routes and open space – all of which can play an important role in reducing crime and the fear of crime. Further benefits may also be realised through the supporting active frontages such as town centre uses, which could reduce the potential for anti-social behaviour.
		Site A 5	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	It can be assumed that policy P4 and P4C1 will be applied to this site allocation.
		Site A 38	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	
15	Maximise the health and wellbeing of the	P4	+	S, M, L-T, D, R, M	Park Royal and surrounding areas	The delivery of additional industrial uses would help maintain jobs in the area, which would help contribute towards maximising wellbeing. The policy supports sustainable transport options which could also lead to positive health effects in this location by encouraging people to walk and cycle and helping to improve local air quality.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	population, reduce inequalities in health and promote healthy living					Accessibility to health services at Central Middlesex Hospital may also be improved through the increased connectivity. However, due to the low proportion of potential residents in this area and the retention of the area as an industrial location, effects are unlikely to be significant.
		P4C1	+	S, M, L-T, D, R, M	Park Royal and surrounding areas	The policy aims to promote access to existing open space, as well as walking and cycling routes. This approach could maximise health and wellbeing of the population by encouraging people to exercise outside for free and therefore deliver benefits against this IIA Objective.
		Site A 5	+	S, M, L-T, D, R, M	Park Royal and surrounding areas	Policies P4 and P4C1 will ensure that this site allocation has good walking and cycling links and access to open space – both of which may encourage exercise.
		Site A 38	+	S, M, L-T, D, R, M	Park Royal and surrounding areas	
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P4	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding residential areas by sustainable modes of transport, walking and cycling.
		P4C1	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	New and improved walking and cycling routes can increase access to education services within and to the surrounding residential areas and score positively against this IIA objective.
		Site A 5	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Delivery of housing set out in site allocations will support the delivery of educational facilities through planning contributions.
		Site A 38	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
17	Maximise the	P4	+	S, M,L-T, I, R,	OPDC area	The policy seeks to support the economic functions of the strategic industrial location,

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
social and economic wellbeing of the local and regional population and improve access to employment and training				M	and surrounding boroughs	which could lead to some positive benefits against this objective arising from the implementation of this policy.
	P4C1	+		S, M,L-T, I, R, M	Park Royal	The policy seeks to deliver new, high quality homes and space for jobs which will maximise the economic wellbeing of the local population and attract investment.
	Site A 5	+		S, M,L-T, I, R, M	Park Royal	New homes and commercial floorspace will be available in this site allocation, thus scoring positively against this IIA objective.
	Site A 38	+		S, M,L-T, I, R, M	Park Royal	
18 To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P4	++		M, L-T, I, R, L	London-wide and nationally	The Park Royal industrial estate is protected by a SIL designation and appropriate development is supported in this location. This clarity of land uses, creation of new employment spaces, potential improvement in the local environment and connectivity could contribute to London's economic growth and improve the attractiveness of the area to inward investors.
	P4C1	+		S, M, L-T, I, R, L	Park Royal	The creation of new homes and employment spaces will contribute to London's economic growth, attract investors into the area and encourage inward investment.
	Site A 5	+		S, M, L-T, I, R, L	Park Royal	
	Site A 38	+		S, M, L-T, I, R, L	Park Royal	

## Table A-6 – Old Park Royal

### P5 Old Park Royal

#### Site Allocations 6 and 7

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P5	+	S, M, L-T, I, R, L	Old Park Royal	The policy for Old Park Royal seeks to conserve and enhance its established historical character and as a vibrant hub for small businesses. This area will be supported as an attractive entrance into Park Royal from Old Oak. Creating new jobs and employment growth sectors, protecting the area's character, enhancing the public realm and supporting more opportunities to walk and cycle through this area should help to enhance the built environment and encourage place-making
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	By delivering areas for new jobs, the site allocations will support place-making.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P5	+	S, M, L-T, I, R, L	Old Park Royal	The policy supports intensification, responding to the need to make optimum use of land to create more jobs and support more businesses. This should lead to the optimisation of land in this location, including opportunities for horizontal/vertical extensions, subdivision of units and redevelopment.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	Policy P5 supports optimum use of land through intensification. This should lead to the optimisation of land for these sites, including opportunities for horizontal/vertical extensions.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of	P5	+	S, M, L-T, I, R, L	Old Park Royal	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	contaminated land					
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P5	++	S, M, L-T, D, R, L	Old Park Royal	The continued delivery of employment functions would help minimise the need for local people to travel to find work. Park Royal West currently suffers from high levels of road congestion generated by industrial functions and a reliance on private vehicular transport. Improvements to the movement network, particularly walking and cycling routes, to connect surrounding residential neighbourhoods and routes from stations into Park Royal could lead to significant benefits against this objective.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	Policy P5 and two site allocations support continued delivery of employment functions help minimise the need for local people to travel to find work.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P5	0			There is no clear link between the policy and the IIA Objective.
		Site A 6	0			There is no clear link between the policy and the IIA Objective.
		Site A 7	0			
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the	P5	+	S, M, L-T, D, R, L	Old Park Royal	Impacts of the urban heat island effect and surface water can be minimised by greening the area. Policies in the Environment and Utilities chapter will also ensure these impacts are adequately mitigated. This could lead to positive effects against this objective.
		Site A 6	+/-	S, M, L-T, ID, R, L	Old Park Royal	The allocation sites are located in flood zone 1 area so have a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective and are not appropriately mitigated through guidance in the Environment and Utilities Chapter.
		Site A 7	+/-	S, M, L-T, ID, R, L	Old Park Royal	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	heat island effect					
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P5	+	S, M, L-T, D, R, L	Old Park Royal	The policy supports improvements to the transport network to address congestion, as well as, the delivery of improvements to walking and cycling routes. These changes could lead to an improvement in local emissions levels. Development proposals could help to improve energy efficiency through improving the performance of buildings. This may balance out a potential increase in demand for energy from new development, although the exact mix of uses and potential energy balance is unknown, leading to uncertainty in the prediction of effects.
		Site A 6	+/-	S, M, L-T, ID, R, L	Old Park Royal	Minimising the need to travel through providing further employment opportunities should help to reduce the use of private vehicles in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		Site A 7	+/-	S, M, L-T, ID, R, L	Old Park Royal	
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P5	+/-	S, M, L-T, D, R, L	Old Park Royal	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 6	+/-	S, M, L-T, ID, R, L	Old Park Royal	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 7	+/-	S, M, L-T, ID, R, L	Old Park Royal	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
9	Improve the quality of the water environment	P5	+/-	S, M, L-T, D, R, L	Old Park Royal	The new development from policy P4 may lead to some negative effects from pollution run off. However, urban greening (green roofs/walls etc) and the implementation of policies within the Environment and Utilities Chapter, could provide an opportunity for the positive management of water quality.
		Site A 6	+/-	S, M, L-T, ID, R, L	Old Park Royal	These sites may lead to some negative effects from pollution run off. However, urban greening (green roofs/walls etc) and the implementation of policies within the Environment and Utilities Chapter, could provide an opportunity for the positive management of water quality.
		Site A 7	+/-	S, M, L-T, ID, R, L	Old Park Royal	These sites may lead to some negative effects from pollution run off. However, urban greening (green roofs/walls etc) and the implementation of policies within the Environment and Utilities Chapter, could provide an opportunity for the positive management of water quality.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P5	+/-	S, M, L-T, D, R, L	Old Park Royal	There are no open spaces or designated biodiversity assets in Old Park Royal, so the policy supports new green infrastructure and the use of roof space for food growing. These policy measures should make a positive contribution towards this IIA objective.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and deliver a net additional increase in biodiversity.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and deliver a net additional increase in biodiversity.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P5	+	S, M, L-T, D, R, L	Old Park Royal	Improvements to walking and cycling routes should lead to an improvement in air, noise and light pollution locally. The protection of industrial uses may mean that pollution levels remain higher in the SIL compared with the surrounding areas. The policy aims to improve air quality monitoring and address any issues which arise from the monitoring results. This should also be monitored and regulated by the regulatory control system, which is outside the remit of the Local Plan.
		Site A 6	+/-	S, M, L-T, ID, R, L	Old Park Royal	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new industrial development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		Site A 7	+/-	S, M, L-T, ID, R, L	Old Park Royal	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new industrial development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
12	To conserve and enhance the historic environment,	P5	+	S, M, L-T, D, R, L	Old Park Royal	This policy seeks to conserve and enhance Old Park Royal's historic industrial character and any individual buildings which positively contribute towards this. This will have a positive effect against the objective.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	Site allocations are situated near heritage assets which provides an opportunity for development conservation and enhancement of the historic environment.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	heritage assets and their settings	Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P5	+	S, M, L-T, ID, R, L	Old Park Royal	The policy has a strong focus on public realm by enhanced street greening, public realm, and active or positive frontages, particularly along Bashley Road and Chandos Road which can act as an entrance into Park Royal area from Old Oak. Encouraging a better integration between Park Royal and Old Oak and trying to attract people into the industrial area should help promote community cohesion.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	It can be assumed that by delivering new homes and space for new jobs that these site allocations will positively contribute to this IIA objective.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	
14	Improve safety and reduce crime and the fear of crime	P5	+	S, M, L-T, ID, R, L	Old Park Royal	The policy seeks to maintain and increase the intensity of use in this area, introduce active and/or positive frontages and improve the public realm. These could provide benefits in terms of reducing crime and the fear of crime.
		Site A 6		S, M, L-T, ID, R, L	Old Park Royal	It can be assumed that high quality design will be applied to the allocation sites as stated in policy P5.
		Site A 7		S, M, L-T, ID, R, L	Old Park Royal	
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P5	+/-	S, M, L-T, ID, R, L	Old Park Royal	The policy supports sustainable transport options which could also lead to positive health effects in this location by encouraging people to walk and cycle and helping to improve local air quality. However, due to the low proportion of potential residents in this area and the retention of the area as an industrial location, effects are unlikely to be significant.
		Site A 6	+/-	S, M, L-T, ID, R, L	Old Park Royal	Increasing opportunities for employment opportunities and sustainable transport options could lead to positive health effects in this location by encouraging people to walk and cycle and helping to improve local air quality. However, due to the low proportion of potential residents in this area and the retention of the area as an industrial location, effects are unlikely to be significant
		Site A 7	+/-	S, M, L-T, ID, R, L	Old Park Royal	
16	To improve the	P5	0			There is no clear link between the policy and the IIA Objective.
		Site A	0			There is no clear link between the policy and the IIA Objective.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	education and skills levels of all members of the population, particularly vulnerable groups	6 Site A 7	0			
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P5	++	S, M, L-T, ID, R, L	Old Park Royal	The policy seeks to protect and enhance existing economic and employment functions, including provision for small businesses. This approach would contribute towards achieving the IIA Objective by maintaining access to employment opportunities.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	Site allocations seek to improve access to employment through industrial intensification therefore resulting in positive effects against this IIA Objective.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P5	+	S, M, L-T, ID, R, L	Old Park Royal	The policy seeks to continue the delivery of new employment work spaces. This will attract new businesses, contribute to London's economic growth, help to encourage inward investment Better integration with Old Oak via more attractive walking and cycling routes along Chandos and Bashley Road should help attract more footfall and investment into Park Royal.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	Both site allocations offer opportunities for industrial intensification which would help attract investment into the area. The whole OPDC area itself is all about regeneration, transport and jobs and will score positively against this objective.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	

## Table A-7 – Park Royal Centre

### P6: Park Royal Centre

#### Site Allocations 8, 9 and 37

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
1	To enhance the built environment and encourage 'place-making'	P6	++	M, L-T, I, R, M	Park Royal and OPDC area	The policy for the area seeks to enhance the range of services, town centre uses and amenities in the area, to support local business, existing residential and medical communities. The public realm will be improved and benefit from new public open spaces alongside active street frontages. This should lead to benefits against this objective.
		Site A 8	+	S, M, L-T, I, R, L	Park Royal	The new residential and commercial floorspace proposed, as well as access to open space, will contribute to the area's sense of place.
		Site A 9	+	S, M, L-T, I, R, L	Park Royal	The new residential floorspace proposed will contribute to the area's sense of place.
		Site A 37	+	S, M, L-T, I, R, L	Park Royal	
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P6	++	M, L-T, I, R, L	Park Royal area	The policy seeks to increase the quantum of development and centralise the provision of services, town centre uses and amenities to support surrounding businesses, residents and the medical community. This would create some benefits against this objective through creating more efficient use of land.
		Site A 8	+	S, M, L-T, I, R, M	Park Royal	Policy P6 aims to optimise use of land therefore, it can be assumed that this would apply for this site allocation.
		Site A 9	+	S, M, L-T, I, R, M	Park Royal	
		Site A 37	+	S, M, L-T, I, R, M	Park Royal	
3	Maximise the reuse of previously developed land and existing	P6	++	S, M, L-T, I, R, M	Park Royal Centre	The policy directs development to previously developed land. This reuse of land should generate benefits against this objective.
		Site A 8	+	S, M, L-T, I, R, M	Park Royal	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 9	+	S, M, L-T, I, R, M	Park Royal	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	buildings, including the remediation of contaminated land	Site A 37	+	M S, M, L-T, I, R, M	Park Royal	
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P6	++	S, M, L-T, I, R, M	Park Royal and OPDC area, and surrounding boroughs	The policy seeks to centralise services and amenities for the local business community, residents and the medical community. The policy also supports improvements to transport network and the legibility of streets, including the delivery of cycling and walking infrastructure. This could lead to significant benefits against this objective.
		Site A 8	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	Policies P6 and P6C1 aim to minimise the need to travel and improve walking and cycling provision. The site allocation in this area will therefore have access to good sustainable transport links.
		Site A 9	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 37	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and	P6	++	S, M-T, I, R, M	Park Royal and OPDC area	The policy aims to facilitate the delivery of housing and also commits to providing specialist housing along Acton Lane. Furthermore, the policy specifies that new specialist housing will continue to be supported and existing specialist housing protected in accordance with Policy H9 which could deliver benefits against this objective.
		Site A 8	+	S, M, L-T, D, R, M	Park Royal	The site allocation supports the delivery of housing. It is unclear what types of housing this would include at this stage but it is likely positive effects against this objective.
		Site A 9	+	S, M, L-T, D, R, M	Park Royal	
		Site A 37	+	S, M, L-T, D,	Park Royal	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	tenures, to meet identified local needs			R, M		
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P6	+	S, M, L-T, D, IR, L	Park Royal and OPDC area	Impacts of the urban heat island effect and surface water can be minimised by greening the area. Policies in the Environment and Utilities chapter will also ensure these impacts are adequately mitigated. This could lead to positive effects against this objective.
		Site A 8	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The allocation site is located in a flood zone 1 area so has a low risk of flooding. New development will use energy and produce heat which may have a negative impact against this objective. Mitigation for this is covered in the Environment and Utilities Chapter.
		Site A 9	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 37	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources	P6	+/-	S, M, L-T, D, R, M	Park Royal and OPDC area	The policy supports improvements to the transport network, the embedding of green infrastructure and the legibility of streets, including the delivery of cycling and walking infrastructure. This could lead to some benefits against this objective. Improvements to the highway network could lead to some positive effects on local emissions, although could also encourage the use of vehicular transport as a mode of travel unless improvements to the public transport, walking and cycling network are delivered in accordance with the Transport policies.
		Site A 8	+/-	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	Minimising the need to travel and focussing development around sustainable transport infrastructure should help to reduce the reliance on fossil fuels in the long term as discussed in policy P6 and cluster P6C1. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	including fossil fuels for transport, heating and energy	Site A 9	+/-	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	energy supply aren't secured.
		Site A 37	+/-	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P6	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies.
		Site A 8	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 9	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 37	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	
9	Improve the quality of the water environment	P6	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Improvements in the local road infrastructure, embedding green infrastructure such as green walls/roofs, alongside the potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants.
		Site A 8	+/-	S, M-T, D, IR, L	OPDC area and	The new development from policy P6 may lead to some negative effects from pollution run off. However, urban greening (green roofs/walls etc) and the implementation of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding boroughs	policies within the Environment and Utilities Chapter, could provide an opportunity for the positive management of water quality.
		Site A 9	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 37	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P6	+	S, M, L-T, D, R, M	OPDC area	The policy aims to embed green infrastructure throughout the area, this would include green walls and roofs in line with policies in the Environment chapter. This approach could help achieve benefits against this objective.
		Site A 8	+/-	S, M, L-T, D, R, M	Park Royal	New development can lead to a loss of biodiversity. Mitigation for this is included in the policies in the Environment chapter.
		Site A 9	+/-	S, M, L-T, D, R, M	Park Royal	
		Site A 37	+/-	S, M, L-T, D, R, M	Park Royal	
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P6	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated against.
		Site A 8	+/-	S, M, L-T, D, R, M	OPDC area	New development can lead to increase levels of noise, light and air pollution. However, this can be mitigated through Policy P6 by encouraging increasing use of sustainable transport and the implementation of policies in the Environment chapter.
		Site A 9	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 37	+/-	S, M, L-T, D, R, M	OPDC area	
12	To conserve and	P6	+	S, M, L-T, D,	OPDC area	Park Royal Centre's historic character is more limited than neighbouring places and its

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	enhance the historic environment, heritage assets and their settings			IR, M		lacks a sense of place or clear identity. The policy should help to enhance the local built environment, which could lead to some benefits for the setting of any historic assets.
		Site A 8	0			There is no clear link between the policy and the IIA Objective.
		Site A 9	0			
		Site A 37	0			
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P6	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to the potential severance caused by the road network locally. The policy seeks to concentrate the provision of services, shared services and amenities into the town centre in order to support local businesses, residents and the medical community. This approach, alongside providing greater publicly accessible open space and accessibility by walking and cycling modes the creation of more active frontages, which could help attract additional footfall and encourage different people to meet/mix in the area. These improvements could create significant benefits against this objective above the existing baseline.
		Site A 8	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	New residential and commercial floorspace as well as use of shared open space could encourage community cohesion and positively contribute to this IIA objective.
		Site A 9	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	New residential floorspace could encourage community cohesion and positively contribute to this IIA objective.
		Site A 37	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	New residential floorspace as well as use of shared open space could encourage community cohesion and positively contribute to this IIA objective.
14	Improve safety and reduce crime and the fear of crime	P6	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	Improvements to this key road junction could deliver significant benefits to road safety. Measures to improve the built environment within this area, including the creation of more active frontages and a mix of buildings which are used through the day/night, would maximise passive surveillance and therefore create significant benefits against this objective above the existing baseline.
		Site A 8	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	It can be assumed that policy P6 and P6C1 will be applied to this site allocation.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 9	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	
		Site A 37	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P6	++	S, M, L-T, I, R, M	Park Royal and surrounding areas	Improvements in the local transport infrastructure to encourage more sustainable modes could help to support health and wellbeing. Also, policy supports the enhancement of health care facilities and any associated functions at Central Middlesex Hospital, therefore increasing and improving access to health care for local residents, furthering the benefits against this objective.
		Site A 8	0			There is no clear link between the policy and the IIA Objective.
		Site A 9	0			
		Site A 37	0			
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P6	0			There is no clear link between the policy and the IIA Objective.
		Site A 8	0			There is no clear link between the policy and the IIA Objective.
		Site A 9	0			
		Site A 37	0			
17	Maximise the social and economic wellbeing of the local and regional	P6	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to create new employment space whilst supporting the economic functions of the industrial location of Park Royal. Both of these would support jobs growth and therefore could lead to some positive benefits against this objective.
		Site A 8	+	S, M, L-T, I, R, M	Park Royal	New homes and commercial floorspace will be available in this site allocation, thus scoring positively against this IIA objective.
		Site A 9	+	S, M, L-T, I, R, M	Park Royal	New homes will be available in this site allocation, providing opportunities for



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	population and improve access to employment and training			M		construction related employment and training, thus scoring positively against this IIA objective.
		Site A 37	+	S, M,L-T, I, R, M	Park Royal	New homes and commercial floorspace will be available in this site allocation, thus scoring positively against this IIA objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P6	++	M, L-T, I, R, L	London-wide and nationally	The policy supports a range of employment uses and supporting services and amenities within a centralised, accessible area. This should help to generate significant benefits against this objective.
		Site A 8	+	S, M, L-T, I, R, L	Park Royal	The creation of new homes and employment spaces will contribute to London's economic growth, attract investors into the area and encourage inward investment.
		Site A 9	+	S, M, L-T, I, R, L	Park Royal	
		Site A 37	+	S, M, L-T, I, R, L	Park Royal	

**Table A-8 – North Acton and Old Oak Common Station**

**P7 North Action and Acton Wells  
P7C1 North Action Town Centre Cluster  
P7C2 Old Oak Common Lane Station Cluster  
Site Allocations 10 to 20, 35, 36, 41 and 42**

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P7	++	S, M, L-T, I, R, M	North Acton and OPDC area	The policy seeks to improve the public realm within the area, including supporting the development of active frontages. Alongside the delivery of a new public open spaces, residential, employment, social infrastructure and improved connections across the area, the policy could lead to the generation of significant positive benefits against this objective.
		P7C1	+	S, M, L-T, I, R, M	North Acton	The vision aims to provide a high-density neighbourhood centre focused on an enhanced North Acton Station and to produce high quality public realm which leads to a positive against this objective.
		P7C2	+	S, M, L-T, I, R, M	Old Oak Common area	The vision aims to deliver the proposed Old Oak Common Lane station and aims to support and enhance public realm, thus scoring positively against this objective.
		Site A 10	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	By delivering new homes and space for new jobs, site allocations will support place-making.
		Site A 11	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 12	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 13	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 14	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 15	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 16	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 17	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 18	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 19	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 20	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 34	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 35	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 36	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A41	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A42	+	S, M, L-T, I,	North Acton and	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
				R, M	Acton Wells and OPDC area		
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P7	++	S, M, L-T, I, R, M	North Acton	The policy specifies the areas that high densities will be encouraged across the area. This could lead to significant benefits against this Objective.	
		P7C1	++	S, M, L-T, I, R, M	North Acton	The vision specifies a high density town centre will be delivered which will benefit this objective.	
		P7C2	0				There is no clear link between the policy and the IIA Objective.
		Site A 10	+	S, M, L-T, I, R, M	North Acton	Policy P7 aims to encourage high density buildings. Therefore, it can be assumed that high density buildings for these site allocations will be encouraged.	
		Site A 11	+	S, M, L-T, I, R, M	North Acton		
		Site A 12	+	S, M, L-T, I, R, M	North Acton		
		Site A 13	+	S, M, L-T, I, R, M	North Acton		
		Site A 14	+	S, M, L-T, I, R, M	North Acton		
		Site A 15	+	S, M, L-T, I, R, M	North Acton		
		Site A 16	+	S, M, L-T, I, R, M	North Acton		
		Site A 17	+	S, M, L-T, I, R, M	North Acton		
		Site A 18	+	S, M, L-T, I, R, M	North Acton		
		Site A 19	+	S, M, L-T, I, R, M	North Acton		
		Site A 20	+	S, M, L-T, I, R, M	North Acton		
Site A 34	+	S, M, L-T, I, R, M	North Acton				

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 35	+	S, M, L-T, I, R, M	North Acton	
		Site A 36	+	S, M, L-T, I, R, M	North Acton	
		Site A41	+	S, M, L-T, I, R, M	North Acton	
		Site A42	+	S, M, L-T, I, R, M	North Acton	
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P7	++	S, M, L-T, I, R, M	North Acton	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		P7C1	++	S, M, L-T, I, R, M	North Acton	The vision specifies the areas that high densities will be encouraged across the area. All development in the OPDC area is on previously developed land, so will score positively against this objective. This could lead to benefits against this objective.
		P7C2	+	S, M, L-T, I, R, M	North Acton	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 10	+	S, M, L-T, I, R, M	North Acton	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 11	+	S, M, L-T, I, R, M	North Acton	
		Site A 12	+	S, M, L-T, I, R, M	North Acton	
		Site A 13	+	S, M, L-T, I, R, M	North Acton	
		Site A 14	+	S, M, L-T, I, R, M	North Acton	
		Site A 15	+	S, M, L-T, I, R, M	North Acton	
	Site A 16	+	S, M, L-T, I, R, M	North Acton		

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
			R, M			
		Site A 17	+	S, M, L-T, I, R, M	North Acton	
		Site A 18	+	S, M, L-T, I, R, M	North Acton	
		Site A 19	+	S, M, L-T, I, R, M	North Acton	
		Site A 20	+	S, M, L-T, I, R, M	North Acton	
		Site A 34	+	S, M, L-T, I, R, M	North Acton	
		Site A 35	+	S, M, L-T, I, R, M	North Acton	
		Site A 36	+	S, M, L-T, I, R, M	North Acton	
		Site A41	+	S, M, L-T, I, R, M	North Acton	
		Site A42	+	S, M, L-T, I, R, M	North Acton	
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport	P7	++	M, L-T, I, R, L	North Acton and OPDC area, and surrounding boroughs	The vision for the area supports new and improved connections centred on main routes and will ensure that North Acton is integrated into the wider regeneration area. The policy supports higher density development across the area. Highways improvements and active frontages along streets are proposed, alongside new and/or improved connections across the A40 to West Acton. The policy also proposes new walking and cycling routes and significant employment as well as residential, thereby bringing homes and jobs closer together. These measures could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. It is also unclear what type of 'connections' across the A40 are supported by the policy.
		P7C1	++	M, L-T, I, R, L	North Acton and OPDC area, and	The vision supports enhancements to North Acton station. The policy aims to improve Victoria Road and deliver new and improved walking and cycle pathways.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
network					surrounding boroughs	This will support walking and cycling, thus minimising the need to travel by private vehicle thus scoring positively against this objective.
	P7C2	++	M, L-T, I, R, L		Old Oak Common and OPDC area, and surrounding boroughs	The vision supports to enhance Old Oak Common station and aims to improve walking and cycle pathways and bus traffic. This will minimise the need to travel by private vehicle thus scoring positively against this objective.
	Site A 11	+	M, L-T, I, R, L		OPDC area, and surrounding boroughs	Policies P7, P7C1 and P7C2 aim to minimise the need to travel and provide new stations. The site allocations in this area will therefore be situated near good sustainable transport, walking, and cycling links.
	Site A 10	+	M, L-T, I, R, L		OPDC area, and surrounding boroughs	
	Site A 11	+	M, L-T, I, R, L		OPDC area, and surrounding boroughs	
	Site A 12	+	M, L-T, I, R, L		OPDC area, and surrounding boroughs	
	Site A 13	+	M, L-T, I, R, L		OPDC area, and surrounding boroughs	
	Site A 14	+	M, L-T, I, R, L		OPDC area, and surrounding boroughs	
	Site A 15	+	M, L-T, I, R, L		OPDC area, and surrounding boroughs	
	Site A 16	+	M, L-T, I, R, L		OPDC area, and surrounding boroughs	
	Site A 17	+	M, L-T, I, R, L		OPDC area, and surrounding boroughs	
	Site A 18	+	M, L-T, I, R, L		OPDC area, and surrounding boroughs	
	Site A 19	+	M, L-T, I, R, L		OPDC area, and surrounding boroughs	
	Site A 20	+	M, L-T, I, R, L		OPDC area, and surrounding boroughs	
Site A 34	+	M, L-T, I, R, L		OPDC area, and surrounding boroughs		

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 35	+	M, L-T, I, R, L	OPDC area, and surrounding boroughs	
		Site A 36	+	S, M, L-T, I, R, M	North Acton	
		Site A41	+	M, L-T, I, R, L	OPDC area, and surrounding boroughs	
		Site A42	+	M, L-T, I, R, L	OPDC area, and surrounding boroughs	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P7	++	S, M, L-T, D, R, L	North Acton, OPDC area and surrounding boroughs	As stated in the Local Plan, the area is currently being developed with existing developments of residential and student housing being included within the land uses. The vision for the area seeks to build upon this, to provide a substantial number of new homes in the area, which could lead to benefits against this objective.
		P7C1	0			There is no clear link between the policy and the IIA Objective.
		P7C2	0			There is no clear link between the policy and the IIA Objective.
		Site A 10	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	The site allocations are situated in an accessible area and will be required to accord with affordable housing policies within the Housing Chapter.
		Site A 11	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 12	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 13	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 14	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 15	+	S, M, L-T, I,	North Acton and	



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M	Acton Wells and OPDC area	
		Site A 16	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 17	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 18	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 19	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 20	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 34	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 35	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 36	+	S, M, L-T, I, R, M	North Acton	
		Site A41	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A42	+	S, M, L-T, I, R, M	North Acton and Acton Wells and	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					OPDC area	
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P7	0			No reference is made within the policy to adapt to the potential effects of climate change as this is provided in policy SP2 and within the Environment and Utilities Chapter.
		P7C1	0			The allocation site is located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective. Mitigation for this is provided within policy SP2 and within the Environment and Utilities Chapter.
		P7C2	0			The allocation site is located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective. Mitigation for this is provided within policy SP2 and within the Environment and Utilities Chapter.
		Site A 10	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	The allocation site is located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective. Mitigation for this is provided within policy SP2 and within the Environment and Utilities Chapter.
		Site A 11	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 12	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 13	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 14	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 15	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
Site A 16	+/-	S, M, L-T, D,	North Acton and			

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				IR, L	Acton Wells and OPDC area	
		Site A 17	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 18	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 19	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 20	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 34	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 35	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 36	+	S, M, L-T, I, R, M	North Acton	
		Site A41	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A42	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
7	To minimise contributions to	P7	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the

IIA Objective	Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy					pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured. Policy supporting text does however set out that any proposals will be expected to deliver on site low carbon heating solutions which could result in benefits against this objective.
	P7C1	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	The vision for the area supports new and improved connections to North Acton Station, and will ensure that North Acton is integrated into the wider regeneration area. It also encourages walking and cycling and proposes employment and jobs in the same area thereby reducing the possible distances travelled. This could lead to some benefits against this objective, although an increase in employment creating greater energy needs could lead to a negative impact on the IIA objective. The increase of sustainable transport will have positive effects against this objective however, potential use of private vehicles could put more pressure on resources.
	P7C2	+/-	S, M, L-T, D, R, M	Old Oak Common and OPDC area, and surrounding boroughs	The vision for the area supports new and improved connections to Old Oak Common Lane Station and will ensure that Old Oak Common is integrated into the wider regeneration area. It also encourages walking and cycling and proposes employment and jobs in the same area thereby reducing the possible distances travelled. This could lead to some benefits against this objective, although an increase in employment creating greater energy needs could lead to a negative impact on the IIA objective. The increase of sustainable transport will have positive effects against this objective.
	Site A 10	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
	Site A 11	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	
	Site A 12	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 13	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs
		Site A 14	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs
		Site A 15	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs
		Site A 16	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs
		Site A 17	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs
		Site A 18	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs
		Site A 19	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs
		Site A 20	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs
		Site A 34	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs
		Site A 35	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs
		Site A 36	+/-	S, M, L-T, D,	North Acton and

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M	OPDC area, and surrounding boroughs	
		Site A41	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	
		Site A42	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P7	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P7C1	+/-	S, M, L-T, D, R, M	North Acton Area	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P7C2	+/-	S, M, L-T, D, R, M	Old Oak Common Area	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 10	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	Insufficient information given to assess but it can be presumed that the increase in new development will increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 11	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 12	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 13	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 14	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 15	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 16	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 17	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 18	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 19	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 20	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 34	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 35	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 36	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A41	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A42	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
9	Improve the quality of the water environment	P7	0	S, M-T, D, IR, M	OPDC area and surrounding boroughs	There is no direct link between the policy and the IIA objective given the lack of water bodies in the area.
		P7C1	0	S, M-T, D, IR, M	OPDC area and surrounding boroughs	There is no direct link between the policy and the IIA objective given the lack of water bodies in the area.
		P7C2	0	S, M-T, D, IR, M	OPDC area and surrounding boroughs	There is no direct link between the policy and the IIA objective given the lack of water bodies in the area.
		Site A 10	0			There is no direct link between the policy and the IIA objective given the lack of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 11	0			water bodies in the area.
		Site A 12	0			
		Site A 13	0			
		Site A 14	0			
		Site A 15	0			
		Site A 16	0			
		Site A 17	0			
		Site A 18	0			
		Site A 19	0			
		Site A 20	0			
		Site A 34	0			
		Site A 35	0			
		Site A 36	0			
		Site A41	0			
		Site A42	0			
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P7	+/-	S, M-T, D, IR, M	OPDC area	The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2.
		P7C1	+/-	S, M-T, D, IR, M	OPDC area	The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2
		P7C2	+/-	S, M-T, D, IR, M	OPDC area	The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2
		Site A 10	+/-	S, M-T, D, IR, M	OPDC area	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and deliver a net additional increase in biodiversity.
		Site A 11	+/-	S, M-T, D, IR, M	OPDC area	



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 12	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 13	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 14	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 15	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 16	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 17	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 18	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 19	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 20	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 34	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 35	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 36	+/-	S, M-T, D, IR, M	OPDC area	
		Site A41	+/-	S, M-T, D, IR, M	OPDC area	
		Site A42	+/-	S, M-T, D, IR, M	OPDC area	
11	To minimise air,	P7	+/-	S, M, L-T, D, R, M	OPDC area	The policy requires development to contribute to improving air quality along the A40 and Victoria Road. Improvements in the local road infrastructure and potential

IIA Objective	Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
noise and light pollution, particularly for vulnerable groups					increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
	P7C1	+/-	S, M, L-T, D, R, M	North Acton area	The policy requires development to contribute to improving air quality along the A40 and Victoria Road. Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
	P7C2	+/-	S, M, L-T, D, R, M	Old Oak Common area	The policy requires development to contribute to improving air quality along the A40 and Victoria Road. Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
	Site A 10	0	S, M, L-T, D, R, L	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
	Site A 11	0	S, M, L-T, D, R, L	OPDC area	
	Site A 12	0	S, M, L-T, D, R, L	OPDC area	
	Site A 13	0	S, M, L-T, D, R, L	OPDC area	
	Site A 14	0	S, M, L-T, D, R, L	OPDC area	
	Site A 15	0	S, M, L-T, D, R, L	OPDC area	
Site A 16	0	S, M, L-T, D, R, L	OPDC area		

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
			R, L			
		Site A 17	0	S, M, L-T, D, R, L	OPDC area	
		Site A 18	0	S, M, L-T, D, R, L	OPDC area	
		Site A 19	0	S, M, L-T, D, R, L	OPDC area	
		Site A 20	0	S, M, L-T, D, R, L	OPDC area	
		Site A 34	0	S, M, L-T, D, R, L	OPDC area	
		Site A 35	0	S, M, L-T, D, R, L	OPDC area	
		Site A 36	+/-	S, M-T, D, IR, M	OPDC area	
		Site A41	0	S, M, L-T, D, R, L	OPDC area	
		Site A42	0	S, M, L-T, D, R, L	OPDC area	
12	To conserve and enhance the historic environment, heritage assets and their settings	P7	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy aims to conserve and enhance the locally listed Castle Public House and other heritage assets and their settings and strengthen local identity by responding to existing and proposed locally listed buildings alongside the wider historic environment. This could provide some benefits against this objective.
		P7C1	0			There is no clear link between the policy and the IIA Objective.
		P7C2	+	S, M, L-T, D, IR, M	Old Oak Common area	There is no clear link between the policy and the IIA Objective.
		Site A 10	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	Supporting text in policy P7 and policy D6 aims to conserve and enhance existing heritage sites. This will mitigate against any impacted heritage assets located in close proximity to the site allocation developments.
		Site A 11	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 12	+	S, M, L-T, D,	OPDC area and	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				IR, M	surrounding boroughs	
		Site A 13	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 14	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 15	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 16	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 17	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 18	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 19	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 20	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 34	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 35	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 36	+/-	S, M-T, D, IR, M	OPDC area	
		Site A41	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A42	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
13	Increase community cohesion and	P7	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver a mixed use high density neighbourhood that includes residential, student housing, employment uses and town centre uses. The supporting text identifies the need to accord with policy H10 to ensure student housing contributes to sustainable communities. It also seeks to deliver a range of

IIA Objective	Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
reduce social exclusion to encourage a sense of community and welfare					employment uses and town centre uses to support new and existing communities. The policy also seeks to improve connections between features within the area such as the station and the town centre uses, which should enable the achievement of significant benefits against this objective.
	P7C1	+	S, M, L-T, D, R, M	OPDC area	By improving sustainable transport links, this can help reduce social exclusion as areas will be more accessible by the public.
	P7C2	+	S, M, L-T, D, R, M	OPDC area	By improving sustainable transport links, this can help reduced social exclusion as areas will be more accessible by the public.
	Site A 10	+	S, M, L-T, D, R, M	OPDC area	It can be assumed that by delivering new homes and space for new jobs that these site allocations will positively contribute to this IIA objective.
	Site A 11	+	S, M, L-T, D, R, M	OPDC area	
	Site A 12	+	S, M, L-T, D, R, M	OPDC area	
	Site A 13	+	S, M, L-T, D, R, M	OPDC area	
	Site A 14	+	S, M, L-T, D, R, M	OPDC area	
	Site A 15	+	S, M, L-T, D, R, M	OPDC area	
	Site A 16	+	S, M, L-T, D, R, M	OPDC area	
	Site A 17	+	S, M, L-T, D, R, M	OPDC area	
	Site A 18	+	S, M, L-T, D, R, M	OPDC area	
	Site A 19	+	S, M, L-T, D, R, M	OPDC area	
	Site A 20	+	S, M, L-T, D, R, M	OPDC area	
Site A 34	+	S, M, L-T, D, R, M	OPDC area		

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M		
		Site A 35	+	S, M, L-T, D, R, M	OPDC area	
		Site A 36	+	S, M, L-T, D, R, M	OPDC area	
		Site A41	+	S, M, L-T, D, R, M	OPDC area	
		Site A42	+	S, M, L-T, D, R, M	OPDC area	
14	Improve safety and reduce crime and the fear of crime	P7	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver a high quality movement network across the area with a focus on walking and cycling routes supported by active and positive frontages. These connections seek to connect local designations. This could enable the achievement of benefits against this objective in terms of community cohesion and interaction, leading to a greater sense of wellbeing locally and an increase in natural surveillance.
		P7C1	+	S, M, L-T, D, R, M	North Acton and Acton Wells	The policy seeks that North Acton Station provides new high quality 24 hour walking and cycling access to improve permeability of the area. This should achieve benefits against this objective.
		P7C2	+	S, M, L-T, D, R, M	North Acton and Acton Wells	The policy seeks that North Acton Station provides new high quality 24 hour walking and cycling access to improve permeability of the area. This should achieve benefits against this objective.
		Site A 10	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The requirement to deliver a legible and permeable street network could contribute positively to the IIA objective for these site allocations.
		Site A 11	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 12	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 13	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 14	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 15	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 16	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 17	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 18	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 19	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 20	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 34	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 35	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 36	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A41	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A42	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy	P7	+	S, M, L-T, I, R, M	North Acton and surrounding areas	Land uses supported will include a mix of scale retail, leisure and social infrastructure uses and eating and drinking establishments to serve local needs. The policy also specifically requires that supported development will be of a lower density in more sensitive locations close to residential areas, as well as areas of open space such as Acton Cemetery, as well as improve connections between features within the area such as the station and the town centre uses. This should enable the achievement of benefits against this objective in terms of community cohesion and interaction, as well as physical activity, leading to a greater sense of wellbeing locally and an increase in natural surveillance. The policy also seeks to

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
living						enhance air quality working with TfL and relevant boroughs. Walking and cycling is also encouraged through new and improved connections. Potential improvements in air, noise and light quality could further improve physical health.
	P7C1	+	S, M, L-T, I, R, M	North Acton and surrounding areas	The policy aims to promote walking and cycling via new routes which will help to promote healthy living and score positively against this objective.	
	P7C2	+	S, M, L-T, I, R, M	Old Oak common and surrounding areas	The policy aims to promote walking and cycling via new routes which will help to promote healthy living and score positively against this objective.	
	Site A 10	?			It can be assumed that site allocation that contributes housing will have some associated social infrastructure, such as health and sports facilities, contained within it, but it's uncertain at this level of detail how likely this will be.	
	Site A 11	?				
	Site A 12	?				
	Site A 13	?				
	Site A 14	?				
	Site A 15	?				
	Site A 16	?				
	Site A 17	?				
	Site A 18	?				
	Site A 19	?				
	Site A 20	?				
	Site A 34	?				
	Site A 35	?				
Site A 36	?					
Site A41	?					
Site A42	?					
16	To improve the education and skills levels of all members of the population, particularly vulnerable	P7	++	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. The policy specifically supports the delivery of education uses close to North Acton station, which could lead to significant benefits against this objective.
		P7C1	+	S, M-T, I, R, M	North Acton	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. This could lead to a positive against the objective.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
groups	P7C2	+	S, M-T, I, R, M	Old Oak Common	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. This could lead to a positive against the objective.	
	Site A 10	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling through Policy P7. This will result in the site allocations scoring positively against this IIA objective.	
	Site A 11	+	S, M-T, I, R, M	OPDC area and surrounding boroughs		
	Site A 12	+	S, M-T, I, R, M	OPDC area and surrounding boroughs		
	Site A 13	+	S, M-T, I, R, M	OPDC area and surrounding boroughs		
	Site A 14	+	S, M-T, I, R, M	OPDC area and surrounding boroughs		
	Site A 15	+	S, M-T, I, R, M	OPDC area and surrounding boroughs		
	Site A 16	+	S, M-T, I, R, M	OPDC area and surrounding boroughs		
	Site A 17	+	S, M-T, I, R, M	OPDC area and surrounding boroughs		
	Site A 18	+	S, M-T, I, R, M	OPDC area and surrounding boroughs		
	Site A 19	+	S, M-T, I, R, M	OPDC area and surrounding boroughs		
	Site A 20	+	S, M-T, I, R, M	OPDC area and surrounding boroughs		
	Site A 34	+	S, M-T, I, R, M	OPDC area and surrounding boroughs		
	Site A 35	+	S, M-T, I, R, M	OPDC area and surrounding boroughs		
	Site A 36	+	S, M-T, I, R, M	OPDC area and surrounding boroughs		

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A41	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A42	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P7	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of Old Oak and Park Royal, by delivering a range of employment uses. Accessibility to training facilities may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. As such these could lead to some positive benefits against this IIA objective.
		P7C1	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of Old Oak and Park Royal, by delivering a range of employment uses around the station squares. Accessibility to training facilities may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. As such these could lead to some positive benefits against this IIA objective.
		P7C2	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of Old Oak and Park Royal, by delivering a range of employment uses around the station squares. Accessibility to training facilities may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. As such these could lead to some positive benefits against this IIA objective.
		Site A 10	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	It can be assumed that site allocations that contribute to housing will deliver have some associated social infrastructure contained within it, but it's uncertain at this level of detail how likely this will be.
		Site A 11	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 12	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 13	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 14	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 15	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 16	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 17	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 18	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 19	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 20	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 34	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 35	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 36	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A41	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A42	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
18	To encourage inward investment alongside investment within existing communities, to create sustainable	P7	++	M, L-T, I, R, L	London-wide and nationally	The policy seeks to provide a range of workspaces that can support small businesses, and a significant quantum of new jobs and SME space, focussed on the station and major routes. This should help to deliver significant benefits against this objective.
		P7C1	+	M, L-T, D, R, L	OPDC area	The policy seeks to improve access and create employment uses which will encourage inward investment within OPDC.
		P7C2	+	M, L-T, D, R, L	OPDC area	The policy seeks to improve access and create employment uses which will encourage inward investment within OPDC.
		Site A 10	+	M, L-T, I, R, L	London-wide and nationally	Providing new, high quality homes in the OPDC area can attract investment. The whole OPDC area itself is all about regeneration, transport and jobs and will score positively against this objective.
		Site A 11	+	M, L-T, I, R, L	London-wide and nationally	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
economic growth			L		nationally	
	Site A 12	+	M, L-T, I, R, L		London-wide and nationally	
	Site A 13	+	M, L-T, I, R, L		London-wide and nationally	
	Site A 14	+	M, L-T, I, R, L		London-wide and nationally	
	Site A 15	+	M, L-T, I, R, L		London-wide and nationally	
	Site A 16	+	M, L-T, I, R, L		London-wide and nationally	
	Site A 17	+	M, L-T, I, R, L		London-wide and nationally	
	Site A 18	+	M, L-T, I, R, L		London-wide and nationally	
	Site A 19	+	M, L-T, I, R, L		London-wide and nationally	
	Site A 20	+	M, L-T, I, R, L		London-wide and nationally	
	Site A 34	+	M, L-T, I, R, L		London-wide and nationally	
	Site A 35	+	M, L-T, I, R, L		London-wide and nationally	
	Site A 36	+	M, L-T, I, R, L		London-wide and nationally	
	Site A41	+	M, L-T, I, R, L		London-wide and nationally	
Site A42	+	M, L-T, I, R, L		London-wide and nationally		

**Table A-9 – Old Oak Land and Old Oak Common Lane and Atlas Junction**

**P8 Old Oak Lane and Old Oak Common Lane  
P8C1 Atlas Junction Town Centre  
Site Allocations 21 to 25**

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P8	++	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area.	The policy seeks to improve the public realm within the area, including delivering connected public spaces and travel routes. Alongside the delivery of a new town centre, public spaces, residential uses, a mix of employment uses, community infrastructure and improved connections across the area, the policy could lead to the generation of significant positive benefits against this objective.
		P8C1	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area.	The supporting text aims to deliver a new town centre that is supported by high quality public realm and conserves and enhances local character. Alongside these elements and by creating new housing and communities, this can have a positive impact on place-making.
		Site A 21	+	S, M-T, I, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area.	By delivering new homes and space for new jobs, site allocations will support place-making.
		Site A 22	+	S, M-T, I, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area.	
		Site A 23	+	S, M-T, I, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area.	
		Site A 24	+	S, M-T, I, R,	Old Oak Lane	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				M	and Old Oak Common Lane and OPDC area.	
		Site A 25	+	S, M-T, I, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area.	
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P8	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	The policy sets out the locations for a mixed use neighbourhood within the Westway Estate and adjacent sites and defines that a range of buildings heights will be considered here as appropriate.
		P8C1	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	The policy aims to deliver a range of buildings heights, with potential for increased heights that relate to the existing Collective development helping to increase development capacity, thus score positively against this objective.
		Site A 21	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	Building heights are considered in Policy P7. It can be assumed that these site allocations will incorporate tall buildings where appropriate.
		Site A 22	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 23	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 24	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 25	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P8	++	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	All development in the OPDC area is on previously developed land, so will score positively against this objective. The policy aims to retain existing residential areas and buildings which will score positively against this objective.
		P8C1	++	S, M, L-T, I, R, M	Old Oak Lane and Old Oak Common Lane	The policies provide guidance for a range of buildings heights. All development in the OPDC area is on previously developed land, so will score positively against this objective. This could lead to benefits against this Objective.
		Site A 21	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 22	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 23	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 24	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 25	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and	P8	++	S, M, L-T, D, R, M	OPDC area	The policy aims to improve existing and deliver new walking and cycling routes and routes for buses which will minimise the need to travel by motorised transportation methods.
		P8C1	++	S, M, L-T, D, R, M	OPDC area	The policy aims to improve existing and deliver new walking and cycling routes and routes for buses which will minimise the need to travel by motorised transportation methods.
		Site A 21	+	S, M, L-T, D, R, M	OPDC area	The site allocations are in areas near good cycling and walking routes. This will minimise the need to travel by motorised transportation methods.
		Site A 22	+	S, M, L-T, D, R, M	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	mitigate impacts on the transport network	Site A 23	+	S, M, L-T, D, R, M	OPDC area	
		Site A 24	+	S, M, L-T, D, R, M	OPDC area	
		Site A 25	+	S, M, L-T, D, R, M	OPDC area	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P8	++	S, M, L-T, D, R, M	OPDC area	The policy supports mixed housing types and mixed use neighbourhoods. The vision for the area seeks to build upon this, to provide a substantial number of new homes in the area, which could lead to benefits against this objective.
		P8C1	++	S, M, L-T, D, R, M	OPDC area	The policy supports mixed housing types and mixed use neighbourhoods. The vision for the area seeks to build upon this, to provide a substantial number of new homes in the area, which could lead to benefits against this objective.
		Site A 21	+	S, M-T, D, R, M	OPDC area	The site allocations are situated in an accessible area and will be required to accord with affordable housing policies within the Housing Chapter.
		Site A 22	+	S, M-T, D, R, M	OPDC area	
		Site A 23	+	S, M-T, D, R, M	OPDC area	
		Site A 24	+	S, M-T, D, R, M	OPDC area	
		Site A 25	+	S, M-T, D, R, M	OPDC area	
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding	P8	0			No reference is made within the policy to adapt to the potential effects of climate change as this is provided in policy SP2 and within the Environment and Utilities Chapter.
		P8C1	0			No reference is made within the policy to adapt to the potential effects of climate change as this is provided in policy SP2 and within the Environment and Utilities Chapter.
		Site A 21	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak	The allocation site is located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	and addressing the heat island effect				Common Lane	this objective. Mitigation for this is provided within policy SP2 and within the Environment and Utilities Chapter.
		Site A 22	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 23	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 24	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 25	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P8	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area, and surrounding boroughs	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		P8C1	+/-	S, M, L-T, D, R, M	Atlas Junction and OPDC area, and surrounding boroughs	The vision for the area supports new and improved connections to Old Oak Lane and Old Oak Common Lane and will ensure that Atlas junction is integrated into the wider regeneration area. It also encourages walking and cycling and proposes employment and jobs in the same area thereby reducing the possible distances travelled. Highways improvements and active frontages along streets are proposed. This could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. Increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		Site A 21	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However,

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					Common Lane and OPDC area, and surrounding boroughs	the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		Site A 22	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area, and surrounding boroughs	
		Site A 23	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area, and surrounding boroughs	
		Site A 24	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area, and surrounding boroughs	
		Site A 25	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area, and surrounding	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P8	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P8C1	+/-	S, M, L-T, D, R, M	Atlas Junction and OPDC area, and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 21	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	Insufficient information given to assess but it can be presumed that the increase in new development will increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 22	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	
		Site A 23	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding boroughs	
		Site A 24	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	
		Site A 25	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	
9	Improve the quality of the water environment	P8	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	Policy includes for canalside green infrastructure, improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport all of which could help to reduce the runoff of pollutants locally.
		P8C1	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	Policy includes for canalside green infrastructure, improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport all of which could help to reduce the runoff of pollutants locally.
		Site A 21	0			There is no clear link between the allocation and the IIA Objective.
		Site A 22	0			There is no clear link between the allocation and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 23	0			There is no clear link between the allocation and the IIA Objective.
		Site A 24	0			There is no clear link between the allocation and the IIA Objective.
		Site A 25	0			There is no clear link between the allocation and the IIA Objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P8	+/-	S, M, L-T, D, R, M	OPDC area	The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2
		P8C1	+/-	S, M, L-T, D, R, M	OPDC area	The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2
		Site A 21	+/-	S, M-T, D, IR, M	OPDC area	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and deliver a net additional increase in biodiversity.
		Site A 22	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 23	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 24	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 25	+/-	S, M-T, D, IR, M	OPDC area	
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P8	+/-	S, M, L-T, D, R, M	OPDC area	The policy requires development to contribute to improving air quality by mitigating against impacts from local pollution sources particularly identifying Old Oak Sidings waste facility and SIL uses within Willesden Junction Bus Garage. Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		P8C1	0			There is no clear link between the policy and the IIA Objective.
		Site A 21	+/-	S, M, L-T, D, R, M	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution,
		Site A 22	+/-	S, M, L-T, D,	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 23	+/-	R, M S, M, L-T, D, R, L	OPDC area	particularly during the construction period if not adequately mitigated by design, environmental policies and London Plan guidance.
		Site A 24	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 25	+/-	S, M, L-T, D, R, L	OPDC area	
12	To conserve and enhance the historic environment, heritage assets and their settings	P8	+	S, M, L-T, D, R, M	OPDC area	
		P8C1	+	S, M, L-T, D, R, M	OPDC area	This policy aims to maintain and enhance existing and proposed heritage assets. This will have a positive effect against the IIA objective.
		Site A 21	+	S, M, L-T, D, R, M	OPDC area	Policy P8 and cluster P8C1 aim to maintain and enhance any existing heritage sites. Any negative impacts on listed buildings from development will be mitigated against.
		Site A 22	+	S, M, L-T, D, R, M	OPDC area	
		Site A 23	+	S, M, L-T, D, R, M	OPDC area	
		Site A 24	+	S, M, L-T, D, R, M	OPDC area	
		Site A 25	+	S, M, L-T, D, R, M	OPDC area	
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and	P8	+	S, M, L-T, D, R, M	OPDC area	By improving sustainable transport links, this can help reduce social exclusion as areas will be more accessible by the public as will the delivery of a range of housing and open space and associated employment space.
		P8C1	+	S, M, L-T, D, R, M	OPDC area	By improving sustainable transport links, this can help reduce social exclusion as areas will be more accessible by the public as will the delivery of a range of housing and open space, including canal side activation, and associated employment space.
		Site A 21	+	S, M, L-T, D, R, M	OPDC area	It can be assumed by providing new housing developments and open space (site 26), this will positively contribute to the IIA objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	welfare	Site A 22	+	S, M, L-T, D, R, M	OPDC area	
		Site A 23	+	S, M, L-T, D, R, M	OPDC area	
		Site A 24	+	S, M, L-T, D, R, M	OPDC area	
		Site A 25	+	S, M, L-T, D, R, M	OPDC area	
14	Improve safety and reduce crime and the fear of crime	P8	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver a high quality movement network across the area with a focus on walking and cycling routes supported by active and positive frontages. These connections seek to connect local designations. This could enable the achievement of benefits against this objective in terms of improving safety and reducing fear of crime.
		P8C1	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver a high quality movement network within the cluster, including the Grand Union Canal towpath which currently suffers from a lack of natural surveillance. This could enable the achievement of benefits against this objective in terms of improving safety and reducing fear of crime. T
		Site A 21	+	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	The requirement to deliver a high quality movement network could contribute positively to the IIA objective for these site allocations
		Site A 22	+	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 23	+	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	
		Site A 24	+	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	
		Site A 25	+	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P8	++	S, M, L-T, D, R, M	OPDC area	The policy aims to support health and well-being by, ensuring development mitigates the impacts of noise and air pollution generated by Old Oak Sidings waste facility, SIL uses on the Willesden Junction Bus Garage site and construction activities including associated vehicle movement to mitigate impacts on residential amenity and contributing to and/or delivering measures that help support OPDC, the boroughs and where relevant TfL, to address air quality issues along Victoria Road and Old Oak Lane including street greening. This will have a major positive against the objective.
		P8C1	+	S, M, L-T, I, R, M	Old Oak Lane and Old Common Lane and OPDC	The policy aims to promote walking and cycling via new routes and mitigating impacts of air pollution sources which will help to promote healthy living and score positively against this objective.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					area, and surrounding boroughs	
		Site A 21	+	S, M, L-T, D, R, M	OPDC area	It can be assumed that site allocation that contributes housing will have some associated social infrastructure, such as health and sports facilities, contained within it. Policy P8 aims to address issues from air quality in the area. This will have a positive effect against the IIA objective.
		Site A 22	+	S, M, L-T, D, R, M	OPDC area	
		Site A 23	+	S, M, L-T, D, R, M	OPDC area	
		Site A 24	+	S, M, L-T, D, R, M	OPDC area	
		Site A 25	+	S, M, L-T, D, R, M	OPDC area	
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P8	+	S, M, L-T, D, R, M	OPDC area	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P8C1	+	S, M, L-T, D, R, M	OPDC area	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		Site A 21	+	S, M, L-T, D, R, M	OPDC area	Policy P8 states that site allocations will include provisions for education facilities, thus scoring positively against the IIA objective.
		Site A 22	+	S, M, L-T, D, R, M	OPDC area	
		Site A 23	+	S, M, L-T, D, R, M	OPDC area	
		Site A 24	+	S, M, L-T, D, R, M	OPDC area	
		Site A 25	+	S, M, L-T, D, R, M	OPDC area	
17	Maximise the	P8	+	S, M, L-T, D, R, M	OPDC area	The policy states that employment uses and mix use will be supported, including for small business. This could lead to local employment increasing.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
social and economic wellbeing of the local and regional population and improve access to employment and training	P8C1	+	S, M, L-T, D, R, M	OPDC area	The policy states that employment uses and mix use will be supported, including for small business. This could lead to local employment increasing.	
	Site A 21	+	S, M, L-T, D, R, M	OPDC area	It can be assumed that site allocation that contributes housing will have some associated social infrastructure contained within it. The site allocations are located near employment opportunities and sustainable transport links. This will make jobs in other locations in London more accessible.	
	Site A 22	+	S, M, L-T, D, R, M	OPDC area		
	Site A 23	+	S, M, L-T, D, R, M	OPDC area		
	Site A 24	+	S, M, L-T, D, R, M	OPDC area		
	Site A 25	+	S, M, L-T, D, R, M	OPDC area		
18 To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P8	+	M, L-T, D, R, L	OPDC area	The policy seeks to improve access and create employment uses which will encourage inward investment within OPDC.	
	P8C1	+	M, L-T, D, R, L	OPDC area	The policy seeks to improve access and create employment uses which will encourage inward investment within OPDC.	
	Site A 21	+	M, L-T, D, R, L	OPDC area	Providing new, high quality homes in the OPDC area can attract investment. The whole OPDC area itself is all about regeneration, transport and jobs and will score positively against this objective.	
	Site A 22	+	M, L-T, D, R, L	OPDC area		
	Site A 23	+	M, L-T, D, R, L	OPDC area		
	Site A 24	+	M, L-T, D, R, L	OPDC area		
	Site A 25	+	M, L-T, D, R, L	OPDC area		

## Table A-10 – Channel Gate

### P9 Channel Gate

#### Site allocation 26

**Reasonable Alternative (RA) 4 - Old Oak major town centre is redirected to include further sites in North Acton. It absorbs North Acton neighbourhood centre instead of Atlas Junction neighbourhood centre. Atlas Junction neighbourhood centre remains and could be increased in size reflecting increased development capacity in Channel Gate.**

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P9 / Site A 26	++	S, M, L-T, D, R, M	Channel Gate and OPDC area	The vision seeks to deliver a high quality residential led neighbourhood centred on the Grand Union Canal including a new local park, Cultural Quarter, town centre and community uses and linkages with the adjacent existing neighbourhoods... The policy also defines the aspiration to deliver a high quality movement network alongside expanding existing open spaces as well as delivering new and improved walking and cycling routes throughout Channel Gate and new accesses to Old Oak Lane and Victoria Road. This will contribute to place-making positively.
		RA 4	+	S, M, L-T, D, R, M	North Acton and OPDC area	RA 4 would deliver high quality town centre and community uses and linkages with the adjacent existing neighbourhoods if it were delivered
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P9 / Site A 26	+	S, M, L-T, D, R, M	Channel Gate and OPDC area	The policy aims to deliver high density residential-led neighbourhoods which will have a positive effect against this objective.
		RA 4	+	S, M, L-T, D, R, M	North Acton and OPDC area	The RA would contribute to the policy aims in delivering high density town centre and community uses which will have a positive effect against this objective.
3	Maximise the reuse of previously	P9 / Site A 26	++	S, M, L-T, I, R, M	North Acton	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		RA 4	++	S, M, L-T, I,	North Acton	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	developed land and existing buildings, including the remediation of contaminated land			R, M		
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P9 / Site A 26	+	S, M, L-T, D, R, M	Channel Gate and OPDC	The policy aims to deliver new and improve walking and cycle links and new connections across barriers which will have a positive effect against this objective.
		RA 4	+	S, M, L-T, D, R, M	North Acton and OPDC area	RA 4 is located in a mixed-use town centre setting offering ease of access to retail, employment and housing,
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P9 / Site A 26	+	S, M, L-T, D, R, M	North Acton and OPDC area	The policy aims to deliver 3,100 new homes which will have a positive effect against this objective.
		RA 4	+	S, M, L-T, D, R, M	North Acton and OPDC area	As the RA is located in a town centre setting there would be opportunities to provide housing should RA 4 be delivered.
6	Improve climate	P9 / Site A	+	S, M, L-T, D, R, M	North Acton and OPDC	The policy aims to contribute to the delivery of an integrated network of high quality, multi-functional publicly accessible open spaces and green infrastructure across Channel

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	26 RA 4	+/-	S, M, L-T, D, R, M	area North Acton and OPDC area, and surrounding boroughs	Gate which could help improve climate change adaptation in the area. RA 4 is located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective. Mitigation for this is provided within Policy SP2 and within the Environment and Utilities Chapter.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P9 / Site A 26 RA 4	+/-	S, M, L-T, D, R, M S, M, L-T, D, R, M	Channel Gate and OPDC area, and surrounding boroughs North Acton and OPDC area, and surrounding boroughs	The vision for the area is to create a high quality residential led neighbourhood centred on the Grand Union Canal.. It also encourages walking and cycling and proposes employment and jobs in the same area thereby reducing the possible distances travelled. This could lead to some benefits against this objective., although an increase in employment uses could lead to an increased number of travellers which could lead to a negative impact on the IIA objective.  The policy also refers to supporting and/or enabling opportunities for heat recovery from adjacent industrial activities that could contribute to a decentralised energy network within Channel Gate.  RA 4 would result in the use of natural resources for construction however given its town centre location this could promote more sustainable modes of transports to be used.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing	P9 / Site A 26 RA 4	+/-	M, L-T, D, R, M M, L-T, D, R, M	Channel Gate and surrounding areas North Acton and OPDC area	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	rates of re-use, recycling and recovery rates as well as composting of all green waste					
9	Improve the quality of the water environment	P9 / Site A 26	0			There is no clear link between the policy and the IIA Objective as the policy makes no reference to the improvement of the water environment.
		RA 4	0			
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P9 / Site A 26	+/-	S, M-T, D, IR, M	OPDC area	The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2
		RA 4	+/-	S, M-T, D, IR, M	North Acton and OPDC area	
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P9 / Site A 26	+	S, M, D, R, M	Channel Gate	The policy aims to mitigate against any impacts it makes on air, noise and light pollution. Examples of mitigation techniques include the use of robust materials, noise absorbing materials and use of planting to mitigate air and noise pollution.
		RA 4	+/-	S, M, D, R, M	North Acton and OPDC area	RA 4, if brought forward and delivered, would result in noise pollution during its construction phase potentially leading to negative effects to its surroundings. Mitigation for this is provided within the Environment and Utilities Chapter.
12	To conserve and enhance the historic environment, heritage assets	P9 / Site A 26	+	S, M, L-T, D, R, M	Channel Gate and OPDC area	The policy aims to strengthen local identity and character by conserving and enhancing Grand Union Canal Conservation Area and the adjacent Old Oak Lane Conservation Area as well the wider industrial heritage. This will have a positive effect against the IIA objective.
		RA 4	+	S, M, L-T, D, R, M	North Acton and OPDC	RA 4, if brought forward, would be delivered in line with SP9 to ensure a well-designed, high quality and resilient built environment, that supports the creation of a new high-

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	and their settings				area	density part of London, positively shaped by local context, character and heritage.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P9 / Site A 26	+	S, M, L-T, D, R, L	Channel Gate and OPDC area	The policy aims to create new housing, jobs and green spaces which can encourage a sense of community.
		RA 4	+	S, M, L-T, D, R, L	North Acton and OPDC area	RA 4 is located in a mixed-use town centre setting offering ease of access to social and economic amenity,
14	Improve safety and reduce crime and the fear of crime	P9 / Site A 26	+	S, M, L-T, D, R, L	Channel Gate and OPDC area	The supporting text in the policy seeks to increase natural surveillance along the canal, thus scoring positively against this objective.
		RA 4	?			It is unclear how RA 4 would contribute to improving safety and how its delivery would affect crime levels in the local area
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P9 / Site A 26	+	S, M, L-T, D, R, L	Channel Gate and OPDC area	By expecting proposals to contribute towards increasing the community garden space (Old Oak Common Community Gardens) and additional open public spaces in the policy, this can potentially promote wider healthy living aims.
		RA 4	+	S, M, L-T, D, R, L	North Acton and OPDC area	RA 4 is located in a mixed-use town centre setting which would offer increased sustainable transport options such as walking or cycling due to the close proximity to essential amenities.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P9 / Site A 26	0			There is no clear link between the policy and the IIA Objective.
		RA 4	0			
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P9 / Site A 26	+	S, M, L-T, D, R, L	Channel Gate and OPDC area	By encouraging good transport links and by creating new employment and investment opportunities, this will maximise the social and economic wellbeing of the local and regional population and could improve access to employment and training. The policy also contributes to the delivery of the Old Oak major town centre by delivering vibrant town centre uses, at Atlas Junction, Channel Gate Street and along the Grand Union Canal.
		RA 4	+	S, M, L-T, D, R, L	North Acton and OPDC area	RA 4 would deliver economic and community uses such as retail and leisure amenities therefore scoring positively against this objective, if it were to be brought forward.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P9 / Site A 26	++	S, M, L-T, D, R, L	Channel Gate and OPDC area	By encouraging good transport links and by creating new employment and investment opportunities, this will encourage inward investment alongside investment within existing communities, to create sustainable economic growth. The policy also contributes to the delivery of the Old Oak major town centre by delivering vibrant town centre uses, at Atlas Junction, Channel Gate Street and along the Grand Union Canal.
		RA 4	+	S, M, L-T, D, R, L	North Acton and OPDC area	RA 4 would deliver economic and community uses such as retail and leisure amenities therefore scoring positively against this objective, if it were to be brought forward.



## Table A-11 – Scrubs Lane

### P10 Scrubs Lane

#### P10C1 Harrow Road Cluster

#### P10C2 Laundry Cluster

#### P10C3 Hythe Road Cluster

#### P10C4 Mitre Canal Cluster

#### P10C5 Mitre Way Cluster

Site Allocations 27 to 31, 33, 34, 39 and 40

Reasonable Alternatives (RA) 2 - Cargiant Scrubs Lane site allocation retained as SIL; and RA3 - Alternative form of increased massing is considered for the Cargiant Scrubs Lane site allocation to the north of Hythe Road or on other available development sites.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P10	++	M, L-T, I, R, M	Scrubs Lane and OPDC area	The policy seeks to contribute to and/or deliver new and improved walking and cycling routes, access to Wormwood Scrubs and Little Wormwood Scrubs as well as a high quality coordinated public realm, street greening and the clustering of active land uses including town centre uses. Alongside the overall approach to the area, which focusses development around the important historic character of the area, these measures should lead to an improvement in local distinctiveness locally.
		P10C1	+	S, M, L-T, D, R, H	Harrow Road and OPDC area	The policy includes improving existing and delivering new public realm, new open spaces, creating high quality connections with surrounding areas and providing a range of active uses. This will have a positive effect on this IIA objective.
		P10C2	+	S, M, L-T, D, R, H	Park Road (part of) and OPDC area	The policy includes improving existing and delivering new public realm, new open spaces, creating high quality connections with surrounding areas and providing a range of active uses. This will have a positive effect on this IIA objective.
		P10C3	+	S, M, L-T, D, R, H	Hythe Road and OPDC area	The policy includes improving existing and delivering new public realm, new open spaces, creating high quality connections with surrounding areas and providing a range of active uses. This will have a positive effect on this IIA objective.
		P10C4	+	S, M, L-T, D, R, H	Mitre Canalside and OPDC	The policy includes improving existing and delivering new public realm, new and improve open spaces, creating high quality connections with surrounding areas and providing a range of

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations		
				area	active uses. This will have a positive effect on this IIA objective.		
		P10C5	+	S, M, L-T, D, R, H	Mitre Way and OPDC area	The policy includes improving existing and delivering new public realm, new and improve open spaces, creating high quality connections with surrounding areas and providing a range of active uses. This will have a positive effect on this IIA objective.	
		Site A 27	+	S, M-T, I, R, M	OPDC area	By delivering new homes and space for new jobs, site allocations will support place-making.	
		Site A 28	+	S, M-T, I, R, M	OPDC area		
		Site A 29	+	S, M-T, I, R, M	OPDC area		
		Site A 30	+	S, M, L-T, D, R, H	OPDC area		
		Site A 31	+	S, M, L-T, D, R, H	OPDC area		
		Site A 33	+	S, M-T, I, R, M	OPDC area		
		Site A 34	+	S, M-T, I, R, M	OPDC area		
		Site A 39	+	S, M-T, I, R, M	OPDC area		
		Site A 40	+	S, M-T, I, R, M	OPDC area		
		RA 2	-	S, M-T, I, R, M	OPDC area		By retaining sites as SIL, this would likely not support the delivery of a coherent place in Scrubs Lane having a negative effect on this IIA objective.
		RA 3	-	S, M-T, I, R, M	OPDC area		By delivering additional homes and space for new jobs on other sites in Scrubs Lane, this could deliver a negative effect on the sense of enclosure along the street and weaken the approach for tall buildings to support local legibility.
2	To optimise the efficient use of land through	P10	++	S, M, L-T, I, R, M	Scrubs Lane	The policy specifies the areas where greater heights will be encouraged across the area, seeking to recognise sensitive historic assets as locations where lower heights would be appropriate. This could lead to benefits against this Objective.	
		P10C1	+	S, M, L-T, D,	Harrow Road	The supporting text aims to supply a variety of different building heights where appropriate	

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increased development densities and building heights, where appropriate				R, H	and OPDC area	including a single taller building. This will score positively against this objective.
	P10C2	+		S, M, L-T, D, R, H	Park Road (part of) and OPDC area	The supporting text aims to supply a variety of different building heights where appropriate including a single taller building. This will score positively against this objective.
	P10C3	+		S, M, L-T, D, R, H	Hythe Road and OPDC area	The supporting text aims to supply a variety of different building heights where appropriate including two tall buildings. This will score positively against this objective.
	P10C4	+		S, M, L-T, D, R, H	Mitre Canalside and OPDC area	The supporting text aims to supply a variety of different building heights where appropriate including a single taller building. This will score positively against this objective.
	P10C5	+		S, M, L-T, D, R, H	Mitre Way and OPDC area	The supporting text aims to supply a variety of different building heights where appropriate including a single taller building. The policy aims to supply a mixed-use development by utilising residential provision above existing employment uses where appropriate. This will score positively against this objective.
	Site A 27	+		S, M-T, I, R, M	OPDC area	Policy P10 aims to encourage a range of building heights. Therefore, it can be assumed that high density buildings for these site allocations will be encouraged that also respond to sensitive locations.
	Site A 28	+		S, M-T, I, R, M	OPDC area	
	Site A 29	+		S, M-T, I, R, M	OPDC area	
	Site A 30	+		S, M-T, I, R, M	OPDC area	
	Site A 31	+		S, M-T, I, R, M	OPDC area	
	Site A 33	+		S, M-T, I, R, M	OPDC area	
	Site A 34	+		S, M-T, I, R, M	OPDC area	
Site A 39	+		S, M-T, I, R, M	OPDC area		

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		Site A 40	+	S, M-T, I, R, M	OPDC area	
		RA 2	+	S, M-T, I, R, M	OPDC area	Policy P10 aims to encourage a range of building heights. Therefore, it can be assumed that high density buildings for these reasonable alternatives would be encouraged that also respond to sensitive locations should they be brought forward.
		RA 3	+	S, M-T, I, R, M	OPDC area	
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P10	++	S, M, L-T, I, R, M	Scrubs Lane	
		P10C1	+	S, M, L-T, D, R, H	Harrow Road and OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		P10C2	+	S, M, L-T, D, R, H	Park Road (part of) and OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		P10C3	+	S, M, L-T, D, R, H	Hythe Road and OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		P10C4	+	S, M, L-T, D, R, H	Mitre Canalside and OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		P10C5	+	S, M, L-T, D, R, H	Mitre Way and OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 27	+	S, M, L-T, D, R, H	OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 28	+	S, M, L-T, D, R, H	OPDC area	
		Site A 29	+	S, M, L-T, D, R, H	OPDC area	
		Site A 30	+	S, M, L-T, D, R, H	OPDC area	
		Site A 31	+	S, M, L-T, D, R, H	OPDC area	

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				R, H		
		Site A 33	+	S, M, L-T, D, R, H	OPDC area	
		Site A 34	+	S, M, L-T, D, R, H	OPDC area	
		Site A 39	+	S, M, L-T, D, R, H	OPDC area	
		Site A 40	+	S, M, L-T, D, R, H	OPDC area	
		RA 2	+	S, M, L-T, D, R, H	OPDC area	
		RA 3	+	S, M, L-T, D, R, H	OPDC area	
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P10	++	M, L-T, I, R, L	Scrubs Lane and OPDC area, and surrounding boroughs	The policy seeks to contribute towards and/or deliver new and improved walking and cycling routes to the east and west and improved infrastructure along Scrubs Lane. It also uses building heights to support local legibility to destinations and stations. These measures could lead to benefits against this objective.
		P10C1	+	S, M, L-T, D, R, L	Harrow Road and OPDC area	The policy supports local connectivity by delivering Ellisland Way as a new walking and cycling route and safeguarding for a long-term new route to Willesden Junction Station.
		P10C2	+	S, M, L-T, D, R, L	Park Road (part of) and OPDC area	This policy aims to contribute to delivering a potential new, high quality east-west walking and cycling and vehicular connection connecting Scrubs Lane with Old Oak North.
		P10C3	+	S, M, L-T, D, R, L	Hythe Road and OPDC area	This policy aims to contribute to delivering a new and improved, high quality east-west walking, cycling and vehicular connection connecting Scrubs Lane with Old Oak North.
		P10C4	+	S, M, L-T, D, R, L	Mitre Canalside and OPDC area	This policy aims to contribute to delivering improved, high quality east-west walking and cycling connection along the canal tow path connecting Scrubs Lane with Old Oak South and Kensal Canalside Opportunity Area.
		P10C5	+	S, M, L-T, D,	Mitre Way and	This policy aims to contribute to delivering new, high quality walking and cycling connecting

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				R, H	OPDC area	Wormwood Scrubs Street to Scrubs Lane.
		Site A 27	+	S, M, L-T, D, R, L	OPDC area	The site allocations are located near good walking, cycling and sustainable transport links which will minimise the need to travel. The policy and clusters for the area seek to improve the connector routes and install new footpaths and cycle lanes to improve this further.
		Site A 28	+	S, M, L-T, D, R, L	OPDC area	
		Site A 29	+	S, M, L-T, D, R, L	OPDC area	
		Site A 30	+	S, M, L-T, D, R, L	OPDC area	
		Site A 31	+	S, M, L-T, D, R, L	OPDC area	
		Site A 33	+	S, M, L-T, D, R, L	OPDC area	
		Site A 34	+	S, M, L-T, D, R, L	OPDC area	
		Site A 39	+	S, M, L-T, D, R, L	OPDC area	
		Site A 40	+	S, M, L-T, D, R, L	OPDC area	
		RA 2	+	S, M, L-T, D, R, L	OPDC area	
		RA 3	+	S, M, L-T, D, R, L	OPDC area	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of	P10	++	S, M, L-T, D, R, M	OPDC area	This policy supports the delivery of a range of mixed-use development along Scrubs Lane including new homes. It also aims to improve access via roads, walking and cycling.
		P10C1	+	S, M, L-T, D, R, M	Harrow Road and OPDC area	The policy seeks to deliver housing across the cluster and guides locations away from areas of potentially poor residential amenity. This will have a positive impact against the objective.
		P10C2	+	S, M, L-T, D, R, M	Park Road (part of) and OPDC area	The policy seeks to deliver housing across the cluster and guides locations away from areas of potentially poor residential amenity. This will have a positive impact against the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
types and tenures, to meet identified local needs	P10C3	+	S, M, L-T, D, R, M	Hythe Road and OPDC area	The policy seeks to deliver a mixed use cluster including for housing and guides locations away from areas of potentially poor residential amenity. This will have a positive impact against the objective.	
	P10C4	+	S, M, L-T, D, R, M	Mitre Canalside and OPDC area	The policy seeks to deliver housing across the cluster, including residential moorings, and guides locations away from areas of potentially poor residential amenity. This will have a positive impact against the objective.	
	P10C5	+	S, M, L-T, D, R, H	Mitre Way and OPDC area	The policy aims to supply a mixed-use development by utilising residential provision above existing employment uses where appropriate. This will score positively against this objective.	
	Site A 27	+	S, M-T, D, R, M	OPDC area	The site allocations are situated in an accessible area and will be required to accord with affordable housing policies within the Housing Chapter.	
	Site A 28	+	S, M-T, D, R, M	OPDC area		
	Site A 29	+	S, M-T, D, R, M	OPDC area		
	Site A 30	+	S, M-T, D, R, M	OPDC area		
	Site A 31	+	S, M-T, D, R, M	OPDC area		
	Site A 33	+	S, M-T, D, R, M	OPDC area		
	Site A 34	+	S, M-T, D, R, M	OPDC area		
	Site A 39	+	S, M-T, D, R, M	OPDC area		
	Site A 40	+	S, M-T, D, R, M	OPDC area		
	RA 2	O	S, M-T, D, R, M	OPDC area		RA 2 does not provide housing and therefore there is no clear link between the reasonable alternative and the IIA Objective,
RA 3	+	S, M-T, D, R, M	OPDC area	RA 3 is situated in an accessible area and will be required to accord with affordable housing policies within the Housing Chapter.		
6	Improve climate	P10	+	S,M, L-T, D,	Scrubs Lane	Policy supporting text ensures that the design of proposals should include for sustainable

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change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect				R, M	and OPDC area	drainage systems and associated green infrastructure helping to reduce the risk of flooding resulting in a positive score against this objective.
	P10C1	+		S,M, L-T, D, R, M	Scrubs Lane and OPDC area	The green infrastructure policies seek to embed resilience to climate change. This will score positively against this objective.
	P10C2	+		S,M, L-T, D, R, M	Scrubs Lane and OPDC area	The green infrastructure policies seek to embed resilience to climate change. This will score positively against this objective.
	P10C3	+		S,M, L-T, D, R, M	Scrubs Lane and OPDC area	The green infrastructure policies seek to embed resilience to climate change. This will score positively against this objective.
	P10C4	+		S,M, L-T, D, R, M	Scrubs Lane and OPDC area	The green infrastructure policies seek to embed resilience to climate change. This will score positively against this objective.
	P10C5	+		S, M, L-T, D, R, H	Mitre Way and OPDC area	The green infrastructure policies seek to embed resilience to climate change. This will score positively against this objective.
	Site A 27	+/-		S,M, L-T, D, R, M	Scrubs Lane and OPDC area	The sites are located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective. Mitigation for this is provided within Policy SP2 and within the Environment and Utilities Chapter.
	Site A 28	+/-		S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
	Site A 29	+/-		S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
	Site A 30	+/-		S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
	Site A 31	+/-		S,M, L-T, D, R, M	Scrubs Lane and OPDC area	



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		Site A 33	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
		Site A 34	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
		Site A 39	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
		Site A 40	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
		RA 2	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	The reasonable alternatives are located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective. Mitigation for this is provided within Policy SP2 and within the Environment and Utilities Chapter.
		RA 3	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil	P10	+/-	M, L-T, I, R, L	Scrubs Lane and OPDC area, and surrounding boroughs	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		P10C1	+/-	M, L-T, I, R, L	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		P10C2	+/-	M, L-T, I, R, L	OPDC area	
		P10C3	+/-	M, L-T, I, R, L	OPDC area	
		P10C4	+/-	M, L-T, I, R, L	OPDC area	
		P10C5	+/-	S, M, L-T, D, R, H	Mitre Way and OPDC area	
		Site A 27	+/-	M, L-T, I, R, L	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the
Site A 28	+/-	M, L-T, I, R, L	OPDC area			

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fuels for transport, heating and energy	Site A 29	+/-	M, L-T, I, R, L	OPDC area	increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.	
	Site A 30	+/-	M, L-T, I, R, L	OPDC area		
	Site A 31	+/-	M, L-T, I, R, L	OPDC area		
	Site A 33	+/-	M, L-T, I, R, L	OPDC area		
	Site A 34	+/-	M, L-T, I, R, L	OPDC area		
	Site A 39	+/-	M, L-T, I, R, L	OPDC area		
	Site A 40	+/-	M, L-T, I, R, L	OPDC area		
	RA 2	+/-	M, L-T, I, R, L	OPDC area		
RA 3	+/-	M, L-T, I, R, L	OPDC area			
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P10	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P10C1	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P10C2	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P10C3	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy. The removal of the waste management facilities may also impact on the local management waste if not mitigated through other policies in the Local Plan.
		P10C4	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.

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		P10C5	+/-	S, M, L-T, D, R, H	Mitre Way and OPDC area	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 27	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	Insufficient information given to assess but it can be presumed that the increase in new development will increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 28	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 29	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 30	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 31	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 33	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 34	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	

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		Site A 39	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 40	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
		RA 2	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
		RA 3	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
9	Improve the quality of the water environment	P10	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment. However, the extent of predicted benefits is uncertain. Street 'greening' could also create benefits to a certain degree, although it is unclear what exactly these measures might comprise.
		P10C1	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	New developments can lead to pollutant run off entering the water environment. However, improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6.
		P10C2	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		P10C3	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	

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				L	and surrounding boroughs	
		P10C4	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		P10C5	+/-	S, M, L-T, D, R, H	Mitre Way and OPDC area	
		Site A 27	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	New developments can lead to pollutant run off entering the water environment. However, improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6.
		Site A 28	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 29	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 30	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 31	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 33	+/-	S, M-T, D, IR, L	OPDC area and surrounding	

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					boroughs	
		Site A 34	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 39	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 40	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		RA 2	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		RA 3	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P10	0			The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2.
		P10C1	0			The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2.
		P10C2	0			The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2.
		P10C3	0			The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also

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		P10C4	0			lead to a loss of biodiversity if not appropriately mitigated by policy EU2.
		P10C5	+/-	S, M, L-T, D, R, H	Mitre Way and OPDC area	The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2.
		Site A 27	+/-	M, L-T, D, IR, M	OPDC area	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and deliver a net additional increase in biodiversity.
		Site A 28	+/-	M, L-T, D, IR, M	OPDC area	
		Site A 29	+/-	M, L-T, D, IR, M	OPDC area	
		Site A 30	+/-	M, L-T, D, IR, M	OPDC area	
		Site A 31	+/-	M, L-T, D, IR, M	OPDC area	
		Site A 33	+/-	M, L-T, D, IR, M	OPDC area	
		Site A 34	+/-	M, L-T, D, IR, M	OPDC area	
		Site A 39	+/-	M, L-T, D, IR, M	OPDC area	
		Site A 40	+/-	M, L-T, D, IR, M	OPDC area	
		RA 2	?			
		RA 3	?			
11	To minimise air, noise and light pollution,	P10	+/-	S, M, L-T, D, R, M	OPDC area	This policy aims to mitigate against any noise pollution created from railways. Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
particularly for vulnerable groups						construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
	P10C1	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.	
	P10C2	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.	
	P10C3	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.	
	P10C4	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.	
	P10C5	+/-	S, M, L-T, D, R, H	Mitre Way and OPDC area	Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.	
	Site A 27	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.	
	Site A 28	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.	
	Site A 29	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.	



IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
			R, M		
		Site A 30 +/-	S, M, L-T, D, R, M	OPDC area	
		Site A 31 +/-	S, M, L-T, D, R, M	OPDC area	
		Site A 33 +/-	S, M, L-T, D, R, M	OPDC area	
		Site A 34 +/-	S, M, L-T, D, R, M	OPDC area	
		Site A 39 +/-	S, M, L-T, D, R, M	OPDC area	
		Site A 40 +/-	S, M, L-T, D, R, M	OPDC area	
		RA 2 +/-	S, M, L-T, D, R, M	OPDC area	
		RA 3 +/-	S, M, L-T, D, R, M	OPDC area	
12	To conserve and enhance the historic environment, heritage assets and their settings	P10	++	M, L-T, D, IR, M	OPDC area and surrounding boroughs The policy seeks to strengthen local identity and character by conserving and enhancing existing and proposed heritage assets within the area and adjacent to it. It also seeks to reflect wider heritage in future development, thus scoring significant positively against this IIA objective.
		P10C1	+	S, M, L-T, D, R, M	OPDC area The policy identifies the local historic railways to be an important heritage theme that can help shape the character of development scoring positively against this IIA objective.
		P10C2	+	S, M, L-T, D, R, M	OPDC area The policy seeks to enhance local character by conserving and enhancing proposed heritage assets within the area, thus scoring positively against this IIA objective.
		P10C3	+	S, M, L-T, D, R, M	OPDC area The policy seeks to enhance local character by conserving and enhancing local heritage within the area, thus scoring positively against this IIA objective.
		P10C4	+	S, M, L-T, D, R, M	OPDC area The policy seeks to enhance local character by conserving and enhancing existing proposed heritage assets within the area, thus scoring positively against this IIA objective.
		P10C5	+	S, M, L-T, D, R, H	Mitre Way and OPDC area The policy seeks to enhance local character by conserving and enhancing existing proposed heritage assets within the area, thus scoring positively against this IIA objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 27	+/-	S, M, L-T, D, R, M	OPDC area	Site allocations are situated near listed buildings which could be negatively impacted during construction. However, Policy P10 aims to conserve and enhance existing listed heritage sites and aims to ensure that future development acknowledges this heritage.
		Site A 28	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 29	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 30	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 31	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 33	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 34	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 39	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 40	+/-	S, M, L-T, D, R, M	OPDC area	
		RA 2	+/-	S, M, L-T, D, R, M	OPDC area	
		RA 3	+/-	S, M, L-T, D, R, M	OPDC area	
13	Increase community cohesion and reduce social exclusion to encourage a sense of	P10	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy supports development as part of a mix of uses, which could help to create a sense of community locally. The proposed improvements to walking and cycling links, as well as reducing traffic congestion, could increase community interaction, resulting in greater cohesion. Improvements to the public realm based on the enhancement of historic assets could lead to a greater sense of place, which could have further benefits for the local sense of community.
		P10C1	+	S, M, L-T, D, R, M	OPDC area	The policy is 'a community and employment focused cluster framed by the prominent corner of Harrow Road and Scrubs Lane connecting to Willesden Junction.' This will help to increase community cohesion and reduce social exclusion.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
community and welfare	P10C2	+	S, M, L-T, D, R, M	OPDC area	The policy aims to support a mixed-use cluster which will have a positive impact against the IIA objective.	
	P10C3	+	S, M, L-T, D, R, M	OPDC area	By improving sustainable transport links, this can help reduced social exclusion as areas will be more accessible by the public.	
	P10C4	+	S, M, L-T, D, R, M	OPDC area	The policy aims to support a housing and community focused cluster which will have a positive impact against the IIA objective.	
	P10C5	+	S, M, L-T, D, R, H	Mitre Way and OPDC area	The policy aims to support a mixed-use cluster which will have a positive impact against the IIA objective.	
	Site A 27	+	S, M, L-T, D, R, M	OPDC area	It can be assumed that by delivering new homes and space for new jobs that these site allocations will positively contribute to this IIA objective.	
	Site A 28	+	S, M, L-T, D, R, M	OPDC area		
	Site A 29	+	S, M, L-T, D, R, M	OPDC area		
	Site A 30	+	S, M, L-T, D, R, M	OPDC area		
	Site A 31	+	S, M, L-T, D, R, M	OPDC area		
	Site A 33	+	S, M, L-T, D, R, M	OPDC area		
	Site A 34	+	S, M, L-T, D, R, M	OPDC area		
	Site A 39	+	S, M, L-T, D, R, M	OPDC area		
	Site A 40	+	S, M, L-T, D, R, M	OPDC area		
	RA 2	+	S, M, L-T, D, R, M	OPDC area		It can be assumed that by delivering new jobs that RA 2 would positively contribute to this IIA objective should it be brought forward and delivered.
RA 3	+	S, M, L-T, D, R, M	OPDC area	It can be assumed that by delivering new homes and space for new jobs that RA 3 would positively contribute to this IIA objective should it be brought forward and delivered.		
14	Improve safety	P10	++	S, M, L-T, D,	OPDC area	The policy seeks to deliver a high quality movement network across the area with a focus on

IIA Objective	Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
and reduce crime and the fear of crime			R, M	and surrounding boroughs	walking and cycling routes supported by active and positive frontages. These connections seek to connect local designations. This could enable the achievement of benefits against this objective in terms of community cohesion and interaction, leading to a greater sense of wellbeing locally and an increase in natural surveillance.
	P10C1	+	S, M, L-T, D, R, M	OPDC area	The policy seeks to provide new east-west high quality walking and cycling routes to improve permeability of the area. This should achieve benefits against this objective.
	P10C2	+	S, M, L-T, D, R, M	OPDC area	The policy seeks to provide new east-west high quality walking and cycling routes to improve permeability of the area. This should achieve benefits against this objective.
	P10C3	+	S, M, L-T, D, R, M	OPDC area	The policy seeks to provide new and improved east-west high quality walking and cycling routes to improve permeability of the area. This should achieve benefits against this objective.
	P10C4	+	S, M, L-T, D, R, M	OPDC area	The policy seeks to provide new and improved east-west high quality walking and cycling routes to improve permeability of the area. This should achieve benefits against this objective.
	P10C5	+	S, M, L-T, D, R, H	Mitre Way and OPDC area	The policy seeks to provide new and improved high quality walking and cycling routes to improve permeability of the area. This should achieve benefits against this objective.
	Site A 27	+	S, M, L-T, D, R, M	OPDC area	The requirement to deliver a legible and permeable street network could contribute positively to the IIA objective for these site allocations
	Site A 28	+	S, M, L-T, D, R, M	OPDC area	
	Site A 29	+	S, M, L-T, D, R, M	OPDC area	
	Site A 30	+	S, M, L-T, D, R, M	OPDC area	
	Site A 31	+	S, M, L-T, D, R, M	OPDC area	
	Site A 33	+	S, M, L-T, D, R, M	OPDC area	
	Site A 34	+	S, M, L-T, D, R, M	OPDC area	
	Site A 39	+	S, M, L-T, D, R, M	OPDC area	
Site A 40	+	S, M, L-T, D,	OPDC area		

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M		
		RA 2	+	S, M, L-T, D, R, M	OPDC area	The requirement to deliver a legible and permeable street network could contribute positively to the IIA objective for these reasonable alternatives should they be delivered
		RA 3	+	S, M, L-T, D, R, M	OPDC area	
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P10	+	M, L-T, I, R, M	Scrubs Lane and surrounding areas	The policy supports development of a mix of uses, which could help to create a sense of community locally. The proposed improvements to walking and cycling links, access to recreational space at Wormwood Scrubs, as well as reducing traffic congestion, could increase community interaction. This would result in greater cohesion as well as physical activity and improved physical health over time. It would also result from potential long term air quality improvements. Improvements to the public realm based on the enhancement of historic assets could lead to a greater sense of place, which could have further benefits for the local sense of community, leading to improvements in mental health.
		P10C1	+	S, M, L-T, I, R, M	OPDC area	The policy aims to support and enhance health and wellbeing through green infrastructure and will have a positive impact against the IIA objective.
		P10C2	+	S, M, L-T, I, R, M	OPDC area	The policy aims to support and enhance health and wellbeing through green infrastructure and will have a positive impact against the IIA objective.
		P10C3	+	S, M, L-T, I, R, M	OPDC area	The policy aims to support and enhance health and wellbeing through green infrastructure and will have a positive impact against the IIA objective.
		P10C4	+	S, M, L-T, I, R, M	OPDC area	The policy aims to support and enhance health and wellbeing through green infrastructure and will have a positive impact against the IIA objective.
		P10C5	+	S, M, L-T, D, R, H	Mitre Way and OPDC area	The policy aims to support and enhance health and wellbeing through green infrastructure and will have a positive impact against the IIA objective.
		Site A 27	?			It can be assumed that site allocation will contribute some associated social infrastructure, such as health and sports facilities, contained within it, but it's uncertain at this level of detail how likely this will be. Policy P10 aims to improve access which means access to health care facilities will be more readily available.
		Site A 28	?			
		Site A 29	?			
		Site A 30	?			
		Site A 31	?			
		Site A 33	?			
		Site A 34	?			
		Site A 39	?			

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 40	?			
		RA 2	?			
		RA 3	?			
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P10	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P10C1	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P10C2	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P10C3	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P10C4	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P10C5	+	S, M, L-T, D, R, H	Mitre Way and OPDC area	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		Site A 27	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. This will result in the site allocations scoring positively against this IIA objective.
		Site A 28	+	S, M-T, I, R, M	OPDC area and	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding boroughs	
		Site A 29	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 30	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 31	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 33	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 34	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 39	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 40	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		RA 2	+	S, M-T, I, R, M	OPDC area and	Accessibility to education services may be improved through the delivery of new jobs which could bring about education and training opportunities such as apprenticeships and/or

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding boroughs	internships for examples. Increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling would also contribute positively. This will result in the reasonable alternatives scoring positively against this IIA objective should they be delivered.
		RA 3	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P10	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver social infrastructure that could include training facilities. Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P10C1	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver employment space for SMEs that help support place-making, deliver a mixed-use place and act as a catalyst for wider regeneration, as well as new town centre uses. This could lead to positive effects against this Objective.
		P10C2	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver employment space for SMEs that help support place-making, deliver a mixed-use place and act as a catalyst for wider regeneration, as well as new town centre uses. This could lead to positive effects against this Objective.
		P10C3	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver employment space for SMEs that help support place-making, deliver a mixed-use place and act as a catalyst for wider regeneration, as well as new town centre uses. This could lead to positive effects against this Objective.
		P10C4	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver employment space for SMEs that help support place-making, deliver a mixed-use place and act as a catalyst for wider regeneration, as well as new town centre uses. This could lead to positive effects against this Objective.
		P10C5	+	S, M, L-T, D, R, H	Mitre Way and OPDC area	The policy seeks to deliver employment space that help support place-making, deliver a mixed-use place and act as a catalyst for wider regeneration, as well as new town centre uses. This could lead to positive effects against this Objective.
		Site A 27	+	S, M,L-T, I, R, M	OPDC area and surrounding	It can be assumed that site allocation that contributes housing will have some associated social infrastructure contained within it. The site allocations are located near employment opportunities and sustainable transport links. This will make jobs in other locations in London more



IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				boroughs	accessible.
	Site A 28	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	
	Site A 29	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	
	Site A 30	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	
	Site A 31	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	
	Site A 33	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	
	Site A 34	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	
	Site A 39	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	
	Site A 40	+	S, M,L-T, I, R, M	OPDC area and surrounding	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
		RA 2	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	RA 2 delivers employment opportunities and is located near to other employment opportunities and sustainable transport links.
		RA 3	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	It can be assumed that planning contributions from housing developments would include some associated social infrastructure. RA 3 also delivers employment opportunities and is located near to other employment opportunities and sustainable transport links.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P10	++	M, L-T, I, R, L	London-wide and nationally	The policy seeks to provide a range of flexible workspaces as part of the development of the Cumberland Park Factory and new mixed-use developments. The policy also demonstrates OPDC's support for an existing successful business (Cargiant) that will support the local economy and employment opportunities for local people. This should help to deliver significant benefits against this objective.
		P10C1	+	M, L-T, I, R, M	OPDC area and surrounding boroughs	The creation of new employment areas and better transport facilities will encourage inward investment within existing communities and create sustainable economic growth.
		P10C2	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	The creation of new employment areas and better transport facilities will encourage inward investment within existing communities and create sustainable economic growth.
		P10C3	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	The creation of new employment areas and better transport facilities will encourage inward investment within existing communities and create sustainable economic growth.
		P10C4	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	The creation of new employment areas and better transport facilities will encourage inward investment within existing communities and create sustainable economic growth.
		P10C5	+	S, M, L-T, D, R, H	Mitre Way and OPDC area	The creation of new employment areas and better transport facilities will encourage inward investment within existing communities and create sustainable economic growth.

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
		Site A 27	+	M, L-T, I, R, L	London-wide and nationally	Providing new, high quality homes in the OPDC area can attract investment. The whole OPDC area itself is all about regeneration, transport and jobs and will score positively against this objective.
		Site A 28	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 29	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 30	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 31	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 33	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 34	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 39	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 40	+	M, L-T, I, R, L	London-wide and nationally	
		RA 2	+	M, L-T, I, R, L	London-wide and nationally	
		RA 3	+	M, L-T, I, R, L	London-wide and nationally	Providing new, high quality homes in the OPDC area can attract investment. The whole OPDC area itself is about regeneration, transport and jobs and will score positively against this objective.

**Table A-12 – Willesden Junction**

**P11 Willesden Junction**

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P11	++	S,M,L-T, D, R, M	OPDC area	Policy provides an enhanced station at Willesden Junction along with improved station spaces. Policy also includes the delivery of new town centre uses focused around Willesden Junction station which would help to positively integrate the areas surroundings playing an important role in place-making.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P11	+	S, M, L-T, D, R, M	OPDC area	The policy aims to produce high density development which will have a positive effect against this objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P11	+	S, M, L-T, D, R, M	OPDC area	By focusing on high density development, this will contribute to maximising the reuse of previously developed land.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P11	+	S, M, L-T, D, R, M	OPDC area	By delivering station upgrades, this will encourage sustainable transport and discourage use of private motorised vehicles.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P11	++	S,M, L-T, D, R, M	OPDC area	This policy supports the delivery of a range of mixed-use development for Willesden Junction by contributing to the early delivery of new homes and during the plan. It also aims to improve access through sustainable transport.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P11	0			There is no clear link between the policy and the IIA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P11	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The vision for the area supports new and improved transport connections. It also encourages walking and cycling and proposes employment and jobs in the same area thereby reducing the possible distances travelled. Highways improvements and active frontages along streets are proposed. This could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. Increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P11	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme. This will be mitigated and managed through the Waste Policy.
9	Improve the quality of the water environment	P11	0			There is no clear link between the policy and the IIA Objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P11	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P11	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by design, environmental policies and London Plan guidance.
12	To conserve and enhance the historic environment, heritage assets and their settings	P11	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy aims to conserve and enhance existing heritage assets thus scoring positively against the IIA objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P11	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy supports development as part of a mix of uses, which could help to create a sense of community locally. The proposed improvements to walking and cycling links, as well as reducing traffic congestion, could increase community interaction, resulting in greater cohesion. Improvements to the public realm based on the enhancement of historic assets could lead to a greater sense of place, which could have further benefits for the local sense of community.
14	Improve safety and reduce crime and the fear of crime	P11	0			There is no clear link between the policy and the IIA Objective.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P11	+	S, M, L-T, D, R, L	OPDC area	Although the Policy does not specifically reference health and wellbeing, the inclusion of green infrastructure through the application of Policy D6 would result in a positive score against this IIA objective.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P11	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P11	0			There is no clear link between the policy and the IIA Objective.
18	To encourage	P11	+	S, M-T, I, R,	OPDC area	By improving transport links and employment opportunities it can encourage inward

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	inward investment alongside investment within existing communities, to create sustainable economic growth			M	and surrounding boroughs	investment within the area as well as be ensuring that Willesden Junction becomes a destination in its own right

**Table A-13 – Wormwood Scrubs**

**P12 Wormwood Scrubs**

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P12	++	S, M, L-T, I, R, M	OPDC area	Wormwood Scrubs is described in the Local Plan as a cherished public open space that provides people and wildlife with the opportunity to enjoy nature and space for recreation and relaxation. The policy seeks to conserve and enhance the Scrubs as a public open space, alongside securing resources for its management in agreement with stakeholders, which should help to conserve and enhance its function.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P12	+	S, M, L-T, I, R, M	Wormwood Scrubs	The continued protection of Wormwood Scrubs is considered to be an efficient use of space appropriate to its relevant designations.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P12	0			The policy will not lead to the development of previously developed land reflecting the protection of Wormwood Scrubs as Metropolitan Open Land and that offered by relevant legislation.
4	Minimise the	P12	++	S, M, L-T, D, R, M	OPDC area, and	The policy seeks to improve access to Wormwood Scrubs from surroundings areas. This could help to improve accessibility and help to connect communities within the area

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network				surrounding boroughs	through improved public realm and connectivity (walking and cycling).
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P12	0			The policy will not lead to the delivery of housing development.
6	Improve climate change adaptation and mitigation, including minimising the	P12	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	risk of flooding and addressing the heat island effect					
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P12	+	S, M, L-T, I, R, L	OPDC area, and surrounding boroughs	The management of Wormwood Scrubs has the potential to be sensitively enhanced to enable the area to adapt to climate change, although this is not specified within the policy. It is referred to in the justification text and in the Water Policy. The promotion of walking and cycling access to the park may reduce current emissions from people accessing the park, leading to some positive benefits against this objective.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting	P12	0			The policy is unlikely to have an effect when considered against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste					
9	Improve the quality of the water environment	P12	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	The policy discusses surface water flooding and how the OPDC area could be used as a more strategic flood management resource. This will have a positive effect against the objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P12	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to conserve and enhance the existing Local Nature Reserve and sites of borough importance for nature conservation in accordance with policy EU2, which could lead to positive effects against this objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P12	+	S, M, L-T, I, R, L	OPDC area, and surrounding boroughs	The management of Wormwood Scrubs has the potential to address air and noise pollution, although this is not specified within the policy. The promotion of walking and cycling access to the park may reduce current pollution levels from people accessing the park, leading to some positive benefits against this objective.
12	To conserve and enhance the	P12	0			The policy is unlikely to have an effect when considered against this IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	historic environment, heritage assets and their settings					
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P12	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The conservation and enhancement of Wormwood Scrubs as a public open space for exercise and recreation could have significant positive effects against this objective. Increasing accessibility to the area through walking and cycling connections is likely to support this effect.
14	Improve safety and reduce crime and the fear of crime	P12	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The enhancing of Wormwood Scrubs could help to improve safety through appropriate lighting and improving access to open space to create higher levels of natural surveillance.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P12	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The management of the facilities as a public open space for exercise and recreation could have significant positive effects against this objective. Increasing accessibility to the area through walking and cycling connections is likely to support this effect.
16	To improve the	P12	0			The policy is unlikely to have an effect when considered against this IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	education and skills levels of all members of the population, particularly vulnerable groups					
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P12	0			The policy is unlikely to have an effect when considered against this IIA Objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P12	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The conserving and enhancing of this green open space could encourage inward investment to some degree, through increasing the attractiveness of the area as a place to live and work.



## GENERAL POLICIES

**Table A-14 – Design Policies**

- D0: Securing high quality design
- D1: Public Realm
- D2: Accessible and Inclusive design
- D3: Well-designed buildings
- D4: Tall buildings
- D5: Amenity
- D6: Key views
- D7: Heritage
- D8: Play Space

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	D0	++	M, L-T, D, R, H	OPDC area	The principle seeks to deliver a high quality design process to create high quality development resulting in an enhanced built environment. As the policy provides opportunities to develop and enhance and the built environment, and explores the process to deliver a high quality built environment. Major positive scores have been recorded against the IIA Objective.
		D1	++	M, L-T, D, R, H	OPDC area	The policy seeks to deliver well designed, welcoming, safe, resilient, flexible, inclusive, and coordinated multifunctional public realm network through supporting proposals that contribute to improving the quality of existing public realm and creating new public realm; this would contribute to improving local character areas or contributing to the delivery of new local character areas which would encourage place-making.
		D2	+	S, M, L-T, I, R, M	OPDC area	The provision of an inclusive designed environment for Old Oak, Park Royal, and Wormwood Scrubs would support place-making as it ensures new buildings are appropriately designed and optimises development opportunities to develop and enhance local distinctiveness and character.
		D3	++	M, L-T, D, R, M	OPDC area	The policy seeks to deliver well designed buildings which would encourage place-making. Policy also includes strict compliance with Building Regulations into relation to resilience and fire safety and aims to achieve BREEAM Excellent ratings for non-residential development

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		D4	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver high quality tall buildings which would contribute towards place-making.
		D5	+	S, M, L-T, I, R, M	OPDC area	The provision of a high level of amenity and quality environment for building users and surrounding areas would help to support place-making.
		D6	+	S, M, L-T, I, R, M	OPDC area	By ensuring areas benefit from and are shaped key views, this can positively contribute to place-making as it creates visual interest that contributes to character and the built environment.
		D7	++	S, M, L-T, I, R, M	OPDC area	The conservation and enhancement of the historic environment, heritage assets and their setting would contribute towards creating a sense of place through protecting and enhancing local distinctiveness and character.
		D8	+	S, M, L-T, I, R, M	OPDC area	By having open spaces for young children to play, this will positively contribute to wider place-making.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	D0	0			There is no clear link between the principle and the IIA Objective.
		D1	0			There is no clear link between the policy and the IIA Objective.
		D2	0			There is no clear link between the policy and the IIA Objective.
		D3	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver well designed buildings that will contribute to optimising development. It will have an indirect positive effect against the IIA objective by facilitating high quality design.
		D4	+	S, M, L-T, I, R, M	OPDC area	Due to their form and scale, tall buildings generally enable the delivery of higher densities. The supporting text discusses increasing development capacity of tall buildings which can have a positive impact against this IIA Objective.
		D5	0			There is no clear link between the Policy and IIA Objective.
		D6	0			There is no clear link between the Policy and IIA Objective.
		D7	0			There is no clear link between the Policy and IIA Objective.
		D8	0			There is no clear link between the Policy and IIA Objective.
3	Maximise the reuse of previously developed land and existing	D0	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D1	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D2	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	buildings, including the remediation of contaminated land	D3	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D4	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D5	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D6	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D7	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D8	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	D0	+	S, M, L-T, I, R, M	OPDC area	The delivery of high quality design quality should involve good levels of accessibility which would support the IIA Objective.
		D1	++	S, M, L-T, I, R, M	OPDC area	The policy seeks to contribute to or improve the network of streets and to contribute to connecting places together which would support the improvement of accessibility and may contribute towards minimising the need to travel.
		D2	+	S, M, L-T, D, I, R, M	OPDC area	The policy specifically seeks to deliver accessible design solutions that meet the requirements of all users and contribute to addressing barriers which currently exist.
		D3	0			The policy would enable the provision of sustainable new buildings however this would have a limited effect in achieving the IIA Objective.
		D4	0			There is no clear link between the policy and the IIA Objective.
		D5	0			There is no clear link between the policy and the IIA Objective.
		D6	0			There is no clear link between the policy and the IIA Objective.
		D7	0			There is no clear link between the policy and the IIA Objective.
5	Improve access to well designed, well-located,	D0	+	S, M, L-T, I, R, M	OPDC area	By delivering a high quality design process for development, improved access to housing will be more likely.
		D1	0			The policy seeks the delivery of public realm and therefore has no direct link to the IIA Objective.
		D2	+	S, M, L-T, D,	OPDC area	The policy seeks to deliver inclusive design which will help to improve access and

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs			I, R, M		include a range of types and tenures of housing for all ages in order to meet local needs.
		D3	+			The policy addresses the delivery of all new buildings including housing.
		D4	+	S, M, L-T, D, I, R, M	OPDC area	This policy seeks to ensure that tall buildings accord with housing policies too which may benefit this IIA Objective.
		D5	0			There is no direct link between the policy and the IIA Objective.
		D6	0			There is no clear link between the policy and the IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	0			There is no clear link between the policy and the IIA Objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	D0	0			There is no clear link between the principle and the IIA Objective.
		D1	+	S, M, L-T, D, I, R, L	OPDC area	This policy seeks to utilise sustainable materials that will support this IIA Objective.
		D2	0			There is no direct link between the policy and the IIA Objective.
		D3	+	S, M, L-T, D, I, R, L	OPDC area	It is stated that new development proposals will be supported if renewable energy generation is incorporated into the design. This could help to improve climate change adaption. This policy also seeks to utilise sustainable materials that will support this IIA Objective.
		D4	+	S, M, L-T, D, I, R, L	OPDC area	This policy states that it will not adversely affect amenity in terms of microclimates, air quality etc, so this may have a positive effect on the IIA Objective
		D5	+	S, M, L-T, D, I, R, L	OPDC area	The policy aims to minimise the heat island effect, which will score positively against this IIA objective. The provision of amenity space has the potential to act as flood storage which could prevent adverse risk to housing areas.
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
7	To minimise contributions to climate change through greater	D0	0			There is no direct link between the principle and the IIA Objective.
		D1	0			There is no direct link between the policy and the IIA Objective.
		D2	0			There is no direct link between the policy and the IIA Objective.
		D3	+	S, M, L-T, D, I, R, M	OPDC area	The policy seeks the development of well-designed buildings which would likely support the minimisation of contributions to climate change through high standards of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy						sustainable design and the incorporation of incorporated measures for energy efficiency. By supporting new development proposals which incorporate renewable energy generation could reduce the need to use fossil fuels and score positively against this IIA objective.
	D4	0				There is no direct link between the policy and the IIA Objective.
	D5	+	S, M, L-T, D, I, R, M	OPDC area		The supporting text considers heating and energy efficiency which will help to contribute to minimising contributions to climate change.
	D6	0				There is no direct link between the policy and the IIA Objective.
	D7	0				There is no direct link between the policy and the IIA Objective.
	D8	0				There is no direct link between the policy and the IIA Objective.
8 To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of	D0	0				There is no direct link between the principle and the IIA Objective.
	D1	0				There is no direct link between the policy and the IIA Objective.
	D2	0				There is no direct link between the policy and the IIA Objective.
	D3	+/-	S, M, L-T, D, I, R, M	OPDC area		Development of new buildings could have negative effects resulting in increased waste particularly during construction if waste management and circular economy policies are not implemented. The policy also seeks to utilise sustainable materials that will support this IIA Objective.
	D4	0				There is no direct link between the policy and the IIA Objective.
	D5	0				There is no direct link between the policy and the IIA Objective.
	D6	0				There is no direct link between the policy and the IIA Objective.
	D7	0				There is no direct link between the policy and the IIA Objective.
	D8	0				There is no direct link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	all green waste					
9	Improve the quality of the water environment	D0	0			There is no direct link between the principle and the IIA Objective.
		D1	+	S, M, L-T, D, I, R, M	OPDC area	This policy seeks to deliver green infrastructure and sustainable materials. This could include water efficiency and cleaning measures such as SuDs which would contribute to improving the water environment.
		D2	0			There is no direct link between the policy and the IIA Objective.
		D3	+	S, M, L-T, D, I, R, M	OPDC area	The policy seeks to deliver well designed and sustainable buildings. It could include water efficiency measures such as SuDS which would contribute to improving the water environment.
		D4	0			There is no direct link between the policy and the IIA Objective.
		D5	0			There is no direct link between the policy and the IIA Objective.
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	0			There is no direct link between the policy and the IIA Objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	D0	0			There is no direct link between the principle and the IIA Objective.
		D1	+	S, M, L-T, D, I, R, M	OPDC area	This policy seeks the delivery of green infrastructure which would support the enhancement of biodiversity.
		D2	0			There is no direct link between the policy and the IIA Objective.
		D3	+	S, M, L-T, D, I, R, L	OPDC area	The policy explores the idea of green spaces and biodiversity areas being incorporated into roof design. This will help to have a positive effect on the IIA Objective.
		D4	0		-	There is no direct link between the policy and the IIA Objective.
		D5	0			There is no direct link between the policy and the IIA Objective.
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	0			There is no direct link between the policy and the IIA Objective.
11 11	To minimise air, noise and light pollution, particularly for	D0	0			There is no direct link between the principle and the IIA Objective.
		D1	0			There is no direct link between the policy and the IIA Objective.
		D2	0			There is no direct link between the policy and the IIA Objective.
		D3	0			There is no direct link between the policy and the IIA Objective.
		D4	0		-	There is no direct link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	vulnerable groups	D5	+	S, M, L-T, D, I, R, L	OPDC area	The policy states that private residential open space should be positioned away from sources of noise and poor quality air that would make them unpleasant to use. The policy also states that residential development should be located away from and designed to mitigate light pollution all of which would score positively against this IIA Objective.
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	+	S, M, L-T, D, I, R, L	OPDC area	The policy seeks to locate all dedicated child play space away from pollution hotspots. This would score positively against this IIA Objective.
12	To conserve and enhance the historic environment, heritage assets and their settings	D0	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high quality design process and making use of the OPDC Place Review Group and Community Place Review Panel would help to ensure that assets and their settings would be protected as well helping to conserve the historic environment.
		D1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D2	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D3	+	S, M, L-T, I, R, M	OPDC area	The delivery of well-designed buildings would support the IIA Objective through careful design that respects its surroundings and conserves the historic environment, heritage assets and their setting.
		D4	+	S, M, L-T, I, R, M	OPDC area	The policy aims to undertake proactive engagement with Historic England, thus scoring positively against this objective.
		D5	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to provide high level amenity and quality environment for building users and surrounding areas which would enable an approach to development that would be sensitive to the existing local area which would likely respect and complement features including heritage assets and their setting.
		D6	+	S, M, L-T, I, R, M	OPDC area	The policy aims to use views defined in the OPDC Heritage Strategy and relating to the setting of heritage assets, which will score positively against this objective.
D7	++	S, M, L-T, D, R, H	OPDC area	The policy would directly support the IIA Objective as it seeks to identify, conserve and enhance the historic environment, heritage assets and their setting. Furthermore, any proposals that have the potential to harm the significance of a designated heritage asset will require clear and convincing justification to avoid or mitigate harm. The policy also seeks to ensure heritage assets contribute to improving and creating a sense of place where appropriate and address Heritage at Risk.		

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		D8	0			There is no direct link between the policy and the IIA Objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	D0	0			There is no direct link between the principle and the IIA Objective.
		D1	+	S, M, L-T, I, R, L	OPDC area	The policy seeks provision of public realm that facilitates the use and enjoyment of spaces and to improve the network of streets, to connect places together and breakdown severance all of which would contribute towards increasing community cohesion and reducing social exclusion.
		D2	+	S, M, L-T, I, R, L	OPDC area	The development of inclusive design that is safe and accessible and addresses existing barriers would contribute towards community cohesion.
		D3	+	S, M, L-T, I, R, L	OPDC area	The delivery of new buildings would contribute to creating a sense of place and would partially support the IIA Objective.
		D4	+	S, M, L-T, I, R, L	OPDC area	The delivery of new buildings would contribute to creating a sense of place and would partially support the IIA Objective.
		D5	+	S, M, L-T, I, R, L	OPDC area	The provision of a high level of amenity and quality environment would help to support community cohesion and welfare.
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	+	S, M, L-T, I, R, L	OPDC area	The improvement and enhancement of the historic environment and heritage features within the area may contribute partially towards supporting community cohesion by recognising local identity.
		D8	+	S, M, L-T, I, R, M	OPDC area	By having play areas for children, this can positively encourage community cohesion and welfare and help reduce social exclusion.
14	Improve safety and reduce crime and the fear of crime	D0	+	S, M, L-T, I, R, L	OPDC area	The principle primarily focuses on place-making through the provision of high quality architectural and landscape design quality. This could make contributions towards reducing fear of crime.
		D1	+	S, M, L-T, I, R, L	OPDC area	The policy seeks to provide safe public realm and improving the network of streets which would help to improve safety.
		D2	+	S, M, L-T, I, R, L	OPDC area	The policy seeks to deliver accessible and inclusive design. In doing so, the policy will help to deliver safe and permeable development. This will help to reduce crime and fear of crime.
		D3	+	S, M, L-T, I, R, L	OPDC area	The policy identifies the need for development to provide a balanced approach between its security and design. The supporting text makes reference to the need to have regard to national and London guidance as well as working with a number of security related stakeholders. The London Plan policy 7.3 provides guidance in



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						relation to Secured by Design.
		D4	0			There is no direct link between the policy and the IIA Objective. However, policy D4 would also apply to tall buildings to achieve a safe environment.
		D5	+	S, M, L-T, I, R, L	OPDC area	By seeking to deliver high quality amenity within the public realm and within development, the increased use of spaces and buildings will likely result in natural surveillance. This will help to address crime and reduce fear of crime. The London Plan policy 7.3 provides guidance in relation to Secured by Design.
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	+	S, M, L-T, I, R, M	OPDC area	This policy states that the play areas should benefit from natural surveillance which can discourage anti-social behaviour.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	D0	+	S, M, L-T, I, R, M	OPDC area	The principle seeks to produce a high-quality design. It can help improve people's physical, mental and emotional health and well-being.
		D1	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to provide welcoming and safe public realm network that facilitates the use and enjoyment of spaces while responding to local character and integrating with surroundings. This would contribute towards maximising the wellbeing of the population through enabling safety, enhancing community spirit all of which would support community cohesion. It would also contribute to promoting healthy living giving greater opportunities for walking and cycling which would promote health benefits.
		D2	+	S, M, L-T, I, R, L	OPDC area	The delivery of inclusive design which is accessible and addresses existing barriers of the physical environment would make contributions towards maximising wellbeing of the population.
		D3	+	S, M, L-T, I, R, L	OPDC area	The policy seeks development to deliver high quality design that will have a positive impact on the health and wellbeing of people. Specifically, it looks to deliver a high quality of life for building users. This will have a positive effect on this IIA Objective.
		D4	+	S, M, L-T, I, R, L	OPDC area	This policy seeks to minimise negative impacts on the amenity of space surrounding tall buildings and to deliver social infrastructure alongside wider benefits to the local community. These elements will have a positive effect on this IIA Objective.
		D5	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high level of amenity and quality environment for building users would contribute towards maximising the health and wellbeing of the population.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	+	S, M, L-T, I, R, M	OPDC area	Encouraging children to play outside has a positive impact on their health and wellbeing and promotes healthy lifestyles.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	D0	0			There is no direct link between the principle and the IIA Objective.
		D1	0			There is no direct link between the policy and the IIA Objective.
		D2	0			There is no direct link between the policy and the IIA Objective.
		D3	+	M, L-T, I, R, L	OPDC area	The policy primarily addresses new building design which could include education facilities which would support access to education and wider lifelong learning.
		D4	0			There is no direct link between the policy and the IIA Objective.
		D5	0			There is no direct link between the policy and the IIA Objective.
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	+	M, L-T, I, R, L	OPDC area	By encourage children to play outside, this could have positive effects on early years education.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	D0	0			There is no direct link between the principle and the IIA Objective.
		D1	+	S, M, L-T, I, R, L	OPDC area	Social and economic wellbeing could be partly supported through improvements to public realm and street network using a Healthy Streets Approach (set out in SP4) to support access to employment and training facilities.
		D2	+	S, M, L-T, I, R, L	OPDC area	Inclusive design aims to promote the wellbeing of members of the public, thus scoring positively against this objective.
		D3	+	S, M, L-T, I, R, L	OPDC area	The delivery of well-designed buildings could help to support social and economic wellbeing through the delivery of a high quality environment that will likely support local investment and development.
		D4	+	S, M, L-T, I, R, L	OPDC area	The delivery of tall buildings could help to support social and economic wellbeing as the policy seeks to provide floorspace for small businesses which commonly create new employment opportunities.
		D5	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high-level amenity and quality environment for building users and surrounding areas would help to support social and economic wellbeing as it will create new facilities and shops in the area.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	+	S, M, L-T, I, R, M	OPDC area	The conservation, enhancement and improvement of the historic environment and heritage assets help to generate social and economic benefits for OPDC and would therefore partially support the IIA Objective as it will encourage tourism in the area.
		D8	+	S, M, L-T, I, R, M	OPDC area	Provision of play spaces for children can help to reduce social exclusion and promote social wellbeing and community cohesion.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	D0	0			There is no direct link between the principle and the IIA Objective.
		D1	+	S, M, L-T, I, R, L	OPDC area	Inward investment would be encouraged through the delivery of high quality public realm that facilitates the use and enjoyment of spaces.
		D2	+	S, M, L-T, I, R, M	Old Oak, Park Royal, and Wormwood Scrubs	The delivery of an inclusive and accessible design environment would increase attractiveness within these areas and would help to encourage inward investment.
		D3	+	S, M, L-T, I, R, M	OPDC area	The delivery of exemplary and sustainable buildings would enable the creation of attractive areas which would help to encourage inward investment alongside investment within existing communities.
		D4	+	S, M, L-T, I, R, M	OPDC area	The delivery of high quality tall buildings will help to support local identity which will likely support inward investment.
		D5	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high-level amenity and quality environment for building users and surrounding areas would help to promote the attractiveness of the local area as a place to live and work which would help to attract inward investment and would support the creation of economic growth.
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	+	S, M, L-T, I, R, M	OPDC area	Conserving and enhancing the historic environment and heritage could make contributions to encouraging inward investment.
		D8	0			There is no direct link between the policy and the IIA Objective.

**Table A-15 – Environment and Utilities**

- EU1: Open Space
- EU2: Urban Greening and Biodiversity
- EU3: Water
- EU4: Air Quality
- EU5: Noise and vibration
- EU6: Waste
- EU7: Circular and Sharing economy
- EU8: Sustainable materials
- EU9: Minimising Carbon Emissions and Overheating
- EU10: Energy Systems
- EU11: Smart Technology
- EU12: Extraction of minerals
- EU13: Land contamination

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	EU1	++	S, M and L-T, D, R, M	OPDC area	Ensuring the delivery of a minimum of 30% of the developable area to be publicly accessible open space would lead to a positive effect against this IIA objective as it would directly enhance the built environment and encourage place-making.
		EU2	++	S, M and L-T, D, R, M	OPDC area	Ensuring all new development seeks to create new open spaces and protect biodiversity would lead to a positive effect on the IIA Objective as it would directly enhance the built environment and encourage 'place making'. For this reason, a major positive score has been recorded.
		EU3	+	M and L-T, I, R, L	OPDC area	The policy would indirectly contribute to ensuring new buildings are appropriately designed i.e. through ensuring they do not lead to inappropriate run off or lead to an unacceptable demand on water resources.
		EU4	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
		EU5	+	S, M and L-T, I, R, L	OPDC area	Guarding against inappropriate increases in noise levels from major development would indirectly contribute to the creation of safe and welcoming spaces. The policy also aims to deliver high quality soundscapes.
		EU6	?			The relocation of waste and recycling sites (depending upon the final design) may lead to a detrimental effect on landscape character. Due to this uncertainty it is recommended that the policy is strengthened to provide references to policy D6 and the Places Chapter.
		EU7	+	S, M and L-T, D, R, M	OPDC area	The use of circular and sharing economy can contribute to place making by providing communal space and improving walking and cycling mobility. This would directly enhance the built environment and encourage place-making.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	?			Seeking to support and facilitate the provision of infrastructure to deliver a decentralised energy network within major new development may affect the character and quality of the built environment of the OPDC area depending on its visual appearance. Due to this uncertainty it is recommended that the policy is strengthened to provide references to policy D6 and the Places Chapter.
		EU11	+	S, M and L-T, D, R, M	OPDC area	Promoting the area as a global leading location for the exploration and implementation of smart city technology, concepts and systems would benefit this IIA Objective as it actively encourages the use of contemporary technology. The policy supporting text aims to improve quality of life and give access to place makers and service providers to provide joined up and efficient services that respond to customer needs, which is important in place-making.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	+	S, M and L-T, D, R,	OPDC area	The policy scores positively against the IIA objective as the IIA objective aims to create new open space which will require land contamination mitigation which the policy

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
				M		seeks to improve
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	EU1	+	S, M and L-T, D, R, M	OPDC area	The supporting text explores the idea that open spaces are crucial for high density building developments to meet local needs.
		EU2	+	S, M and L-T, D, R, M	OPDC area	The supporting text explores the idea that open spaces are crucial for high density building developments to meet local needs.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	0			There is no clear link between the policy and the IIA Objective.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
		EU13	0			There is no clear link between the policy and the IIA Objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	EU1	+	S, M and L-T, D, R, M	OPDC area	The majority of land in OPDC is previously developed land so all land-use proposals will score positively against this IIA objective.
		EU2	+	S, M and L-T, D, R, M	OPDC area	The majority of land in OPDC is previously developed land so all land-use proposals will score positively against this IIA objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	0			There is no clear link between the policy and the IIA Objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	The majority of land in OPDC is previously developed land so the most of new development will occur on previously developed land, thus scoring positively against this IIA objective. The policy aims for at least 20% of material to be from recycled waste. This too will positively affect the IIA objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	++	L-T, D, R, M	OPDC area	The policy ensures that development would not be permitted until effective measures are taken to manage the risk of contaminated land through treating, containing or controlling. This would therefore fulfil this IIA Objective as it would contribute to a scheme of land remediation and improve soil quality over the long term.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	EU1	+	S, M and L-T, I/D, R, L	OPDC area	The policy seeks to contribute or deliver local Green Streets which are fully accessible and designed predominantly for high pedestrian and cycle flows. This would have a positive effect against the IIA objective.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	+	S, M and L-T, D, R, M	OPDC area	This policy seeks to minimise air pollution by designing and positioning buildings, civic and open spaces to minimise exposure to elevated levels of pollution. For these reasons, a positive score has been recorded over the short to long term.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	+	S, M and L-T, D, R, L	OPDC area	The policy seeks to investigate the movement of waste by sustainable means of transport, including by rail and by the Grand Union Canal which may mitigate impacts on the transport network. It also seeks to design out waste from construction which may also mitigate impacts on the transport network.
		EU7	+	S, M and L-T, D, R, L	OPDC area	Mobility and transport and discussed in the supporting text. Walking and cycling will be encouraged, and low carbon and zero emission vehicles will be promoted.
		EU8	0			There is no clear link between the policy and the IIA Objective.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	+/-	S, M and L-T, D, R, L	OPDC area	Mineral extraction can have negative impacts on the local transport network. Mitigating factors within the policy can neutralise impacts on the local transport.
		EU13	0			There is no clear link between the policy and the IIA Objective.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	EU1	0			There is no clear link between the policy and the IIA Objective.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	+	S, M and L-T, I, R, M	OPDC area	The policy would indirectly contribute to ensuring new homes are appropriately designed and located through ensuring they do not lead to inappropriate run off, flood risk or unacceptable water demand.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	+	S, M and L-T, I, R, M	OPDC area	The policy would indirectly contribute to ensuring new homes are appropriately designed and located through ensuring a buffer is in place between residential and commercial uses.
		EU6	+	S, M and L-T, I, R, M	OPDC area	The policy would indirectly contribute to ensuring new homes are appropriately designed by incorporating appropriate waste space in the design of new buildings.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
		EU7	0			There is no clear link between the policy and the IIA Objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	The policy aims to create well designed buildings with materials which support healthy living. This will have a positive effect against the IIA objective.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy aims to create well designed buildings with materials which will help deliver a zero-carbon strategy in London. This will score positively against the IIA objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island	EU1	++	S, M and L-T, D, R, M	OPDC area and wider area	The policy positively fulfils the IIA Objective through promoting the use of sustainable drainage systems and incorporated mitigation for the heat island effect within new development.
		EU2	++	S, M and L-T, D, R, M	OPDC area and wider area	The policy aims to deliver new urban greening improvements by delivering a range of habitats that are resilient to climate change.
		EU3	++	S, M and L-T, D, R, M	OPDC area and wider area	The policy positively fulfils the IIA Objective through ensuring that development within areas at risk of flooding reduce flood risk and improve flood storage in the area including during rainfall events up to the 1 in 100 years plus a 40% climate change allowance. Policy also strongly promotes the use of sustainable drainage techniques within new development along with implementing flood risk management solutions identified in the relevant borough's Surface Water Management Plans.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
effect	EU4	0				There is no clear link between the policy and the IIA Objective.
	EU5	0				There is no clear link between the policy and the IIA Objective.
	EU6	0				There is no clear link between the policy and the IIA Objective.
	EU7	+	S, M and L-T, D, R, M	OPDC area and wider area		This objective explores the use of sustainable resources which can help minimise contributions to climate change.
	EU8	+	S, M and L-T, D, R, M	OPDC area and wider area		The policy supports the use of materials which will reduce the urban heat island effect as well as reducing energy.
	EU9	+	S, M and L-T, D, R, M	OPDC area and wider area		The policy aims to minimise carbon emissions through low carbon heat sources and utilising heat networks to optimise network efficiency. By reducing carbon issues this will contribute to improving climate change adaptation.
	EU10	+	S, M and L-T, I, R, M	OPDC area and wider area		The policy is principally focused on ensuring new major development is able to accommodate energy demand and supports the use of low carbon cooling networks in non-residential buildings. The supporting text discusses low carbon energy sources and harnessing heat from local energy sources, so this 'reuse' could indirectly contribute to reducing heat island
	EU11	0				There is no clear link between the policy and the IIA Objective.
	EU12	0				There is no clear link between the policy and the IIA Objective.
	EU13	0				There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	EU1	+	S, M and L-T, I/D, R, L	OPDC area	The policy seeks to contribute or deliver local Green Streets which are fully accessible and designed predominantly for high pedestrian and cycle flows. There would be very restricted access to motorised vehicles. This would discourage the motorised vehicles which in turn will lead to less pressure on fossil fuel resources for petrol, thus having a positive effect against the IIA objective.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to reduce waste generated by new development through using waste as a resource e.g. through maximising the use of secondary materials and the opportunities for reuse or recycling of materials remaining from construction and investigating the potential for on-site energy recovery from waste. This would benefit the IIA Objective as it would contribute to minimising the resource requirements and outputs for new development.
		EU7	+	S, M and L-T, D, R, M	OPDC area and wider area	This objective explores the use of sustainable resources which can help minimise contributions to climate change and energy from waste. Policy seeks to promote car clubs in accordance with Policy T4 including the deployment of suitable electric vehicle charging infrastructure.
		EU8	+	S, M and L-T, D, R, M	OPDC area	The policy aims to use sustainable materials which can reduce the need to use fossil fuels to process them and will have a positive effect against the IIA objective.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy aims to reduce carbon emissions through smart technologies. This will discourage the use of fossil fuels which release these emissions and have a positive effect against the IIA objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
		EU10	++	M and L-T, D, R, M	OPDC area	The policy supports and seeks to facilitate the provision of infrastructure to deliver a decentralised energy network as part of new major development. This would positively benefit the IIA Objective as would encourage new major development to be more self-sufficient over the medium to long term and help to deliver low carbon cooling networks where feasible and appropriate.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	+/-	S, M and L-T, D, R, M	OPDC area	The extraction of minerals can have a negative impact and use resources. However, mitigation included within the policy will neutralise these effects.
		EU13	0			There is no clear link between the policy and the IIA Objective.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting	EU1	0			There is no clear link between the policy and the IIA Objective.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	++	S, M and L-T, D, R, M	OPDC area	The policy seeks to reduce waste and use it as a resource particularly on building sites. It also commits to investigating the potential for the movement of waste and recyclable materials during construction by sustainable means of transport, including by rail, and by the Grand Union Canal. All of which would promote the circular economy for the production of waste, increase the use of recycled materials in construction and maximises the use of innovative waste collection. As the policy fulfils the IIA Objective and its sub-objective a major positive score has been recorded.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
	of all green waste	EU7	+	S, M and L-T, D, R, M	OPDC area	Major developments must demonstrate how circular economy principles have informed the design and implementation of energy and waste infrastructure which will have a positive effect against this IIA objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	The use of sustainable materials includes recycled material. The policy aims for a minimum of 20% of the total material value of new buildings, infrastructure and landscape works to derive from reused or recycled content
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this IIA Objective as it could encourage innovative waste collection.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to remediate contaminated land. This would therefore partially fulfil the IIA Objective through contributing to the sustainable management of contaminated soils.
9	Improve the quality of the water environment	EU1	+	S, M and L-T, D, R, M	OPDC area	Provision of green open spaces can help natural infiltration rates. More open green spaces will also result in fewer hard surfaces which can transport pollutants in surface run-off.
		EU2	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to maximise opportunities to protect and / or enhance biodiversity in the Grand Union Canal and protect, enhance, and creates a network of multi-functional water spaces. It also aims to integrate planting as part of SuDS systems. This would therefore help to meet the IIA sub-objectives, more specifically <i>'to promote the quality of local watercourses'</i> .
		EU3	++	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure new development proposals promote integrated water management, through addressing surface and waste-water disposal capacity issues, sustainably managing water supply and minimising water consumption. All of which promotes efficiency in the use of water. In addition, the policy also seeks to ensure

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
						new development protects and improve the water environment of the Grand Union Canal and other watercourses in accordance with the Water Framework Directive. This would contribute to the protection of local water courses. Policy also takes steps to ensure sufficient capacity within the sewerage network is demonstrated as part of an applicant's Water Efficiency, SUDs and Drainage Statement.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	+	S, M and L-T, D, R, M	OPDC area	Major development programmes will be required to demonstrate how circular economy principles have informed the design and implementation of water infrastructure. This will have a positive impact against the IIA objective.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	+/-	S, M and L-T, D, R, M	OPDC area	Mineral extraction can result in water pollution. Mitigating factors within the policy ensure water quality will not be polluted.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU13	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure that the remediation of contaminated land for new development does not lead to the contamination of any watercourse, water body or aquifer. As the policy directly seeks to prevent the risk posed to the water environment from the run-off of contaminants a positive score has been recorded.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	EU1	++	S, M and L-T, D, R, M	OPDC area	The policy aims to enhance existing open spaces and aims to contribute to 30% of OPDC becoming open space. Creating new open spaces and enhancing existing ones will have a major positive effect against this objective.
		EU2	++	S, M and L-T, D, R, M	OPDC area	A major positive score has been recorded against the IIA Objective as the policy seeks to ensure all new development conserves / enhances existing biodiversity, increases connectivity of habitats through the provision of green infrastructure and protecting designated sites resulting in no net loss of local biodiversity.
		EU3	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure development proposals within Park Royal and Old Oak include measures to protect and improve the ecological value of the Grand Union Canal and other watercourses. This may contribute to improving the existing poor biological quality of Grand Union Canal and conserving overall biodiversity across the plan area.
		EU4	+	S, M and L-T, D, R, M	OPDC area	By mitigating against any negative impacts if development on air quality, this could have a minor positive impact against the IIA objective.
		EU5	+	S, M and L-T, D, R, M	OPDC area	By mitigating against any negative impacts if development on noise, this could have a minor positive impact against the IIA objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	0			There is no clear link between the policy and the IIA Objective.
		EU8	0			There is no clear link between the policy and the IIA Objective.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	+	S, M and L-T, D, R, L	OPDC area	Seeking to remediate contaminated land within the OPDC area and guarding against the risk of contaminated run off to watercourses would benefit the IIA Objective and may increase biodiversity on brownfield sites. However, this would be dependent upon the final development on the site. A low certainty has therefore been recorded.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	EU1	+	S, M and L-T, D, R, M	OPDC area	The policy aims to ensure there will be appropriate standards of air and noise quality in open spaces, which will score positively against the IIA objective.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	++	L-T, D, R, M	OPDC area	The policy states that that OPDC will seek to improve air quality and minimise air pollution impacts on health the natural and built environment and on amenity. It also outlines that the OPDC will implement the recommendations of the Old Oak and Park Royal Air Quality Study and comply with the relevant borough's Air Quality Action Plans.. For the reasons outlined above effects are recorded as major positive.
		EU5	++	S, M and L-T, D, R, M	OPDC area	The principal focus of the policy is to ensure that new development does not lead to unacceptable increases in noise as a result of construction and operational phases of development.. Therefore, effects have been recorded as major positive.
		EU6	+	M and L-T, I, R, L	OPDC area	The policy commits to designing out waste from construction sites and maximising waste generated for re-use in construction – over the medium to long term this may lead to a reduction in required traffic movements which in turn may contribute to

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
						minimising air pollution.
		EU7	0			There is no clear link between the policy and the IIA Objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	Development proposals will be supported when they incorporate high quality materials with noise absorbing properties. This will score positively against the IIA objective.
		EU9	+	S, M and L-T, D, R, M	OPDC area	By reducing carbon emissions with help from smart technologies, this will have a positive impact against air quality.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	+	S, M and L-T, D, R, M	OPDC area	Applications for mineral extraction will be supported when they adequately protect the amenity of nearby residents and businesses from the effects of the operations, which includes air quality and noise.
		EU13	0			There is no clear link between the policy and the IIA Objective.
12	To conserve and enhance the historic environment, heritage assets and their settings	EU1	++	M and L-T, I, R, M	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening would lead to a positive effect on the IIA Objective as it would contribute to promoting the historical interpretation of heritage assets, including the canal using multifunctional green infrastructure. In addition, green infrastructure would also contribute to enhancing local views and landscapes. For this reason, a major positive score has been recorded.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	+	M and L-	OPDC area	The policy would ensure surface water runoff is managed and flood risk management solutions are implemented as part of new development. This would protect heritage

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
				T, I, R, M		assets over the medium to long term from flood damage.
		EU4	+	M and L-T, I, R, M	OPDC area	Poor air quality can damage historic buildings. This policy tries to avoid poor air quality, thus will have a minor positive effect against this IIA objective.
		EU5	+	M and L-T, I, R, M	OPDC area	Noise and vibration mitigation included within the policy can protect OPDC's historic character. Soundscape is important in ensuring noise features such as water flows are not disturbed.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	0			There is no clear link between the policy and the IIA Objective.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.
13	Increase community cohesion and reduce social	EU1	+	S, M and L-T, D, R, M	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening would lead to a positive effect on the IIA Objective as it would directly increase connectivity and may help to create social linkages with surrounding communities. For this reason, effects have been recorded as beneficial.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
exclusion to encourage a sense of community and welfare	EU2	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure that development helps to balance the built and natural environment through a strategic and co-ordinated approach. For this reason, effects have been recorded as beneficial.	
	EU3	0			There is no clear link between the policy and the IIA Objective.	
	EU4	+	S, M and L-T, D, R, M	OPDC area	The supporting text discusses improving and ensuring open spaces not affected. Open spaces are important in encouraging outdoor activity which in turn can have a positive effect against the IIA objective.	
	EU5	+	S, M and L-T, I, R, L	OPDC area	Guarding against inappropriate increases in noise levels from major development would indirectly contribute to maintaining / or potentially improving the quality of the public realm, recreation and play spaces which would benefit the IIA Objective.	
	EU6	0			There is no clear link between the policy and the IIA Objective.	
	EU7	+	S, M and L-T, D, R, M	OPDC area	Ensuring development has a circular economy and ensuring all economic profits benefit the OPDC area, this can be beneficial against the IIA objective.	
	EU8	0			There is no clear link between the policy and the IIA Objective.	
	EU9	0			There is no clear link between the policy and the IIA Objective.	
	EU10	0			There is no clear link between the policy and the IIA Objective.	
	EU11	0			There is no clear link between the policy and the IIA Objective.	
	EU12	0			There is no clear link between the policy and the IIA Objective.	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU13	0			There is no clear link between the policy and the IIA Objective.
14	Improve safety and reduce crime and the fear of crime	EU1	0			There is no clear link between the policy and the IIA Objective.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	0			There is no clear link between the policy and the IIA Objective.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.
15	Maximise the health and	EU1	+	S, M and L-T, D, R,	OPDC area	By creating more open spaces, it aims to seek, protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening may

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
wellbeing of the population, reduce inequalities in health and promote healthy living			L			lead to a positive effect on the IIA Objective within OPDC as it can encourage outdoor exercise.
	EU2	++	S, M and L-T, D, R, L	OPDC area		Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening may lead to a positive effect on the IIA Objective as may increase accessibility to social infrastructure and encourage more active lifestyles. For these reasons, effects have been recorded as major positive.
	EU3	0				There is no clear link between the policy and the IIA Objective.
	EU4	+	M and L-T, D, R, M	OPDC area		The policy states that OPDC will seek to improve air quality and minimise air pollution impacts on health . For this reason, effects have been recorded as positive.
	EU5	+	S, M and L-T, D, R, M	OPDC area		The principal focus of the policy is to ensure that new development does not lead to unacceptable increases in noise. Therefore, effects have been recoded as positive.
	EU6	0				There is no clear link between the policy and the IIA Objective.
	EU7	+	S, M and L-T, D, R, M	OPDC area		By delivering a shared economy, this support the IIA objective about shared community use, so will score positively against this IIA objective.
	EU8	0				There is no clear link between the policy and the IIA Objective.
	EU9	0				There is no clear link between the policy and the IIA Objective.
	EU10	0				There is no clear link between the policy and the IIA Objective.
	EU11	0				There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	+	M and L-T, D, R, H	OPDC area	The policy requires developers to complete the implementation of agreed measures to assess and abate any risks to human health for this reason effects have been assessed as positive
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	EU1	0			There is no clear link between the policy and the IIA Objective.
		EU2	+	M and L-T, D, R, H	OPDC area	In circumstances when it is not possible to protect a SINC, developers will be expected to support development of educational materials. This will score positively against the IIA objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	+	S, M and L-T, I, R, L	OPDC area	The development of maker and mender centres in which members of the public can take, make and repair products could indirectly support the IIA objective by supporting jobs.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	+	M and L-	OPDC area	The policy aims to provide educational services, thus scoring positively against the IIA objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
				T, D, R, H		
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	EU1	+	S, M and L-T, D, R, L	OPDC area	Ensuring all new development includes open space, the policy will seek to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening may lead to a positive effect on the IIA Objective as may increase accessibility to employment and training and improve wellbeing. For these reasons, effects have been recorded as positive
		EU2	+	S, M and L-T, D, R, L	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening may lead to a positive effect on the IIA Objective as may increase accessibility to employment and training and improve wellbeing. For these reasons, effects have been recorded as positive.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	+	S, M and L-T, I, R, L	OPDC area	The development of maker and mender centres could indirectly support the IIA objective by creating new jobs.
		EU8	0			There is no clear link between the policy and the IIA Objective.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographic Extent	Commentary and Recommendations
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	EU1	+	S, M and L-T, I, R, L	OPDC area	Accessible open spaces and green infrastructure plays an important role in making an attractive place. This in turn can encourage investment alongside homes and jobs.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	+	M and L-T, D, R, M	OPDC area	The policy may encourage inward investment through its focus of a circular and sharing economy.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	+	M and L-T, D, R, M	OPDC area	The policy may encourage inward investment through its aspiration to become a global leading location for the exploration, exploitation, and implementation of smart city technology, approaches and systems. For this reason, effects have been recorded as positive.
		EU12	+	M and L-T, D, R, M	OPDC area	Mineral extraction can create new job opportunities and encourage investment within mineral extraction. This will score positively against the IIA objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.

## Table A-16 – Transport

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

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	T1	+	S,M,L-T,I,R,M	OPDC and surrounding area	The policy seeks to deliver high quality streets that integrate effectively with the wider public realm which would help to support placemaking.
		T2	+	S,M,L-T,I,R,M	OPDC and surrounding area	Walking is the most sustainable form of transport and encouraging increased walking will have many advantages including more connected neighbourhoods. Increasing the connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks including via green infrastructure networks and the canal would all support placemaking.
		T3	+	S,M,L-T,I,R,M	OPDC and surrounding area	Placemaking would be encouraged through the provision of state of the art cycling infrastructure, improved cycle wayfinding and signage and the enhancement of existing cycle connections to ensure they are safe, convenient, direct but not detrimental to pedestrians.
		T4	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy seeks to promote modal shift towards more sustainable modes, by reducing car parking spaces. This would help to support the street scene, public realm and placemaking.
		T5	+	S,M,L-T,I,R,M	OPDC and surrounding area	The policy seeks to support a number of rail improvements including the delivery of state of the art new rail stations as well as improved services on existing rail infrastructure these features would all contribute towards enhancing the built environment and improving accessibility.
		T6	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy seeks the delivery of increased bus frequencies on existing and extended bus routes; to provide bus journey time reliability and to provide clear and legible signage.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					area	This would encourage placemaking.
		T7	0			The policy would not have any significant effects for the objective.
		T8	+	S,M,L- T,I,R,L	OPDC and surrounding area	The policy seeks to provide support to reduce freight and construction trips which may have an indirect effect on amenity through reduced frequency of heavy goods vehicles (HGVs) on roads.
		T9	0			There is no clear link between the policy and the IIA Objective.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	T1	0			There is no clear link between the policy and the IIA Objective.
		T2	+	S,M,L- T,I,R,L	OPDC and surrounding area	The efficient use of land would be demonstrated through the provision of high quality, safe, accessible and inclusive walking networks.
		T3	+	S,M,L- T,I,R,L	OPDC and surrounding area	The provision of comprehensive, safe, attractive and inclusive cycle network through this policy would contribute towards optimising efficient land use.
		T4	+	S,M,L- T,I,R,M	OPDC and surrounding area	The provision of high quality connections through the delivery of state of the art transport infrastructure would contribute towards optimising efficient land use.
		T5	0			There is no clear link between the policy and the IIA Objective.
		T6	0			There is no clear link between the policy and the IIA Objective.
		T7	+	S,M,L- T,I,R,L	OPDC and surrounding area	The policy supports freight, servicing and deliveries and it seeks to identify the provision of facilities for home deliveries within residential development. The delivery of facilities for home deliveries within residential development would help to optimise the efficient use of land.
		T8	0			There is no clear link between the policy and the IIA Objective.
		T9	0			There is no clear link between the policy and the IIA Objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of	T1	+	S,M,L- T,D,R,M	OPDC and surrounding area	The strategic road network, particularly the A40 and A406, is vital to the successful operation of Park Royal and will be in the future to Old Oak. Road schemes should contribute to strategic land remediation.
		T2	+	S,M,L- T,I,R,L	OPDC and surrounding area	As a sustainable form of travel, walking routes and infrastructure will be more likely to be in place in previously developed areas therefore encouraging brownfield development.
		T3	+	S,M,L- T,I,R,L	OPDC and surrounding area	As a sustainable form of travel, cycle routes and infrastructure will be more likely to be in place in previously developed areas therefore encouraging brownfield development.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	contaminated land	T4	0			There is no clear link between the policy and the IIA Objective.
		T5	0			There is no clear link between the policy and the IIA Objective.
		T6	0			There is no clear link between the policy and the IIA Objective.
		T7	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy supports freight, servicing and deliveries and it seeks to identify potential sites for consolidation centres and the provision of facilities for home deliveries within residential development. The delivery of facilities for home deliveries within residential development would help to optimise the efficient use of land.
		T8	0			There is no clear link between the policy and the IIA Objective.
		T9	0			There is no clear link between the policy and the IIA Objective.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	T1	+	S,M,L-T,D,R,M	OPDC area	The policy primarily seeks to provide roads and streets that overcome severance and optimise connectivity. It also seeks to ensure that streets give priority to pedestrians, cyclists and buses which would improve accessibility.
		T2	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy seeks to support walking through the provision of high quality, safe and accessible walking networks. This would help to minimise the need to travel through improving accessibility by walking.
		T3	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy seeks to support and encourage cycling through the provision of state of the art infrastructure and enhanced connections which would help to minimise the need to travel through improving accessibility by cycling.
		T4	+/-	S,M,L-T,D,R,M	OPDC area	There is likely to be an increase in vehicle use in parts of the OPDC area due to the new development which would have a negative impact on the transport network, however, the policy primarily seeks to promote modal shift towards more sustainable modes through car parking limitations. Reducing car parking leads to a reduction in car ownership and car trips. This is likely to increase walking and cycling and use of public transport.
		T5	++	S,M,L-T,D,R,H	OPDC and surrounding area	The policy would deliver new rail infrastructure and would provide quality links between stations as well as improving services on existing infrastructure all of which would directly serve to improve accessibility. The delivery of two new overground stations would also help to manage capacity.
		T6	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy would deliver and contribute to the existing and future delivery of bus network and infrastructure to improve bus journey time reliability and priority measures as well as improved bus frequencies on new and extended routes which would help to improve accessibility.
		T7	+			The policy supports the use of freight consolidation centres and Delivery and Servicing Plans in order to mitigate impacts on the transport network.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T8	+	S,M,L-T,D, I, R M	OPDC and surrounding area	The policy seeks to provide for measures to reduce freight and construction trips, make use of rail and water transportation and to coordinate and phase construction projects to enable effective mitigation of transport impacts all of which would help to mitigate impacts on the transport network.
		T9	+	S,M,L- T,D,I,R,M	OPDC and surrounding area	Transport assessments and travel plans will help to deliver sustainable transport objectives and will seek to address congestion and impacts upon bus routes and on the primary route network and will ultimately support the mitigation of impacts upon the transport network.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	T1	?			A high-quality road network could contribute to the provision of a variety of homes in the area.
T2		+	S,M,L- T,D,R,L	OPDC area	Redevelopment presents an opportunity to enhance existing and provide new pedestrian environments across Old Oak and Park Royal. High quality pedestrian walking routes to Old Oak Common station from all areas will be vital to ensure residents can benefit from this new transport superhub. This should improve access to housing developments through sustainable travel.	
T3		+	S,M,L- T,D,R,L	OPDC area	Private cycle parking for residents and provision for visitors should meet local needs and encourage cycling. Adequate cycle storage and infrastructure may increase the suitability of homes for potential residents.	
T4		+	S,M,L- T,D,R,H	OPDC area	The policy seeks to control the level of parking. For Old Oak, this means limiting car parking to 0.2 spaces for residential developments, promotion of car free development close to public transport hubs and securing zero car parking for non-residential developments. For Park Royal, this means limiting car parking to 0.2 spaces for residential developments and allowing limited car parking for non-residential development taking into account access to public transport and operational or business needs. Limited car parking should encourage sustainable travel and provide greater flexibility in improving access and providing different types of homes.	
T5		+	S,M,L- T,I,R,L	OPDC area and London wide	High quality rail infrastructure and a frequent rail service may help meet local needs. HS2 and Crossrail could benefit the area and support sustainable travel to surrounding residential areas.	
T6		+	S,M,L- T,D,R,L	OPDC area	Increased bus services and frequencies would provide improved connections to homes in Old Oak and Park Royal reducing dependence on the private car. This policy may have an indirect effect on housing locations.	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T7	+	S,M L-T,I,R,M	OPDC area	OPDC will work collaboratively with stakeholders to ensure that freight movements are conducted in a safe, efficient and sustainable manner by encouraging the provision of facilities for home deliveries within residential developments. This will require sufficient access to housing areas.
		T8	0			The policy would not have any significant effects for the objective. However, a Construction Logistics Strategy will be developed by TfL and OPDC to ensure a coordinated approach which will minimise the disruption to surrounding residents.
		T9	?			Workplace and/or residential travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance. This requirement may indirectly affect housing provision, access and locations.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	T1	0			There is no clear link between the policy and the IIA Objective.
		T2	0			There is no clear link between the policy and the IIA Objective.
		T3	0			There is no clear link between the policy and the IIA Objective.
		T4	+/-	S,M,L-T,D,I,R,M	OPDC area	There is likely to be an increase in vehicle use in parts of the OPDC area leading to an increase in greenhouse gas emissions, however, this policy seeks to ensure that development is an exemplar of low carbon development and seeks to promote a modal shift towards more sustainable modes by imposing car parking limits which will help to support climate change mitigation. Further reduction in car parking would improve the mitigation against climate change.
		T5	+	S,M,L-T,D,I,R,M	OPDC area	Climate change adaptation could be achieved through provisions including a state of the art rail links and a state of the art rail station at old common as well as future proofing station design to enable smart technology to be implemented.
		T6	0			The policy would not have any significant effects for the objective. Provisions for roads in connection with the policy could contribute towards achieving the IIA Objective.
		T7	0			There is no clear link between the policy and the IIA Objective.
		T8	0			There is no clear link between the policy and the IIA Objective.
		T9	0			There is no clear link between the policy and the IIA Objective.
7	To minimise contributions to climate change through	T1	+	S,M,L-T,D,I,R,M	OPDC area	Climate change adaptation would be supported through the provision of high quality roads with robust and coordinated materials. The policy also seeks to mitigate impacts of development on surrounding local and strategic road networks as well as ensuring that streets prioritise pedestrians, cyclists and buses which would help to encourage sustainable movements.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	T2	+	S,M,L-T,D,I,R,M	OPDC area	The policy primarily focuses on supporting walking networks and connectivity which would help to support the increase of journeys made by non-motorised transport and would contribute towards achieving the IIA Objective.	
	T3	+	S,M,L-T,D,I,R,M	OPDC area	The policy primarily focuses on supporting and encouraging cycling which would help to encourage more people to cycle helping to increase non-motorised journeys and may help to reduce car reliance and emissions which would support climate change adaptation.	
	T4	+/-	S,M,L-T,D,I,R,M	OPDC area	There is likely to be an increase in vehicle use in parts of the OPDC area leading to an increase in greenhouse gas emissions, however, this policy seeks to ensure that development is an exemplar of low carbon development and seeks to promote a modal shift towards more sustainable modes by imposing car parking limits which will help to support climate change mitigation. The policy also seeks to incorporate electric charging points for electric vehicles at all new parking spaces which would help to promote and encourage the use of electric cars, further supporting the IIA Objective.	
	T5	+	S,M,L-T,D,I,R,M	OPDC area	Climate change adaptation could be achieved through provisions including a state of the art rail links and a state of the art rail station at old common helping to increase energy efficiency. Future proofing station design would also enable smart technology to be implemented.	
	T6	0			There is no clear link between the policy and the IIA Objective.	
	T7	+	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to identify more efficient and sustainable ways of delivering goods including the use of cargo bikes as well as seeking to ensure that operators of all freight vehicles have attained the Gold Fleet Operator Recognition Scheme (FORS) accreditation demonstrating efforts to reduce emissions all of which supports climate change adaptation.	
	T8	+	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to reduce freight and construction trips and to make maximum use of rail and water transport for construction and freight which would help to support reducing transportation by road.	
	T9	+	M,L-T,D,I,R,M	OPDC area	Travel plans provide a long term strategy to deliver sustainable transport objectives through an action plan and would ultimately contribute towards increasing energy efficiency, reducing congestion and emissions.	
8 To minimise production of waste across	T1	0			There is no clear link between the policy and the IIA Objective.	
	T2	0			There is no clear link between the policy and the IIA Objective.	
	T3	0			There is no clear link between the policy and the IIA Objective.	



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	T4	0			There is no clear link between the policy and the IIA Objective.
		T5	0			There is no clear link between the policy and the IIA Objective.
		T6	0			There is no clear link between the policy and the IIA Objective.
		T7	0			There is no clear link between the policy and the IIA Objective.
		T8	++	S,M,L-T,D,R,H	OPDC area	The policy addresses freight and construction transport may enable benefits through minimisation techniques. Maximum re-use and recycling of waste and construction materials within the area will reduce transport demands. For residual movements, there is potential for bulk construction materials and/or waste to be transported by rail and canal although issues of local environmental impact and commercial viability will need to be addressed.
		T9	+	S,M,L-T,D,R,M	OPDC area	Transport assessments and travel plans would enable sustainable objectives which could include efficient transportation of waste materials from development sites which would partially support the IIA Objective.
9	Improve the quality of the water environment	T1	0			There is no clear link between the policy and the IIA Objective.
		T2	0			There is no clear link between the policy and the IIA Objective.
		T3	0			There is no clear link between the policy and the IIA Objective.
		T4	0			There is no clear link between the policy and the IIA Objective.
		T5	+	M,L-T,I,R,L	OPDC area	The provision of state of the art rail links and a state of the art rail station at old common could help to support the IIA Objective through incorporating water features into design.
		T6	0			The policy would not have any significant effects for the objective.
		T7	+/-	S,M,L-T,I,R,L	OPDC area	The policy seeks to make maximum use of rail and water transport for construction and freight. Transportation for construction and freight across water has the potential to result in pollution of the water environment. However, in comparison to the noise and air pollution generated by freight movements by road, the water pollution would be less disruptive. The policy has been amended to include a requirement to ensure appropriate pollution prevention is considered when assessing proposals for water transportation.
		T8	+/-	S,M,L-T,D,R,M	OPDC area	The policy seeks to make maximum use of rail and water transport for construction and freight. Transportation for construction and freight across water has the potential to result in pollution of the water environment. However, in comparison to the noise and air pollution generated by freight movements by road, the water pollution would be less disruptive. Guidance has been provided in the environmental chapter to ensure appropriate pollution

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						prevention is considered when assessing proposals for water transportation.
		T9	0			The policy would not have any significant effects for the objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	T1	?			The value of the policy to the objective would be uncertain but new streets, if allied with suitable green infrastructure provision may act as green corridors.
		T2	+	S,M,L-T,D,R,M	OPDC and London wide	This policy offers opportunities to tie in walking routes with Green Infrastructure and improve wildlife connectivity
		T3	+	S,M,L-T,D,R,M	OPDC and London wide	This policy offers opportunities to tie in cycling routes with GI and improve wildlife connectivity
		T4	0			There is no clear link between the policy and the IIA Objective.
		T5	+/-	S,M,L-T,D,R,M	OPDC and London wide	Whilst the construction of new stations and infrastructure may adversely affect biodiversity present, this is unknown at this stage. New stations could include planting schemes and biodiversity enhancements.
		T6	0			There is no clear link between the policy and the IIA Objective.
		T7	0			There is no clear link between the policy and the IIA Objective.
		T8	0			There is no clear link between the policy and the IIA Objective.
		T9	0			There is no clear link between the policy and the IIA Objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	T1	+/-	S,M,L-T,D,R,L	OPDC area	New streets may bring pollution closer to residents in those areas, or it may help relieve congestion elsewhere and hence have benefits.
		T2	+	M,L-T,D,R,M	OPDC area	The policy would benefit the minimisation of pollution as walking provides an alternative to the private car.
		T3	+	M,L-T,D,R,M	OPDC area	The policy would benefit the minimisation of pollution as cycling provides an alternative to the private car.
		T4	+/-	S,M,L-T,D,R,M	OPDC area	OPDC will ensure the development area is an exemplar of low carbon development and will promote a modal shift towards more sustainable modes. There is likely to be an increase in vehicle use in parts of the OPDC Area due to the new development which would have a negative impact on air and noise pollution, however, limiting parking spaces will deter residents and visitors from owning or using cars which will help to mitigate these impacts. The provision of charging points will encourage those people that use cars to use electric vehicles.
		T5	0			The policy would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T6	+/-	S,M,L-T,D,R,L	OPDC area	The policy would not have any significant effects for the objective. The policy would benefit the minimisation of pollution as buses provide a sustainable alternative to the private car. However, buses can cause pollution. Low carbon buses are addressed through this policy.
		T7	+/-	S,M,L-T,D,R,H	OPDC and surrounding area	The significant HGV activity in the development area can have negative impacts on the environment in terms of noise and air quality and causes congestion, particularly on Scrubs Lane. However, there is an attempt to limit and control the congestion.
		T8	+/-	S,M,L-T,D,R,M	London wide	Construction traffic will increase the volume of HGVs and other construction vehicles on the local and strategic road network and may increase pollution levels. However, the freight consolidation centre described in policy T8 could be used to reduce the number of construction vehicles required and the number of construction vehicle movements on the road network. Maximum re-use and recycling of waste and construction materials within the area will reduce transport demands.
		T9	+	S,M,L-T,D,R,M	London wide	Transport Statement or Transport Assessment which assesses the extent to which the development will support opportunities for sustainable travel that should minimise air, noise and light pollution.
12	To conserve and enhance the historic environment, heritage assets and their settings	T1	?			The policy may not have any significant effects for the objective although it depends on the relative location of heritage assets.
		T2	+	S,M,L-T,I,R,M	OPDC area	Fewer cars will cause less disturbance and pollution which could affect heritage assets and their settings.
		T3	+	S,M,L-T,I,R,M	OPDC area	Fewer cars will cause less disturbance and pollution which could affect heritage assets and their settings.
		T4	0			There is no clear link between the policy and the IIA Objective.
		T5	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy would not have any significant effects against the objective. However, a focus on really high quality design should complement any existing heritage assets.
		T6	0			There is no clear link between the policy and the IIA Objective.
		T7	?			The policy may not have any significant effects against the objective although it depends on the relative location of heritage assets.
		T8	?			Although construction work is short-term and temporary, it can affect heritage assets via direct physical disturbance and noise for example.
		T9	0			The policy would not have any significant effects for the objective.
13	Increase	T1	+	S,M-	OPDC and	The Healthy Streets Approach promotes social interaction and community cohesion.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	community cohesion and reduce social exclusion to encourage a sense of community and welfare			T,D,R,M	surrounding area	The policy aims to reduce severance and benefit connectivity.
		T2	+	S,M-T,D,R,H	OPDC and surrounding area	Measures that encourage safe, accessible transport can help community cohesion. <i>Guidance provided in policy D3.</i>
		T3	+	S,M-T,D,R,H	OPDC and surrounding area	Measures that encourage safe, accessible transport can help community cohesion. <i>Guidance provided in policy D3.</i>
		T4	+/-		OPDC and surrounding area	Increasing vehicle use in parts of the OPDC area would have a negative impact on social interaction and community cohesion; however, limiting parking spaces will deter residents and visitors from owning or using cars which will help to mitigate these impacts.
		T5	+	S,M-T,D,R,H	OPDC and surrounding area	The policy promotes sustainable transport and hubs like this can benefit communities by providing a central focus, encouraging sustainable movement.
		T6	++	S,M-T,D,R,H	OPDC area	Connections to new stations should take priority to capitalise on new transport services. There is also a need to secure improved bus connections between Old Oak and Park Royal to ensure that the existing community can take advantage of the benefits the new interchange at Old Oak Common would bring to the area.
		T7	0			The policy would not have any significant effects for the objective.
		T8	?			Large construction projects and new development may help create a greater sense of place and build the existing community. The Construction Logistics Strategy promises to minimise disruption to surrounding residents and business should prevent unrest in the community.
		T9	+	S,M,L-T,I,R,L	OPDC area	Transport Assessments and Travel Plans will aim to protect the livelihood of the community through ensuring transport safety, efficiency and mitigating the impact on the existing network. This should unite the community.
14	Improve safety and reduce crime and the fear of crime	T1	+			The policy would not have any significant effects for the objective.
		T2	+	S,M-T,D,R,M	OPDC area	The existing pedestrian environment within the development area is poor. There is limited permeability and a lack of lighting and active frontages, which creates an unwelcoming streetscape, a perception of poor personal security and a fear of crime, particularly after dark. However, the policy does aim to make walking routes safer and more legible for the users to provide clear, comprehensive and consistent wayfinding

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						information and enable pedestrians to complete more journeys on foot
		T3	+	S,M-T, D,R,H	OPDC and surrounding area	The policy seeks to promote safety and security measures for cyclists.
		T4	0			There is no clear link between the policy and the IIA Objective.
		T5	+	M,L- T,D,R,L	London wide	There is a range of potential smart rail innovations that could be achieved with advances in security technology.
		T6	+	S,M-T, D,R,H	OPDC and surrounding area	The policy seeks to provide clear and legible signage for bus users. Infrastructure should include bus priority measures such as priority at junctions, bus gates and bus only links as well as suitably located bus stops, stands and welfare provision for drivers
		T7	+	S,M,L- T,D,R	London wide	The policy explains that the volume of freight and servicing movements raises challenges in terms of maintenance and management of the road network and the safety and environment for other road users. FORS is an overarching scheme that encompasses all aspects of safety, fuel efficiency, economical operations and vehicle emissions.
		T8	0			There is no clear link between the policy and the IIA Objective.
		T9	0			There is no clear link between the policy and the IIA Objective.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	T1	+	S,M,L- T,D,R,M	OPDC area	If new streets are well designed to deliver Healthy Streets with green infrastructure and improved connectivity they may benefit the objective and help to avoid social exclusion and mental health issues.
		T2	++	S,M,L T,D,IR,M	OPDC area and London wide	Providing a street network that is safe, attractive and easy to navigate, people will be encouraged to walk more, which will have social, economic, environmental and health benefits and support the viability of the development area.
		T3	+	S,M,L- T,D,IR,M	OPDC area, London and Nationwide	Providing a street network that is safe, attractive, and easy to navigate, people will be encouraged to cycle more, which will have social, economic, environmental and health benefits and support the viability of the development area.
		T4	+/-	S,M,L- T,I,R,M	OPDC area	Increasing vehicle use in parts of the OPDC area would have a negative impact on health and well-being; however, limiting parking spaces will deter residents and visitors from owning or using cars which will help to mitigate these impacts. Reducing car parking levels to lower levels would help to further reduce health inequalities and improve mitigation against the negative health impacts.
		T5	+	S,M,L-	OPDC	Increased rail use can encourage more walking/cycling and reduce the use of a private

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				T,D,R,H	area, London and Nationwide	car. This would reduce the levels of carbons emissions and therefore benefit the objective.
		T6	+	S,M,L-T,D,R,H	OPDC area, London and Nationwide	Increased bus use can encourage more walking/cycling and reduce the use of a private car. This would reduce the levels of carbons emissions and therefore benefit the objective.
		T7	+/-	S,M,L-T,I,R,M	OPDC and surrounding areas	The significant HGV activity in the development area can have negative impacts on the health and well-being of the community. However, coordination of HGV activity and the provision of facilities for home deliveries within residential developments may help to mitigate against these impacts.
		T8	+/-	S,M,L-T,I,R,M	OPDC area	The policy highlights that construction traffic will increase the volume of HGVs and other construction vehicles on the local and strategic road network. This will need careful planning, coordination and management to minimise the negative impacts on health from increased volume of traffic, noise, vibration, air pollution, severance and road danger.
		T9	+	S,M,L-T,I,R,M	OPDC area	All development proposals will be assessed for their contribution to traffic generation and their impact on congestion, particularly on bus routes and on the primary route network, and against the existing and potential availability of public transport, and its capacity to meet increased demand. Proposals that increase the availability of public transport and improve the environment for walking and cycling will lead to improvements in health and well-being and reductions in health inequalities.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	T1	0			There is no clear link between the policy and the IIA Objective.
T2		+	S,M,L-T,D,R,M	OPDC area	The policy benefits walking routes which provide access to schools and higher education.	
T3		+	S,M,L-T,D,R,M	OPDC area	The policy benefits cycling routes which provide access to schools and higher education. <i>Guidance is provided in SP7.</i>	
T4		+/-	S,M,L-T,D,R,M	OPDC area	Increasing vehicle use in parts of the OPDC Area would have a negative impact on the environment for walking and cycling on routes to schools; however, limiting parking spaces will deter residents and visitors from owning or using cars which will help to mitigate these impacts. <i>Guidance is provided in SP7.</i>	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T5	+	S,M,L-T, D,R,M	OPDC area	The policy benefits connectivity through rail use which will help improve access to schools and higher education.
		T6	++	S,M,L-T, D,R,M	OPDC area	The policy benefits connectivity through bus travel which will help improve access to schools and higher education. <i>Guidance is provided in SP7.</i>
		T7	0			There is no clear link between the policy and the IIA Objective.
		T8	0			There is no clear link between the policy and the IIA Objective.
		T9	+	S,M,L- T,D,R,M	OPDC area and London wide	All proposals for new or significantly expanded schools or other education or institutional uses should be accompanied by a Travel Plan. The Travel Plan could help improve levels of access to schools from a range of different areas.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	T1	+	S,M,L- T,D,R,M	OPDC area and London wide	The policy seeks to enhance existing streets and junctions to mitigate the impacts of development on the surrounding local and strategic road network. A better road network in the OPDC area would better serve local communities and improve employment provision.
		T2	+	S,M,L- T,D,R,M	OPDC area and London wide	Redevelopment presents an opportunity to enhance existing and provide new pedestrian environments across Old Oak and Park Royal. High quality pedestrian walking routes to Old Oak Common station from all areas will be vital to ensure residents, employees and business can benefit from this new transport superhub.
		T3	++	S,M,L- T,D,R,M	OPDC area	The policy will benefit the objective by OPDC working with businesses in Park Royal to develop training and guidance and improve awareness of the benefits of cycling to employees to encourage more cycling. In Old Oak, redevelopment provides an opportunity to push the boundary and provide state of the art cycling infrastructure that can benefit everyone who lives and works in the area.
		T4	+/-	S,M,L- T,D,R,M	OPDC area and London wide	The policy promotes car free development close to public transport hubs and zero car parking for non-residential developments in Old Oak which is likely to have a positive impact on social and environmental wellbeing and help to improve the reliability of bus travel and other essential traffic. There is likely to be a strong demand for taxis and private hire vehicles (PHVs) generated by the HS2/ Crossrail/ National Rail interchange which is likely to have a negative impact on social wellbeing.
		T5	++	S,M,L- T,D,R,H	OPDC area and London wide	The policy explains that the new HS2, Crossrail and Great West Mainline station at Old Oak Common will be a key driver for regeneration in the area. When built out the core area at Old Oak will be served by approximately ten different rail services and over 200



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						trains per hour at peak times. This will benefit the social and economic wellbeing of the local people and provide sufficient access to key employment and training areas.
		T6	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy states that increased bus services and frequencies would provide improved connections to homes, office and retail destinations in Old Oak and Park Royal reducing dependence on the private car. This is of relevance for existing business in Park Royal where a high percentage of people live within 5-8km of the area which would make a reliable and frequent bus service a viable option for travelling to work.
		T7	0			There is no clear link between the policy and the IIA Objective.
		T8	+	S,M,L-T,D,R,M	OPDC area	More construction work would provide an employment source for the local community.
		T9	?			Transport Assessments and Travel Plans will address any access issues to key services such as employment hubs.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	T1	+/-	S,M,L-T,D,R,M	OPDC area and London wide	The policy states that congestion at key junctions and on links providing access to strategic routes is a barrier to business growth. However, in Park Royal, the road network will need to prioritise the movement of freight to facilitate business growth. This will need to be carefully planned alongside the need to improve bus movements, pedestrians and cyclists and deliver a healthy street environment.
		T2	++	S,M,L-T,D,R,H	OPDC area	Walking as a sustainable form of transport can bring economic benefits. Through an increase in footfall, the vitality of an area is likely to increase and subsequently bring benefits to local businesses. Redevelopment presents an opportunity to enhance the existing pedestrian environment and deliver a high quality pedestrian environment in Old Oak and Park Royal. High quality pedestrian walking routes to Old Oak Common station from all areas will be vital to ensure residents, employees and business can benefit from the new transport superhub.
		T3	++	S,M,L-T,D,R,M	OPDC area and London wide	Investments in “end-of-journey” cycle facilities in the form of secure cycle parking, lockers and showers are also vital across Old Oak and Park Royal. Major employers, businesses and landowners should invest in this infrastructure, recognising its value and importance to their businesses, tenants and employees.
		T4	++	S,M,L-T,D,R,M	OPDC area and London wide	Sufficient car parking will need to be provided to meet the essential needs of developments, particularly ensuring that there are suitable places for disabled people, car clubs and electric cars and facilitating the successful operation of the Park Royal industrial estate. This approach is justified by the very high level of public transport



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						accessibility resulting from the planned and proposed investment. The need for access to a car can be met in part by dedicated car club spaces together with parking for disabled people.
		T5	++	S,M,L-T,I,R,H	OPDC area and London wide	The policy explains that the new HS2, Crossrail and Great West Mainline station at Old Oak Common will be a key driver for regeneration in the area. This should attract investment and benefit local businesses to improve the local economy.
		T6	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy promotes sustainable bus travel. Increased bus frequencies, better journey time reliability, new and improved bus stops and a more efficient service should encourage inward investment and attract businesses to the area. This will have a positive effect on the local economy.
		T7	0			There is no clear link between the policy and the IIA Objective.
		T8	+	S,M,L-T,D,R,M	OPDC and surrounding area.	The nearby delivery of HS2 and Crossrail may encourage other businesses and investment to move into the area. As such, the policy seeks to minimise the construction disruptions for existing businesses through the Construction Logistics Strategy and Construction Management Plans.
		T9	0			There is no clear link between the policy and the IIA Objective.

**Table A-17 – Housing**

- H1: Housing supply
- H2: Affordable housing
- H3: Housing mix
- H4: Family Housing
- H5: Existing housing
- H6: Build to rent
- H7: Purpose-built Co-Living and other housing with shared facilities
- H8: Gypsy and Traveller Accommodation
- H9: Specialist housing
- H10: Student Accommodation

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	H1	++	S, M, L-T, I, R, L	OPDC area	The policy seeks to deliver housing to contribute to meeting local and pan-London housing needs. The requirement for high quality design should lead to significant benefits against this objective. It also seeks to bring vacant dwellings back into use, which could enhance the built environment and improve sense of place locally.
		H2	++	L-T, I, R, L	OPDC area	The development of high quality affordable housing, up to 50% of the total new housing supply, can contribute to place-making. It will be appropriate located across the development with the same quality of appearance as market homes.
		H3	+	L-T, I, R, L	OPDC area	The policy could lead to the generation of some benefits against this objective, in that it will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods.
		H4	+	M, L-T, I, R, L	OPDC area	The policy aims to develop family housing which can encourage place-making by creating mixed and balanced neighbourhoods.
		H5	+	M, L-T, I, R, L	OPDC area	The policy could have some benefits against this objective in that it seeks to bring vacant dwellings back into use, as well as resist the loss of existing housing stock, apart from land within the SIL, which could improve sense of place locally.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide	The PRS is the fastest growing housing tenure in London and can deliver new housing supply more quickly than market for sale housing helping to enhance the built environment and create a sense of place in the area.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility and facilities, could lead to some benefits against this objective. Supporting text indicates that where quality concerns exist about existing shared housing, their loss to an alternative housing uses will not be resisted or proposals to improve standards will be considered.
		H8	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London which seeks to encourage a varied community and therefore contribute to a sense of place.
		H9	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments are of a high standard of design, and are accessible to public transport, shops, services, community facilities and social networks, should seek to benefit this objective to some degree.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. The policy seeks to ensure that the development of student accommodation does not lead to an over-concentration of student accommodation in particular locations. In addition, proposals should not have an unacceptable impact on the immediate and surrounding areas, including residential amenity. Sites should be in accessible locations and not lead to the net loss of other forms of housing. These measures should ensure that a sense of place and community is maintained, although will not necessarily contribute towards the creation of communities.
2	To optimise the efficient use of land	H1	+	M, L-T, I, R, M	OPDC area	This policy seeks to deliver a significant number of new homes and will lead to optimisation in the use of land previously used mainly for industrial purposes.
		H2	+	M, L-T, I, R, M	OPDC area	This policy seeks to deliver a significant number of new affordable homes and will lead to optimisation in the use of land.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
through increased development densities and building heights, where appropriate	H3	+	M, L-T, I, R, M	OPDC area	This policy seeks to provide a housing mix that meets housing need and is appropriate for the densities of the proposed development, providing for an efficient use of land.		
	H4	+	M, L-T, I, R, M	OPDC area	This policy sets out specific design requirements for family housing that are consistent with the expected built form and density in the area.		
	H5	+	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings providing for more efficient use of land.		
	H6	+	M, L-T, I, R, M	OPDC area	This policy supports the development of purpose-built PRS housing which is likely to be built at high density and supporting this IIA objective.		
	H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	Meeting an identified need for shared housing within the plan area is considered to be an efficient use of land.		
	H8	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	Gypsy and traveller sites are likely to be characterised by low density development. However, there is only one such site within the OPDC area currently. Any future provision will be based on the required number of pitches in accordance with national planning guidance. The space occupied by this land use is limited so overall it will not have a negative impact against this objective.		
	H9	+	S, M, L-T, I, R, L	OPDC area and London-wide	The key issues to consider within the Local Plan in relation to this policy highlight that new specialist need housing should be provided in new high density buildings. However, this is not reflected in the policy wording.  <i>This recommendation has been addressed in the strategic policies on optimising development to provide a range of housing types at high densities.</i>		
	H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	Student accommodation could be considered to be an efficient use of land as it is likely to be high density.		
	3	Maximise the reuse of previously developed land and	H1	+	L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to bring vacant dwellings back into use and the area has a large reservoir of brownfield land available that will be used to deliver a substantial amount of new housing to meet local and London housing needs. The policy states that 'Vacant Building Credit will be applied where it is verified that a building has not been made vacant for the sole purpose of redevelopment and has been vacant

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	existing buildings, including the remediation of contaminated land					for at least five years.'
		H2	+	L-T, I, R, M	OPDC area	The policy seeks to provide substantial amounts of affordable housing which will be delivered on land with previous industrial uses thus maximising reuse of land as required under this objective.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	+	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to bring vacant dwellings back into use and aims to aid 'comprehensive regeneration' of the area
		H6	0			There is no clear link between the policy and the IIA Objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	Meeting an identified need for shared housing within the plan area is considered to be an efficient use of land.
		H8	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	Gypsy and traveller sites are likely to be characterised by low density development. However, there is only one such site within the OPDC area currently. Any future provision will be based on the required number of pitches in accordance with national planning guidance. The space occupied by this land use is limited so overall it will not have a negative impact against this objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	Student accommodation could be considered to be an efficient use of land as it is likely to be high density.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the	H1	0			There is no clear link between the policy and the IIA Objective.
		H2	0			There is no clear link between the policy and the IIA Objective.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	0			There is no clear link between the policy and the IIA Objective.
		H6	0			There is no clear link between the policy and the IIA Objective.
		H7	+	M, L-T, I, R, M	OPDC area	The policy seeks that new shared housing should be located in areas with high public transport access and facilities and services. This could help to create benefits against this objective.
		H8	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be accessible to transport, services and facilities. This could help to create benefits against this objective.
		H9	+	M, L-T, I,	OPDC area	The policy seeks that new specialist housing should be located in areas with

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	transport network			R, M		high public transport access and facilities and services. This could help to create benefits against this objective.
		H10	+	M, L-T, I, R, M	OPDC area	The policy requires that new student housing should be in accessible locations, which could lead to some benefits against this objective.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	H1	++	L-T, D, R, M	OPDC area and London-wide	The policy should help significantly increase the supply of housing within the area to meet local and London housing need, through the creation of delivery targets, promotion of development opportunities and conversion of existing buildings, as well as through monitoring. The supporting text highlights that the conversion of larger dwellings to smaller, more affordable dwellings, will contribute to the supply of housing. This could create significant benefits against this objective.
H2		++	L-T, D, R, M	OPDC area and London-wide	The focus of this policy is to create affordable and inclusive housing of a range of types and tenures, therefore scoring a major positive against this objective in terms of providing greater access to affordable housing. The policy aims to reach an overarching 50% affordable housing within the OPDC area, providing <u>a minimum of 30% of affordable housing as social rent (including London Affordable Rent)</u> and <u>the remainder as a range of social rent level housing (including London Affordable Rent)</u> , Intermediate housing, including London Living Rent and London Shared Ownership. This policy also ensures intermediate homes are affordable to households on <u>median</u> incomes within the OPDC area.	
H3		++	L-T, I, R, L	OPDC area	The policy could lead to the generation of significant benefits against this objective, in that it will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods.	
H4		+	M, L-T, I, R, L	OPDC area	The policy aims to provide family housing across all tenures in accordance with Policy H3. This is a balance between identified housing need, development viability and reflecting the high density form of development. In the policy, access to open spaces is included and careful design of housing which is to be designated for families is outlined to ensure that it suitable for families with children.	

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		H5	+	M, L-T, I, R, L	OPDC area	The policy could generate positive effects against this objective through the creation of additional housing through the conversion of existing dwellings and other types of buildings. The policy seeks to ensure that conversions of larger houses still include at least one family sized unit therefore seeking to meet a range of needs and help to maintain a mix of housing; however, it is unclear whether this proportion would meet local needs or not. As stated in the supporting text for policy H3, housing mix and needs will be identified more clearly in the next iteration of the local plan.
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide	This policy supports the development of purpose-built PRS housing which will diversify the tenure mix to be provided in the new development and meet a housing need. Further to this, Build to Rent requires schemes to deliver 35% affordable housing and 30% of this affordable housing to be at London Living Rent
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support identified local and London housing need. Supporting text indicates that where quality concerns exist about existing shared houses, their loss to any alternative housing uses will not be resisted and proposals to improve standards will be considered. This could help to increase quality locally over time.
		H8	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to benefits against this objective as it seeks to support an identified local and London housing need in London. The study concluded that there are no requirements for additional pitches according to the planning definition but an additional 12 pitches will be needed for households who do not meet the definition. Therefore, the policy seeks to include the need for the accommodation of gypsies and travellers.
		H9	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to benefits against this objective as it seeks to support an identified housing need in London. Affordable housing is also sought within the policy for developments that include market led development aimed at older or vulnerable people. Policy also seeks to protect from the loss of existing specialist housing by only supporting proposals that can demonstrate there is no longer an identified local need for it.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to benefits against this objective as it seeks to support an identified local and London housing need. Specific requirements regarding design are not included within the policy.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	H1	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	The policy seeks to deliver a significant number of new homes. The strategic policies on excellence and innovation promote high standards for sustainable development at high density and OPDC has also produced an Environmental Standards Study to develop a series of environmental standards for the development which will help to improve adaption to climate change.
		H2	0			The policy seeks to deliver a significant number of new affordable homes. The strategic policies on excellence and innovation promote high standards for sustainable development at high density and OPDC has also produced an Environmental Standards Study to develop a series of environmental standards for the development which will help to improve adaption to climate change.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	0			There is no clear link between the policy and the IIA Objective.
		H6	0			There is no clear link between the policy and the IIA Objective.
		H7	0			There is no clear link between the policy and the IIA Objective.
		H8	0			There is no clear link between the policy and the IIA Objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	0			There is no clear link between the policy and the IIA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources	H1	+	L-T, I, R, L	OPDC area	The policy seeks to deliver a significant number of new homes which could have negative effects against this objective, through an increase in the need for energy and transport. However, the strategic policies on excellence and innovation promoting high standards for sustainable development at high density and modern methods of construction could minimise this effect. OPDC has also produced an Environmental Standards Study to develop a series of environmental standards for the development which will help to minimise contribution to climate change.
		H2	+	L-T, I, R, L	OPDC area	The policy seeks to deliver a significant number of new affordable homes which could have negative effects against this objective, through an increase in the need for energy and transport. However, the strategic policies on excellence and innovation promoting high standards for sustainable development at high density and modern methods of construction sustainable and modern methods of construction could minimise this effect.
		H3	0			There is no clear link between the policy and the IIA Objective.



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
including fossil fuels for transport, heating and energy	H4	0				There is no clear link between the policy and the IIA Objective.
	H5	+/-	M, L-T, I, R, M	OPDC area		<p>The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings, which could reduce the embodied energy required compared with the creation of new dwellings to meet the entire housing need. However, increased pressure on local infrastructure through an intensification of the population, could lead to negative effects on resource requirements. However, the policy seeks to minimise this effect through requiring that conversions do not result in cumulative stress on services and would not result in an adverse impact on parking or other local amenities.</p> <p><i>The policy could seek to require that conversions of existing and vacant buildings include provision for ensuring that the energy efficiency of buildings is brought up to the standard required for new developments.</i></p>
	H6	+	L-T, I, R, L	OPDC area		Purpose-built PRS is likely to be built in areas with good access to public transport and services and facilities which could help to create benefits against this objective in terms of access to transport.
	H7	+	L-T, I, IR, L	OPDC area and London-wide		The policy seeks that new shared houses are located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on the emissions of greenhouse gases.
	H8	+	M, L-T, I, R, M	OPDC area		The policy seeks that any new gypsy and traveller sites should be accessible to transport, services and facilities. This could help to create benefits against this objective.
	H9	+	L-T, I, IR, L	OPDC area and London-wide		<p>The policy seeks that new specialist housing is located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on the emissions of greenhouse gases.</p> <p><i>It is recommended that high quality design aspects also specify the need for energy efficient design, which should help to reduce the cost of living for older</i></p>

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
						<i>people and improve their health.</i>	
		H10	+	M, L-T, I, R, M	OPDC area	The policy requires that new student housing should be in accessible locations, which could lead to some benefits against this objective.	
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	H1	-	L-T, I, R, L	OPDC area	The policy seeks to deliver a significant number of new homes which could have negative effects against this objective, through an increase in the need for natural resources and the creation of waste during the construction. However, design objectives could minimise this effect. OPDC has also produced an Environmental Standards Study to develop a series of environmental standards for the development. This will help to minimise waste production and transportation in the future.	
		H2	-	L-T, I, R, L	OPDC area	The policy seeks to deliver a significant number of new affordable homes which could have negative effects against this objective, through an increase in the need for natural resources and the creation of waste during the construction. However, design objectives could minimise this effect. OPDC has also produced an Environmental Standards Study to develop a series of environmental standards for the development. This will help to minimise waste production and transportation in the future.	
		H3	0				There is no clear link between the policy and the IIA Objective.
		H4	0				There is no clear link between the policy and the IIA Objective.
		H5	+/-	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings, which could reduce the waste generated during construction activities. However, increased pressure on local infrastructure through an intensification of the population, could lead to negative effects on resource requirements. The policy seeks to minimise this effect through requiring that conversions do not result in cumulative stress on services and would not result in an adverse impact on local amenities.	
		H6	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources and the creation of waste during construction. However, design objectives could minimise this effect. OPDC has also produced an Environmental Standards Study to develop a series of environmental standards for the development. This will help to minimise waste production and	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						transportation in the future.
		H7	0			There is no clear link between the policy and the IIA Objective.
		H8	0			There is no clear link between the policy and the IIA Objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	0			There is no clear link between the policy and the IIA Objective.
9	Improve the quality of the water environment	H1	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	+/-	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings, which could reduce the pollution generated during construction activities. However, increased pressure on local infrastructure through an intensification of the population, could lead to negative effects on resource requirements and potential pollution. The policy seeks to minimise this effect through requiring that conversions do not result in cumulative stress on services and would not result in an adverse impact on local amenities.
		H6	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H7	0			There is no clear link between the policy and the IIA Objective.
		H8	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be capable of connecting to utilities infrastructure and services. This could help to create benefits against this objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	0			There is no clear link between the policy and the IIA Objective.
10	Create and	H1	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
enhance biodiversity and the diversity of habitats across the area and its surroundings						natural resources. However, design objectives could minimise this effect.
	H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.	
	H3	0			There is no clear link between the policy and the IIA Objective.	
	H4	0			There is no clear link between the policy and the IIA Objective.	
	H5	0			There is no clear link between the policy and the IIA Objective.	
	H6	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.	
	H7	0			There is no clear link between the policy and the IIA Objective.	
	H8	0			There is no clear link between the policy and the IIA Objective.	
	H9	0			There is no clear link between the policy and the IIA Objective.	
	H10	0			There is no clear link between the policy and the IIA Objective.	
11	To minimise air, noise and light pollution, particularly for vulnerable groups	H1	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	0			There is no clear link between the policy and the IIA Objective.
		H6	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H7	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new shared houses are located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on local pollution levels.
		H8	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be accessible to transport, services and facilities. This could help to create benefits against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H9	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new specialist housing is located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on local pollution levels.
		H10	+	M, L-T, I, R, M	OPDC area	The policy requires that new student housing should be in accessible locations, which could lead to some benefits against this objective through a potential reduction in an increase in vehicular transport. Further, the requirement for consideration of the potential impact on the immediate and surrounding area and residential amenity, could help to reduce potential impacts from noise, air and light pollution.
12	To conserve and enhance the historic environment, heritage assets and their settings	H1	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative implications for the historic environment through a significant change in the setting of the local area. However, design objectives and conservation measures where they are adopted could minimise this effect.
		H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative implications for the historic environment through a significant change in the setting of the local area. However, design objectives and conservation measures where they are adopted could minimise this effect.
		H3	+	M, L-T, I, IR, L	OPDC area and surrounding boroughs	The policy could lead to benefits against this objective, in that new housing will need to take into consideration the local character of the site and its ability to accommodate a mix of housing types and sizes.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	+	M, L-T, I, IR, L	OPDC area and surrounding boroughs	The policy seeks to ensure that conversions of existing buildings maintain the general character of the surrounding area. This could help to ensure that effects on the historic environment are minimised.
		H6	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative implications for the historic environment through a significant change in the setting of the local area. However, design objectives and conservation measures where they are adopted could minimise this effect.
		H7	0			There is no clear link between the policy and the IIA Objective.
		H8	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	0			There is no clear link between the policy and the IIA Objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	H1	+	M, L-T, I, R, L	OPDC area	The policy seeks to significantly increase the housing supply in the area, providing more high quality homes for more people. This will increase community cohesion in the area. The policy also seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership.
		H2	++	M, L-T, I, R, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to create affordable housing. This will increase community cohesion and reduce social exclusion as more people will be housed in suitable properties that are affordable either to own or rent. could
		H3	++	L-T, I, R, L	OPDC area	The policy could lead to the generation of benefits against this objective, in that it will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. This could generate significant benefits against this objective, through the potential creation of greater social equity through reducing geographical inequalities.
		H4	+	M, L-T, I, R, L	OPDC area	The policy seeks to ensure that any family housing is appropriately designed and accessible to useable amenity space. This could provide some benefits against this objective.
		H5	+	M, L-T, I, IR, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership. Further, the policy seeks that conversions of existing dwellings maintain the amenity of neighbours, the general character of the surrounding area, and do not result in the cumulative stress on services.
		H6	+	M, L-T, I, IR, L	OPDC area	The policy aims to create developments for rental. This will have a positive effect against this IIA objective as it provides housing for those who cannot afford to buy a property in that area but can still rent and especially as leases are aimed for longer terms. This will encourage social inclusion, thus scoring positively against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Further, new shared houses should not give rise to unacceptable impacts on amenity.
		H8	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy seeks to ensure that any new sites are accessible to services and facilities, and local social infrastructure. This could provide some benefits against this objective.  <i>The policy could usefully consider the potential integration of new sites within the surrounding community, as part of the assessment of impacts.</i>
		H9	++	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Significant positive effects may be achieved through a requirement that accessible social networks are appropriate to the needs of the intended occupiers.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. The policy seeks to ensure that the development of student accommodation does not lead to an over-concentration of student accommodation in a particular location. In addition, proposals should not have an unacceptable impact on the immediate and surrounding areas, including residential amenity. Sites should be in accessible locations and not lead to the net loss of other forms of housing. These measures should ensure that a sense of place and community is maintained, although will not necessarily contribute towards the creation of more cohesive communities.
14	Improve safety and reduce crime and the	H1	+	M, L-T, I, R, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings can engender a sense of local decline and anti-social behaviour through reduced sense of community



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
fear of crime						ownership.
	H2	+	M, L-T, I, R, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to increase the availability of affordable housing. This will promote an increased sense of community in the area which may help improve safety and help prevent crime and anti-social behaviour by providing a more inclusive and mixed community where households are suitably housed in homes that are genuinely affordable.	
	H3	+	L-T, I, R, L	OPDC area	The policy could lead to the generation of some benefits against this objective, in that it will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. This could generate benefits against this objective, through the potential creation of greater social equity through reducing inequalities.	
	H4	+	M, L-T, I, IR, L	OPDC area	The policy aims to develop housing which is suitable for families. This could have a positive effect against the IIA objective as it can contribute to creating a sense of place and inclusive and mixed community which helps to create a safe neighbourhood with low levels of crime.	
	H5	+	M, L-T, I, IR, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings can engender a sense of local decline and anti-social behaviour through reduced sense of community ownership. Further, the policy seeks that conversions of existing dwellings maintain the amenity of neighbours, which could have some benefits.	
	H6	0			There is no clear link between the policy and the IIA Objective.	
	H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards and are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Further, new shared houses should not give rise to unacceptable impacts on amenity, which should help to reduce potential impacts on crime.	
	H8	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy seeks to ensure that any new sites are accessible to services and facilities, and local social infrastructure. This could provide some benefits against this objective through potentially reducing the potential for anti-social	



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						behaviour.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	+/-	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The introduction of student housing into the area could increase the potential for local crime, as students can be targets for crime, as well as causing potential anti-social behaviour if not managed effectively. However, ensuring a mix of housing throughout the area and that student housing does not result in a net loss of self-contained accommodation could lead to the minimisation of this potentially negative effect. Student housing will also be subject to a residential management plan which must specify how any impacts on neighbouring residents will be managed.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	H1	+	M, L-T, I, R, L	OPDC area	The policy seeks to significantly increase the number of new homes and create an inclusive new place which can contribute towards greater levels of health and wellbeing for existing residents and new residents. It also seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership.
		H2	+	M, L-T, I, R, L	OPDC area	The policy could lead to the generation of benefits against this objective, as it seeks to create more affordable housing which can improve the health and wellbeing and reduce the inequalities in health outcomes of households who are struggling to find or sustain housing that is genuinely affordable and meets their needs in the local area.
		H3	+	L-T, I, R, L	OPDC area	The policy could lead to the generation of some benefits against this objective, in that it will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. This could generate benefits against this objective, through the potential creation of greater social equity through reducing geographical inequalities, leading to potential benefits for mental health as well as physical health, through the provision of appropriate housing types.
		H4	+	S, M, L-T, I, R, L	OPDC area	The policy aims to improve access to open spaces and green spaces for families. This can encourage people to go outside more and exercise and interact with one another which can contribute positively to mental and physical health and wellbeing.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H5	+	M, L-T, I, R, L	OPDC area	The policy could lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing and thus improvements in mental health, as vacant dwellings can engender a sense of local decline and anti-social behaviour through reduced sense of community ownership. Further, the policy seeks that conversions of existing dwellings maintain the amenity of neighbours, and do not result in the cumulative stress on services. This could help to maintain existing health levels.
		H6	0			There is no clear link between the policy and the IIA Objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Further, new shared houses should not give rise to unacceptable impacts on amenity, which could have some benefits against this objective.
		H8	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy seeks protect and maintain the existing site, providing certainty and stability for the community which may improve wellbeing. Any new sites could lead to the generation of additional health benefits for potential communities on new sites, as the policy requires that new sites are supported by appropriate facilities, layout and design quality to support health and wellbeing.
		H9	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments are of a high standard of design, and are accessible to public transport, shops, services, community facilities and social networks, should seek to also benefit this objective to some degree through a potential increase in walking to services and facilities, as well as reduction in air pollution, which could provide health benefits.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support student housing in accessible locations to public transport. However, the policy also seeks to ensure the new student housing does not have an unacceptable impact on residential amenity, which doesn't necessarily ensure the health and wellbeing of the student communities.
16	To improve	H1	+	M, L-T, I,	OPDC area	The policy will significantly increase the number of homes in the area. OPDC

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
the education and skills levels of all members of the population, particularly vulnerable groups				R, L		has considered the impact on school places and other social infrastructure and is working with partners to secure the additional provision required at the relevant stages of the redevelopment of the area.	
	H2	0				There is no clear link between the policy and the IIA Objective.	
	H3	0				There is no clear link between the policy and the IIA Objective.	
	H4	+		M, L-T, I, R, L	OPDC area	Family housing will be delivered close to appropriate social infrastructure such as schools.	
	H5	+		M, L-T, I, R, L	OPDC area	Impacts on social infrastructure such as schools will be considered in determining whether to permit conversion of existing homes into two or more dwellings.	
	H6	0				There is no clear link between the policy and the IIA Objective.	
	H7	0				There is no clear link between the policy and the IIA Objective.	
	H8	+		M, L-T, I, R, L	OPDC area	The policy requires that new gypsy and traveller site should be capable of support by local social infrastructure. This could include education facilities, leading to potential benefits against this objective.	
	H9	0				There is no clear link between the policy and the IIA Objective.	
	H10	0				There is no clear link between the policy and the IIA Objective.	
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	H1	+		M, L-T, I, R, L	OPDC area	Old Oak and Park Royal Opportunity areas are major reservoirs of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility. Through this thousands of new employment opportunities will be created.
		H2	+		M, L-T, I, R, L	OPDC area	Delivery of affordable housing will ensure that people can afford to live and work in the OPDC area including those who provide emergency and other services that are essential to the effective running of mixed and balanced communities.
		H3	0				There is no clear link between the policy and the IIA Objective.
		H4	0				There is no clear link between the policy and the IIA Objective.
		H5	0				There is no clear link between the policy and the IIA Objective.
		H6	+		M, L-T, I, R, L	OPDC area	This policy seeks to provide purpose-built PRS which can meet the housing needs of young professionals who want to move to the area for work and others who require employment mobility.
		H7	+		M, L-T, I, R, L	OPDC area	This policy seeks to provide shared accommodation which can meet the housing needs of young professionals who want to move to the area for work

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						and others who require employment mobility.
		H8	0			There is no clear link between the policy and the IIA Objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	0			There is no clear link between the policy and the IIA Objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	H1	+	L-T, I, R, L	OPDC area, London-wide and nationally	The policy seeks to provide a significant number of new homes in the area, which could increase the attractiveness of the area to inward investors wishing to locate in an area with high quality homes and facilities.
		H2	0			There is no clear link between the policy and the IIA Objective.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	0			There is no clear link between the policy and the IIA Objective.
		H6	+	M, L-T, I, R, L	OPDC area, London-wide	By having housing which has been built for renting, this could attract a more mobile workforce and encourage inward investment for sustainable economic growth.
		H7	+	M, L-T, I, R, L	OPDC area, London-wide	Co-living schemes can support the sharing economy and play a role in meeting the housing needs of young professionals and those who require employment mobility.
		H8	0			There is no clear link between the policy and the IIA Objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	+	M, L-T, I, R, L	OPDC area, London-wide	An increase in students in the area may attract local investment through the potential for a highly skilled and potentially flexible workforce.

## Table A-18 – Employment

- E1: Protecting, strengthening and intensifying the Strategic Industrial Location  
 E2: Employment sites outside of Strategic Industrial Location  
 E3: Supporting small businesses and start ups  
 E4: Work-live units  
 E5: Local access to training, employment and economic opportunities

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	E1	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to protect, strengthen and intensify land linked with industrial functions in the area. The area possesses a diverse economic profile and supporting industrial growth in areas within the Strategic Industrial Locations (SIL) would help to enhance the built environment and encourage place making.
		E2	+	S, M, L-T, I, R, M	OPDC area	The policy supports new employment outside of SIL and seeks to retain uses such as creative industries which can encourage place-making and enhance the built environment.
		E3	+	S, M, L-T, I, R, M	OPDC area	Supporting small businesses can encourage place-making and enhance the built environment by reflecting the needs of the community.
		E4	0			The policy would not have any significant effects for the IIA Objective.
		E5	+	S, M, L-T, I, R, L	OPDC area	An important focus of the policy is improving access to employment and training and it seeks to provide physical access to jobs for local people which would help the area become more defined and would contribute to placemaking.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	E1	+	S, M, L-T, I, R, M	OPDC area	The policy sets out to achieve no net loss of industrial floorspace maintaining and possibly increasing industrial building density which will have a positive effect against this objective.
		E2	+	S, M, L-T, I, R, M	OPDC area	The policy supports employment floorspace outside of SIL in appropriate locations and where this is an efficient use of land, thus scoring positively against this objective.
		E3	0			There is no clear link between the policy and the IIA Objective.
		E4	0			There is no clear link between the policy and the IIA Objective.
		E5	0			There is no clear link between the policy and the IIA Objective.
3	Maximise the reuse	E1	+	S, M, L-T, I, R, M	OPDC area	The policy protects existing strategic industrial locations so that it is available for reuse for these purposes which will have a positive effect against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	of previously developed land and existing buildings, including the remediation of contaminated land	E2	+	S, M, L-T, I, R, M	OPDC area	The policy directs new employment space to appropriate locations, including previously developed land, which will have a positive effect against this objective. Although, if previously developed land is not suitable for the use or type of industry it may have to locate on greenfield land which could cause a negative impact on the Objective.
		E3	0			There is no clear link between the policy and the IIA Objective.
		E4	0			There is no clear link between the policy and the IIA Objective.
		E5	0			There is no clear link between the policy and the IIA Objective.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	E1	+	M, L-T, I, R, L	OPDC area	The protection of strategic industrial functions would improve accessibility to jobs and help minimise the need for local people to travel to find work.
		E2	+	M, L-T, I, R, L	OPDC area	This policy seeks to support new employment space outside of SIL. By increasing employment space and job opportunities, it would improve accessibility to jobs and help minimise the need for local people to travel to find work.
		E3	0			There is no clear link between the policy and the IIA Objective.
		E4	+	M, L-T, I, R, L	OPDC area	Combining spaces for work and living could contribute towards minimising contributions to climate change as it would reduce the need for travel.
		E5	+	M, L-T, I, R, L	OPDC area	The policy will require plans which help local people into work and local supply chains which should help minimise travel patterns.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	E1	0			There is no clear link between the policy and the IIA Objective.
		E2	0			There is no clear link between the policy and the IIA Objective.
		E3	0			There is no clear link between the policy and the IIA Objective.
		E4	0			There is no clear link between the policy and the IIA Objective.
		E5	0			There is no clear link between the policy and the IIA Objective.
6	Improve climate change adaptation and mitigation,	E1	0			There is no clear link between the policy and the IIA Objective.
		E2	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	including minimising the risk of flooding and addressing the heat island effect	E3	0			There is no clear link between the policy and the IIA Objective.
		E4	0			There is no clear link between the policy and the IIA Objective.
		E5	0			There is no clear link between the policy and the IIA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	E1	+/-	M, L-T, I, R, M	OPDC area	The protection of SIL has the potential to impact upon climate change as it supports continued industrial activity. In the long term, it could contribute to effects upon natural resources and fossil fuels linked to industrial activities. However, this could be mitigated against with the inclusions of sustainable transport links; economic growth could include more low carbon industries and ensure implementation of Local Plan policies related to environmental targets
		E2	+/-	M, L-T, I, R, M	OPDC area	By delivering new employment floor space outside of SIL, a negative impact on climate change could be seen as an increase in economic growth has inherent impacts on natural resource/fossil fuel use. However, this economic growth could include more low carbon industries and the implementation of Local Plan policies related to environmental targets could help mitigate this impact.
		E3	0			There is no direct link between the policy and the IIA Objective.
		E4	+	M, L-T, I, R, L	OPDC area	Combining work and living spaces could contribute towards minimising contributions to climate change as it would reduce the need for travel.
		E5	+	M, L-T, I, R, L	OPDC area	The primary focus of the policy is to improve access to employment and skills for local people. Improved accessibility could contribute towards reducing journey times thus helping to minimise contributions to climate change.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates	E1	+/-	M, L-T, I, R, L	OPDC area	An increase in SIL could have implications for increased industrial waste generation as well as opportunities for waste facilities and recycling. This could be mitigated through building design and the implementation of circular economy principles so the impact is uncertain.
		E2	+/-	M, L-T, I, R, L	OPDC area	Increased employment floorspace outside of SIL could increase waste generation as well as opportunities for waste facilities and recycling This could be mitigated through building design and the implementation of circular economy principles so the impact is uncertain.

IIA Objective		Performance of Policy		Temporal Scale	Geographical Extent	Commentary and Recommendations
				Nature of Impact		
	of re-use, recycling and recovery rates as well as composting of all green waste	E3	0			There is no clear link between the policy and the IIA Objective.
		E4	0			There is no clear link between the policy and the IIA Objective.
		E5	0			There is no clear link between the policy and the IIA Objective.
9	Improve the quality of the water environment	E1	0			There is no clear link between the policy and the IIA Objective.
		E2	0			There is no clear link between the policy and the IIA Objective.
		E3	0			There is no clear link between the policy and the IIA Objective.
		E4	0			There is no clear link between the policy and the IIA Objective.
		E5	0			There is no clear link between the policy and the IIA Objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	E1	0			There is no clear link between the policy and the IIA Objective.
		E2	0			There is no clear link between the policy and the IIA Objective.
		E3	0			There is no clear link between the policy and the IIA Objective.
		E4	0			There is no clear link between the policy and the IIA Objective.
		E5	0			There is no clear link between the policy and the IIA Objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	E1	+/-	M, L-T, I, R, H	OPDC area	The policy aims to protect and strengthen SIL, which accommodates uses that can generate noise and contribute to poor air quality. The implementation of policies in the Environment and Utilities chapter may help to mitigate potential impacts.
		E2	+/-	M, L-T, I, R, L	OPDC area	Increased employment sites outside of SIL has the potential to contribute to noise, air and light pollution. Careful design, the implementation of environmental policies and the incorporation of sustainable transport will help to mitigate these impacts.
		E3	0			The policy would not have any significant effects for the IIA Objective.
		E4	+	M, L-T, I, R, M	OPDC area	This policy aims to create work spaces located where people live which will have a positive impact on the Objective as it discourages travelling and large-scale developments.
		E5	+	M, L-T, I, R, M	OPDC area	By encouraging a local workforce, you can reduce need for travel, which will have an indirect impact on this.
12	To conserve and enhance the historic environment, heritage	E1	0			There is no clear link between the policy and the IIA Objective.
		E2	0			There is no clear link between the policy and the IIA Objective.
		E3	0			There is no clear link between the policy and the IIA Objective.
		E4	0			There is no clear link between the policy and the IIA Objective.



IIA Objective		Performance of Policy		Temporal Scale	Geographical Extent	Commentary and Recommendations
				Nature of Impact		
	assets and their settings	E5	0			There is no clear link between the policy and the IIA Objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	E1	+	M, L-T, I, R, M	OPDC area	The policy seeks to protect and strengthen SIL therefore retaining and potentially increasing local work opportunities which can encourage people to mix and promote community cohesion. Those that work and live in the local area can benefit from this policy.
		E2	+	M, L-T, I, R, M	OPDC area	Policy promotes employment sites outside of SIL and makes specific reference to the retention of uses such as creative industries to help establish identity and support community cohesion. This broad mix of industrial type activities can assist with establishing a sense of community.
		E3	+	M, L-T, I, R, M	OPDC area	This policy would support entrepreneurship and new businesses to start up, increasing the opportunities for people to participate in economic development of the area and helping to reduce social exclusion.
		E4	+/-	M, L-T, I, R, M	OPDC area	Combined living and working spaces could lead to people becoming reclusive which will have a negative impact against the objective. However, the policy seeks to address this issue by encouraging a multitude of different business types, spaces of interaction and active frontages.
		E5	+	S, M, L-T, I, R, L	OPDC area	The policy focus is on maximising access to employment, skills training, apprenticeships and pre-employment support and the opportunity to provide pathways to employment could indirectly support the IIA Objective by encouraging community cohesion and welfare.
14	Improve safety and reduce crime and the fear of crime	E1	0			There is no clear link between the policy and the IIA Objective.
		E2	0			There is no clear link between the policy and the IIA Objective.
		E3	0			There is no clear link between the policy and the IIA Objective.
		E4	0			There is no clear link between the policy and the IIA Objective.
		E5	0			There is no clear link between the policy and the IIA Objective.
15	Maximise the health and wellbeing of the	E1	+	S, M, L-T, I, R, L	OPDC area	The protection and strengthening of SIL would help maintain jobs in the area, which would help contribute towards maximising wellbeing.
		E2	+	S, M, L-T, I,	OPDC area	Whilst an increase in employment sites outside of SIL would not directly relate to

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	population, reduce inequalities in health and promote healthy living			R, L		health, the provision of increased employment uses would ultimately deliver additional jobs which would help contribute towards maximising wellbeing.
		E3	+	S, M, L-T, I, R, L	OPDC area	Whilst delivery of a diverse economy by supporting small businesses would not directly relate to health, the provision of new employment space would ultimately secure jobs which would help contribute towards wellbeing.
		E4	+	S, M, L-T, I, R, L	OPDC area	The provision of work-live units would not directly relate to health but would ultimately create jobs and maximise wellbeing and could encourage a more appealing work and life balance.
		E5	+	S, M, L-T, I, R, L	OPDC area	Maximising access to employment and training could have a positive effect on the wellbeing of the population.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	E1	?			The protection and strengthening of SIL could maintain and possibly enhance industrial training opportunities such as apprenticeships for young people, however the extent of these opportunities is unknown at this time.
		E2	?			Policy promotes employment sites outside of SIL which could potentially offer enhanced industrial training opportunities such as apprenticeships for young people, however the extent of these opportunities is unknown at this time.
		E3	0			There is no clear link between the policy and the IIA Objective.
		E4	0			There is no clear link between the policy and the IIA Objective.
		E5	++	S, M, L-T, I, R, M	OPDC area	The policy seeks to maximise access to skills training, apprenticeships, and pre-employment support all of which would contribute towards improving the skills level of the population.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and	E1	++	S, M, L-T, I, R, M	OPDC area	The policy seeks to protect and strengthen SIL which would contribute partially towards achieving the IIA Objective by maintaining and potentially increasing access to industrial employment opportunities.
		E2	++	S, M, L-T, I, R, M	OPDC area	Policy promotes employment sites outside of SIL which would contribute partially towards achieving the IIA Objective through improved and increased access to employment.
		E3	++	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver a diverse economy through supporting small local businesses which would contribute towards achieving the IIA Objective by maximising economic wellbeing through improved access to employment.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	training	E4	+	M, L-T, I, R, M	OPDC area	The policy seeks to support work-live spaces which could maximise economic wellbeing by creating new opportunities for employment, including self-employment.
		E5	++	S, M, L-T, I, R, M	OPDC area	The policy seeks to maximise employment, skills training, apprenticeships, and pre-employment all of which would directly support the IIA Objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	E1	++	M, L-T, I, R, M	OPDC area and beyond	The policy seeks to protect and strengthen SIL including for a broad range of industrial types and activities including identified future growth sectors. This will also contribute to London's economic growth all of which would help to encourage inward investment alongside investment within existing communities.
		E2	++	M, L-T, I, R, M	OPDC area and beyond	Policy promotes employment sites outside of SIL including for a broad range of industrial types, activities and including identified future growth sectors. This would help to encourage inward investment alongside investment within existing communities. This will also contribute to London's economic growth all of which would help to encourage inward investment alongside investment within existing communities.
		E3	+	M, L-T, I, R, M	OPDC area	The policy seeks to support small businesses. This will contribute to London's economic growth and help to encourage inward investment alongside investment within existing communities.
		E4	+	M, L-T, I, R, M	OPDC area	The policy would contribute to establishing and/or growing a new business sector that would positively contribute to the economic regeneration of the area.
		E5	+	M, L-T, I, R, M	OPDC area	The policy principally seeks to maximise access and investment in employment and training for local people. Access to a skilled pool of people could contribute towards attracting inward investment.

**Table A-19 – Town Centre and Community Uses**

- TCC1: Locations for and impacts of town centre uses
- TCC2: Vibrancy
- TCC3: Social infrastructure
- TCC4: Culture and Art
- TCC5: Sports and Leisure
- TCC6: Public Houses
- TCC7: Catalyst Uses
- TCC8: Meanwhile Uses
- TCC9: Visitor Accommodation
- TCC10: Night-time economy uses

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	TCC1	++	S,M,L-T, D, R, M	Town Centres	This policy aims to optimise development opportunities, ensures the development will reduce the need to travel by car, will not have an adverse effect on the operation on the road network. This policy focuses on town centre uses which play an important role in place-making by attracting people to the area and helping to enliven it.
		TCC2	++	S,M,L-T, D,R,H	Town Centres	Town centre uses play an important role in place-making, by attracting people to an area and helping to enliven it. Town centre uses within the OPDC area, particularly in Old Oak and Channel Gate, will help to play a critical role in the approach to place-making. An important way of achieving this is through activating and overlooking the public realm, by providing outdoor uses such as event space, outdoor seating associated with eating and drinking establishments and through the provision of street markets.
		TCC3	++	S,M,L-T, D, R, L	OPDC and surrounding area	This policy is focused upon social infrastructure. This may attract more visitors by protecting existing facilities and creating new ones. It is stated that new infrastructure will be highly accessible, health care facilities will have located nearby, education facilities can be easily accessed by foot and will be in close proximity to public open spaces. This policy also ensures there is a high quality of design in the new infrastructure which is essential for place-making. The policy also provides a 3 form entry (FE) primary school, including early years provision; and four super nurseries.
		TCC4	+	S,M,L-T, D,R,H	OPDC and surrounding	The supporting text to the policy states that culture facilities can make an important contribution to place-making, can be important catalyst uses. They can help to define and

IIA Objective		Performance of Policy	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
				area	shape the place and add to vibrancy and activity by attracting visitors to an area.	
		TCC5	+	S,M,L-T, D,R,H	OPDC and surrounding area	The supporting text to the policy states that sports and leisure facilities can make an important contribution to place-making, can be important catalyst uses. The can help to define and shape the place and add to vibrancy and activity by attracting visitors to an area.
		TCC6	+	S,M,L-T, D,R,M	OPDC and surrounding area	Pubs can be important in place-making as they can add attract visitors into an area and are important in community life, thus scoring a positive for this objective.
		TCC7	+	S,M,L-T, D,R,M	OPDC and surrounding area	The criteria for catalyst uses require that facilities support place-making and identity.
		TCC8	++	S,M,L-T, D,R,H	Old Oak and Park Royal	The policy promotes positive contributions to the character and early activation of an area and reinforces longer term uses planned for the area. This is important in particular as it can contribute positively to the character of an area which is important in place-making.
		TCC9	0			Visitor accommodation is an element that contributes to creating a place. The policy highlights the importance of hotels for leisure and business that could help the tourism sector in the area. However, positive effects of this policy are considered negligible.
		TCC10	++	S,M,L-T, D,R,M	OPDC and surrounding area	Night-time economy uses play an important role in place-making, by attracting people to an area and helping to enliven it. Eating and drinking establishments and culture, sports and entertainment uses should create a sense of place for residents and visitors to the area. Limits have been imposed to ensure activity is kept within sensible hours.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	TCC1	+	S,M,L-T, D,R,M	Town Centres	This policy supports efficient use of land through focusing town centre development in town centres. The policy will only support development outside town centres when development is located within identified clusters.
		TCC2	0			The policy would not have any significant effects for the IIA Objective.
		TCC3	+	S,M,L-T, I,R,H	OPDC area	By delivering social infrastructure, this would support the efficient use of land. The policy aims to collocate facilities where feasible and in close proximity to town centres. This can ensure the land is more efficiently allocated for other needs.
		TCC4	+	S,M,L-T, I,R,L	OPDC area	By protecting existing culture facilities, this would support the efficient use of land. New facilities will be in town centres which can release land for other needs
		TCC5	+	S,M,L-T, I,R,L	OPDC area	Protecting existing sports and leisure facilities would support the efficient use of land. This can indirectly ensure that other land can be set aside for other needs within local

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						plan.
		TCC6	0			There is no clear link between the policy and the IIA Objective.
		TCC7	0			There is no clear link between the policy and the IIA Objective.
		TCC8	++	S,M,L-T, I,R,L	OPDC area and London wide	The policy for meanwhile uses seeks to make practical use of land which would otherwise remain vacant until redeveloped. This policy therefore supports an optimised approach to the use of land
		TCC9	+	S,M,L-T, I,R,L	OPDC area and London wide	The preferred policy option to deliver visitor accommodation would support the efficient use of land as it is focused within town centre locations.
		TCC10	0			The policy would not have any significant effects for the IIA Objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	TCC1	+	S,M,L-T, D, R, M	Town Centres	Town Centres are all located on previously developed land which will score positively against this IIA Objective.
		TCC2	0			There is no clear link between the policy and the IIA Objective.
		TCC3	0			There is no clear link between the policy and the IIA Objective.
		TCC4	0			There is no clear link between the policy and the IIA Objective.
		TCC5	0			There is no clear link between the policy and the IIA Objective.
		TCC6	0			There is no clear link between the policy and the IIA Objective.
		TCC7	++	S,M,L-T, I,R,L	OPDC area and London wide	Any new development within the town centre would be built on brownfield sites on a large scale.
		TCC8	+	S,M,L-T, I,R,L	OPDC area and London wide	This policy states that <i>'there will be many temporarily vacant land parcels awaiting development in the longer term.'</i>
		TCC9	+	S,M,L-T, I,R,L	OPDC area	The preferred policy option to deliver visitor accommodation would support the maximum reuse of brownfield land.
		TCC10	0			The policy would not have any significant effects for the IIA Objective.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised	TCC1	+	L-T, I, R, M	Town Centres	This policy states that developments which will reduce the need to travel by car will be supported
		TCC2	+	L-T, I, R, L	OPDC area	The policy seeks to deliver a range of land uses and associated town centre infrastructure. This could help to reduce the need to travel for both existing and incoming communities, which could have long term benefits against this objective.
		TCC3	+	M, L-T, I, R, L	OPDC area	The policy ensures educational facilities can be easily accessible by foot or by public transport. It also ensures development is in highly accessible and that health care and

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
transportation methods and mitigate impacts on the transport network						community facilities are in close proximity to town centres. This will have a positive impact on the transport objective. The policy also provides a 3 form entry (FE) primary school, including early years provision; and four super nurseries. However, there will be a loss of a secondary school, which will reduce the significance of the any benefits.
	TCC4	+	M-T, D,R,M	OPDC area	The policy clarifies that OPDC will be supportive of the provision of new facilities, where they demonstrably address either a local or strategic need and do not give rise to an unacceptable impact on the amenity of existing and future residents, businesses or on the transport network.	
	TCC5	+	M-T, D,R,M	OPDC area	The policy clarifies that OPDC will be supportive of the provision of new facilities, where they demonstrably address either a local or strategic need and do not give rise to an unacceptable impact on the amenity of existing and future residents, businesses or on the transport network.	
	TCC6	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy aims to ensure licensed premises are within close proximately to public houses which could minimise the need to travel.	
	TCC7	0			There is no clear link between the policy and the IIA Objective.	
	TCC8	+	S,M,L-T, I,R,L	OPDC area and London wide	The policy refers to not having an unacceptable impact on transport. This could indirectly minimise the need to travel as it ensures existing transport is not negatively affected.	
	TCC9	++	S,M,L-T,D,R,M	OPDC and surrounding area	The policy states that hotels are well suited to areas of high public transport access and therefore, parts of the OPDC area and particularly the Old Oak area would be appropriate locations to consider promoting visitor accommodation.	
	TCC10	0			There is no clear link between the policy and the IIA Objective.	
	5 Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local	TCC1	0			There is no clear link between the policy and the IIA Objective.
		TCC2	0			There is no clear link between the policy and the IIA Objective.
TCC3		0			There is no clear link between the policy and the IIA Objective.	
TCC4		0			There is no clear link between the policy and the IIA Objective.	
TCC5		0			There is no clear link between the policy and the IIA Objective.	
TCC6		0			There is no clear link between the policy and the IIA Objective.	
TCC7		0			There is no clear link between the policy and the IIA Objective.	
TCC8		0			There is no clear link between the policy and the IIA Objective.	
TCC9		+			The policy requires 10% of hotel bedrooms to be wheelchair accessible, supporting the need for inclusive housing. Policy also ensures that provision for visitor accommodation	



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	needs					does not compromise the delivery of housing targets.
		TCC10	0			There is no clear link between the policy and the IIA Objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	TCC1	0			There is no clear link between the policy and the IIA Objective.
		TCC2	0			There is no clear link between the policy and the IIA Objective.
		TCC3	0			There is no clear link between the policy and the IIA Objective.
		TCC4	0			There is no clear link between the policy and the IIA Objective.
		TCC5	0			There is no clear link between the policy and the IIA Objective.
		TCC6	0			There is no clear link between the policy and the IIA Objective.
		TCC6	0			There is no clear link between the policy and the IIA Objective.
		TCC7	0			There is no clear link between the policy and the IIA Objective.
		TCC8	0			There is no clear link between the policy and the IIA Objective.
		TCC9	0			There is no clear link between the policy and the IIA Objective.
		TCC10	0			There is no clear link between the policy and the IIA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	TCC1	+	L-T, I, IR, L	OPDC and surrounding area	This policy supports development in town centres that aims to reduce the use of cars which would have a positive effect on climate change as less cars on the road may result in less greenhouse gas emissions.
		TCC2	0			The policy would not have any significant effects for the IIA Objective.
		TCC3	+	L-T, I, IR, L	OPDC and surrounding area	This policy aims to increase the public transport and increase areas which are accessible by foot or cycle. This in turn may reduce the use of cars which may have a positive effect on climate change as less cars on the road may result in less green-house gas emissions.
		TCC4	0			There is no clear link between the policy and the IIA Objective.
		TCC5	0			There is no clear link between the policy and the IIA Objective.
		TCC6	0			There is no clear link between the policy and the IIA Objective.
		TCC7	0			There is no clear link between the policy and the IIA Objective.
		TCC8	0			There is no clear link between the policy and the IIA Objective.
		TCC9	0			There is no clear link between the policy and the IIA Objective.
		TCC10	0			There is no clear link between the policy and the IIA Objective.
8	To minimise production of waste across all sectors in the	TCC1	?			The policy will not directly contribute to benefits against this objective. However, by focusing development in town centres, it could benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity.
		TCC2	?			The policy will not directly contribute to benefits against this objective. However, the



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste						emphasis on high quality design should contribute in ensuring that sufficient space is given to waste collection and aim to minimise transporting waste.
	TCC3	?				The policy will not directly contribute to benefits against this objective. However, by focusing development near town centres, it can benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity.
	TCC4	0				There is no clear link between the policy and the IIA Objective.
	TCC5	0				There is no clear link between the policy and the IIA Objective.
	TCC6	0				There is no clear link between the policy and the IIA Objective.
	TCC7	0				There is no clear link between the policy and the IIA Objective.
	TCC8	0				There is no clear link between the policy and the IIA Objective.
	TCC9	0				There is no clear link between the policy and the IIA Objective.
	TCC10	0				There is no clear link between the policy and the IIA Objective.
	9 Improve the quality of the water environment	TCC1	?			
TCC2		?				The policy would not have any significant effects on the IIA Objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
TCC3		?				The policy would not have any significant effects on the IIA Objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
TCC4		?				The policy would not have any significant effects on the IIA Objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
TCC5		?				The policy would not have any significant effects on the IIA Objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
TCC6		?				The policy would not have any significant effects on the IIA Objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
TCC7		?				The policy would not have any significant effects on the IIA Objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TCC8	?			The policy would not have any significant effects on the IIA Objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
		TCC9	?			The policy would not have any significant effects on the IIA Objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
		TCC10	?			The policy would not have any significant effects on the IIA Objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	TCC1	0			There is no clear link between the policy and the IIA Objective.
		TCC2	0			There is no clear link between the policy and the IIA Objective.
		TCC3	0			There is no clear link between the policy and the IIA Objective.
		TCC4	0			There is no clear link between the policy and the IIA Objective.
		TCC5	0			There is no clear link between the policy and the IIA Objective.
		TCC6	0			There is no clear link between the policy and the IIA Objective.
		TCC7	0			There is no clear link between the policy and the IIA Objective.
		TCC8	0			There is no clear link between the policy and the IIA Objective.
		TCC9	0			There is no clear link between the policy and the IIA Objective.
		TCC10	0			There is no clear link between the policy and the IIA Objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	TCC1	+/-	S,M,L-T, I,R,L	Town Centres	By focussing development within town centres will encourage people to use sustainable public transport which will help to reduce noise and air pollution. However, more development within town centres will encourage more visiting to the city which could cause an increase in the number of cars in the area. Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TCC2	?			Minimisation of air, noise and light pollution caused by traffic and commercial uses during the construction and operation of development on existing town centres and communities should help maintain the vibrancy of the area, but this is not explicitly referred to.
		TCC3	+/-	S,M,L-T, I,R,L	Town Centres	By focussing town centre development within town centres may encourage people to use sustainable public transport which may help to reduce noise and air pollution. However, more development within town centres may encourage more visiting to the city which could cause an increase in the number of cars in the area. Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						and policies in the Environment and Utilities Chapter.
		TCC4	0			There is no clear link between the policy and the IIA Objective.
		TCC5	0			There is no clear link between the policy and the IIA Objective.
		TCC6	0			There is no clear link between the policy and the IIA Objective.
		TCC7	0			There is no clear link between the policy and the IIA Objective.
		TCC8	0			There is no clear link between the policy and the IIA Objective.
		TCC9	+/-	S, M, L-T, I, IR, L	OPDC area and surrounding boroughs	Greater volumes of tourists to the area may result in higher amounts of vehicular transport and resultant air pollution if the area is not supported by appropriate public transport infrastructure. However, the policy states that it will not give rise to unacceptable impacts on the transport network.
		TCC10	+	S, M, L-T, I, IR, L	OPDC area	The policy states that proposals for late licenses will be assessed in terms of the uses impact on residential amenity. It will consider issues such as noise within the premises, smells, light pollution and the impact of those going to and from the facility It considers issues such as traffic and car parking and anti-social behaviour. As such this would benefit the objective.
12	To conserve and enhance the historic environment, heritage assets and their settings	TCC1	0			The policy would not have any significant effects for the IIA Objective.
		TCC2	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy could lead to the preservation of the historic environment through a focus on creating an attractive, locally distinctive, vibrant town centre. Regeneration and intensification must recognise the importance of heritage and historic environment as referred to in Policy D8.
		TCC3	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	New social infrastructure development, in particular in areas in proximity to heritage assets, could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D8 and London Plan policy.
		TCC4	0			There is no clear link between the policy and the IIA Objective.
		TCC5	0			There is no clear link between the policy and the IIA Objective.
		TCC6	++			The policy looks to protect public houses. All three public houses within the OPDC area are currently identified as being appropriate to be locally listed. This policy therefore scores positively against this objective.
		TCC7	+/-	S, M, L-T, D, IR, L	OPDC area and	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding boroughs	through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D8 and London Plan policy.
		TCC8	0			The policy would not have any significant effects for the IIA Objective.
		TCC9	+/-	S, M, L-T, I, R, M	OPDC and London wide	The policy could lead to the preservation of the historic environment, but the potential design of proposals may have a detrimental effect on the character of the area if not adequately managed by design policies within the Design Chapter and London Plan.
		TCC10	0			The policy would not have any significant effects for the IIA Objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	TCC1	+	S,M,L-T, D,R,M	Town Centres	This policy supports the role and function of OPDC's designated town centres and town centres uses. Town centres play a vital role in community cohesion and encourage a sense of community and welfare.
		TCC2	++	M, L-T, D, R, M	OPDC area and London wide	Vibrant town centre uses, regeneration links with London and a healthy mix of retailers in the area should benefit the community cohesion through entertainment, employment and social infrastructure.
		TCC3	+	S,M,L-T, D,R,L	OPDC area	By providing new social infrastructure provisions and protecting and enhancing existing ones this will have a major positive impact on this objective. The policy also provides a 3 form entry (FE) primary school, including early years provision; and four super nurseries. However, the loss of a secondary school will reduce the potential significant beneficial effects against this objective.
		TCC4	+	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC aims to support high quality culture in the area. This should improve community cohesion and reduce social exclusion.
		TCC5	+	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC is keen to ensure that there is access to all new sports facilities for local communities and OPDC will seek to secure a proportion of affordable sports and leisure provision. This should improve community cohesion and reduce social exclusion.
		TCC6	+/-	S,M,L-T, I,D,R,M	OPDC area	The use of pubs encourages social activity which will have positive effect on social aspects and encourages a sense of community and welfare. However, use of alcohol can lead to anti-social behaviour which will have a negative impact on this objective.
		TCC7	++	S,M,L-T, D,R,H	Nationwide	Catalyst uses which satisfy the criteria in the policy would provide access to facilities to meet needs and support the integration of existing and new communities in the area.
		TCC8	+	M,L-T, D,R, M	Nationwide	This policy aims to provide the opportunity for place-making which in turn will improve cohesion.
		TCC9	+	S,M,L-T,	OPDC and	More high quality visitor accommodation will improve the tourism sector in the area,

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				D,R,H	surrounding area	thereby, improving the local economy with community benefits. A more prosperous local economy should create more community cohesion.
		TCC10	+	S,M,L-T, D,R,H	OPDC area	Nighttime entertainment should play an important role in the vibrancy of the area, thereby, improving community cohesion and adding activity to the public realm and supporting the local economy. This is supported as the policy seeks to impose sensible limits on hours.
14	Improve safety and reduce crime and the fear of crime	TCC1	+/-	S.M. L-T, R, ID, M	Town Centres	Careful design of development can help to discourage anti-social behaviour. However, new development can also attract more criminal activity as there will be more areas for criminals to target.
		TCC2	+	M, L-T, I, R, L	London wide	The optimisation of development in the town centres, including facility security and strategic infrastructure that could improve traffic management, could lead to benefits against this objective through improved safety.
		TCC3	++	S.M. L-T, R, ID, M	OPDC area	This policy aims to improve the design of the area which can discourage anti-social activity. It also provides infrastructure for social facility and community facilities. A large community can be off putting to criminals. It also creates more activities for people. Furthermore, the delivery of, or contributions towards 3 Neighbourhood Police Facilities within the OPDC area would offer a deterrent to criminals through an increased police presence.
		TCC4	+/-	S.M. L-T, R, ID, L	OPDC area	High quality design of culture and art may attract criminal activity. However, due to high quality design, there should be high level security provided to increase safety of others and to discourage criminal activity,
		TCC5	+	M, L-T, I, R, M	London wide	A new leisure facility should provide high level security and natural surveillance to increase the safety of the users.
		TCC6	-	S,M,L-T, I,R,M	OPDC area	Drinking activity in pubs can be associated with anti-social behaviour such as fighting. However, policy TCC11 aims to ensure that licensing of premises is appropriately managed to mitigate any negative impacts.
		TCC7	+/-	S,M,L-T, I,R,M	OPDC and surrounding area	Supporting the area with new cultural destinations and town centres should enhance security and surveillance in the area. However, it will also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TCC8	+/-	S,M,L-T, I,R,M	OPDC and surrounding area	Supporting the area with new cultural destinations and town centres should enhance security and surveillance in the area. However, it may also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TCC9	?			Visitor accommodation should provide high level security and natural surveillance to

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						increase the safety of their guests. The accommodation will attract more visitors with uncertain effects on crime.
		TCC10	+	S,M,L-T, I,R,L	OPDC area	Security is an important aspect of night-time uses. The safety and wellbeing of local residents and users at drinking establishments must have high security and surveillance in place during and after operating hours. Imposing appropriate hours for trade may help prevent crime
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	TCC1	0			There is no clear link between the policy and the IIA Objective.
		TCC2	+	S, M, L-T, D, R, H	London wide	The policy seeks to realise benefits for health and well-being, by limiting takeaways in certain locations near schools and the volume of betting/payday loan shops/games arcades and pawn shops.as such, this would have a positive benefit against the objective.
		TCC3	++	S,M,L-T, I,R,M	OPDC area	The policy seeks to provide appropriate health facilities to meet the needs of development. The policy therefore scores positively against this objective.
		TCC4	0	S, M, L-T, D, R, H	OPDC and London wide	There is no clear link between the policy and the IIA Objective.
		TCC5	++	S, M, L-T, D, R, H	OPDC and London wide	Sports and leisure facilities will be expected to cater for a range of incomes, particularly those in low incomes who are often excluded from access to such facilities or whose choice is often limited. This will be especially important for access to sports facilities. There is a direct correlation between income deprivation and obesity and as a healthy new London quarter, OPDC is keen to ensure that there is access for all to new sports facilities for local communities and OPDC will seek to secure a proportion of affordable sports and leisure provision.
		TCC6	0			There is no clear link between the policy and the IIA Objective.
		TCC7	+	S,M,L-T, I,R,M	OPDC area	The policy supports the provision of new sports facilities, subject to the criteria being satisfied.
		TCC8	+	S,M,L-T, I,R,M	OPDC area	The policy makes it clear that OPDC will support proposals which do not have a negative impact on residential amenity.
		TCC9	0			The policy would not have any significant effects for the IIA Objective.
		TCC10	+	S, M, L-T, I, R, M	OPDC area	Seeking to manage the hours of operation of evening and nighttime economy uses would help to manage the impact on building user amenity and users' health and well-being.
16	To improve the education and skills levels of all	TCC1	0			There is no clear link between the policy and the IIA Objective.
		TCC2	0			There is no clear link between the policy and the IIA Objective.
		TCC3	++	S.M.L-T, D,	OPDC area	This policy aims to build new education facilities which has a major positive against this

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations	
members of the population, particularly vulnerable groups				R, M		objective.	
	TCC4	++		S, M, L-T, D, R, H	London wide	The Mayor's Cultural Strategy promotes London as the world's cultural capital and this role can help widen the reach of access to culture, support education skills and careers and enhance the physical environment. The delivery of new cultural facilities will help to generate new job and skills development opportunities that will benefit local people.	
	TCC5	++		S, M, L-T, D, R, H	London wide	The Mayor's Cultural Strategy promotes London as the world's cultural capital and this role can help widen the reach of access to culture, support education skills and careers and enhance the physical environment. The delivery of new sports and leisure facilities will help to generate new job and skills development opportunities that will benefit local people.	
	TCC6	0				There is no clear link between the policy and the IIA Objective.	
	TCC7	+		S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	New education facilities would contribute to the achievement of benefits against this objective.	
	TCC8	0				There is no clear link between the policy and the IIA Objective.	
	TCC9	+		S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The delivery of new visitor accommodation will help to generate new job and skills development opportunities that will benefit local people.	
	TCC10	0				There is no clear link between the policy and the IIA Objective.	
	17 Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	TCC1	++		S,M,L-T, I,R,M	OPDC area	Town centre uses can also add to the economic prosperity of an area, helping to provide a range of employment opportunities over a wide range of sectors and skill levels. Town centre uses will play a critical role in achieving this, providing new employment and services, and adding vibrancy and activity. To support these centres, employment and residential uses will also be supported as part of the mix of uses, which can help to increase footfall and add to vibrancy and vitality. New town centre uses will also play a critical role in overcoming the socio-economic deprivation experienced in and around the OPDC area by providing a range of new opportunities for employment and training across a breadth of sectors.
		TCC2	+		S,M,L-T,I,R,M	OPDC area	The policy promotes vibrancy that can attract inward investment which is a positive for socio-economic wellbeing.
TCC3		++		S,M,L-T,	OPDC area	This policy seeks to protect existing social infrastructure facilities through ensuring no net	



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				D,R,L		loss occurs and supports proposals for new and improved community facilities where possible. This will score a major positive against this objective.
		TCC4	++	S, M, L-T, D, R, H	London wide	The Mayor's Cultural Strategy promotes London as the world's cultural capital and this role can help widen the reach of access to culture, support education skills and careers and enhance the physical environment. The delivery of new cultural facilities will help to generate new job and skills development opportunities that will benefit local people.
		TCC5	++	S, M, L-T, D, R, H	London wide	The Mayor's Cultural Strategy promotes London as the world's cultural capital and this role can help widen the reach of access to culture, support education skills and careers and enhance the physical environment. The delivery of new sports and leisure facilities will help to generate new job and skills development opportunities that will benefit local people.
		TCC6	+	S,M,L-T, D,R,M	OPDC area	Enhancing pubs and create new public houses will create areas for people to meet and drink socially which will score positively against this objective.
		TCC7	++	S,M,L-T, I,R,M	OPDC area	Town centre uses can also add to the economic prosperity of an area, helping to provide a range of employment opportunities over a wide range of sectors and skill levels. Town centre uses will play a critical role in achieving this, providing new employment and services and adding vibrancy and activity. To support these centres, catalyst uses will also be supported as part of the mix of uses, which can help to increase footfall and add to vibrancy and vitality. Catalyst uses that satisfy the criteria in the policy 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.
		TCC8	0			There is no clear link between the policy and the IIA Objective.
		TCC9	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The delivery of new visitor accommodation will help to generate new job and skills development opportunities that will benefit local people.
		TCC10	+/-	S,M,L-T, I,R,M	OPDC area	Operational hours may influence employment resource required at the venues. A new facility could create employment opportunities for the local people. The policy also ensures proposals would not result in harmful cumulative impacts in association with other late licensed properties leading to loss of employment.
18	To encourage inward	TCC1	+	S, M, L-T, I, R, M	Town Centres	Town centres tend to have the most businesses. By focusing development in town centres, this will encourage sustainable economic growth. Also, by focusing development



IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
investment alongside investment within existing communities, to create sustainable economic growth						in town centres, it will encourage more sustainable transport methods.
	TCC2	+	M, L-T, I, R, L	OPDC area and London wide	The policy could lead to indirect positive effects against this objective, as an improvement to the aesthetics and vibrancy could improve the attractiveness of the town centres to inward investors.	
	TCC3	+	S, M, L-T, I, R, M	OPDC area	More facilities may provide inward investment and community benefits for the area.	
	TCC4	+	S,M,L-T, D,R,M	OPDC and surrounding areas	More facilities may provide inward investment and community benefits for the area.	
	TCC5	+	S,M,L-T, D,R,M	OPDC and surrounding areas	More facilities may provide inward investment and community benefits for the area.	
	TCC6	+	S, M, L-T, I, R, M	OPDC area	More facilities may provide inward investment and community benefits for the area.	
	TCC7	++	S,M,L-T, I,R,M	London wide	The policy emphasises London's growing needs and the role that these town centre facilities can play in promoting economic prosperity and maintaining London's status as one of the world's greatest cities.	
	TCC8	+	S,M,L-T, I,R,M	London wide	More facilities may provide inward investment and community benefits for the area.	
	TCC9	+	S,M,L-T, D,R,H	OPDC and surrounding area	More high quality visitor accommodation businesses will attract investment into the area which help create and build sustainable economic growth in the OPDC and surrounding area.	
	TCC10	++	S,M,L-T, D,R,H	OPDC and surrounding area	The policy supports the role that eating and drinking establishments and culture, sports and leisure uses can play in contributing to the vibrancy and vitality of the OPDC area. This will add activity to the public realm and supporting the local economy. The operating hours should benefit the local community and develop economic growth in the area.	

**Table A-20 – Delivery and Implementation**

- DI1: Balancing priorities and securing infrastructure delivery
- DI2: Timely delivery and optimised phasing
- DI3: Stakeholder engagement and being a proactive planning authority
- DI4: Planning powers and monitoring

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	DI1	+	S,M,L-T, R, D, L	OPDC area	By funding and financing infrastructure, it can optimise development opportunities and enhance local distinctiveness and character which is important in place making.
		DI2	+	S,M,L-T, R, D, L	OPDC area	By supporting coordinated delivery of development, comprehensive delivery of a high quality place is more likely.
		DI3	+	S,M,L-T, R, D, L	OPDC area	By supporting community involvement in the planning and delivery of development, it can play an important role in place making as can assist in reflecting the needs of the community.
		DI4	++	S,M,L-T, R, D, L	OPDC area	By utilising planning powers, including plan making, a high quality place is more likely to be delivered.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	DI1	+	S,M,L-T, R, D, L	OPDC area	The policy seeks to balance the priorities between housing, infrastructure and sustainability and to do so in light of an optimised approach to development throughout the OPDC area. This could help ensure the efficient use of land.
		DI2	+	S,M,L-T, R, D, L	OPDC area	By supporting coordinated delivery of development, achieving higher densities could be more likely compared to a piecemeal approach.
		DI3	0			The policy would not have any significant effects for the objective.
		DI4	+	S,M,L-T, R, D, L	OPDC area	Using the broad range of planning functions will likely support the optimum use of land by coordinating delivery.
3	Maximise the reuse of previously developed land and existing buildings, including the	DI1	0			There is no clear link between the policy and the IIA Objective.
		DI2	+	S,M,L-T, R, D, L	OPDC area	By supporting coordinated delivery of development, the efficient use of previously development land is more likely.
		DI3	0			There is no clear link between the policy and the IIA Objective.
		DI4	+	S,M,L-T, R, D, L	OPDC area	Utilising planning powers will likely deliver efficiencies in the reuse of previously development land through a coordinated approach.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	remediation of contaminated land					
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	D11	+	S,M,L-T, R, D, L	OPDC area	The main element of the policy and the delivery of infrastructure within OPDC relates to transport links, therefore a co-ordinated approach to this should score positively against this objective.
		D12	0			There is no clear link between the policy and the IIA Objective.
		D13	0			There is no clear link between the policy and the IIA Objective.
		D14	0			There is no clear link between the policy and the IIA Objective.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	D11	+	S,M,L-T, R, D, L	OPDC area	This policy aims to secure the delivery of infrastructure. Careful design of the infrastructure may have a positive effect against this objective
		D12	+			By supporting coordinated delivery of development, a comprehensive approach to delivering affordable housing could be achieved, thereby potentially increasing delivery.
		D13	0			The policy would not have any significant effects for the objective.
		D14	+	S,M,L-T, R, D, L	OPDC area	By using the full range of planning powers, a comprehensive approach to delivering affordable housing could be achieved, thereby potentially increasing delivery.
6	Improve climate change adaptation and mitigation, including minimising the	D11	+	S,M,L-T, R, D, L	OPDC area	The policy seeks to ensure that infrastructure provision, amongst which open space and street greening are discussed, is required for the sustainable development of the area.
		D12	+			By supporting coordinated delivery of development, a strategic approach for larger areas could result in the delivery of more effective infrastructure to adapt and mitigate climate change.
		D13	+	S,M,L-T, I, IR,	OPDC area	The post occupancy survey referenced in the policy is aimed at ensuring that lessons can

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	risk of flooding and addressing the heat island effect			L		be learnt on development across the area.  <i>The supporting text can be strengthened in order to ensure that climate change is mentioned in terms of resilience.</i>
		D14	0			The policy would not have any significant effects for the objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	D11	+	S,M,L-T, I, IR, L	OPDC area	The policy secures infrastructure which makes the development acceptable in accordance with the policies in the Local Plan, which aim to promote sustainable transport measures and high standards of environmental sustainability and minimising contributions to climate. In the round, this therefore scores positively.
		D12	0			By supporting coordinated delivery of development, a strategic approach for decentralised energy generation and storage could be achieved.
		D13	+	S,M,L-T, I, IR, L	OPDC area	The post occupancy survey referenced in the policy is aimed at ensuring that lessons can be learnt on development across the area.  <i>The supporting text can be strengthened in order to ensure that climate change is mentioned in terms of resilience.</i>
		D14	0			The policy would not have any significant effects for the objective.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and	D11	+	S,M,L-T, I, R, L	OPDC area	Infrastructure provision includes waste infrastructure.  <i>The supporting text can be strengthened in order to ensure that waste infrastructure is considered.</i>
		D12	0			There is no clear link between the policy and the IIA Objective.
		D13	+	S,M,L-T, I, R, L	OPDC area	The post occupancy survey referenced in the policy is aimed at ensuring that lessons can be learnt on development across the area.  <i>The supporting text can be strengthened in order to ensure that waste management is mentioned in terms of resilience.</i>
		D14	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	recovery rates as well as composting of all green waste					
9	Improve the quality of the water environment	D11	+	S,M,L-T, IR, I, L	OPDC area	The policy secures infrastructure which makes the development acceptable in accordance with the policies in the Local Plan, which aim to promote sustainable transport measures and high standards of environmental sustainability and minimising contributions to climate.
		D12	+	S,M,L-T, IR, I, L	OPDC area	By supporting coordinated delivery of development, a strategic approach for water infrastructure could be achieved that is more effective in improving water quality.
		D13	0			There is no clear link between the policy and the IIA Objective.
		D14	0			There is no clear link between the policy and the IIA Objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	D11	+	S,M,L-T, R, D, L	OPDC area	New infrastructure provision includes open space and securing contributions towards that will be beneficial.
		D12	+	S,M,L-T, R, D, L	OPDC area	By supporting coordinated delivery of development, an integrated network of green infrastructure is more likely to be effective. It is paramount that the green infrastructure provisions consider biodiversity and not merely amenity.
		D13	0			There is no clear link between the policy and the IIA Objective.
		D14	0			There is no clear link between the policy and the IIA Objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	D11	+	S,M,L-T, R, I, L	OPDC area	The policy aims to secure funding and commitment in terms of new infrastructure provision which can secure sustainable transport modes and thereby minimise air and noise pollution.
		D12	0			There is no clear link between the policy and the IIA Objective.
		D13	0			There is no clear link between the policy and the IIA Objective.
		D14	0			There is no clear link between the policy and the IIA Objective.
12	To conserve and enhance the historic environment, heritage assets	D11	0			There is no clear link between the policy and the IIA Objective.
		D12	0			There is no clear link between the policy and the IIA Objective.
		D13	0			There is no clear link between the policy and the IIA Objective.
		D14	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	and their settings					
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	D11	+	S,M,L-T, R, D, M	OPDC area	Infrastructure provision includes social and community facilities hence a positive impact can be expected.
		D12	0			The policy would not have any significant effects for the objective.
		D13	++	S,M,L-T, R, D, L	OPDC area	This policy aims to support community involvement in the planning and delivery of development which will improve the quality of the public realm and create social linkages with surrounding communities.
		D14	0			There is no clear link between the policy and the IIA Objective.
14	Improve safety and reduce crime and the fear of crime	D11	+	S,M,L-T, R, D, L	OPDC area	Infrastructure provision includes policing infrastructure.  <i>The supporting text can be amended to reflect this element.</i>
		D12	0			There is no clear link between the policy and the IIA Objective.
		D13	+	S,M,L-T, R, I, M	OPDC area	By supporting community involvement this can help reduce social exclusion which in turn will improve safety and reduce the fear of crime.
		D14	0			There is no clear link between the policy and the IIA Objective.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	D11	+	S,M,L-T, R, D, L	OPDC area	Infrastructure provision includes health facilities.  <i>The supporting text can be amended to reflect this element.</i>
		D12	+	S,M,L-T, R, D, L	OPDC area	Securing the timely delivery of infrastructure required to support the needs of development will help to support health and equalities of the area.
		D13	+	S,M,L-T, R, D, L	OPDC area	Community participation may help to maximise the health and wellbeing of the population by encouraging community cohesion.
		D14	0			There is no clear link between the policy and the IIA Objective.
16	To improve the education and skills levels of all members of the population, particularly	D11	+	S,M,L-T, R, D, L	OPDC area	The supporting text in the policy talks about contributions for schools and employment and training opportunities which will have a positive impact against the policy.
		D12	+	S,M,L-T, R, D, L	OPDC area	Securing the timely delivery of infrastructure required to support the needs of development will help to improve education and skills levels through education and training facilities.
		D13	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	vulnerable groups	D14	0			There is no clear link between the policy and the IIA Objective.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	D11	+	M,L-T, R, D, L	OPDC area	The supporting text in the policy talks about contributions for employment and training opportunities which will help to maximise the social and economic wellbeing of the local population.
		D12	+	M,L-T, R, D, L	OPDC area	Securing the timely delivery of infrastructure required to support the needs of development will help to improve education and skills levels through education and training facilities.
		D13	+	M,L-T, R, D, M	OPDC area	By engaging with the community and their needs, this can help maximise social and economic wellbeing of the local and regional population.
		D14	0			There is no clear link between the policy and the IIA Objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	D11	+	M,L-T, R, D, L	OPDC area	New development will create jobs during and after construction. This will encourage inward investment. The policy also implies that states the majority of infrastructure will be met through on-site enablement rather than off-site provision, thus increasing inward longer term investment.
		D12	+	S,M,L-T, R, D, M	OPDC area	By seeking to deliver development in a coordinated phased manner, a higher quality place is more likely to be delivered which will encourage inward investment alongside investment within existing communities.
		D13	+	S,M,L-T, R, D, L	OPDC area	The policy refers to neighbourhood planning and working with communities which will encourage inward investment alongside investment within existing communities.
		D14	+			By using the full range of planning powers, a higher quality place is more likely to be delivered which will encourage inward investment alongside investment within existing communities.

## **Appendix B**

### **Rejected 'Reasonable Alternatives' Options**



**Table B 1: Consideration of modifications options as reasonable alternatives**

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
RA1	EMR reinstated as SIL	EMR released from SIL for mixed use development including housing.	Industrial Land Review Addendum 2021	Y	<p>Officers consider that the preferred approach is the most appropriate because:</p> <ul style="list-style-type: none"> <li>• The site’s context has changed as a result of other proposed modifications. EMR would be surrounded by retained and intensified SIL, an existing waste site and busy railways to the north. Therefore, retaining this site as SIL is appropriate to the surrounding site context and means that SIL compliant development can be optimised on both the site itself and surrounding SIL sites.</li> <li>• This approach can deliver an increase in industrial floorspace, which would help meet demand for this type of space and be able to contribute to delivering a net gain of industrial floorspace.</li> </ul> <p>This preferred option would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul> <p>The alternative option for releasing EMR from SIL to enable the delivery of housing with a mix of uses on the site is a reasonable alternative as it would meet the above plan objectives. The Local Plan would continue to be able to deliver a net gain of industrial floorspace with the removal of EMR from SIL for general mixed use or as a Locally Significant Industrial Site. This will enable the Local Plan to demonstrate general conformity with the London Plan.</p>
RA2	Cargiant Scrubs Lane site allocation	Cargiant Scrubs Lane site	Scrubs Lane Development Framework	Y	<p>Officers consider that the preferred approach is the most appropriate because:</p>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
	released from SIL	allocation retained as SIL.	Principles Update 2021 Industrial Land Review Addendum 2021		<ul style="list-style-type: none"> <li>• The Cargiant Scrubs Lane sites are a suitable location for residential led mixed use development. They would be contiguous with other sites which would continue to be de-designated from SIL and allocated for residential led development. Therefore, these uses are appropriate to this context and development can be optimised.</li> <li>• The delivery of mixed use development will support the delivery of the place vision for Scrubs Lane.</li> <li>• This approach can deliver: <ul style="list-style-type: none"> <li>○ a high quality place along Scrubs Lane.</li> <li>○ optimised development capacity.</li> <li>○ a range of homes and housing tenures.</li> <li>○ a high quality public realm and active travel network.</li> <li>○ green infrastructure.</li> <li>○ an acceptable impact on the significance of nearby designated heritage assets.</li> <li>○ appropriate levels of amenity for residents.</li> </ul> </li> </ul> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP3 Proposed outcome: Creating a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities.</li> <li>• SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> </ul>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
					<ul style="list-style-type: none"> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor’s ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> <li>• SP8 Proposed outcome: Contributing to the All London Green Grid by delivering new and enhanced green infrastructure and open spaces that provide for a range of functions, serving people and nature across the OPDC area.</li> <li>• SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul> <p>The alternative option for retaining Cargiant Scrubs Lane site allocation as SIL is a reasonable alternative as it would meet some of the above plan objectives but it would not help contribute towards delivering the London Plan ten year housing target and therefore the Plan would not be able to demonstrate general conformity.</p>
RA3	Old Oak major town centre is redirected to include sites in Old Oak Common Lane, Old Oak Lane and Channel Gate. Absorbs Atlas Junction neighbourhood centre.	Old Oak major town centre is redirected to include further sites in North Acton. It absorbs North Acton neighbourhood centre instead of Atlas Junction neighbourhood centre. Atlas	Channel Gate Development Framework Principles	Y	<p>Officers consider the preferred approach is the most appropriate approach to deliver:</p> <ul style="list-style-type: none"> <li>• local legibility enabling people to navigate to Hythe Road as the key route into Old Oak and beyond;</li> <li>• definition of the local spatial hierarchy of development;</li> <li>• optimised development capacity;</li> <li>• An appropriate sense of enclosure to the public realm and open spaces along Scrubs Lane while contributing to meeting London Plan housing targets;</li> </ul> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP3 Proposed outcome: Creating a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor’s ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> </ul>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
		Junction neighbourhood centre remains and could be increased in size reflecting increased development capacity in Channel Gate.			<ul style="list-style-type: none"> <li>SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> </ul> <p>The alternative option for delivering an alternative form of increased massing on the Cargiant Scrubs Lane site allocation or other sites is a reasonable alternative as it would meet the above plan objectives and the Local Plan will continue to be able to meet its London Plan ten year housing target to demonstrate general conformity.</p> <p>Other sites outside of Scrubs Lane are not considered to be reasonable alternatives as these sites would not deliver the same benefits of supporting local legibility and wayfinding to key routes to access destinations as the sites along Scrubs Lane provide.</p> <p>This would not deliver the following plan objectives:</p> <p>SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</p>
RA4	Old Oak major town centre is redirected to include sites in Old Oak Common Lane, Old Oak Lane and Channel Gate. Absorbs Atlas Junction neighbourhood centre.	Old Oak major town centre is redirected to include further sites in North Acton. It absorbs North Acton neighbourhood centre instead of Atlas Junction neighbourhood centre. Atlas Junction	Channel Gate Development Framework Principles	Y	<p>Officers consider the preferred approach is the most appropriate approach to deliver:</p> <ul style="list-style-type: none"> <li>A range of town centre uses close to existing and planned neighbourhoods to benefit existing and future residents.</li> <li>Town centre use floorspace to meet the needs of development.</li> <li>A high quality town centre public realm.</li> <li>town centre uses that complement the phasing of new residential neighbourhoods.</li> <li>town centre uses that complement the existing range of town centre uses in Harlesden district centre located to the north in the London Borough of Brent.</li> </ul> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> </ul>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
		neighbourhood centre remains and could be increased in size reflecting increased development capacity in Channel Gate.			<ul style="list-style-type: none"> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>• SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul> <p>The alternative option for delivering a portion of Old Oak major town centre within North Acton is a reasonable alternative as it would meet the above plan objectives and would continue to deliver sufficient retail and leisure floorspace to meet the needs of development.</p>
NRA1	Production of modifications to the Local Plan to address impacts of the Planning Inspector's Interim Findings and secure General Conformity with the London Plan.	Local Plan adopted as directed by the Planning Inspector including recommendations set out in the Interim Findings	N/A	N	<p>Officers consider that the preferred approach is the most appropriate because the alternative option would not address the impacts of the Planning Inspector's Interim Findings that would result in a decrease in housing capacity within the plan period. This decrease would result in the Local Plan not meeting its London Plan ten-year housing target. Should the plan not meet these targets, it will not be able to demonstrate General Conformity with the London Plan. The Local Plan will not be able to be found sound without this demonstration.</p> <p>Therefore, the modifications set out in the preferred option are required to enable the Local Plan to demonstrate General Conformity.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP1: Proposed outcome: A world-class transport super-hub at Old Oak Common, supporting the creation of a new part of London that acts as a catalyst for growth at national, regional and local levels.</li> </ul>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
					<ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP3 Proposed outcome: Creating a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities.</li> <li>• SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> <li>• SP8 Proposed outcome: Contributing to the All London Green Grid by delivering new and enhanced green infrastructure and open spaces that provide for a range of functions, serving people and nature across the OPDC area.</li> <li>• SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
NRA2	Channel Gate released from Strategic Industrial Location (SIL)	Channel Gate retained as SIL and other locations in Park Royal released from SIL	Industrial Land Review Addendum 2021	N	<p>Officers consider that the preferred approach is the most appropriate because the sites proposed for additional SIL release have been identified following a sequential assessment process in the Industrial Land Review. The alternative, for other locations in Park Royal to be released from SIL, is not considered to be a reasonable alternative because it would be based on including sites that are less accessible or have the potential to have a greater impact on the wider SIL area.</p> <p>The assessment process:</p> <ol style="list-style-type: none"> <li>1. identified priority search areas, selected on the basis that are close and highly accessible to sustainable travel modes and they are already located on the edges of SIL to try and minimise the interface and impact on the wider industrial area.</li> <li>2. Priority search areas were used using more detailed site assessment criteria and ranked accordingly. The highest ranking sites are the ones that were selected for release. The aim was to select the minimum number of sites needed to confidently demonstrate that housing targets can be met.</li> </ol> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>• SP8 Proposed outcome: Contributing to the All London Green Grid by delivering new and enhanced green infrastructure and open spaces that provide for a range of functions, serving people and nature across the OPDC area.</li> </ul>



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					<ul style="list-style-type: none"> <li>• SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA3	Channel Gate released from SIL	Channel Gate designated fully or in part as Locally Significant Industrial Site (LSIS).	Industrial Land Review Addendum 2021	N	<p>Officers consider that the preferred approach is the most appropriate because a Locally Significant Industrial Site is designated to reflect sites that have a particular local importance for industrial and related functions. Designation for all or part of Channel Gate as a LSIS is not considered to be a reasonable alternative because of the strategic role of the Euroline Rail Freight terminal.</p> <p>The delivery a residential-led area within Channel Gate would also enable the Local Plan to optimise residential development capacity and contribute to the Local Plan demonstrating general conformity with the London Plan.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>• SP8 Proposed outcome: Contributing to the All London Green Grid by delivering new and enhanced green infrastructure and open spaces that provide for a range of functions, serving people and nature across the OPDC area.</li> </ul>



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					<ul style="list-style-type: none"> <li>• SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA4	School Road released from SIL	School Road retained as SIL and other sites within SIL are released.	Industrial Land Review Addendum 2021	N	<p>Officers consider that the preferred approach is the most appropriate because the sites proposed for additional SIL release have been identified following a sequential assessment process. The alternative, for other locations in Park Royal to be released from SIL, is not considered to be a reasonable alternative because it would be based on including sites that are less appropriate. The assessment process:</p> <ol style="list-style-type: none"> <li>1. identified priority search areas, selected on the basis that are close and highly accessible to sustainable travel modes and they are already located on the edges of SIL to try and minimise the interface and impact on the wider industrial area.</li> <li>2. Priority search areas were used using more detailed site assessment criteria and ranked accordingly. The highest ranking sites are the ones that were selected for release. The aim was to select the minimum number of sites needed to confidently demonstrate that housing targets can be met.</li> </ol> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>

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NRA5	School Road released from SIL	Sites comprising longer frontage along Victoria Road released from SIL	Industrial Land Review Addendum 2021	N	<p>Officers consider that the preferred approach is the most appropriate because as other higher scoring sites had made up most of the shortfall in housing capacity. Therefore, a smaller site parcel was selected to see if that would be sufficient to fill the remaining capacity gap. The site selected for an initial site assessment was selected on the basis that it is closest to the station and it has highest interface with other areas that are already proposed for de-designation from SIL.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA6	Park Royal Road Sites released from SIL	Park Royal Road Sites retained as SIL	Industrial Land Review Addendum 2021	N	<p>Officers consider that the preferred approach is the most appropriate because the sites proposed for additional SIL release have been identified following a sequential assessment process. The alternative, for other locations in Park Royal to be released from SIL, is not considered to be a reasonable alternative because it would be based on including sites that are less appropriate. The assessment process:</p> <ol style="list-style-type: none"> <li>1. identified priority search areas, selected on the basis that are close and highly accessible to sustainable travel modes and they are already located on the edges of SIL to try and minimise the interface and impact on the wider industrial area.</li> <li>2. Priority search areas were used using more detailed site assessment criteria and ranked accordingly. The highest ranking sites are the ones that were selected for release. The aim was to select the minimum number of sites needed to confidently demonstrate that housing targets can be met.</li> </ol>

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					<p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA7	North of Chandos Road Site retained in SIL	North of Chandos Road released from SIL	Industrial Land Review Addendum 2021	N	<p>Officers consider that the preferred approach is the most appropriate because the sites proposed for additional SIL release have been identified following a sequential assessment process. The assessment process:</p> <ol style="list-style-type: none"> <li>1. identified priority search areas, selected on the basis that are close and highly accessible to sustainable travel modes and they are already located on the edges of SIL to try and minimise the interface and impact on the wider industrial area.</li> <li>2. Priority search areas were used using more detailed site assessment criteria and ranked accordingly. The highest ranking sites are the ones that were selected for release. The aim was to select the minimum number of sites needed to confidently demonstrate that housing targets can be met.</li> </ol> <p>This site was identified as a priority search area but when it was assessed against the site assessment criteria, other sites were ranked higher and therefore considered to be more suitable for release.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide</li> </ul>

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					<p>opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</p> <ul style="list-style-type: none"> <li>SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA8	South of Chandos Road Site retained in SIL	South of Chandos Road Sites released from SIL	Industrial Land Review Addendum 2021	N	<p>Officers consider that the preferred approach is the most appropriate because the sites proposed for additional SIL release have been identified following a sequential assessment process. The assessment process:</p> <ol style="list-style-type: none"> <li>identified priority search areas, selected on the basis that are close and highly accessible to sustainable travel modes and they are already located on the edges of SIL to try and minimise the interface and impact on the wider industrial area.</li> <li>Priority search areas were used using more detailed site assessment criteria and ranked accordingly. The highest ranking sites are the ones that were selected for release. The aim was to select the minimum number of sites needed to confidently demonstrate that housing targets can be met.</li> </ol> <p>This site was identified as a priority search area but when it was assessed against the site assessment criteria, other sites were ranked higher and therefore considered to be more suitable for release.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA9	Twyford Tip retained as SIL	Twyford Tip released from SIL	Industrial Land Review	N	<p>Officers consider that the preferred approach is the most appropriate because the site is not suitable for release from SIL. This is because:</p>

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			Addendum 2021		<ul style="list-style-type: none"> <li>The site is a good location for industrial uses. It has excellent access to local and strategic transport routes. There is potential for the site to deliver industrial intensification including multi-storey industrial/waste uses reflecting its location and less sensitive adjacent uses to the north, east and south.</li> <li>Evidence base confirms that an industrial use is likely to be the most deliverable end use.</li> </ul> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA10	Old Oak North retained as SIL	Old Oak North has interim policies for managing development prior to the identification of homes being delivered	Industrial Land Review Addendum 2021 and Old Oak North Intensification Study 2021	N	<p>Officers consider that the preferred approach is the most appropriate because retaining SIL in Old Oak North would be the most effective and justified approach for the following reasons:</p> <ul style="list-style-type: none"> <li>The landowner of site allocations 2 and 3 wish to remain and intensify these sites;</li> <li>it would deliver other policy objectives seeking to meet demand for industrial floorspace and support opportunities for industrial intensification. The Old Oak North Intensification Study demonstrates the significant potential to achieve an uplift in industrial floorspace capacity; and</li> </ul>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
		after the plan period			<ul style="list-style-type: none"> <li>removing the SIL designation would make it more challenging to set out a clear and effective policy framework in the Local Plan that can support future industrial intensification and support Cargiant to remain a "flourishing business" in the area.</li> </ul> <p>The alternative option for providing interim policies is not considered to be a reasonable alternative as they would not enable development capacity to be optimised by not providing a clear and effective policy framework to support future industrial intensification. Therefore SIL policies for Old Oak North have been included within the plan.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA11	Acceleration of North Pole East Depot for delivery of housing within the plan period	North Pole East is not included within the plan period for housing delivery.	Scrubs Lane Development Framework Principles Update 2021	N	<p>Officers consider that the preferred approach is the most appropriate because the alternative option would not reflect the aspirations of a willing land owner to accelerate the delivery of the site. Not including the site within OPDC's Development Capacity Study and Local Plan would not be in accordance with the National Planning Practice Guidance for Housing and Economic Land Availability Assessment.</p> <p>This would deliver the following plan objectives:</p>

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					<ul style="list-style-type: none"> <li>• SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>• SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA12	Maintain the approach to development capacity and form and mix of uses for Scrubs Lane	Further release of SIL to enable lower development capacities along Scrubs Lane	Scrubs Lane Development Framework Principles Update 2021	N	<p>Officers consider that the preferred approach is the most appropriate because new development along Scrubs Lane will benefit from new active non-residential uses and open spaces to meet the needs of new and existing residents alongside new and improved connections to existing and emerging destinations. These destinations include Harlesden town centre, Kensal Rise, Kensal Canalside Opportunity Area, White City Opportunity Area, Old Oak major town centre and Old Oak Common Station. Scrubs Lane will act as a hinge, tying together these locations through the enhanced east to west routes that will intersect with Scrubs Lane as a key north to south movement route. By continuing to deliver mixed use development along Scrubs Lane, it also prevents the need for further release of SIL, thereby protecting its functions.</p> <p>The approach to built form continues to respond to sensitive locations, while supporting legibility to the east to west routes enabling people to access destinations within Scrubs Lane and the surrounding areas.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that</li> </ul>



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					<p>contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</p> <ul style="list-style-type: none"> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> <li>• SP8 Proposed outcome: Contributing to the All London Green Grid by delivering new and enhanced green infrastructure and open spaces that provide for a range of functions, serving people and nature across the OPDC area.</li> <li>• SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA13	Willesden Bus Depot maintained as SIL	Willesden Bus Depot released from SIL	Industrial Land Review Addendum 2021	N	<p>Officers consider that the preferred approach is the most appropriate because the site is not suitable for release from SIL. This is because:</p> <ul style="list-style-type: none"> <li>• The bus depot serves a specific strategic transport function. In line with the Mayor's 'Land for Industry and Transport SPG', the retention of the bus garage is required unless a suitable alternative site can be found or TfL formally agrees that the garage is no longer required. TfL has confirmed that there is an ongoing need for this function and demand for bus services will increase linked to the redevelopment of Old Oak. The bus operator has indicated that the current site employs circa 400 jobs and includes an on site training facility. Therefore this is a significant employment</li> <li>• This site is in close proximity to Willesden Junction station and has access to bus routes. Given the need to retain the function of the bus garage, it is not considered that the site would be suitable for residential uses. The potential to mitigate the potential loss of the bus garage through co-location of this use</li> </ul>



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					<p>as part of a mixed development is challenging as bus garages have very specific design related operational requirements, including 24 hour operations. This has been confirmed by TfL.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA14	Additional cluster and single tall building are identified at Mitre Way	Mitre Way Cluster is not identified and a single tall building is not identified.	Scrubs Lane Development Framework Principles Update 2021	N	<p>Officers consider that the preferred approach is the most appropriate because the confirmation of the landowner to accelerate the delivery of the site will enable the delivery of the eastern portion of Wormwood Scrubs Street within the plan period. This will be a new east-west street, connecting Scrubs Lane to Old Oak Common Lane, Old Oak Common Station and Kensal Canalside Opportunity Area. The eastern portion will connection Scrubs Lane to Kensal Canalside with the western portion delivered in the longer term.</p> <p>The Scrubs Lane Development Framework Principles (SLDFP) identifies clusters where there are new or improved east-west routes intersecting with Scrubs Lane. Wormwood Scrubs Street will be a new east-west route connecting with Scrubs Lane. Therefore, a new Mitre Way cluster is appropriate to be identified to guide the delivery of new active non-residential uses and open space to support new residents.</p> <p>The SLDFP also guides the location of tall buildings to clusters to ensure tall buildings support local legibility by enabling people to navigate to the location of where the east-west routes connect with Scrubs Lane. With the delivery of Wormwood Scrubs Street, a tall building is appropriate to be located within the new cluster.</p> <p>This would deliver the following plan objectives:</p>

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					<ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> <li>• SP8 Proposed outcome: Contributing to the All London Green Grid by delivering new and enhanced green infrastructure and open spaces that provide for a range of functions, serving people and nature across the OPDC area.</li> <li>• SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA15	Maintain amount of retail floorspace within Old Oak major town centre	Deliver a lower amount of retail floorspace in smaller centres.	Retail and Leisure Needs Study 2018	N	<p>Officers consider that the preferred approach is the most appropriate because the proposed modifications to residential development capacity result in minimal population changes. Therefore, the Retail and Leisure Needs Study (2018) recommendations for the amount of retail floorspace required to meet the demands of development remain relevant. Delivering a lower amount of floorspace would not meet the needs of the development.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new</li> </ul>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
					<p>businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</p> <ul style="list-style-type: none"> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> </ul> <p>OPDC note that the retail sector is seeing unprecedented changes and impacts as a result of the Covid-19 pandemic. OPDC views that it is appropriate to consider the impacts of Covid-19 after an appropriate period of time to understand what the effects may be. This will be undertaken through the next review of the Local Plan.</p>
NRA16	Safeguard for potential access at Laundry Lane to Old Oak North	No safeguarding is identified.	<p>Scrubs Lane Development Framework Principles Update 2021</p> <p>Preliminary Infrastructure Design and Costs Study 2021</p>	N	<p>Officers consider that the preferred approach is the most appropriate to safeguard for the potential access needs and support the industrial intensification proposed for Old Oak North.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
NRA17	Park Royal Big X junction improvements and traffic management	Previous junction improvements are maintained	Infrastructure Delivery Plan 2021	N	<p>Officers consider that the preferred approach is the most appropriate because delivering the previous junction improvements would require a significant amount of third-party land and utility diversions. The previous approach would also likely increase traffic from more capacity at the junction. Further review concluded that it would be preferred to improve the junction by changing the traffic management along the Big X to also remove through-traffic across Park Royal.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP3 Proposed outcome: Creating a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities.</li> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> </ul>
NRA18	Old Oak Common Lane Station is identified as potential, non-essential infrastructure	Old Oak Common Lane Station is identified as essential infrastructure	Infrastructure Delivery Plan 2021	N	<p>Officers consider that the preferred approach is the most appropriate because as the Strategic Outline Business Case identifies that the Old Oak Common Lane Station would only support an additional 80 homes and 800 jobs. As the station would support a small proportion of our growth targets it is not considered essential infrastructure and has been identified as potential infrastructure. This will support TfL's transport requirements and support placemaking.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport</li> </ul>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
					accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.
NRA19	Old Oak Common Station eastern access to Scrubs Lane along the Grand Union Canal towpath is identified	Old Oak Common Station eastern access to Scrubs Lane along the Grand Union Canal towpath is not identified	Infrastructure Delivery Plan 2021	N	<p>Officers consider that the preferred approach is the most appropriate because providing an eastern access to the new Old Oak Common Station is important to support local walking and cycling access to residential-led development proposed along Scrubs Lane.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> </ul>
NRA20	Potential Channel Gate northern access to Old Oak Lane is identified	Potential Channel Gate northern access to Old Oak Lane is not identified	Channel Gate Development Framework Principles 2021	N	<p>Officers consider that the preferred approach is the most appropriate because it will provide a potential new route to serve development within Channel Gate and divert traffic from the Old Oak Lane Conservation Area.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> </ul>
NRA21	Potential sensitive Wormwood Scrubs walking and cycling access	Potential sensitive Wormwood Scrubs walking and cycling	Infrastructure Delivery Plan 2021	N	<p>Officers consider that the preferred approach is the most appropriate to help address barriers for new and future communities to the north of Wormwood Scrubs to access this public open space.</p> <p>This would deliver the following plan objectives:</p>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
	from Old Oak South is identified	access from Old Oak South is not identified			<ul style="list-style-type: none"> <li>• SP3 Proposed outcome: Creating a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities.</li> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoners, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> <li>• SP8 Proposed outcome: Contributing to the All London Green Grid by delivering new and enhanced green infrastructure and open spaces that provide for a range of functions, serving people and nature across the OPDC area.</li> </ul>
NRA22	Previous canal bridges within Old Oak North are no longer identified	Previous canal bridges within Old Oak North are identified	Infrastructure Delivery Plan 2021	N	<p>Officers consider that the preferred approach is the most appropriate because Old Oak North is no longer being brought forward for residential-led development. As such, Union Way and Old Oak Street, along with the associated canal bridges, are no longer needed to unlock developable land and enable homes to be delivered.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA23	A replacement bridge for the existing Bulls Bridge on the canal is identified	A replacement bridge for the existing bridge on the canal is not identified	Infrastructure Delivery Plan 2021		<p>Officers consider that the preferred approach is the most appropriate because the current bridge is pedestrian only and does not allow for step free access. A replacement bridge will allow for pedestrian and cycle access that is compliant with modern accessibility standards and could be located to better connect with development in Old Oak South.</p> <p>This would deliver the following plan objectives:</p>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
					<ul style="list-style-type: none"> <li>• SP3 Proposed outcome: Creating a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA24	New bridge from Old Oak North to Willesden Junction is no longer identified. Improvements to the existing bridge are identified.	New bridge from Old Oak North to Willesden Junction is identified. Improvements to the existing bridge are not identified.	Infrastructure Delivery Plan 2021	N	<p>Officers consider that the preferred approach is the most appropriate because Old Oak North is no longer being brought forward for residential-led development. As such, a new bridge from Old Oak North to Willesden Junction is no longer needed to unlock developable land and enable homes to be delivered. Upgrades to the existing bridge will be brought forward instead to support employees and visitors to access Old Oak North.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP3 Proposed outcome: Creating a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> </ul>
NRA25	Union Way underpass is no longer identified	Union Way underpass is identified	Infrastructure Delivery Plan 2021	N	<p>Officers consider that the preferred approach is the most appropriate because Old Oak North is no longer being brought forward for residential-led development. As such, Union Way, along with its associated underpass, is no longer needed to unlock developable land and enable homes to be delivered.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide</li> </ul>



Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
					<p>opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</p> <ul style="list-style-type: none"> <li>SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA26	Improvements to Hythe Road junction with Scrubs Lane are amended	Improvements to Hythe Road junction with Scrubs Lane are not amended	Preliminary Infrastructure Design and Costs Study 2021	N	<p>Officers consider that the preferred approach is the most appropriate because requirements for upgrading the Hythe Road and Scrubs Lane junction have changed due to Old Oak North being retained for industrial uses.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> </ul>
NRA27	A new walking and cycling connection is identified between Scrubs Lane and Wormwood Scrubs Street	A new walking and cycling connection is not identified between Scrubs Lane and Wormwood Scrubs Street	Scrubs Lane Development Framework Principles Update 2021	N	<p>Officers consider that the preferred approach is the most appropriate because a new walking and cycling connection is needed to support development by allowing direct access to the bus network and cycling infrastructure along Scrubs Lane and along Wormwood Scrubs Street to Kensal Canalside Opportunity Area in the east.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>SP3 Proposed outcome: Creating a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities.</li> <li>SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals</li> </ul>



Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
					<p>and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</p> <ul style="list-style-type: none"> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA28	A potential all modes connection is identified between Scrubs Lane and Mitre Way	A potential all modes connection is not identified between Scrubs Lane and Mitre Way	Scrubs Lane Development Framework Principles Update 2021	N	<p>Officers consider that the preferred approach is the most appropriate because an all modes connection will provide a direct link between Scrubs Lane and Mitre Way allowing for enhanced bus services to serve residential-led development at the North Pole East Depot link and the Kensal Canalside Opportunity Area to the east.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP3 Proposed outcome: Creating a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities.</li> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
NRA29	Hythe Road Station is no longer identified to be delivered.	Hythe Road Station continues to be identified to be delivered	Infrastructure Delivery Plan 2021	N	<p>Officers consider that the preferred approach is the most appropriate because Old Oak North is no longer being brought forward for residential-led development. As such, there is less demand for a station located at Hythe Road. The economic case for Hythe Road station was strongly influenced by development demand and without this demand the station is no longer required, and the land required will continue to be used as SIL.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> </ul>
NRA30	1 Lakeside Drive is identified as a new development site	1 Lakeside Drive is not identified as a new development site	Development Capacity Study 2021	N	<p>Officers consider that the preferred approach is the most appropriate because the alternative option would not reflect the aspirations of a willing land owner to accelerate the delivery of the site. Not including the site within OPDC's Development Capacity Study and Local Plan would not be in accordance with the National Planning Practice Guidance for Housing and Economic Land Availability Assessment.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>
NRA31	1 Portal Way delivery is accelerated for	1 Portal Way delivery is not	Development Capacity Study 2021	N	<p>Officers consider that the preferred approach is the most appropriate because the alternative option would not reflect the aspirations of a willing landowner to accelerate the delivery of the site. Not including the site within OPDC's Development Capacity</p>

Ref	Preferred modification option	Alternative modification option	Relevant supporting study	Should the option be assessed as a reasonable alternative?	Rationale for why the preferred approach is the most appropriate option or why both options can be considered as reasonable alternatives
	inclusion within the first ten years of the Local Plan	accelerated for inclusion within the first ten years of the Local Plan			<p>Study and Local Plan would not be in accordance with the National Planning Practice Guidance for Housing and Economic Land Availability Assessment.</p> <p>This would deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>• SP9 Proposed outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>

## Appendix C

### May 2019 Proposed Modification Addendum (Supporting Information)

# OPDC LOCAL PLAN INTEGRATED IMPACT ASSESSMENT ADDENDUM

MAY 2019



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## VERSION CONTROL

Version	Date	Author	Checker	Approver	Changes
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2.0	28.03.19	Joseph Evans Sarah Tooby	Sarah Tooby David Hourd	David Hourd	Final Draft
3.0	17.04.19	Joseph Evans Sarah Tooby	Sarah Tooby David Hourd	David Hourd	Draft following Local Plan Hearing.
4.0	25.04.19	Joseph Evans Sarah Tooby	Sarah Tooby David Hourd	David Hourd	Final version

This report dated 25 April 2019 has been prepared for Old Oak and Park Royal Development Corporation (the “Client”) in accordance with the terms and conditions of appointment dated 20 March 2019 (the “Appointment”) between the Client and **Arcadis (UK) Limited** (“Arcadis”) for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

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## Appendix 1

Copy of Appendix G of Reg 18 IIA Report



# 1 Introduction

## 1.1 Background

The Old Oak and Park Royal Development Corporation (OPDC) is preparing a Local Plan to guide and manage development in the Old Oak and Park Royal area. Arcadis Consulting UK Ltd (Arcadis) has carried out an Integrated Impact Assessment (IIA) of the Local Plan on behalf of the OPDC to identify and evaluate the likely environmental effects of the Local Plan. The IIA incorporates the requirements of:

- **Sustainability Appraisal (SA)** as required by National Planning Policy Framework (NPPF) (MHCLG, July 2018) – Paragraph 32; Planning & Compulsory Purchase Act 2004 – Section 39(2); Planning & Compulsory Purchase Act 2004 – Section 19;
- **Strategic Environmental Assessment (SEA)** as required by Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the SEA Directive); and Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No. 1633) (the SEA Regulations);
- **Health Impact Assessment (HIA)** as referred to in National Planning Policy Guidance<sup>1</sup> and Policy 3.2 of the current London Plan, which also suggests integrating HIA into SEA and SA<sup>2</sup>;
- **Equalities Impact Assessment (EqIA)** in line with requirements of the Equality Act 2010; and
- **Community Safety Impact Assessment (CSIA)** as required by Crime and Disorder Act 1998 and Police Justice Act 2006.

Planning Policy Guidance recommends incorporating the requirements of SEA and SA into one process whilst the London Plan recommends incorporating HIA with this process. It is therefore logical to carry out an IIA process as an effective means of avoiding duplication of assessment work and benefiting from a shared understanding of policies.

A Habitats Regulations Assessment Screening Report has also been undertaken as a parallel process.

## 1.2 Local Plan and IIA process so far

The five main stages in conducting an IIA are defined as:

- Stage A - setting the context and objectives, establishing the baseline and deciding on the scope;
- Stage B - developing and refining options and assessing effects;
- Stage C - preparing the Sustainability Appraisal Report;
- Stage D - consulting on the preferred option of the development plan and SA Report; and
- Stage E - monitoring significant effects of implementing the development plan.

In accordance with regulation 12(5) of the SEA Regulations, the (Stage A) Scoping Report<sup>3</sup> was consulted upon for a five-week period, commencing in September 2015.

Stage B of the SEA process, is focussed on 'Developing, refining and appraising strategic options, policy options and preferred policy options'. The following extract from the SEA Practical Guide (page 25) presents the tasks within Stage B, and their interrelationships:

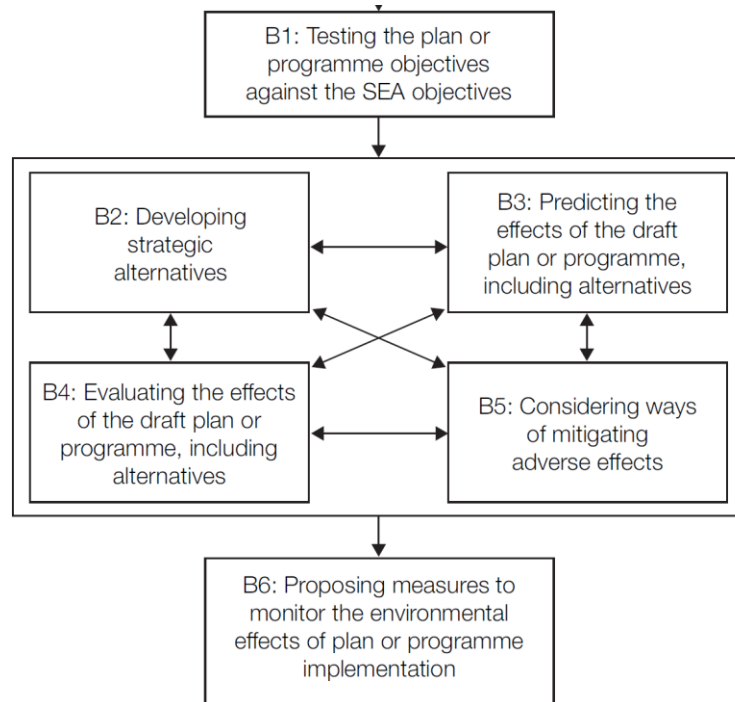
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<sup>1</sup> <https://www.gov.uk/guidance/health-and-wellbeing>

<sup>2</sup> <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-3/policy-32-improving-health>

<sup>3</sup> <https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-op-4>

Stage B: Developing and refining alternatives and assessing effects



Section 3.4 of the Regulation 19(2) IIA Report states that the Report is the second part of Stage B. This is because the Interim IIA Report<sup>4</sup> that accompanied Regulation 18 consultation on the OPDC Local Plan was the first iteration of Stage B.

The Regulation 18 IIA Report included the B1 (testing the plan or programme objectives against the IIA objectives) and B2 assessments (developing strategic alternatives) (where reasonable alternatives exist – see section 2.4 of this report), including assessment of the proposed policy options (Appendix G of the Regulation 18 IIA Report, appended to this addendum). Further information on the options and the reasons for selecting them and the choices for the preferred options are also provided in section 2.4 of this report.

Both the Regulation 19 (1)<sup>5</sup> and (2)<sup>6</sup> IIA Reports tested plan policies and predicted effects, making recommendations for mitigation and enhancements, in order to help develop and refine the plan policies (Stages B3/4/5). The reports also proposed measures by which to monitor predicted effects (Stage B6).

The three reports together comprise Stage B of the IIA process for the OPDC Plan, reflecting the iterative nature of the assessment process. The narratives on each of the assessments are provided within each of the reports.

Consultation and decision-making comprise Stage D of the process. OPDC carried out the first consultation on the Regulation 18 draft Local Plan and its supporting evidence base documents between 4 February and 31 March 2016. Consultation responses received were then documented and integrated, as appropriate, into the next iteration of the Local Plan and the IIA.

The next consultation was carried out on the first Regulation 19 revised draft Local Plan from 29 June until 11 September 2017. Responses to both of these consultations informed the second Regulation 19 revised draft Local Plan, and its associated new and updated supporting studies, which was consulted on from 14 June to 30 July 2018. The consultation responses relevant to the IIA Report are document in Appendix C of the Regulation 19(2) IIA Report.

On 4 October 2018 the Local Plan was submitted to the Planning Inspectorate for independent examination - the final stage of creating a Local Plan.

<sup>4</sup> [https://www.london.gov.uk/sites/default/files/opdc\\_draft\\_local\\_plan\\_draft\\_iaa\\_report\\_new\\_cover.pdf](https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_draft_iaa_report_new_cover.pdf)

<sup>5</sup> [https://www.london.gov.uk/sites/default/files/27.\\_integrated\\_impact\\_assessment\\_1.pdf](https://www.london.gov.uk/sites/default/files/27._integrated_impact_assessment_1.pdf)

<sup>6</sup> [https://www.london.gov.uk/sites/default/files/28.\\_iaa\\_and\\_hra.pdf](https://www.london.gov.uk/sites/default/files/28._iaa_and_hra.pdf)

At each stage of the Local Plan making process an IIA report has accompanied the consultation in order to provide information on the sustainability effects of the Plan, its proposals and reasonable alternatives to these proposals. The IIA process commenced with a Scoping consultation in September 2015 which determined an appropriate scope and level of detail for the IIA process. Consultation responses as a result of this were integrated into the Draft IIA Report prepared for the Regulation 18 Local Plan consultation. Responses received during the Regulation 18 consultation in 2016 were taken into consideration during the preparation of the interim IIA report that accompanied the Regulation 19(1) consultation in 2017. Responses received during this consultation then informed the Regulation 19(2) version of the IIA report finalised in June 2018. Appendix C to the respective Regulation 19 IIA reports contains the consultation responses to the Draft IIA reports and how they have been addressed.

The Proposed Submission Local Plan must be considered by a formal Independent Examination. This is led by an independent Planning Inspector appointed by the Secretary of State for the Ministry of Housing, Communities and Local Government (MHCLG). The independent examination is the final stage in the Local Plan process before it can be adopted following which it will form part of the statutory development plan for the area. The Planning Inspectorate, on behalf of the Secretary of State, has appointed Paul Clark MA MRTPI MCMI as the Planning Inspector. Hearing sessions were undertaken in April 2019. Parts of this Addendum include direct responses to the Inspector’s queries, requesting further information on the IIA process. These were:

Inspector’s Questions for the IIA	Response
Question 29	
<ul style="list-style-type: none"> <li>The matrix referred to in the fifth paragraph of section 3.4 of the report; “Overarching strategic options were assessed ahead of the drafting of the Regulation 18 Local Plan. The purpose of the assessment was to determine the sustainability strengths and weaknesses of each option, such that this information would be used by the plan-makers to develop the plan’s policy options and preferred policies (section 6.3). The preferred policies and policy options were then assessed alongside one another in detail, which enabled a comparison of their predicted sustainability effects, to inform the development of the preferred policies. A matrix was used for this assessment enabling the policies and options to be easily compared.”</li> </ul>	<p>The SA of reasonable strategic alternatives is included in section 5 and Appendix E of the Reg19(2) IIA Report. Further information regarding the scope of reasonable alternatives is provided in Section 3 of the IIA Report. Note comments in section 2.4 of this document below regarding the scope of reasonable alternatives.</p> <p>Appendix G of the Interim IIA Report that accompanied Regulation 18 consultation on the OPDC Local Plan presents the Matrix of assessments for Local Plan policies alongside policy options, where these were considered to be reasonable. This appendix has been appended to this addendum for clarity (see Appendix 1).</p>
<ul style="list-style-type: none"> <li>A narrative of the first part of stage B of the SEA process described in the seventh paragraph of section 3.4 of the report; “This report documents the second part of Stage B of the SEA process and represents Stage C and D of the SA Process. This IIA Report, is being published alongside the Regulation 19(2) Second Revised Draft Local Plan”.</li> </ul>	<p>Further information and clarity regarding this process has been included in Section 1.2 of this Addendum.</p>
Question 30	
<ul style="list-style-type: none"> <li>The last two columns in the table headed SEA Compliance Policy Recommendations following Appendix F in the submitted copy of Submission Document SD2 are blank. May I be provided with a copy with those last two columns completed, please?</li> </ul>	<p>This has been included in Section 4 of this Addendum.</p>

### 1.3 Purpose of this addendum

As laid out in Section 1.2, the IIA process accompanying the Plan-making process has taken many years and involved the preparation of numerous reports. The IIA incorporates the requirements of numerous impact assessments including SA, SEA, HIA and EqIA. In particular, there are a range of requirements that should be met for an IIA report to adequately satisfy the requirements of SA and an SEA 'Environmental Report'.

The purpose of this Addendum is to provide further clarity over how the Local Plan, its accompanying IIA process and the Regulation 19(2) IIA report meet and in certain aspects exceed the minimum requirements of SA and SEA.

### 1.4 Planning hierarchy

The OPDC Local Plan will play an integral role in guiding and managing development in the Old Oak and Park Royal area. The plan sits within an hierarchy, within which there are other development plan documents forming part of the development plan.

The Planning and Compulsory Purchase Act 2004<sup>7</sup>, Part 19 (2) sets out that *'In preparing a local development document the local planning authority must have regard to... (c) the spatial development strategy if the authority are a London borough or if any part of the authority's area adjoins Greater London.'*

Part 3 (38) (2) 'Development plan' sets out that *'for the purposes of any area in Greater London the development plan is: a) the spatial development strategy; and (b) the development plan documents (taken as a whole) which have been adopted or approved in relation to that area.'*

In addition section 24(1)(b) of the Planning and Compulsory Purchase Act 2004 states that *"The local development documents must be in general conformity with... (b) the spatial development strategy (if the local planning authority are a London borough or a Mayoral development corporation"*

Therefore, future development in the Old Oak and Park Royal area needs to be in general conformity with the requirements set out in the London Plan.

The current Mayor of London's London Plan was first published in 2011<sup>8</sup>. Revised Early Minor Alterations (REMA) were published in October 2013<sup>9</sup>. In 2015, the Further Alterations to the London Plan (FALP) was published, which in 2016 underwent minor alterations to the its housing and parking standards<sup>10</sup>. The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the coming 20–25 years.

The London Plan identifies various Opportunity Areas in London for development, including the Old Oak and Park Royal Opportunity Areas. To provide further planning guidance for development in the Old Oak and Park Royal Opportunity Areas, an Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) was produced by the Greater London Authority with inputs from the London Boroughs of Brent, Ealing, Hammersmith and Fulham and Transport for London. The OAPF was adopted on 4 November 2015 as Supplementary Planning Guidance to the London Plan.

Both the London Plan and the OAPF were developed through thorough preparation processes involving numerous background studies and public consultation at multiple stages, including IIA. The London Plan underwent an Examination in Public and the adopted London Plan was determined to be sound.

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<sup>7</sup> Available online at: [http://www.legislation.gov.uk/ukpga/2004/5/pdfs/ukpga\\_20040005\\_en.pdf](http://www.legislation.gov.uk/ukpga/2004/5/pdfs/ukpga_20040005_en.pdf) [Accessed 20.03.19]

<sup>8</sup> Available online at: <https://www.london.gov.uk/what-we-do/planning/london-plan/past-versions-and-alterations-london-plan/london-plan-2011> [Accessed 20.03.19]

<sup>9</sup> Available online at: <https://www.london.gov.uk/what-we-do/planning/london-plan/past-versions-and-alterations-london-plan/revised-early-minor> [Accessed 20.03.19]

<sup>10</sup> Available online at: [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_malp\\_final\\_for\\_web\\_0606\\_0.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_malp_final_for_web_0606_0.pdf) [Accessed 20.03.19]

Both the FALP<sup>11</sup> and the OAPF<sup>12</sup>, were subject to their own IIA processes and reports, which were also consulted on and which culminated in IIA Reports that satisfied the requirements of a SEA Environmental Report.

The spatial strategy and quantum of housing and employment land for the Old Oak and Park Royal area have been determined by the London Plan and alternatives were tested appropriately as part of the preparation of that plan. Consequently, the assessment of an alternative spatial development strategy which would involve less development than that set out in the London Plan for the Old Oak and Park Royal area would not constitute a 'reasonable alternative' and hence there is no need for it to be assessed as an alternative strategy. Extracts from the relevant law and case law that support this approach are set out below:

SEA Directive Article 4(3):

*“Where plans and programmes form part of a hierarchy, Member States shall, with a view to avoiding duplication of the assessment, take into account the fact that the assessment will be carried out, in accordance with this Directive, at different levels of the hierarchy. For the purpose of, inter alia, avoiding duplication of assessment, Member States shall apply Article 5(2) and (3).”*

Regulation 12 of the 2004 SEA Regulations:

*“12.— Preparation of environmental report...*

*3) The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of—*

*(a) current knowledge and methods of assessment;*

*(b) the contents and level of detail in the plan or programme;*

*(c) the stage of the plan or programme in the decision-making process; and*

*(d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.”*

The consequences of Regulation 12(3)(d) can clearly be seen from Beatson J's decision in the case of *Shadwell Estates Ltd v Breckland DC* [2013] EWHC 12. In that case, the claimant's challenge to an area action plan failed inter alia because the accompanying sustainability appraisal was not required to duplicate work done in relation to the higher tier core strategy with which the area action plan had to conform. The judgement states as follows:

*“81. First, the sustainability appraisal was required to assess the likely significant effects on the environment of implementing the TAAP and reasonable alternatives. The Regulations make it clear that the information required is that which may “reasonably be required” taking account inter alia of the need “to avoid duplication of the assessment”: EAPPR 2004, regulation 12(3)(d). The sustainability appraisal, strategic environmental assessment and Habitats Regulations assessment for the Core Strategy had not been challenged and were supported by Natural England and the RSPB. Those assessments led to the decision to adopt the orange and blue buffer zones in the designated areas. Shadwell's current position appears to be that the buffer zones should be altered either by including Kilverstone in the orange zone or by including it or part of it in the blue zone. But since the TAAP is required to conform to the Core Strategy, it is difficult to see how it would be possible to alter the buffer zones.”*

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<sup>11</sup> Further Alterations to the London Plan, Integrated Impact Assessment, Amec, December 2013. Available online at: [https://www.london.gov.uk/file/15565/download?token=xVzX\\_5zA](https://www.london.gov.uk/file/15565/download?token=xVzX_5zA) [Accessed 20.03.19]

<sup>12</sup> Old Oak and Park Royal Opportunity Area Planning Framework (OAPF), Integrated Impact Assessment (IIA), November 2015, Prepared by Greater London Authority



## 2 Requirements from the London Plan and the OAPF

### 2.1 Background

The purpose of this chapter is to show that the spatial strategy and minimum targets for housing and jobs for inclusion in the OPDC Local Plan were set in accordance with the requirements of the London Plan and the OAPF. As the London Plan and OAPF underwent their own consultation exercises and were accompanied by their own distinct IIA processes, the IIA accompanying the OPDC Local Plan is not required to assess, as a reasonable alternative, a spatial development strategy which would plan for less development than is required for this opportunity area by the London Plan.

### 2.2 Quantity of development

Within the London Plan, a development capacity for a minimum of 25,500 new homes and 65,000 jobs are identified for the Old Oak and Park Royal Opportunity Areas comprising the OPDC area. Policy 2.13 'Opportunity Areas and Intensification Areas' on Page 65 of the London Plan states (our emphasis) *"Development proposals within opportunity areas and intensification areas should: c Contribute towards meeting (or where appropriate), exceeding the minimum guidelines for housing and/or estimates for employment capacity set out in Annex 1, tested as appropriate through opportunity area planning frameworks and/or local development frameworks."*

In response to the allocated quantity of development, OPDC gathered various evidence documents to appropriately test the quantity of development the Local Plan should seek to deliver but taking into account that the quantum of housing delivery is clearly stated to be a minimum. This was on the basis that to test for delivery of housing numbers below that stated in the London Plan would not result in the OPDC Local Plan being in general conformity with the London Plan. The evidence that was produced included but was not limited to the following documents which are available on the OPDC's Second Regulation 19 Supporting Studies page<sup>13</sup>:

- Development Capacity Study (DCS), 2018;
- Development Infrastructure Funding Study (DIFS), 2015;
- Retail and Leisure Needs Study (RLNS) and Addendum, 2016 and 2018;
- Industrial Land Review and Addendum, 2017 and 2018;
- Strategic Housing Market Assessment (SHMA), Report of Findings, 2016;
- Gypsy and Travellers Accommodation Needs Assessment, 2016;
- Old Oak North Development Framework Principles, 2018
- Old Oak Strategic Transport Study, 2015;
- Park Royal Development Framework Principles, 2018
- Park Royal Transport Strategy, 2016; and
- Public Realm, Walking and Cycling Strategy, 2017.
- Scrubs Lane Development Framework Principles, 2017
- Victoria Road and Old Oak Lane Development Framework Principles, 2017

In having regard to the minimum targets set by the London Plan, the evidence base gathered by the OPDC enabled the authority to determine how much development is required, the extent to which this development could be accommodated, and the interventions that may be required in order to do so.

Within the Regulation 18 DCS, the appropriate testing process calculated the minimum residential density required to deliver 25,500 homes across the available areas for residential development, based on the emerging illustrative masterplan for Old Oak, set out in the OAPF. Paragraphs 2.8 and 2.9 state: *'This would require a density of 447 units per hectare to be delivered across all areas identified suitable for housing. However, this approach would not be compliant with London Plan policy 2.13 which seeks development to*

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<sup>13</sup> The listed Supporting Studies, and more, are publicly available online at <https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-opdc/opdc-local-plan/previous-versions-local-plan/second-revised-draft-local-plan/reg-19-supporting-studies-other-documents> [Accessed 26.03.19]

*respond to opportunities presented by public transport access improvements and constraints generated by sensitive locations within a local context.'*

The testing process also sought to ensure that the development quanta approach accords with London Plan Policy in terms of distributing residential density across the plan area while responding to sensitive locations, public transport improvements, other key destinations and new residential areas.

The Regulation 19(1) and 19(2) DCS documents continued this methodology in accordance with the PPG guidance for Housing and Economic Land Availability Assessments. The result of this exercise of rigorously testing the residential development quanta dictated by the London Plan was to revise the proposed housing figure within the Local Plan for the OPDC area from 22,350 new homes within the Regulation 19(1) Local Plan to 20,100 homes over the Plan period to 2038 within the Regulation 19(2) Local Plan. 26,500 new homes would be delivered across the full development period which is expected to be until the late 2040s.

The Development Capacity Study also considered and tested the economic floorspace required, in line with the London Plan indicative employment capacity figure. The result of this exercise of rigorously testing the economic floorspace development quanta dictated by the London Plan was to revise the proposed jobs figure within the Local Plan for the OPDC area from 67,000 new jobs within the Regulation 19(1) Local Plan to 40,400 new jobs over the Plan period to 2038. 60,700 new jobs would be delivered across the full development period.

## 2.3 Spatial distribution of development

The London Plan identifies Park Royal and Old Oak Common as two Opportunity Areas and identifies minimum targets for new housing development. The London Plan includes a range of other policy requirements for development planning in the OPDC area. Planning requirements for the Old Oak and Park Royal area set out in Table A1.1 of the London Plan are repeated in **Boxes 2.1** and **2.2**.

### **Box 2.1: Park Royal Opportunity Area – requirements for planning in the area from the London Plan**

Area (Ha): 713

Indicative employment capacity: 10,000

Minimum new homes: 1,500

OAPF progress: 2

Park Royal is one of London's key industrial locations, with potential to meet modern logistics and waste management requirements as well as other industrial type functions. A range of opportunities exist for industrial related development and in selected locations outside of SIL for mixed use intensification where there is good public transport accessibility. These selected locations include a series of 'gateway' sites identified in the Park Royal OAPF comprising the Eastern Gateway at Willesden Junction, the Southern Gateway around North Acton station, the Western gateway around the Diageo First Central site and the Northern Gateway centred around the Northfields industrial estate. Development should take account of London's future rail and water freight requirements and their land use implications, and the scope for improvements in strategic rail accessibility. Planning for Park Royal should be integrated with Old Oak Common and take into account the relationships with White City and Kensal Canalside

### **Box 2.2: Old Oak Opportunity Area – requirements for planning in the area from the London Plan**

(Ha): 155

Indicative employment capacity: 55,000

Minimum new homes: 24,000

OAPF progress: 2

Old Oak Common has significant regeneration potential for new housing and jobs and could make a major contribution to London's position as a world business centre. Regeneration would centre on a new strategic public transport infrastructure hub at Old Oak Common on the HS2 line between London, and Birmingham and beyond with an interchange with Crossrail 1, other national main lines and the London Overground. This should include a new branch of Crossrail 1 linking from Old Oak to the West Coast Main Line and extending via Wembley to Watford and potentially beyond. Provision of public transport infrastructure on this scale would drive substantial development which could yield 24,000 new homes and, subject to capacity and demand, up to 55,000 jobs and a variety of complementary and supporting uses in a commercial hub around the station and in the wider area. The potential for a network of new open spaces and green links connecting Old Oak Common station to North Acton, Willesden Junction, Wormwood Scrubs and the Grand Union Canal should be investigated. Public transport accessibility and availability of amenity space should support high density development which could include a cluster of tall buildings around the interchange. Wormwood Scrubs would provide a major amenity to support this scale of development and improved access to the Scrubs is essential to deliver sustainable residential communities. Planning for Old Oak Common should be integrated with the wider Park Royal Opportunity Area, including scope for business relocations. Linkages with Kensal Canalside and White City Opportunity Areas should also be considered, including the Imperial College campus expansion and associated potential for business creation and development at Old Oak/Park Royal. A vision document for Old Oak was published in June 2013 setting out a direction of travel for the future development of the area.

In addition to the London Plan, the OAPF provides further detail on the requirements for planning in the OPDC area in relation to the spatial distribution of development. The OAPF reviewed the geographic distribution of existing land-uses in the OPDC area and sets out the Land Use Strategy Principles for development in the OPDC area, which are comprised of three principal components (see **Box 2.3 – 2.5**). Principles L1, L2 and L3 are illustrated in **Figure 2.1**.

### **Box 2.3: Principle L1 - Old Oak**

The core development area is focussed at Old Oak (see figure 17). This area should be redeveloped as a sustainable and healthy mixed-use part of west London. In conformity with the London Plan this new urban quarter should be comprehensively redeveloped to accommodate a minimum of 24,000 new homes, and 55,000 jobs. To achieve this, there will be a requirement for significant new transport, utility and social infrastructure provision to meet the requirements of the future population. OPDC will, through its Local Plan, carry out work to further consider the deliverable quantum of development. In accordance with Policy 2.17Bb of the London Plan, it is proposed that SIL is consolidated into the Park Royal as shown in figure 17. The official de-designation process for SIL in Old Oak would be dealt with through OPDC's Local Plan. Requirements for replacement of any resultant loss of SIL should be considered at a strategic level. Old Oak will require a mix of town centre uses. These should primarily be clustered around Old Oak Common Station, around other transport hubs and along Old Oak High Street. There may be opportunities to locate town centre uses in other locations but only where there prove to be large flows of people. Hotels, specifically those supporting business tourism, will be promoted to contribute to London's competitiveness. Central to Old Oak's success will be clear connections into its surroundings so that Old Oak is knitted into the local area. The GLA will work with OPDC and the boroughs to develop appropriate mechanisms to achieve this aspiration. There is also a need to create a network of new streets and new amenity spaces within and across Old Oak, along the Grand Union Canal and to Wormwood Scrubs to ensure these places become integral parts of this network. Within Old Oak there is an opportunity to attract a variety of catalyst uses, from the small to the large scale, which should help play a role in attracting people to the area and creating a destination. Additionally, there are opportunities created by Old Oak's proximity to existing and emerging employment growth sectors generated at the Imperial College White City campus. Old Oak and Park Royal could accommodate the delivery of scaleup workspace in helping to develop both locations as leading smart technology clusters.



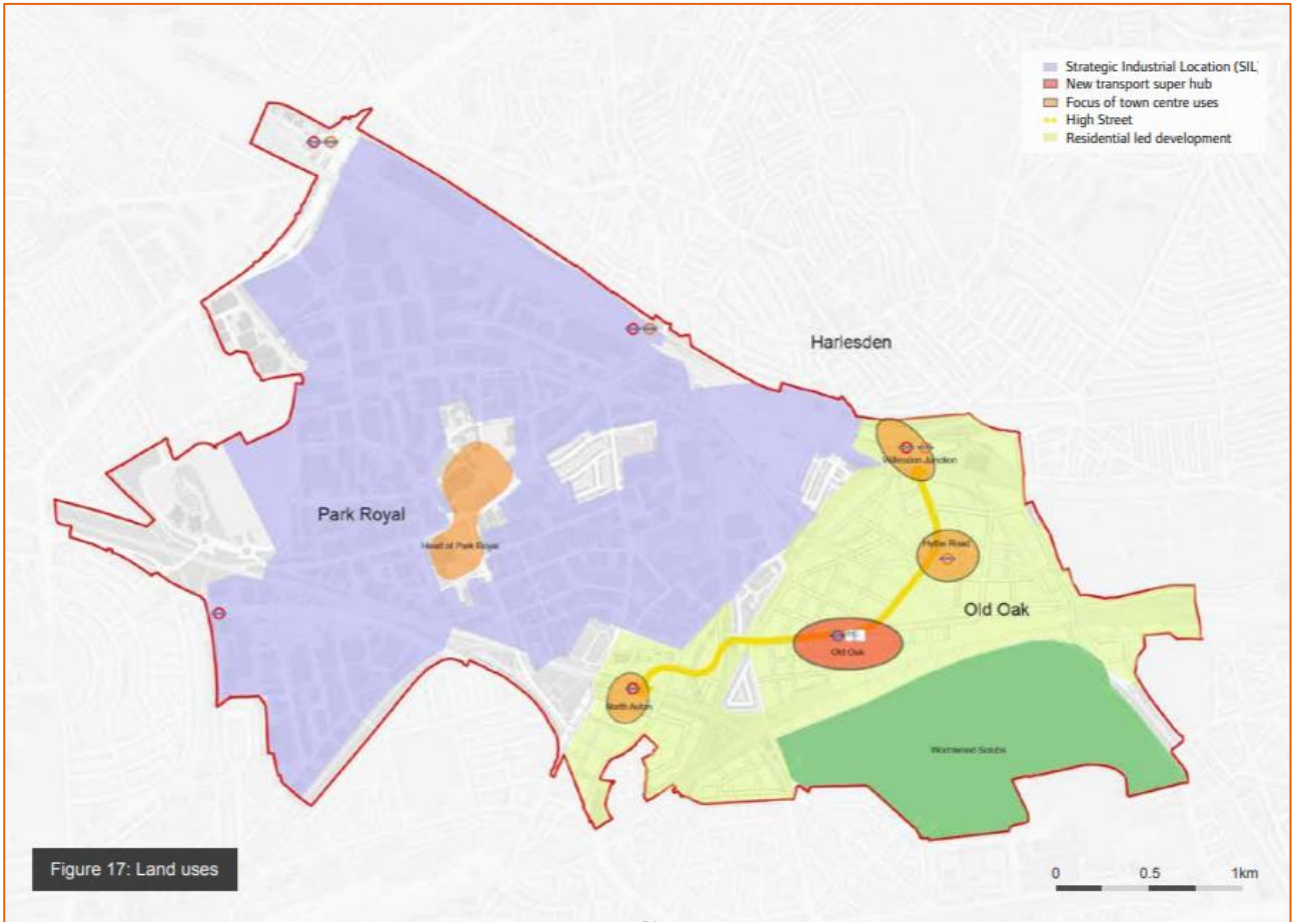
#### **Box 2.4: Principle L2 - Park Royal**

Park Royal performs a vital role in supporting the London economy. Building on the area's existing success there is a fantastic opportunity for Park Royal to become the UK's leading industrial location. Park Royal could establish itself as a globally recognised centre for developing innovations such as smart and clean-tech industries. There are also opportunities to attract growing businesses from Imperial College Campus into Park Royal. This can be achieved by; continuing to protect Park Royal as a Strategic Industrial Location (SIL); identifying interventions to improve transport and utility (including connectivity) infrastructure; managing impacts generated during and after the redevelopment of Old Oak; and developing planning and design policies that encourage development that makes more efficient use of land and that works to attract different sectors to the area through the OPDC Local Plan. Today Park Royal houses approximately 1,200 workspaces, employing over 30,000 people in over 2.3 million square metres of gross floor area. The area's historical development has seen changes in the types and form of businesses. During the life of this plan there is a need to improve the operation of the estate and where possible to intensify uses to cater for up to 10,000 new jobs. Given the timescales involved what is most important now is the development of a place that functions well, and which is an attractive business location. Whilst there may be opportunities to support and promote the location of specific business sectors, it is important to retain flexibility to ensure Park Royal can evolve to changing market demands in a timely manner. Park Royal could also play a valuable role in accommodating displaced employment floorspace and businesses from Old Oak. Outside of SIL, development should be more mixed use, and should look to deliver a minimum of 1,500 homes. In the centre of Park Royal, the existing retail centre should be enhanced and expanded so that it can become a local hub for residents and businesses in Park Royal to include business support services and uses such as meeting spaces and business hotels. The existing character of the Wesley Estate and the nearby playing fields should be enhanced with the Heart of Park Royal reinvigorated to provide a range of services for local communities.

#### **Box 2.5: Principle L3 - Wormwood Scrubs**

Continue the protection of Wormwood Scrubs as a valuable amenity and ecological space for Londoners and its wildlife, coupled with improved access and sensitive enhancements where appropriate. Wormwood Scrubs is located between Old Oak and White City. Improved access to the Scrubs would provide people with the opportunity to enjoy this space and would also help to improve connectivity between both places. OPDC will undertake a study of Wormwood Scrubs and any proposals would be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and discussed with the local community. Park Royal could also play a valuable role in accommodating displaced employment floorspace and businesses from Old Oak.

**Figure 2.1:** Figure 17 from the OAPF providing an illustrative summary of Principles L1, L2 and L3

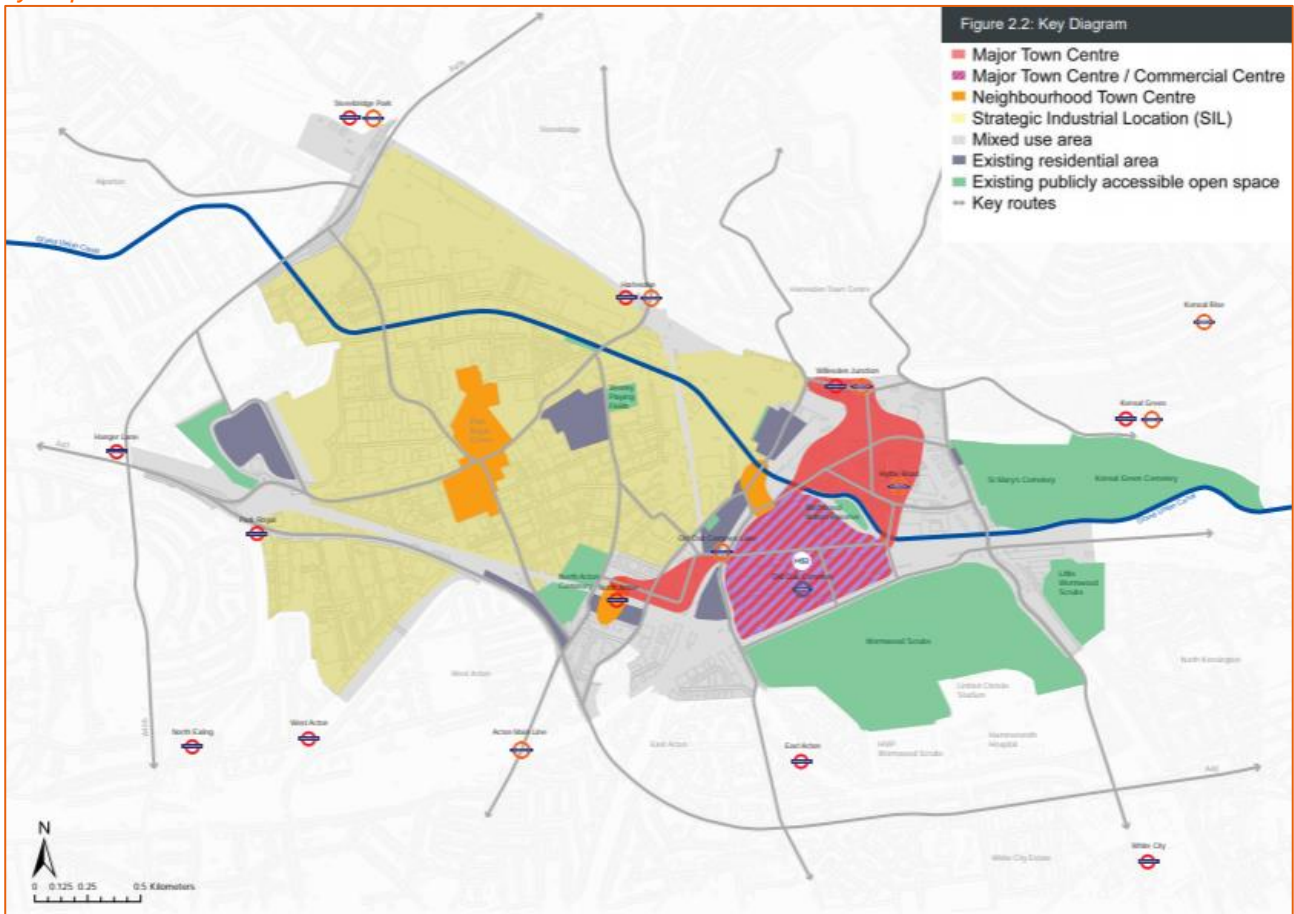


In addition to Land Use Strategy principles, the OAPF also provides:

- Design strategy;
- Old Oak Strategy;
- Park Royal Strategy;
- Wormwood Scrubs Strategy;
- Transport Strategy;
- Environment Strategy; and
- Delivery Strategy.

Combined, the London Plan and the OAPF provide detailed requirements on the quantity of development that should be delivered through the OPDC Local Plan, its spatial distribution and various other planning policy requirements. OPDC considered these requirements carefully alongside considerations such as open spaces, industrial land, sensitive locations and the importance of sustainability. This consideration resulted in the Spatial Vision described in Chapter 2 of the Local Plan and summarised in **Figure 2.2**.

**Figure 2.2:** Illustrative summary of the Spatial Vision for the OPDC Local Plan, which has been determined by requirements set out in the London Plan and the OAPF



## 2.4 Reasonable alternatives to requirements from the London Plan and the OAPF

### 2.4.1 Requirement to consider reasonable alternatives

**Box 2.7: SEA Regulations Schedule 2, paragraph 8**

*... an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.*

**Box 2.6: SEA Directive Art. 5(1)**

*Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.*

For the purpose of satisfying the requirements of an SEA Environmental Report, it is necessary for the IIA report to identify and evaluate the environmental effects of proposals in the Local Plan, alongside the identification and evaluation of environmental effects of reasonable alternatives to these proposals. The purpose of assessing reasonable alternatives is to demonstrate how the chosen plan has been arrived at when compared to the reasonable alternatives.

Determining if an alternative is reasonable is a matter of evaluative and qualitative assessment by the planning authority, i.e. it is a matter of planning judgment. SEA Guidance<sup>14</sup> states that “only reasonable, realistic and relevant alternatives need to be put forward”. The SEA Directive and associated legislation do not define what constitutes a reasonable alternative, or how many alternatives must be considered. Reasonableness in the context of considering "reasonable alternatives" is informed by the objectives sought to be achieved by the Local Plan. An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan is not a "reasonable alternative" (case of R (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers [2015] EWHC 776 (Admin)).

OPDC is under a legal duty to have regard to the London Plan in preparing its Local Plan (section 19(2) of the Planning and Compulsory Purchase Act 2004) and must be in general conformity with the London Plan (section 24(1)(b) of the Planning and Compulsory Purchase Act 2004). Therefore, the potential to consider alternatives associated with the scale and location of housing and employment is limited and the assessment of an option to deliver less housing than the London Plan's stated minimum would not be a reasonable alternative because to do so would not meet a key legal requirement of the Local Plan which is to be in general conformity with the London Plan.

This approach is corroborated by the approach recently taken in IIAs of Local Plans for other London boroughs, including the London Borough of Hounslow. The Planning Inspectorate ‘Report to the Council of the London Borough of Hounslow’, dated 31st July 2015<sup>15</sup> (Paragraph 37) states:

*“London has a two-tier planning system in which the London Plan and the Local Plan are both part of the Development Plan. The London Plan sets out the broad strategy for the city as well as some more detailed provisions. It includes key policy requirements and the Local Plan is required to be in general conformity with it. This limits the scope for the consideration of alternative strategies on matters such as: the supply of housing (for which the London Plan sets a target for the Borough); the location of employment (for which the London Plan identifies some locations and employment types to be provided or protected); and the hierarchy of town centres...”*

Paragraph 39 then states:

*“For these reasons the preparation of the Local Plan and the requisite sustainability appraisal explicitly only explored policy options where the opportunity for proposing reasonable alternatives to national and regional policy existed, whether to meet local objectives or to respond to local distinctiveness. It could not explore policy options in respect of major development decisions that would have been in direct conflict with national and regional policy...and it would not avoid making provision for the housing requirement identified for the Borough in the London Plan.”*

Targets for growth set out in the London Plan for the OPDC area are based on an assessment of the anticipated capacity of sites in the OPDC area identified in the Strategic Housing Land Availability Assessment for London<sup>16</sup>. There is considered to be no scope for considering spatial options associated with the development of different sites, because all potential viable sites have been identified and are already included within the OPDC Local Plan.

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<sup>14</sup> Office of Deputy Prime Minister (2005), A Practical Guide to the Strategic Environmental Assessment Directive Practical guidance on applying European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf)

<sup>15</sup> Inspector’s comments are available online at: <https://hounslow.app.box.com/v/InspRep> [Accessed 28.03.19]

<sup>16</sup> London SHLAA is available online at: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/strategic-housing-land-availability-assessment> [Accessed 26.03.19]

## 2.4.2 Strategic Options

The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified that the preferred option was to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. The Old Oak and Park Royal Opportunity Areas are referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the Greater London Authority (GLA) developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015 and was subject to an IIA. The current London Plan (2016) and the Draft New London Plan (2017) also continue to set out these homes and jobs targets.

These development capacities were appropriately tested further through OPDC's Local Plan evidence base including the various Development Framework Principles documents and the Development Capacity Study<sup>17</sup>. Section 2.2 of this Addendum further explains how the London Plan and OAPF have determined the quantity of development, to be delivered through the OPDC Local Plan.

Section 2.3 of this Addendum shows how the spatial strategy adopted in the Local Plan needs to conform with requirements in the London Plan which limits the scope for the selection and assessment of reasonable alternatives.

The OPDC Local Plan therefore proposes the only approach available in terms of quantity and spatial distribution of development i.e. the approach that conforms with key requirements from the London Plan, i.e. the stated minimum number of new homes that must be delivered in the Old Oak and Park Royal Opportunity Areas. An approach that did not conform with these requirements would not be sound and would not be in accordance with the relevant legal requirements set out in the Planning and Compulsory Purchase Act 2004.

A 'business as usual' or 'no plan' approach would not constitute a 'reasonable alternative' for the purposes of the SEA. The Mayor of London established the OPDC on 1 April 2015 as a 'Mayoral Development Corporation' in order for the OPDC to act as the local planning authority for the OPDC area and to produce a Local Plan in order to enable the transformation of the area and the delivery of new housing and commercial development. The need for the OPDC Local Plan is well established and a 'business as usual' approach, or a 'no Local Plan' approach, would clearly not qualify as a 'reasonable alternative' because it would in no way achieve the stated aims of the London Plan and so it would be inappropriate for the IIA to evaluate the environmental effects of 'business as usual' or 'no plan' as an alternative to the preferred strategy.

In *R (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers* [2015] Env LR 1, Hickinbottom J summarised the law relating to reasonable alternatives:

*“iv) “Reasonable alternatives” does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.*

*v) Article 5(1) refers to “reasonable alternatives taking into account the objectives... of the plan or programme...” (emphasis added). “Reasonableness” in this context is informed by the objectives sought to be achieved. An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”. An option which will, or sensibly may, achieve the objectives is a “reasonable alternative”. The SEA Directive admits to the possibility of there being no such alternatives in a particular case: if only one option is assessed as meeting the objectives, there will be no “reasonable alternatives” to it.*

*vi) The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority*

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<sup>17</sup> [https://www.london.gov.uk/sites/default/files/opdc\\_development\\_capacity\\_study.pdf](https://www.london.gov.uk/sites/default/files/opdc_development_capacity_study.pdf)



*rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”*

The fact that no reasonable alternatives to the quantity of development or spatial strategy proposed in the OPDC Local Plan were available is mitigated by the fact that during the preparation of the London Plan and the OAPF, alternatives were considered and appraised in the IIAs accompanying them. The reasonable alternatives tested in the IIA accompanying the London Plan that are relevant to the OPDC Local Plan include, but are not limited to, those presented in **Table 2.1**.

Reasonable alternatives were also tested during the preparation of the OAPF, including reasonable alternatives for:

- Need/demand for development;
- Intensity of development;
- Location of development;
- Timing of development (i.e. differently phases approaches); and
- Details on the development's implementation.

Reasonable alternatives to the preferred strategy in terms of quantity and location of development have been tested during the preparation of the London Plan and the OAPF which ensures that the development proposals in the OPDC Local Plan are sustainable and evidence-based, because these key decisions have been assessed and agreed, as against reasonable alternatives, at a higher level in the hierarchy of plans (see Article 4(3) of the SEA Directive).

**Table 2.1:** Reasonable alternatives considered in the October 2009 Integrated Impact Assessment full report of the replacement London Plan (aka FALP)<sup>18</sup>

Location in the IIA	Alternative dealt with relevant to the OPDC Local Plan	Comments
5.1.3 Strategic Spatial Options	<p>Three strategic spatial development options were developed and considered in the London Plan Review process to help guide policy development.</p> <ul style="list-style-type: none"> <li>• Strategic Spatial Development Option 1: No change, business as usual scenario</li> <li>• Strategic Spatial Development Option 2: Current London Plan direction plus enhanced growth in metropolitan town centres</li> <li>• Strategic Spatial Development Option 3: Current London Plan direction plus enhanced growth in new Strategic Outer London Development Centres</li> </ul>	<p>The assessment highlights that generally, of the options considered here the second is likely to contribute most towards meeting the IIA objectives. This is predominantly due to the fact that it builds upon the existing London Plan's focus on inner London and promotes an improved distribution of development in outer London by focussing on enhancing growth at metropolitan town centres.</p>
6.1.3 Housing Target Options	<p>Three options relating to annual housing growth were considered for assessment purposes:</p> <ul style="list-style-type: none"> <li>• Housing Option 1: Current Plan Housing Targets – 30,500 homes</li> <li>• Housing Option 2: Increased Housing Target – 33,380 homes</li> <li>• Housing Option 3: Increased Housing Provision – 41,154 homes</li> </ul>	<p>The assessment of the housing growth options highlights that Option 2 is likely to be most sustainable as it provides the enhanced benefits arising from additional housing beyond that of Option 1, without the exacerbated effects associated with the greater provision of housing and higher densities associated with Option 3.</p>

OPDC were committed to the ensuring that reasonable alternatives were considered, within the context within which the Local Plan sits. As such, four different approaches to affordable housing were appraised for their likely effects on the IIA Framework in Section 5.1 of the Reg 19(2) IIA Report. The report presented the following summary of this appraisal:

<sup>18</sup> Entec (2009) on behalf of the GLA, Integrated Impact Assessment full report of the replacement London Plan, available online at: [https://www.london.gov.uk/sites/default/files/ia\\_report\\_oct\\_09.pdf](https://www.london.gov.uk/sites/default/files/ia_report_oct_09.pdf)

- Affordable Housing Approach 1 – Fixing the percentage: This option describes an approach whereby a single OPDC wide figure is fixed for the level of affordable housing, subject to a regular review of viability and need. This is an approach supported in Opportunity Areas in the Mayor’s draft Housing SPG. For this option OPDC would need to review viability on a regular basis 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;
- Affordable Housing Approach 2 – Product dependent range: Under this approach, the option would set a percentage range for each housing type to be provided recognising that some affordable housing products are more costly to deliver than others or are more suited to different types of developments. For example, there may be a lower or higher level of affordable housing depending on the type of housing to be provided and the viability/ affordability of this housing;
- Affordable Housing Approach 3 – Viability based percentage: This is the approach currently implemented by the three boroughs. A target percentage 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; and
- Affordable Housing Approach 4 – Negotiate a target on site specific basis: This option seeks the maximum reasonable amount of affordable housing without specifying a percentage target to achieve for each development. A review of relevant economic data and viability for each site, to be provided by the applicant and tested by OPDC, will enable an allocation of affordable housing on the site to be negotiated and determined.

In addition to reasonable alternatives for the Affordable Housing strategic policy, OPDC also considered an extensive range of reasonable alternatives to the preferred policies.

For some policies in the OPDC Local Plan, it was considered that there were no reasonable alternatives available because the Local Plan is required to be in general conformity with the London Plan. However, reasonable alternatives were identified for 29 of the policies in the Local Plan, which are presented in **Table 2.2**.

Each of the reasonable alternatives for policies listed in Table 2.2 were appraised in the IIA. The full results of these appraisals are presented in Appendix G of the IIA report accompanying the Regulation 18 consultation on the OPDC Plan<sup>19</sup>.

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<sup>19</sup> Integrated Impact Assessment (including Habitats Regulation Assessment Screening) Appendices, Local Plan Supporting Study, Draft for Regulation 18 Consultation, 4 February 2016. Available online at: [https://www.london.gov.uk/sites/default/files/opdc\\_draft\\_local\\_plan\\_draft\\_ia\\_report\\_appendices\\_new\\_cover.pdf](https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_draft_ia_report_appendices_new_cover.pdf) [accessed 20.03.19]

**Table 2.2:** Reasonable alternatives to policies proposed in the OPDC Local Plan. For the full versions of the policies, see the Regulation 18 version of the Local Plan<sup>20</sup>

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
D5: Alterations and extensions	1. Guidance is not provided for alterations, extensions and shopfronts.	n/a	To support the delivery of a high quality built environment.
D7: Amenity	1. London Plan policies are used to manage amenity	n/a	To recognise specific requirements of high density development in delivering an appropriate standard of amenity.
H2: Housing supply	1. Seek to deliver a higher number of new homes within the Local Plan period.	n/a	For the Local Plan period, the Local Plan does not provide targets greater than those defined in the London Plan based on testing set out in the Development Capacity Study. However, policy SP10 seeks to ensure that an optimised and comprehensive approach is taken to the development of site allocations so that targets can be met or exceeded. This reflects London Plan policy 2.13(B)(c).
H3: Housing mix	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)	n/a	To ensure that new homes will have adequately sized rooms and efficient room layouts which are functional and fit for purpose.
H5: Existing housing	1. Take a more flexible approach to the loss of existing stock. 2. Allow the conversion of smaller family sized units and not require a proportion of these to be replaced as family homes	n/a	1. To ensure the loss of existing housing stock to other uses does not undermine the overall housing supply. 2. To prevent the loss of much needed family sized units.
H6: Housing in the Private Rented Sector	1. Make it mandatory for PRS proposals to sign up to London Rental Scheme (LRS)	n/a	Following the change in Mayor, this proposal was no longer sought.

<sup>20</sup> Available online at: [https://www.london.gov.uk/sites/default/files/opdc\\_draft\\_local\\_plan.pdf](https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan.pdf)



Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
H7: Housing with shared facilities	1. Encourage the conversion or loss of shared housing without replacing it.	n/a	Policy H7 was amended to provide criteria to manage the conversion or loss of existing shared housing to ensure that appropriate shared housing was not removed from the market.
H10: Student accommodation	1. Require student housing proposals to be linked to specified educational institutions	To help to demonstrate there is a local or London-wide supply and ensure the accommodation will be supporting London's higher education institutions.	
E2: Old Oak	1. Support for focusing B1(a) uses in and around Old Oak Common Station is not provided. 2. Support for B1(b) and B1(c) uses in Old Oak north is not provided.	n/a	1. To support the development of a commercial centre in Old Oak South. 2. Specific support for B1(b) uses is not provided in policy P2; however, a range of B1 uses are supported within Old Oak North including specifically B1c along the Haul Road.
E3: Park Royal	1. SIL boundary is not extended. 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.	n/a	1. To ensure the ability for intensifying Park Royal is optimised. 2. The release of the Channel Gate High Speed 2 construction work sites would prohibit the Local Plan from meeting the London Plan jobs targets for Park Royal Opportunity Area and intensification aspirations.
E4: Open workspace	1. Delivery of onsite open workspace is required for residential and/or commercial proposals. 2 2. Delivery of small-scale workspaces is supported with coordinated delivery of rented small-scale residential units outside of the SIL.	2. To avoid conversion to residential units of live-work units provided in a single unit.	1. Policies E2 and E3 were drafted to support a range of employment floorspaces, and not solely focus on open workspaces, to support a diverse employment offer.
TC2: Town centre hierarchy	1. Identify Old Oak High Street as a Metropolitan Centre. 2. Two centres are designated in Old Oak - a District Centre to the north of the canal and a	n/a	1. To reflect the quantity of retail and leisure floorspace required to support the needs of development as defined in the Retail and Leisure Needs Study.

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
	<p>Neighbourhood Centre around Old Oak Common Station.</p> <p>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.</p> <p>4. Park Royal is not identified as a Neighbourhood Centre and a different approach is taken to town centre uses in the area.</p>		<p>2. / 3. To reflect the geographic size of Old Oak North and Old Oak South and deliver a comprehensive and coordinated town centre over the long term.</p> <p>4. To ensure local business and residential communities are well served by town centre uses.</p>
TC3: Vibrancy	1. Take a more flexible approach to betting shops, pay-day loan shops and takeaways.	n/a	To support the health and well-being of local people and the vibrancy of town centres.
TC4: A-Class needs	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.	n/a	To reflect the evidence base in the Retail and Leisure Needs study recommending the delivery of a Major Town Centre during the plan period and to manage impacts the vitality and viability of surrounding town centres.
TC5: Culture, sports and leisure facilities	1. Set a quantum threshold for culture, sports and leisure uses.	n/a	To support the ability for culture, sports and leisure uses to aid with placemaking and support the potential for a major cultural, sports or leisure use to locate in the area and act as a catalyst for regeneration.
TC7: Evening night time economy	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.	n/a	To manage the cumulative impacts of night-time economy uses on residential uses.
SI1: Strategic policy for social infrastructure	1. Require new social infrastructure to be provided solely on-site rather than looking to expand surrounding existing facilities.	n/a	To ensure the needs of residents in early phases of development are met and help to knit together new and existing communities.

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
SI2: Education	1. Do not promote the OPDC area as a location for higher education uses	n/a	To reflect the development potential of the OPDC area and the potential for education facilities to act as catalyst uses for the area.
SI5: Pubs	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.	n/a	To prevent the loss of public houses and their role in local communities.
T1: Strategic policy for transport	1. Giving priority to car travel	n/a	To support the delivery of the Healthy Streets, prevent congestion on the local street network, prevent contribution to air pollution and support the health and well-being of local communities.
T7: Car parking	1. Setting less stringent car parking standards. 2. Car free – no residential car parking. Only blue badge. 3. Take a more flexible approach to parking standards for new commercial developments in Old Oak.	n/a	1. To avoid contributing to congestion on the local street network. 2. To reflect the potential need for private vehicle transport before public transport services are improved and increased. 3. To reflect the excellent levels of future public transport accessibility and prevent congestion on the local street network.
T8: Freight, servicing and deliveries	1. No controls over deliveries and servicing. 2. Ban deliveries and servicing by larger vehicles.	n/a	1. To manage the impact of increased freight and servicing vehicles on the local street network. 2. To avoid unduly negatively impacting commercial uses.
T9: Construction	1. There is no control or co-ordination of construction transport 2. All freight has to be moved by rail or water	n/a	1. To protect local amenity and manage impacts on the local street network. 2. To recognise that it is not practical to move all freight by rail or water.
T10: Transport Assessments and Travel Plans	1. Requiring a transport assessment for all developments.	n/a	1. To align with TfL guidance and recognise that very small-scale developments are unlikely to have a minimal impact on the road network.

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
	2. Increasing the threshold for schemes that require a transport assessment.		2. To prevent development being delivered without the adequate assessment of its impacts on the transport network.
EU2: Smart technology	1. That the provision of interoperable, open and usable data is not specifically required.	n/a	To support the delivery of an appropriately open data environment to benefit local people and consultation activities.
EU4: Waste management	1. Safeguard all waste sites in Old Oak.	n/a	To enable development capacity to be optimised in Old Oak North where waste management capacity of lost waste sites can be managed elsewhere.
EU5: Circular economy and resource efficiency	1. Safeguard all waste sites in Old Oak.	n/a	To enable development capacity to be optimised in Old Oak North where waste management capacity of lost waste sites can be managed elsewhere.
EU6: Decentralised energy	1. To delete the policy reference to 'major' development, so that the policy requirements apply to 'all' development.	n/a	To recognise that delivering energy systems may negatively impact the viability of non-major development proposals.
EU7: Digital communications	1. OPDC does not specifically seek to integrate contemporary technology and accommodate future technologies to address challenges and create opportunities.	n/a	To ensure Old Oak and Park Royal is sufficiently robust to address challenges and create opportunities to support local residential and business communities.

### 3 Justifying the proposed approach

It is a requirement of the SEA Directive, as well as the SEA Regulations, for the SEA to give the reasons for the selection of the proposed approach in the Plan in light of the reasonable alternatives dealt with.

The SEA Directive Art 9.1 states:

*“Member States shall ensure that, when a plan or programme is adopted, the authorities referred to in Article 6(3), the public and any Member State consulted under Article 7 are informed and the following items are made available to those so informed: (a) the plan or programme as adopted; (b) a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8 and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and (c) the measures decided concerning monitoring in accordance with Article 10.”*

Regulation 16 of the SEA Regs 2004 states, with regards to post adoption statements:

*“Information as to adoption of plan or programme: 4) ... (a) how environmental considerations have been integrated into the plan or programme; (b) how the environmental report has been taken into account; ... (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.”*

Section 3.4 of the OPDC Regulation 19(2) Second Revised Draft Local Plan IIA Report (May 2018) states that the purpose of the IIA assessments *“was to determine the sustainability strengths and weaknesses of each option, such that this information would be used by the plan-makers to develop the plan’s policy options and preferred policies (section 6.3). The preferred policies and policy options were then assessed alongside one another in detail, which enabled a comparison of their predicted sustainability effects, to inform the development of the preferred policies. A matrix was used for this assessment enabling the policies and options to be easily compared.”*

The IIA therefore made clear that OPDC’s decision-making in terms of taking options was, in part, determined by their sustainability performance in light of the alternatives dealt with. However, as set out in both the SEA Directive and the SEA Regulations, the requirement to give reasons for selecting the proposed approach in light of the alternatives dealt with is typically satisfied within the post-adoption statement of the Plan. As such, it is expected that the post-adoption statement of the OPDC Plan will seek to further clarify the reasoning behind the selection of the proposed approach. Nonetheless, Table 3.1 presents how the policies recommendations from the IIA have been taken into consideration on the Local Plan.

**Table 3.1: How the recommendations of the iterative IIA process have influenced the development of the Local Plan**

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
<b>Strategic Policies</b>			
<b>Places</b>	IIA objective 1, P3 - It is suggested that further clarity with regards to green infrastructure is provided strategically, to which the requirement within the policy could refer to. It is also recommended that it is referred to as ‘multifunctional green infrastructure’ as, although SuDS are referred to in the supporting text, green infrastructure has the potential to provide greater benefits.	Yes	Policy SP8 has been drafted.  Glossary definition refers to multifunctional role of green infrastructure.
	IIA objective 1, P4 - It is recommended that clarity is provided in the supporting text as to the nature of ‘new and enhanced green and civic spaces’ as required through the policy wording in relation to green infrastructure, and what their functions are intended to be.	Yes	Policy P3 now provides further details on the canal Local Park and smaller spaces. Policy P1 has been streamlined.
	IIA objective 4, P1 - It is suggested that the ‘delivery’ and ‘transport’ sections of the policy repeat the supporting of transport infrastructure. These two sections could be merged, to avoid repetition. It is also suggested that the ‘streets’ section (o) repeats the need for the new transport infrastructure to integrate with its surroundings. These two sections could be streamlined to avoid repetition.	Yes	This level of detailed is considered to be more appropriate for Supplementary Planning Documents.
	IIA objective 4, P7 - It is suggested that the proposed ‘connections’ across the A40 are explained more clearly in the policy text.	Yes	Policy H8 provides this additional information.
	IIA objective 4, P10 - The policy wording could specify that promoted access to Wormwood Scrubs would be via walking and cycling modes, as set out in the supporting text to the policy.	No	Policy P12 refers to walking and cycling routes.
	IIA objective 5, P5 - The policy could provide further information following the completion of the OPDC Gypsy and Traveller Accommodation Needs Assessment in light of emerging legislation.	Yes	To avoid repetition in place policies, policy EU3 provides a single reference point for surface water management.
	IIA objective 6, P4, P5, P6, P8 & P9 - Supporting text could include a strategy for how surface water flood risk may be overcome. This could help deliverability and reduce flood risk.	Yes	Policy EU3 refers to vegetated SuDs.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	IIA objective 6, P7 - A scheme of planting, connected to a wider green infrastructure network, which may also include SuDS, could be included as a requirement in the Local Plan.	No	Policy P12 refers to SuDS to address surface water flooding issues.
	IIA objective 6, P10 - Supporting text could include a strategy for how surface water flood risk may be overcome that further relates to the Water Policy. This could help deliverability and reduce flood risk.	Yes	Supporting text has not been updated to repeat evidence base. Supporting text has been amended to refer to amenity management policies.
	IIA objective 7, P2 - The introductory text indicates that an Old Oak Common Decentralised Energy Strategy is currently in preparation. It is suggested that the findings of this study are reflected in the supporting text, to provide more detail in relation to the supported 'energy centre'. How potential pollution from this facility might be managed could be explained.	Yes	Supporting text has not been updated to repeat evidence base. Supporting text has been amended to refer to amenity management policies.
	IIA objective 7, P7 - It is suggested that following the development of further work on the A40, additional detail could be provided for the proposed 'connections' across the A40.	No	This level of detailed is considered to be more appropriate for Supplementary Planning Documents.
	IIA objective 8, P9 - Should further information be provided by HS2 regarding their waste management plans, policies are alternative guidance should reflect this.	No	HS2 waste management is not managed by the Local Plan.
	IIA objective 9, P1 - The management of water quality in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects arise from its development.	No	This level of detailed is considered to be more appropriate for Supplementary Planning Documents.
	IIA objective 9, P1 - The management of water quality in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects arise from its development.	No	This level of detailed is considered to be more appropriate for Supplementary Planning Documents.
	IIA objective 9, P4 - It is suggested that water quality issues are also included as a consideration when considering the future use of the canal.	Yes	Policy EU3 provides guidance to protect the canal in relation to future use.
	IIA objective 10, P1 - Improving connections could be tied to the development of an area-wide multi-functional Green Infrastructure Strategy. The Local Plan text states that this is currently being developed. It is suggested that, when this is available, relevant text is added explicitly to the policy wording to improve deliverability. The	No	Policy SP8 provides this guidance.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	management of biodiversity in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects arise from its development.		
	IIA objective 10, P2 - The policy should provide further information in the supporting text relating to how development should be 'mindful' of these assets as well as how biodiversity may be enhanced within open spaces.	Yes	This level of detailed is considered to be more appropriate for Supplementary Planning Documents.
	IIA objective 10, P4 - It is recommended that measures to enhance biodiversity are encouraged through the policy wording and set out in the supporting text, including the rationale behind a specific lighting strategy. This should help enable successful implementation. It is suggested that some elements of the policy are re-ordered, so that impacts on the water environment and biodiversity are set out under 'environment' in connection with the green infrastructure network.	No	This level of detailed is considered to be more appropriate for Supplementary Planning Documents
	IIA objective 10, P6, P7 & P8 - It is recommended that measures to improve local biodiversity, such as through the extension of the green infrastructure network into the area, or through street planting/landscaping schemes, could be promoted through the policy to improve both biodiversity.	Yes	Policy P3 seeks to enhance biodiversity. Policy P6, P7 and P10 have been amended to refer to delivering green infrastructure.
	IIA objective 12, P1 - It is suggested that further detail relating to how development should reflect the historic character and appearance of the Old Oak area is reflected in the policy wording and supporting text. This should include the identification and protection of local views and the settings of historic assets. However, it is noted that the OPDC Heritage and Views Study is yet to be completed.	Yes	Policy P3 addresses this through biodiversity conservation. Policy P3 has been reordered accordingly.
	IIA objective 12, P2 - The policy should seek to reduce repetition within the policy with regards to the ecological and historical character of the Grand Union Canal as well as provide further information in the supporting text relating to how development should be managed in relating to enhancing nature conservation and heritage assets.	Yes	Policies to conserve and enhance heritage are included in policies P1 and P2.
	IIA objective 12, P3 - It is recommended that this requirement from the supporting text is included in the policy wording to improve implementation.	Yes	Repetition in Policy P3 has been removed. As the town centre crosses more than one place, this wording has been used to inform policy TCC1.



Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	IIA objective 14, P8 - Reference to active frontages, as included in the supporting text, should be specified in the policy wording to improve deliverability.	Yes	Policy P1 refers to conserving and enhancing heritage. Relevant assets are identified. Local views are identified in policy D7.
	IIA objective 14, P10 - The management of the park could include measures to reduce crime and the fear of crime when using or accessing the park, particularly if it would be open during the evenings.	Yes	Policy P6 refers to delivering Healthy Streets and new open spaces. Supporting text to P12 refers to addressing security and lighting.
	IIA objective 15, P6 - Health levels within the area could be improved through the extension of the green infrastructure network through this area, to create more pleasant walking and cycling routes.	Yes	Policies to conserve and enhance heritage are included in policies P1 and P2.
	IIA objective 16, P1, P2, P3 & P4 - Town centre uses could be specified to include education facilities where necessary.	No	Policy P10C1 to P10C4 provide guidance for active frontages.
	IIA objective 17, P1, P2 & P3 - The provision of training facilities could be specified as a requirement in this area in addition to the guidance set out in policy E5.	No	The NPPF does not define education facilities as town centre uses.
	IIA objective 17, P7 - It is unclear from the policy text under b) what exactly the policy is supportive of. This could be made clearer in the policy wording.	Yes	Policy P7 has been amended for clarity.
	IIA objective 18, P1 - It is recommended that this is a consideration, and measures to reduce the impact on neighbouring town centres be included within the policy or highlighted to ensure that the intention behind measures is made clear.	Yes	As the town centre crosses more than one place, this wording has been used to inform policy TCC1.
<b>Design</b>	IIA objective 6, D1 - Where necessary, appropriate mitigation measures should be incorporated into development.	Yes	Development Management Design policies provide guidance for mitigating impacts of the design of development.
	IIA objective 6, D3 & D5 - Where necessary and appropriate, flood risk mitigation measures and measures supporting climate change adaptation should be	Yes	Policy EU2 sets out the role of green infrastructure in relation to SuDS.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	incorporated into the design of open space in accordance with the proposed water policy in the Environment and Utilities Chapter.		
	IIA objective 7, D5 - Development should seek to incorporate sustainability measures during construction and operation.	Yes	Policy SP9 requires high levels of sustainable design, construction and operation.
	IIA objective 8, D4 & D5 - Where appropriate waste and recycling facilities should be incorporated and waste minimisation techniques should be encouraged.	Yes	Policy EU6 provides this guidance.
	IIA objective 9, D3, D4 & D5 - Sustainable water measures should be adopted where appropriate.	Yes	Policy EU3 provides this guidance.
	IIA objective 10, D2 & D3 - Where possible, green corridors should be encouraged within development.	Yes	Policies SP8 and EU2 provide this guidance.
	IIA objective 14, D2 - Development design should seek to optimise natural surveillance and ensure that new spaces and routes are safe.	Yes	Policies P2 and P4 provide this guidance.
<b>Environment and Utilities</b>	No recommendations.	n/a	n/a
<b>Transport</b>	IIA objective 9, T9 - Appropriate pollution prevention would need to be considered where water transportation is concerned.	Yes	Policy EU3 provides guidance to protect the canal in relation to future use.
	IIA objective 11, T5 - Recommendation to encourage use of low carbon buses and work with TfL.	Yes	Policy T6 supports delivery of low and zero emission buses.
	IIA objective 13, T1, T2 & T3 - A recommendation would be to ensure that the needs to vulnerable and wider diversity groups are factored in to all places as different groups can have different needs.	Yes	Policy D3 seeks delivery of accessible built environment; policy SP7 requires delivery of an accessible movement network; and policies T1 and T2 provide guidance in accordance with Mayoral guidance to ensure accessibility.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	IIA objective 14, T5 - Improved lighting and high-quality shelters should be implemented on all bus services and at all bus stops.	Yes	Bus infrastructure is referenced in policy T6. Further detail will be provided in Supplementary Planning Documents.
	IIA objective 15, T6 - We recommend that new streets should give consideration to connecting more isolated areas and seek to reduce social exclusion.	Yes	Policies SP7 and T1 provide this guidance.
	IIA objective 16, T1, T2, T3, T4 & T5 - We recommend that consideration is given to connecting all residential areas, especially the most deprived to a range of essential services such as schools.	Yes	Through Policies SP7 and T1, this will be achieved
<b>Housing</b>	IIA objective 1 & 5, H3 - It is suggested that bullet point 3 of the policy is unnecessary and provides repetition that could be excluded.	No	Policy H3 provides guidance for housing mix supported by local evidence base.
	IIA objective 1, H7 - The policy could include a requirement relating to existing shared housing, similar to that included within the supporting text, within the policy wording.	Yes	This guidance provided in policy H7.
	IIA objective 1, H10 - Measures that could be included to create places within the local communities as a result of student housing could be suggested to enhance their presence within the built environment.	Yes	This is provided within the supporting text to policy H10.
	IIA objective 2, H8 - The policy wording could usefully identify the need for developments to be high density, if this is appropriate.	Yes	Policy SP9 provides this guidance.
	IIA objective 5, H1 - Details pertaining to what the housing needs will be within the area, in order to identify whether these needs are being 'met' within the housing policies, could be provided in the supporting text. This may be implemented in the next stage of the Local Plan, once the evidence-base studies are complete. It is unclear where the 10% of housing to meet building regulation M4(3) 'wheelchair user dwellings' has come from. Reference to the evidence-base for this proportion could be usefully provided in the supporting text. If this is a standard requirement within the building regulations, it is suggested that it need not be included within the policy wording.	Yes	This is provided in supporting text to policy H2. This is provided in supporting text to policy H3.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	IIA objective 5, H5 - It is further recommended that repetition with regards to housing mix is removed between housing policies H3 and H5. The policy could seek to require that conversions of existing and vacant buildings include provision for ensuring that the accessibility of buildings is brought up to the standard required for new developments.	No	Housing mix policies have been consolidated to policy H3.
	IIA objective 7, H5 - The policy could seek to require that conversions of existing and vacant buildings include provision for ensuring that the energy efficiency of buildings is brought up to the standard required for new developments.	No	This would repeat guidance provided in policy D3. This would repeat guidance provided in policy EU9.
	IIA objective 7, H8 - It is recommended that high quality design aspects also specify the need for energy efficient design, which should help to reduce the cost of living for older people and improve their health.	Yes	Policy H8 has been amended.
	IIA objective 8, H5 - The policy could add a requirement that conversions do not result in cumulative stress on the local environment, including pollution levels such as air, noise and light pollution as well as the potential impact on biodiversity, land quality and water quality.	Yes	Policy H5 has been amended. Other environmental policies also provide relevant guidance.
	IIA objective 9, H9 - The policy could include a requirement for the improvement of connections to services and facilities including utilities to the existing site, should this be necessary. Detail relating to this could be included in the supporting text.	Yes	This would repeat guidance provided in policy EU9
	IIA objective 12, H9 - Proposals for new gypsy and traveller sites could impact on the local historic environment. However, whether there is a need for new sites is currently unknown until the outcomes of the study are published. This could be included in the policy wording as a consideration.	No	Policy D8 provides guidance for conserving and enhancing the built environment.
	IIA objective 13, H5 - The policy could be reworded to seek that the conversion of existing dwellings and vacant buildings seeks to enhance the amenity of the local community, as opposed to seeking a minimal effect.	No	The approach to maintaining amenity of neighbourhoods is considered to be appropriate.
	IIA objective 13, H9 - The policy could usefully consider the potential integration of new sites within the surrounding community, as part of the assessment of impacts.	No	The approach to maintaining amenity of neighbourhoods is considered to be appropriate.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	<p>IIA objective 14, H9 - The policy could usefully consider the potential integration of new sites within the surrounding community, as part of the assessment of impacts. This could help to reduce a possible perception of fear of crime.</p>	No	<p>Policy H8 requires new sites to be accessible to public transport, services and facilities and be capable of support by local social infrastructure. This is considered to be appropriate.</p> <p>Policy H8 requires new sites to be accessible to public transport, services and facilities and be capable of support by local social infrastructure. This is considered to be appropriate. Policy SP4 supports social cohesion of all communities.</p>
	<p>IIA objective 15, H1 - The policy wording could specifically refer to the need for developments to be designed with the health and wellbeing of residents in mind. Design measures might also include measures such as high levels of thermal insulation and the provision of outside space/green roofs for all residents.</p>	No	<p>Policy SP2 and SP3 provide guidance for supporting health and wellbeing.</p>
	<p>IIA objective 15, H3 - It is recommended that the next iteration of the Local Plan considers human health as part of the mix of housing provision, through the consideration of design principles alluded to in the supporting text provided for policy H1. It is suggested that the requirements relating to housing mix within policies H1 and H3 are consolidated into the same policy.</p>	No	<p>This would repeat policy SP3 which provides guidance for improving health and reducing health inequalities. This applies to housing.</p> <p>Housing mix policies have been consolidated to policy H3.</p>
	<p>IIA objective 15, H5 - See recommendation under objective 13. The requirements for new development in terms of requirements for improving mental and physical health should also be applied to the conversion of existing and vacant dwellings, to seek that inequalities are not exacerbated.</p>	No	<p>This would repeat policy SP3 which provides guidance for improving health and reducing health inequalities. This applies to housing.</p>
	<p>IIA objective 15, H10 - It is recommended that the policy ensures that new student accommodation is supported by an appropriate level of services and facilities, to meet the needs of the students. This could also help to reduce impacts on residential amenity in a positive way. The creation of new facilities and services might include sports facilities, which could be shared locally.</p>	Yes	<p>Policy H10 provides this guidance.</p>

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
<b>Employment</b>	IIA objective 6, E3 - Appropriate climate change mitigation and adaptation measures should be incorporated where possible - as per Preferred Policy Option EU3: Water.	Yes	Policy P4 provides this guidance.
<b>Town Centres and Community Uses</b>	No recommendations.	n/a	n/a
<b>Delivery and Implementation</b>	No recommendations.	n/a	n/a

## 4 Quality Assurance Checklist

### 4.1 SEA Checklist

**Table 4.1** presents a quality assurance checklist from the Practical Guide to SEA<sup>21</sup>. This checklist provides a concise overview of where within the Reg 19 (2) IIA Report various requirements of an Environmental Report have been met. This was included in Appendix F of the Reg 19 (2) IIA Report. However, where necessary, further detail is provided in **Table 4.1** of this Addendum, to clarify how and why certain requirements have been satisfied in the way that they have been. A quality assurance checklist was originally provided in Appendix F of the Reg 19(2) IIA Report. This has been updated with additional detail in **Table 4.1**.

**Table 4.1: Completed SEA Quality Assurance Checklist**

Requirement for SEA	Comments
Objectives and context	
The plan's or programme's purpose and objectives are made clear	Chapter 1 of the IIA Reg 19(2) Report
Environmental issues and constraints, including international and EC environmental protection objectives, are considered in developing objectives and targets	IIA Scoping report, Chapter 3 of the Reg 19(2) report as well as Appendix B of the Reg 19(2) Report
SEA objectives, where used, are clearly set out and linked to indicators and targets where appropriate.	IIA Framework in Chapter 3, Section 9 of the Reg 19(2) Report
Links with other related plans, programmes and policies are identified and explained	IIA Scoping report, Chapter 3 of the Reg 19(2) report as well as Appendix A of the Reg 19(2) Report
Conflicts that exist between SEA objectives, between SEA and plan objectives and between SEA objectives and other plan objectives are identified and described	Chapter 3 of the Reg 19(2) report
Scoping	
Consultation Bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report	The IIA Scoping report was consulted on with the statutory consultees and the public. Responses received were factored in during the preparation of the IIA Report accompanying the Regulation 18 consultation.
The assessment focuses on significant issues	The scoring system used throughout the IIA distinguishes between major (significant) and minor (likely insignificant) effects. Minor effects are also identified to feed into the cumulative/synergistic effects assessment as multiple minor effects can cumulate into major (significant) effects.
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	Chapter 4, Section 8 of the IIA Reg 19(2) Report
Reasons are given for eliminating issues from further consideration.	IIA Scoping report determined the issues required for consideration in the IIA, as agreed with the statutory consultees.

<sup>21</sup> Office of the Deputy Prime Minister (2005) A Practical Guide to the Strategic Environmental Assessment Directive.

Requirement for SEA	Comments
	Summarised in the Reg 19(2) report in Chapter 4, Section 4.2 (baseline summary) and Chapter 4, Section 4.3 (key environmental issues / problems).
Alternatives	
Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.	Chapter 8 – policy alternatives
Alternatives include ‘do minimum’ and/or ‘business as usual’ scenarios wherever relevant	Alternatives considered in the IIA of the London Plan included do-minimum scenarios
The environmental effects (both adverse and beneficial) of each alternative are identified and compared	Assessments in the Reg 19(2) identify effects ranging classified as major negative, minor negative, neutral/negligible, positive/negative, uncertain, minor positive and major positive
Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained	Chapter 4, Section 4.1 – review of PPPSIs
Reasons are given for selection or elimination of alternatives.	Section 3.4 of the OPDC Regulation 19(2) TBC in Post-adoption statement
Baseline information	
Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described	Chapter 4 and Appendix B of the Reg 19(2) report.
Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan	Chapter 4 and Appendix B of the Reg 19(2) report.
Difficulties such as deficiencies in information or methods are explained	Chapter 3 on the methodology. Uncertainty is also discussed during the assessments of options in Chapter 5 (strategic options), Chapter 6 (vision and narrative) and Chapter 7 (policies) of the Reg 19(2) report.
Prediction and evaluation of likely significant environmental effects	
Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental effects are also covered, as appropriate	The IIA Objectives factored in all topics of the SEA Directive. Assessments against the IIA Framework are therefore inherently assessments against the listed SEA Topics from Annex 1(f) of the Directive, the results of which are presented in Chapter 5 (strategic options), Chapter 6 (vision and narrative) and Chapter 7 (policies) of the Reg 19(2) report.
Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed.	Assessment results presented in the Reg 19(2) report state whether effects are considered to be short-, medium- or long-term.
Likely secondary, cumulative and synergistic effects are identified where practicable	Secondary effects, also called indirect effects, are identified throughout the assessment process. Cumulative and synergistic



Requirement for SEA	Comments
	effects are identified and evaluated in Chapter 7 of the Reg 19(2) report.
Inter-relationships between effects are considered where practicable	Throughout assessment results in Chapter 7 of the Reg 19(2) report
The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds.	As explained in Chapter 3, the prediction and evaluation of effects is based on relevant standards and the best available data with respect to the PPPs identified during scoping. SEA experts carrying out the appraisals used methods successfully used for years throughout the UK and as recommended by bodies including the RTPI and ODPM.
Methods used to evaluate the effects are described.	Chapter 3, section 10, 'Assessment Methodology' of the Reg 19(2) report
Mitigation measure	
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.	Where appropriate and feasible measures were identified, these were proposed to OPDC alongside the assessments in Chapter 5 (strategic options), Chapter 6 (vision and narrative) and Chapter 7 (policies).
Issues to be taken into account in project consents are identified	The mitigation measures presented in Chapter 5 (strategic options), Chapter 6 (vision and narrative) and Chapter 7 (policies) of the Reg 19(2) report sometimes relate to issues that could be taken into account during the project consents stage.
The Environmental Report	
Is clear and concise in its layout and presentation	Yes, public consultation responses have consistently not highlighted issues with accessibility of the report. NTS also included. The IIA purposefully follows a clear and logical layout and format avoiding overly-technical language to be as accessible as possible to laypersons.
Uses simple, clear language and avoids or explains technical terms.	Yes, public consultation responses have consistently not highlighted issues with accessibility of the report. NTS also included. The IIA purposefully follows a clear and logical layout and format avoiding overly-technical language to be as accessible as possible to laypersons.
Uses maps and other illustrations where appropriate.	Maps and illustrations were used extensively to present baseline data summarised in Appendix B of the Reg 19(2) report.
Explains the methodology used.	Chapter 3 – approach and method, including difficulties, of the Reg 19(2) report.
Explains who was consulted and what methods of consultation were used.	Chapter 9 of the Reg 19(2) report sets out the next steps, including consultation. Appendix C of the Reg 19(2) report presents responses received during the Regulation 18 and Regulation 19(1) consultation periods, as well as how these responses were taken into consideration in the preparation of the Regulation 19(2) report.

Requirement for SEA	Comments
Identifies sources of information, including expert judgement and matters of opinion.	Chapter 4, Section 4.2 – baseline summary Chapter 4, Section 4.3 – key environmental issues / problems
Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA	Non-technical summary included with the Reg 19(1) and (2) reports
Consultation	
The SEA is consulted on as an integral part of the plan making process	Consulted on at the IIA Scoping stage, the Regulation 18 stage and two Regulation 19 stages.
Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and Environmental Report.	
Decision-making and information on the decision	
The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme.	Appendix C of the Reg 19(2) report.
An explanation is given of how they have been taken into account	
Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.	
Monitoring measures	
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.	Chapter 8 of the Reg 19(2) report.
Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.	
Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)	
Proposals are made for action in response to significant adverse effects.	

## 5 Conclusion

This Addendum has provided further clarity on how the IIA process accompanying the OPDC Local Plan has satisfied the various requirements of SEA and SA and has made a meaningful contribution towards informing the plan-making process.

With regards to reasonable alternatives, it is considered that the IIA has identified and evaluated the sustainability effects of reasonable alternatives insofar as this was considered to be possible. This includes reasonable alternatives to the affordable housing strategy as well as a range of other policies. This Addendum has clarified why (see Chapter 2), as a result of the London Plan it would not have been reasonable for the OPDC to assess as an alternative an option for a quantum of development less than that set out in the London Plan. The quantum and spatial distribution of development within the OPDC as set out in the London Plan was subject to SA and SEA processes as part of the IIA for the London Plan. The SEA Directive and the SEA Regulations include provisions to avoid duplication of assessment.

This Addendum has also detailed how the approach to sites assessments is compliant with the requirements of SEA and SA (see Chapter 3) and that the assessment results are robust and transparent, with further detail provided on how the OPDC have arrived at their preferred approach.

Chapter 4 provides an overview of how the IIA process is legally compliant and has made a positive impact in ensuring the OPDC Local Plan delivers regenerative and sustainable development.

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# OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION POST SUBMISSION MODIFICATIONS TO THE REGULATION 19(2) SECOND REVISED DRAFT LOCAL PLAN

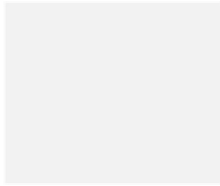
## Habitats Regulations Assessment Screening Report

UA008107-R-05

FEBRUARY 2021



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# Old Oak and Park Royal Development Corporation Post Submission Modifications to the Regulation 19(2) Second revised draft Local Plan

## Habitats Regulations Assessment Screening Report

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Report No UA008107-R-05

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### VERSION CONTROL

Issue	Revision No.	Date Issued	Description of Revision: Page No.	Description of Revision: Comment	Reviewed by:
001	R01	11 <sup>th</sup> December 2015	n/a	Technical Review – First draft	LH & SKW
002	R02	13 <sup>th</sup> March 2017	n/a	Updated following policy changes	SKW
003	R03	18 <sup>th</sup> April 2017	Page 6 Page 21 – Table 5-2 Page 24 – Table 5-3	Updated following client comments and changes to Environment policies	SKW
004	R04	15 <sup>th</sup> May 2018	Page 3 – Section 2.2 Page 5 – Section 2.4 Page 11 – Table 3-1 Page 21 – Table 5-1 Page 23 – Table 5-2 Page 32 – Table 6-2	Updated following Regulation 19 consultation	SKW

Issue	Revision No.	Date Issued	Description of Revision: Page No.	Description of Revision: Comment	Reviewed by:
005	R05	5 <sup>th</sup> February 2021	Pages 1 and 2 – Sections 1.1 and 1.3  Page 3 - 7 – Sections 2.1, 2.2, 2.3, 2.4  Page 8 – Section 3.1  Pages 11 -12 – Table 3-1  Pages 13 - 14 – Table 3-2  Pages 18 - 26 – Section 5.3  Pages 27 - 29 – Section 6.1  Page 32 - 34 – Table 6-2	Legislation changes following exit from the European Union; updates following post- submission amendments	SKW

This report dated 05 February 2021 has been prepared for Old Oak and Park Royal Development Corporation (the "Client") in accordance with the terms and conditions of appointment dated 11 December 2020 (the "Appointment") between the Client and **Arcadis Consulting (UK) Limited** ("Arcadis") for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

## ABBREVIATIONS

ARN	Affected Road Network
CJEU	Court of Justice of the European Union
cSAC	Candidate Special Area of Conservation
EU	European Union
FCS	Favourable Conservation Status
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
HS2	High Speed 2
IROPI	Imperative Reasons of Overriding Public Interest
MOL	Metropolitan Open Land
NAEI	National Atmospheric Emissions Inventory
NPPF	National Planning Policy Framework
OPDC	Old Oak and Park Royal Development Corporation
pSPA	Potential Special Protection Area
SAC	Special Area of Conservation
SCI	Sites of Community Importance
SIL	Strategic Industrial Location
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
TfL	Transport for London
ULEZ	Ultra Low Emission Zone

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## **DRAWINGS**

**DRAWING 001-UA008107-UE31D-01**  
European Sites surrounding the OPDC area

## **APPENDICES**

**APPENDIX A**  
European Sites surrounding the OPDC area

**APPENDIX B**  
Conservation Objectives

# 1 INTRODUCTION AND PURPOSE OF THIS REPORT

## 1.1 Introduction

This Screening Report has been prepared by Arcadis Consulting UK (Ltd) on behalf of the Old Oak and Park Royal Development Corporation (OPDC) as part of the statutory Habitats Regulations Assessment (HRA) of the OPDC Post Submission Modifications to the Regulation 19(2) Second Revised Draft Local Plan (hereafter referred to as the OPDC Local Plan or the Plan).

The OPDC is a new Local Planning Authority launched on 1<sup>st</sup> April 2015 spanning the London Boroughs of Brent, Ealing, and Hammersmith and Fulham. Future development within the OPDC area up to 2038 will be guided by the plans and policies within the OPDC Local Plan which will complement those within the Publication London Plan (2020) (Greater London Authority, 2020).

## 1.2 Purpose of this Report

This report is the first stage in the HRA process, commonly referred to as Screening. It identifies whether or not the OPDC Local Plan is likely to result in significant effects upon one or more European sites, either alone or in-combination with other plans or projects and subsequently whether or not an Appropriate Assessment will be required. If Appropriate Assessment is required this document will outline its proposed scope. Further details on the HRA stages are provided in Section 3.

## 1.3 Background to Habitats Regulations Assessment

Under Article 6 of the Habitats Directive, an assessment is required where a plan or project may give rise to significant effects upon any European sites (known in Europe as Natura 2000 sites).

European sites are a network of areas within the UK territory designated to conserve natural habitats and species that are rare, endangered, vulnerable or endemic within the European Community. This includes Special Areas of Conservation (SACs), designated under the Habitats Directive for their habitats and/or species of European importance, and Special Protection Areas (SPAs), classified under Directive 2009/147/EC on the Conservation of Wild Birds (the codified version of Directive 79/409/EEC as amended) for rare, vulnerable and regularly occurring migratory bird species and internationally important wetlands.

In addition, it is a matter of law that candidate SACs (cSACs) and Sites of Community Importance (SCI) are considered in this process; furthermore, it is Government Policy that sites designated under the 1971 Ramsar Convention for their internationally important wetlands (Ramsar sites) and potential SPAs (pSPAs) are also considered.

There are no cSACs, SCI, Ramsar sites, pSPAs or European sites within the OPDC area; however, there are seven European sites beyond the OPDC area which fall under these designations that could potentially be affected by the OPDC Local Plan (see section 4.1, also illustrated on Drawing Number 001-UA008107-UE31D-01).

The requirements of the Habitats Directive are transposed into law by means of the Conservation of Habitats and Species Regulations 2017 (as amended by the EU Exit Regulations 2019) (the Habitats Regulations). Regulation 63, Part 6 of the Habitats Regulations states that:

*'A competent authority, before deciding to undertake, or give consent, permission or other authorisation for, a plan or project which*

*(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and*

*(b) is not directly connected with or necessary to the management of the site,*

*must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.'*

Regulation 64, Part 6 of the Habitats Regulations states that:

*'If the competent authority is satisfied that, there being no alternative solutions, the plan or project must be carried out for imperative reasons of overriding public interest (which, subject to paragraph (2), may be of a social or economic nature), they may agree to the plan or project notwithstanding a negative assessment of the implications for the European site or the European offshore marine site (as the case may be).'*

Regulation 68, Part 6 of the Habitats Regulations states that:

*'Where, in accordance with regulation 64 —*

*(a) a plan or project is agreed to, notwithstanding a negative assessment of the implications for a European site or a European offshore marine site, or*

*(b) a decision, or a consent, permission or other authorisation, is affirmed on review, notwithstanding such an assessment,*

*the appropriate authority must secure that any necessary compensatory measures are taken to ensure that the overall coherence of Natura 2000 is protected.'*

The overarching aim of HRA is to determine, in view of a site's conservation objectives and qualifying interests, whether a plan, either in isolation and/or in combination with other plans, would have a significant adverse effect on any European site. If the Screening (the first stage of the process, see Section 3 for details) concludes that significant adverse effects are likely, then Appropriate Assessment must be undertaken to determine whether there will be adverse effects on a site's integrity.

It should be noted that following the People Over Wind EU judgement (Court of Justice of the European Union (CJEU), 2018), where the need for mitigation is identified to reduce a likely significant effect, then such measures cannot be included at the Screening Stage and the potential effects must be considered within an Appropriate Assessment.

## 1.4 Legislation and Guidance

This HRA screening report has drawn upon the following legislation and guidance:

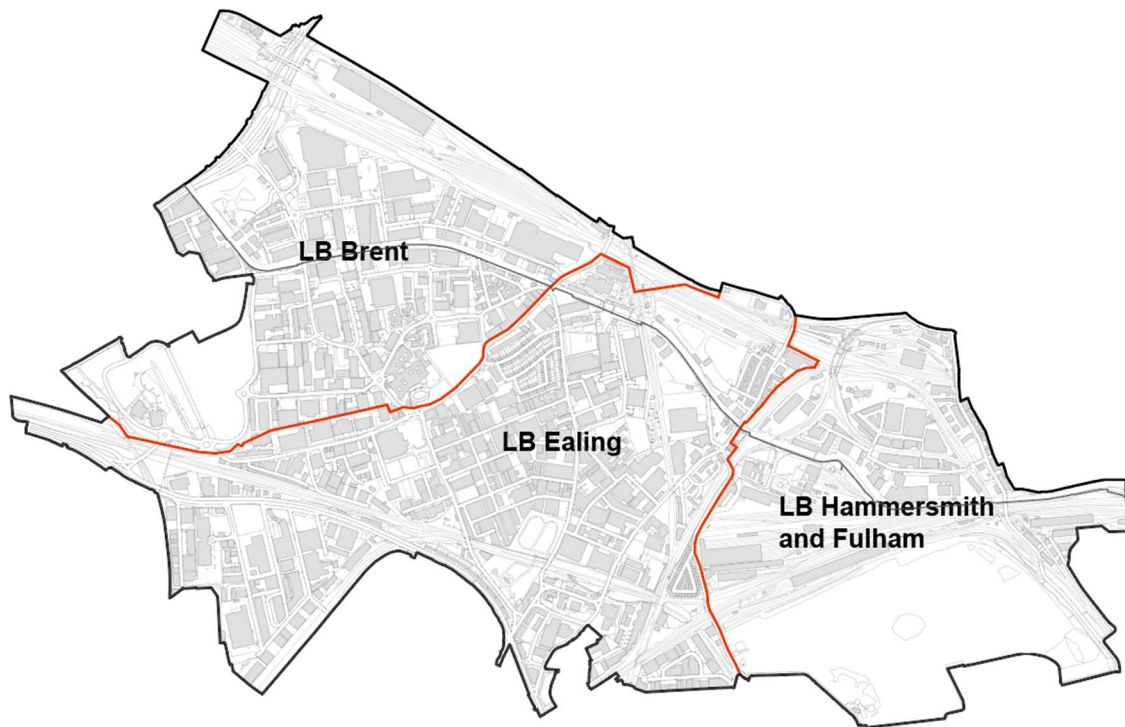
- The Conservation of Habitats and Species Regulations 2017 (as amended by the EU Exit Regulations 2019). In 2017, the Conservation of Habitats and Species Regulations 2017 (the "2017 Habitats Regulations") consolidated and updated the Conservation of Habitats and Species Regulations 2010 (the "2010 Habitats Regulations"). In 2019, the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 were created to amend the 2017 Habitats Regulations to ensure that the habitat and species protection and standards derived from EU law continue to apply after Brexit.
- European Commission, Managing Natura 2000 sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC.
- European Commission, Guidance document on Article 6(4) of the Habitats Directive 92/43/EEC.
- Department for Communities and Local Government (2006). Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents.
- DTA Publications Limited (David Tyldesley Associates, 2021). The Habitats Regulations Assessment Handbook, accessed online January 2021.

## 2 INTRODUCTION TO THE LOCAL PLAN

### 2.1 Background and Purpose

The OPDC area is a predominantly industrial Borough in north-west London. It spans part of three London Boroughs: the London Borough of Brent in the north, the London Borough of Ealing in the west and south and the London Borough of Hammersmith and Fulham in the east (Figure 2-1).

Figure 2-1 Map of the OPDC area with borough boundaries



Alongside the National Planning Policy Framework (NPPF), London Plan, Old Oak and Park Royal Opportunity Area Planning Framework, West London Waste Plan Development Plan Document (DPD), any 'made' Neighbourhood Plans, and any adopted Supplementary Planning Documents (SPDs), the OPDC Local Plan, once adopted, will be a key planning policy document against which planning applications within the OPDC area will be assessed.

Once adopted, the OPDC Local Plan will supersede the existing Local Plans of the constituent three London Boroughs of Brent, Ealing and Hammersmith and Fulham.

Future development within the OPDC area will be guided by the plans and policies within the OPDC Local Plan, which extends until 2038.

### 2.2 Spatial Vision

In order to achieve the spatial vision for the OPDC area, narratives have been produced – “thinking big” and “going local”. The narratives provide information on the proposed outcomes of development at the national and regional scale and set out how local people would benefit from change and how neighbourhoods would improve.



These narratives are as follows:

### **Thinking Big**

1. High quality design will be showcased as part of new development, that will set new international standards in accessible and inclusive high density commercial, industrial and residential development and open space design and management.
2. The OPDC area will become a major new London centre providing high-density mixed use development, that will shape west London and support London's continued growth.
3. The area will become a destination for people from across London and the UK that will be home to a mix of cultural and leisure uses.
4. Old Oak will be the major transport hub for London, providing a gateway to London, the UK and beyond.
5. Wormwood Scrubs will be accessible Metropolitan Open Land (MOL) that will continue to perform its role as a district and metropolitan park.
6. It will be an exemplar in healthy and sustainable large-scale development.
7. Park Royal and Old Oak North will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth.

### **Going Local**

8. Local economies will be supported by creating opportunities for local businesses to access new markets and provide a mix of employment space to support new business growth.
9. The areas' existing rich social, cultural and built environmental and heritage assets such as Wormwood Scrubs, Kensal Green Cemetery, the Grand Union Canal and the Rolls Royce Factory will be conserved and enhanced.
10. An attractive built environment will be created comprising a network of new and enhanced places enabling people to enjoy good quality streets, open spaces and well-designed buildings that complement surrounding neighbourhoods.
11. A mix of new homes will be delivered at different prices including affordable housing for local people.
12. Benefits from development will be generated for local people.
13. New development will connect local existing and new communities and neighbourhoods in the surrounding areas through high quality walking, cycling, public transport and vehicular links.
14. Life chances and fairness will be improved for existing and future communities, with new development providing opportunities to enhance health and well-being, access to skills, education and social infrastructure.
15. Day-to-day quality of life will be enhanced for local people by enabling a sense of ownership, empowerment, safety and provision of convenient access to town centre uses, shops, GPs, schools, nature and parks, community facilities, leisure and sports.

## 2.3 Local Plan Policies

There are 91 policies contained within the OPDC Local Plan which relate to the spatial vision above. These are set out in the plan under the following chapter headings:

- Strategic Policies
- Places
- Design
- Environment and Utilities
- Transport
- Housing
- Employment
- Town Centre and Community Uses
- Delivery and Implementation

## 2.4 Policies within the OPDC Local Plan

The policies within the OPDC Local Plan are listed below:

### **Strategic Policies**

SP1: Catalyst for Growth

SP2: Good Growth

SP3: Improving Health and Reducing Health Inequalities

SP4: Thriving Communities

SP5: Economic Resilience

SP6: Places and Destinations

SP7: Connecting People and Places

SP8: Green Infrastructure and Open Space

SP9: Built Environment

SP10: Integrated Delivery

### **Places**

P1: Old Oak South

P1C1: Old Oak Common Station Cluster

P2: Old Oak North

P3: Grand Union Canal

P4: Park Royal West

P4C1: Brewery Cluster

P5: Old Park Royal

P6: Park Royal Centre

P7: North Acton and Acton Wells

P7C1: North Acton Town Centre Cluster

P7C2: Old Oak Common Lane Station Cluster

P8: Old Oak Lane and Old Oak Common Lane

P8C1: Atlas Junction Cluster  
P9: Channel Gate  
P10: Scrubs Lane  
P10C1: Harrow Road Cluster  
P10C2: Laundry Lane Cluster  
P10C3: Hythe Road Cluster  
P10C4: Mitre Canalside Cluster  
P10C5: Mitre Way Cluster  
P11: Willesden Junction  
P12: Wormwood Scrubs

## **Design**

D1: Public Realm  
D2: Accessible and inclusive design  
D3: Well-designed buildings  
D4: Tall buildings  
D5: Amenity  
D6: Key views  
D7: Heritage  
D8: Play Space

## **Environment and Utilities**

EU1: Open Space  
EU2: Urban Greening and Biodiversity  
EU3: Water  
EU4: Air Quality  
EU5: Noise and vibration  
EU6: Waste  
EU7: Circular and Sharing economy  
EU8: Sustainable materials  
EU9: Minimising Carbon Emissions and Overheating  
EU10: Energy Systems  
EU11: Smart Technology  
EU12: Extraction of minerals  
EU13: Land contamination

## **Transport**

T1: Roads and streets  
T2: Walking  
T3: Cycling  
T4: Parking  
T5: Rail

T6: Buses

T7: Freight, Servicing and Deliveries

T8: Construction

T9: Transport Assessments and Travel Plans

## **Housing**

H1: Housing Supply

H2: Affordable Housing

H3: Housing Mix

H4: Family Housing

H5: Existing Housing

H6: Build to Rent Housing

H7: Co-Living and Shared Housing

H8: Gypsy and Traveller Accommodation

H9: Specialist Housing

H10: Student Accommodation

## **Employment**

E1: Protecting, Strengthening and Intensifying the Strategic Industrial Location

E2: Employment Sites Outside SIL

E3: Supporting Small Businesses and Start Ups

E4: Work-Live Units

E5: Local Access to Training, Employment and Economic Opportunities

## **Town Centre and Community Uses**

TCC1: Locations for and Impacts of Town Centre Uses

TCC2: Vibrancy

TCC3: Social Infrastructure

TCC4: Culture and Art

TCC5: Sports and Leisure

TCC6: Public Houses

TCC7: Catalyst Uses

TCC8: Meanwhile Uses

TCC9: Visitor Accommodation

TCC10: Night-time economy

## **Delivery and Implementation**

DI1: Balancing Priorities and Securing Infrastructure Delivery

DI2: Timely Delivery and Optimised Phasing

DI3: Stakeholder Engagement and being a Proactive Planning Authority

DI4: Planning Powers and Monitoring

## 3 THE HABITATS REGULATIONS ASSESSMENT PROCESS

### 3.1 Stages in HRA

This section provides an outline of the stages involved in HRA and the specific methods that have been used in preparing this report.

The requirements of the Habitats Directive comprise four distinct stages:

- 1 Screening** is the process which initially identifies the likely impacts of a project or plan upon a European site, either alone or in-combination with other projects or plans, and considers whether these impacts may have a significant effect on the integrity of the site's qualifying habitats and/or species. It is important to note that the burden of evidence is to show, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment. There is European Court of Justice case law to the effect that unless the likelihood of a significant effect can be ruled out on the basis of objective information, and adopting the precautionary principle, then an Appropriate Assessment must be made. The April 2018 CJEU judgement determined that mitigation to avoid or reduce harmful effects of the plan or project on a European site cannot be taken into account at the screening stage (Stage 1). Where such measures are required, a plan or project will require Appropriate Assessment to be undertaken (Stage 2).
- 2 Appropriate Assessment** is the detailed consideration of the impact on the integrity of the European site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's conservation objectives and its structure and function. This is to determine whether or not there will be adverse effects on the integrity of the site. This stage also includes the development of mitigation measures to avoid or reduce any possible impacts.
- 3 Assessment of alternative solutions** is the process which examines alternative ways of achieving the objectives of the project or plan that would avoid adverse impacts on the integrity of the European site, should avoidance or mitigation measures be unable to cancel out adverse effects.
- 4 Assessment where no alternative solutions exist and where adverse impacts remain.** At Stage 4, an assessment is made with regard to whether or not the development is necessary for imperative reasons of overriding public interest (IROPI). If it is, this stage also involves detailed assessment of the compensatory measures needed to protect and maintain the overall coherence of the European site network.

### 3.2 Approach to Screening

This Screening Report takes into account the requirements of the Habitats Regulations and relevant guidance produced by David Tyldesley Associates (2021).

The following stages have been completed:

- Identification of all European sites potentially affected (including those outside of the OPDC Local Plan area);
  - A review of each site, including the features for which the site is designated, the Conservation Objectives, and an understanding of the current conservation status and the vulnerability of the individual features to threats;
  - A review of the policies which have the potential to affect the European sites, and whether the sites are vulnerable to these effects (this has included a categorisation of the potential effects of the Policy, in line with current guidance);
  - A consideration of any impacts in-combination with other plans or projects;
-

- Where potential effects are identified, avoidance or the requirement for mitigation measures have been considered in order to avoid significant effects.

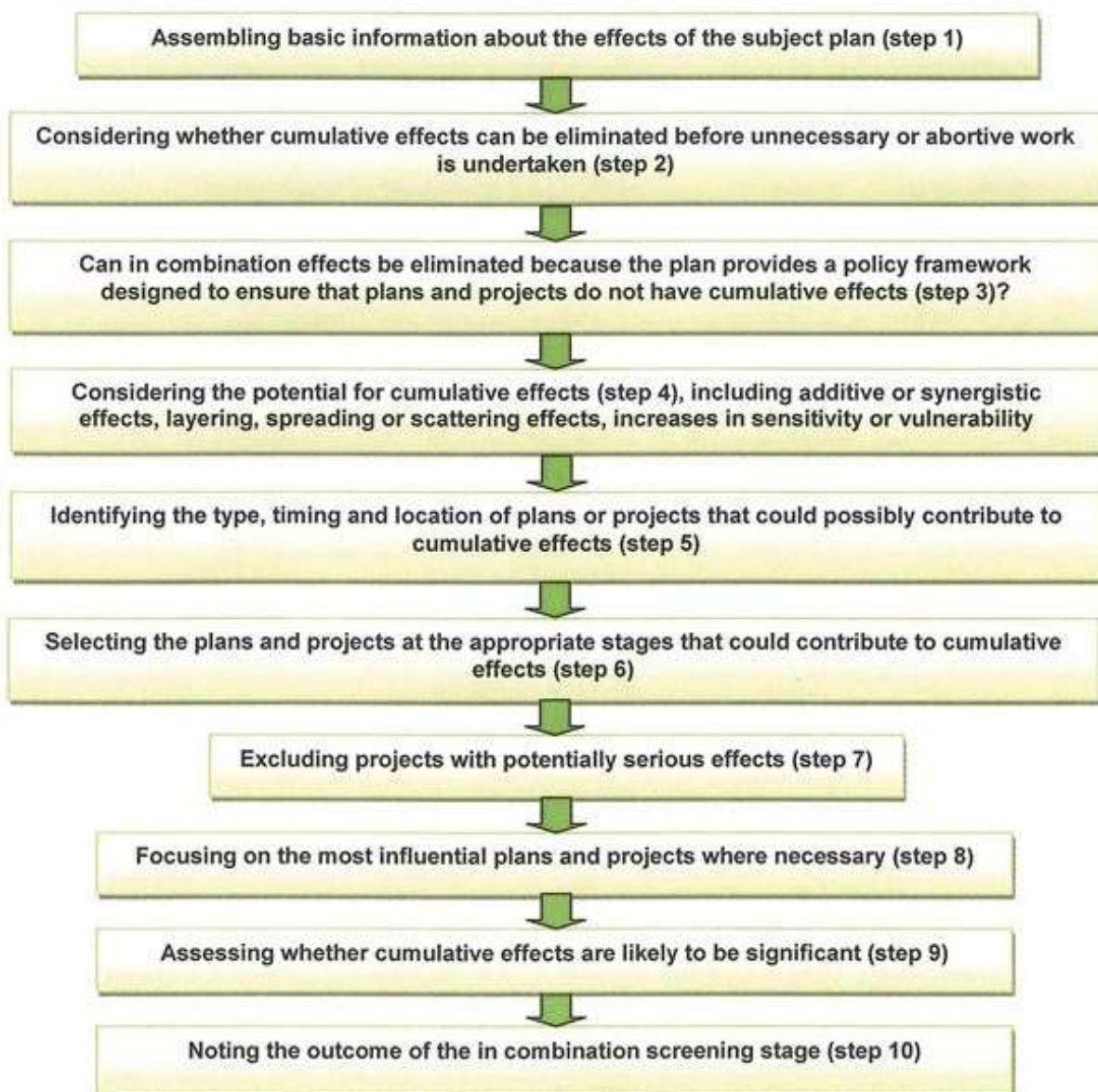
### 3.3 In-Combination Effects

As outlined in Section 3.1, it is necessary for HRA to consider in-combination effects with other plans and projects.

Where an aspect of a plan could have some effect on the qualifying feature(s) of a European site, but the effects of that aspect of the plan alone would not be significant, the effects of that aspect of the plan will need to be checked in-combination, firstly, with other effects of the same plan, and then with the effects of other plans and projects.

The flow chart below is taken from David Tyldesley Associates (2021) and illustrates the outline methodology for the in-combination assessment.

Figure 3-1 Methodology for in-combination assessment



If the prospect of cumulative effects cannot be eliminated in steps 2 and 3 in the figure above, it is necessary to consider how the addition of effects from other plans or projects may produce a combined

adverse effect on a European site that would be significant. Taking the effects which would not be likely to be significant alone, it is necessary to make a judgement as to whether these effects would be made more likely or more significant if the effects of other plans or projects are added to them. Most cumulative effects can be identified by way of the following characteristics. Could additional effects be cumulative because they would:

- a) Increase the effects on the qualifying features affected by the subject plan in an additive, or synergistic way?
- b) Increase the sensitivity or vulnerability of the qualifying features of the site affected by the subject plan?
- c) Be felt more intensely by the same qualifying features over the same area (a layering effect), or by the same qualifying feature over a greater (larger) area (a spreading effect), or by affecting new areas of the same qualifying feature (a scattering effect)?

In accordance with *The Habitats Regulations Assessment Handbook* (David Tyldesley Associates, 2021), it will be necessary to look for plans or projects at the following stages:

- a) Applications lodged but not yet determined.
- b) Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration.
- c) Refusals subject to appeal procedures and not yet determined.
- d) Projects authorised but not yet started.
- e) Projects started but not yet completed.
- f) Known projects that do not require external authorisation.
- g) Proposals in adopted plans.
- h) Proposals in finalised draft plans formally published or submitted for final consultation, examination or adoption.

Consideration of in-combination effects is included in Section 6.5.

Plans under consideration may range from neighbouring authorities' planning documents down to sector-specific strategic plans on such topics as flood risk. A review has been undertaken of plans and projects with the potential for an in-combination effect with the OPDC Local Plan. This information has been provided by OPDC (2017, 2018, and 2021a) and these plans and projects are listed in Table 3-1.

Table 3-1 – Plans and projects considered for in-combination effects

Authority	Relevant Plan/Project
Greater London Authority	<p><b>London Plan (Publication Version December 2020).</b></p> <p>Envisaged London residential population growth of 70,000 people per year reaching 10.8 million by 2041. These figures are inclusive of anticipated population growth within the OPDC area.</p> <p>Envisaged London employment growth of 49,000 people per year reaching 6.9 million by 2041.</p> <p>Envisaged increase in movement with an increase in trips made by Londoners from 20 million in 2011 to 25 million in 2041.</p> <p>Increased risk of impacts of climate change.</p> <p>These above elements have yet to consider the impact of Covid-19.</p>
London Borough of Brent	<p><b>Local Plan (Submission Version 2020)</b></p> <p>Sets out approach to meet London Plan ten year housing target (2019/20 to 2028/29). The target is 23,250.</p> <p>London Plan target for Wembley Opportunity Area (within approximately 1km of OPDC boundary): 14,000 homes and 13,500 jobs of which 6,400 jobs and 6,400 homes have already been provided.</p>
London Borough of Ealing	<p><b>Development Core Strategy (2012)</b></p> <p>The Core Strategy does not make reference to the latest London Plan targets given its publication date. However, Ealing’s emerging Local Plan will need to set out its approach to meet London Plan ten year housing target (2019/20 to 2028/29). The target is 21,570.</p>
London Borough of Hammersmith and Fulham	<p><b>Local Plan (2018)</b></p> <p>Sets out approach to meet London Plan ten year housing target (2019/20 to 2028/29). The target is 16,090.</p> <p>London Plan target for White City Opportunity Area (within approximately 425m of OPDC boundary): 7,000 homes and 2,000 jobs (2,100 homes have been delivered to date)</p>
Royal Borough of Kensington and Chelsea	<p><b>Local Plan (2019)</b></p> <p>Sets out approach to meet London Plan ten year housing target (2019/20 to 2028/29). The target is 4,480.</p> <p>London Plan target for Kensal Canalside Opportunity Area (directly adjacent to OPDC area): 3,500 homes and 2,000 jobs. Note, no homes have been delivered to date.</p>
West London Waste Authority	<p><b>West London Waste Plan (2015)</b></p> <p>Identifies and safeguards sites for waste management within the OPDC area and Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames.</p>



Authority	Relevant Plan/Project
High Speed 2 (HS2) Limited	<p>Old Oak Common Station – new largescale station providing interchanges between HS2 line, the Elizabeth Line and Great Western Mainline. Approximately 250,000 passengers passing through daily.</p> <p>Planning permission for Phase One of the HS2 railway was granted on 23<sup>rd</sup> February 2017 when the HS2 Hybrid Bill received royal assent and became an Act of Parliament. Within the OPDC area, the early construction works at the HS2 sites have come to an end and the main works contractors are now preparing the station site for the first phase of the main station build. HS2 Ltd received consent under Schedule 17 of the HS2 Act on 22<sup>nd</sup> May 2020 from OPDC for the design of Old Oak Common Station.</p>

### 3.4 Consideration of Effects

#### 3.4.1 Definition of Significant Effects

A critical part of the HRA screening process is determining whether or not the proposals are likely to have a significant effect on European Sites and, therefore, if they will require an Appropriate Assessment. Judgements regarding significance should be made in relation to the qualifying interests for which the site is of European importance and also its conservation objectives.

In considering whether the plan is likely to have a significant effect on a European site, a precautionary approach must be adopted:

- The plan should be considered ‘likely’ to have such an effect if the plan making Authority is unable (on the basis of objective information) to exclude the possibility that the plan could have significant effects on any European site, either alone or in combination with other plans or projects.
- An effect will be ‘significant’ in this context if it could undermine the site’s conservation objectives. The assessment of that risk must be made in the light of factors such as the characteristics and specific environmental conditions of the European site in question.

#### 3.4.2 Categorising Effects

All elements of the OPDC Local Plan, have been screened for likely significant effects on European sites and categorised in accordance with DTA Publications Limited - The Habitats Regulations Assessment Handbook (accessed online January 2021).

The effects associated with the OPDC Local Plan can be allocated into one of 12 categories according to the ways in which the option, policy or proposal could affect the European site. These are described in Table 3-2 below.

Table 3-1 - Screening Assessment Categories

Category	Description
Category A	General statements of policy/general aspirations. Policies which are no more than general statements of policy or general political aspirations should be screened out because they cannot have a significant effect on a European site.
Category B	Policies listing general criteria for testing the acceptability/sustainability of proposals. These general policies cannot have any effect on a European site and should be screened out.
Category C	<p>Proposal referred to but not proposed by the plan. Screen out any references to specific proposals for projects, such as those which are identified, for example, in higher policy frameworks such as National Policy Statements, relating perhaps to nationally significant infrastructure projects. These will be assessed by the Secretary of State. A useful 'test' as to whether a project should be screened out in this step is to ask the question:</p> <p>'Is the project provided for/proposed as part of another plan or programme and would it be likely to proceed under the other plan or programme irrespective of whether this subject plan is adopted with or without reference to it?'</p> <p>If the answer is 'yes' it will normally be appropriate to screen the project out in this step.</p>
Category D	Environmental protection/site safeguarding/threshold policies. These are policies, the obvious purpose of which is to protect the natural environment, including biodiversity, or to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any adverse effect on a European Site. They can be screened out because the implementation of the policies is likely to protect rather than adversely affect European sites and not undermine their conservation objectives.
Category E	Policies or proposals that steer change in such a way as to protect European sites from adverse effects. These types of policies or proposals will have the effect of steering change away from European sites whose qualifying features may be affected by the change and they can therefore be screened out.
Category F	Policies or proposals that cannot lead to development or other change. Policies that do not themselves lead to development or other change, for example, because they relate to design or other qualitative criteria for development, such as materials for new development. They do not trigger any development or other changes that could affect a European site and can be screened out.
Category G	Policies or proposals that could not have any conceivable effect on a European site. Policies which make provision for change but which could have no conceivable effect on a European site, because there is no causal connection or link between them and the qualifying features of any European site, and can therefore be screened out.
Category H	Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). Policies or proposals which make provision for change but which could have no significant effect on a European site, either alone or in combination with other aspects of the same plan, or in combination with other plans or projects, can be screened out. These may include cases where there are some potential effects which (and theoretically even in combination) would plainly be insignificant and could not undermine the conservation objectives.
Category I	Policies or proposals with a likely significant effect on a European site alone. Policies or proposals which are likely to have a significant effect on a European site alone, should be screened in.

Category	Description
Category J	Policies or proposals not likely to have a significant effect alone. These aspects of the plan would have some effect on a European site, but the effect would not be likely to be a significant effect; so they must be checked for in-combination (cumulative) effects. They will then be re-categorised as either Category K (no significant effect in combination) or Category L (likely to have a significant effect in-combination), as explained below.
Categories K and L	Policies or proposals not likely to have a significant effect either alone or in-combination (K) or likely to have a significant effect in-combination (L) after the in-combination test. Where an aspect of a plan could have some effect on the qualifying feature(s) or a European site, but the effects of that aspect of the plan alone would not be significant, the effects of that aspect of the plan will need to be checked in-combination firstly, with other effects of the same plan, and then with the effects of other plans and projects.
Category M	Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site. Following the People Over Wind EU judgement (Court of Justice of the European Union (CJEU), 2018), these policies cannot be taken into account in the screening decision and must therefore be screened in for consideration at Appropriate Assessment stage.

### 3.5 Potential Impacts Pathways

During the HRA screening stage, the likely nature, magnitude, frequency, timing, duration, location and spatial extent of changes resulting from implementation of the Local Plan will be assessed. As a part of this, mechanisms through which the OPDC Local Plan could impact upon European sites will be considered. Further details on the potential impact pathways are presented in Section 6.1.

The main impact pathways could be:

- Direct habitat and species loss within European sites.
- Habitat degradation as a result of increased air pollution.
- Loss of habitat functionally linked to a European site (i.e. used by overwintering birds for foraging).
- Disturbance to habitats and species through increased recreational activity, during operational stage.
- Changes in water quality where sites are hydrologically linked to European sites.
- Disturbance to species as a result of construction activities/operational stage.

## 4 IDENTIFYING THE EUROPEAN SITES

### 4.1 Approach to Identifying Sites

There are no European sites located within and on the OPDC boundary. Given the likely distances that mobile species from European sites would travel to land within the OPDC area (or indeed the distances people from the OPDC area might be likely to travel to a sensitive site outside the OPDC area), European sites within a 20 km distance from the OPDC area have been considered as those which may be affected by the Local Plan activities. These are detailed in Table 4-1 and shown on Drawing Number 001-UA008107-UE31D-01.

Table 4-1 - Summary of European Sites within 20 km of the OPDC boundary

Name of Site	Identification Number	Designation	Approximate distance from OPDC boundary
Richmond Park	UK0030246	SAC	7.3 km south
Wimbledon Common	UK0030301	SAC	8.3 km south
Lee Valley	UK9012111	SPA	14.3 km north-east
Lee Valley	UK11034	Ramsar Site	14.3 km north-east
South West London Waterbodies	UK9012171	SPA	16.3 km south-west
South West London Waterbodies	UK11065	Ramsar Site	16.3 km south-west
Epping Forest	UK0012720	SAC	17.8 km north-east

Appendix A provides further information regarding the European sites including current conservation status, threats and the results of the most recent condition assessments of the underlying Sites of Special Scientific Interest (SSSIs).

### 4.2 Impacts and Effects of the Local Plan

The Post Submission Modifications to the Regulation 19(2) Second Revised Draft Local Plan was reviewed and the following potential impact types were identified that may have some effect on European sites and their qualifying species and/or habitats; as shown in Table 4-2, below.

There are no European sites located within and on the OPDC boundary therefore no direct land-take from any European Sites is predicted as a result of plan implementation.

Although there are European sites outside of the OPDC area which support mobile species (i.e. birds), these species require wetland/reedbed habitat which is largely absent from within the OPDC area. As such, there will be no loss of habitat which is functionally linked to a European site, or any impacts on species using such habitat, as a result of plan implementation.

Given that the closest European site is more than 7 km from the OPDC area, and that the OPDC area does not support habitat suitable for mobile species associated with the European sites, disturbance to species as a result of construction activities/operational stage activities is considered unlikely to occur as a result of plan implementation.

The Grand Union Canal runs through the OPDC area and is connected to the River Thames at Brentford. Neither watercourse has any direct downstream links to any of the European sites, therefore changes in the water quality of European sites is not considered likely to occur as a result of plan implementation.

The Post Submission Modifications to the Regulation 19(2) Second Revised Draft Local Plan seeks to provide substantial development within the OPDC area. This could lead to impacts on European sites outside of the OPDC area through increased recreational pressure (as a result of local population growth) and a reduction in air quality (due to increased traffic).

Table 4-2 - Potential Impacts and Effects of the OPDC Local Plan on European Sites beyond the OPDC boundary

Potential impacts and effects of the Local Plan	European sites and features potentially affected
Increased disturbance of species through increased recreational pressure as a result of population growth within the OPDC area.	Richmond Park SAC – Stag beetle ( <i>Lucanus cervus</i> ) Wimbledon Common SAC – Stag beetle Lee Valley SPA – over wintering birds Lee Valley Ramsar – migrant and overwintering birds South West London Waterbodies SPA – over wintering birds South West London Waterbodies Ramsar – migrant and over wintering birds Epping Forest SAC – Stag beetle
Degradation of habitat due to increased recreational pressure as a result of population growth within the OPDC area	Wimbledon Common SAC –North Atlantic wet heaths with <i>Erica tetralix</i> , European dry heaths. Epping Forest SAC – Atlantic acidophilous beech forests North Atlantic wet heaths with <i>Erica tetralix</i> , European dry heaths
Impacts on European sites outside the OPDC boundary as a result of changes in air quality from increased traffic and development.	Wimbledon Common SAC –North Atlantic wet heaths with <i>Erica tetralix</i> , European dry heaths. Epping Forest SAC – Atlantic acidophilous beech forests North Atlantic wet heaths with <i>Erica tetralix</i> , European dry heaths

### 4.3 Conservation Objectives of the European Sites

The conservation objectives for a European site are intended to represent the aims of the Habitats and Birds Directives in relation to that site. To this end, habitats and species of European Community importance should be maintained or restored to ‘favourable conservation status’ (FCS), as defined in Article 1 of the Habitats Directive below:

The conservation status of a natural habitat will be taken as ‘favourable’ when:

- Its natural range and the area it covers within that range are stable or increasing;
- The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and
- Conservation status of typical species is favourable as defined in Article 1(i).

The conservation status of a species will be taken as favourable when:

- Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Guidance from the European Commission (2000) indicates that the Habitats Directive intends FCS to be applied at the level of an individual site, as well as to habitats and species across their European range. Therefore, in order to properly express the aims of the Habitats Directive for an individual site, the conservation objectives for a site are essentially to maintain (or restore) the habitats and species of the site at (or to) FCS.

Conservation Objectives for Richmond Park SAC, Wimbledon Common SAC, Lee Valley SPA, South West London Waterbodies SPA and Epping Forest SAC site were obtained from Natural England's (2021a) website and are provided in Appendix B.

## 5 SCREENING

### 5.1 Context

The OPDC Local Plan contains a spatial vision that sets out how the Development Corporation would like the Old Oak and Park Royal area to develop over the Plan period (2018 – 2038). It seeks to pioneer international excellence in sustainability, health and wellbeing and design quality to deliver tangible benefits for both local communities and London.

### 5.2 Screening Approach taken for the Local Plan

The screening process has been split into two distinct stages: initial screening and detailed screening. The initial screening stage has provided a high-level screening 'matrix style' assessment to determine if the OPDC Local Plan could possibly lead to significant adverse effects on European sites identified in Section 4.1. The purpose of this is to eliminate those policies from the assessment which very clearly would not affect European sites in order to focus on those policies where there is potential for effects or uncertainty about potential effects. These policies are generally those that could not lead to 'direct development', or could have no impact pathway to any of the European sites identified. The policies that are identified as having potential impacts on the European sites or those policies for which impacts are uncertain, will be carried forward into a more detailed screening assessment.

When identifying the elements of the OPDC Local Plan that could potentially affect European sites, it is important to focus upon those elements that will have the greatest likelihood of impacting the sites. Therefore, the definition of significance identified in Section 3.4.1 is very important for the detailed screening.

The OPDC Local Plan is intended to be read as a single document rather than a series of separate policies, and has been assessed as such. Proposals in one area of the Local Plan may mitigate potentially damaging activities promoted in another area and should be understood in the wider context of the Plan's aims and purposes.

The sections below outline the initial and detailed screening of the OPDC Local Plan.

### 5.3 Initial Screening of the Local Plan Policies

The initial screening of the OPDC Local Plan is presented in Table 5-1 below.

The policies within the sub-headings were initially examined to determine their need for further detailed screening. The notations below are used to indicate if further detailed assessment screening is required:

- ✓ Further detailed screening is required to determine the nature of effects on the European site.
- X No further screening is required as no significant effects are predicted on the European site.

Table 5-1- Initial screening of the OPDC Local Plan

European Sites	Strategic Policies	Places	Design	Environment and Utilities	Transport	Housing	Employment	Town Centre and Community Uses	Delivery and Implementation
Richmond Park SAC	✓	✓	x	✓	✓	✓	✓	✓	x
Wimbledon Common SAC	✓	x	x	✓	✓	✓	✓	✓	x
Lee Valley SPA	x	x	x	x	x	x	x	x	x
Lee Valley Ramsar	x	x	x	x	x	x	x	x	x
South West London Waterbodies SPA	x	x	x	x	x	x	x	x	x
South West London Waterbodies Ramsar	x	x	x	x	x	x	x	x	x
Epping Forest SAC	x	x	x	✓	x	x	✓	x	x
Policies Screened In	SP3, SP4, SP5, SP7	P3, P4		EU6	T3, T7, T8	H1		TCC9	
Policies Screened out	SP1, SP2, SP6, SP8, SP9, SP10	P1, P1C1, P2, P4C1, P5, P6, P7, P7C1, P7C2, P8, P8C1, P9, P10, P10C1, P10C2, P10C3, P10C4, P10C5, P11, P12	D1, D2, D3, D4, D5, D6, D7, D8	EU1, EU2, EU3, EU4, EU5, EU7, EU8, EU9, EU10, EU11, EU12, EU13	T1, T2, T4, T5, T6, T9	H2, H3, H4, H5, H6, H7, H8, H9, H10	E1, E2, E3, E4, E5	TCC1, TCC2, TCC3, TCC4, TCC5, TCC6, TCC7, TCC8, TCC10	DI1, DI2, DI3, DI4



Data from the National Travel Survey 2018/2019 (Gov.uk, 2020a) shown in Table 5-2 indicates that car, van, motorcycle, taxi, Bus in London and London Underground journeys are, on average, below the distance required to reach Lee Valley SPA/Ramsar site (14.3 km) and/or South West London Waterbodies SPA/Ramsar site (16.3 km).

Table 5-2 – Summary of 2018/2019 National Travel Survey data for London residents – trip length

Mode of transport	Average trip length (km) <sup>1</sup>
Car/van (driver)	11.1
Car/van passenger	12.6
Motorcycle	11.3
Other private transport <sup>2</sup>	17.5
Bus in London <sup>3</sup>	5.8
Other Local Bus	15.6
Non-Local Bus <sup>4</sup>	103.0
London Underground	13.8
Surface Rail	28.2
Taxi/Minicab	11.6

In order to reach these European sites by surface rail, Local and Non-Local Bus and/or other private transport is not straightforward. There are no direct rail or bus routes from the OPDC area to any of the reservoirs within the Lee Valley SPA/Ramsar site or the South West London Waterbodies SPA/Ramsar site. Journey times via these modes of transport is a minimum of 34 minutes<sup>5</sup> to Lee Valley SPA/Ramsar site and a minimum of 42 minutes<sup>6</sup> to South West London Waterbodies SPA/Ramsar site (Transport for London, 2020).

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<sup>1</sup> Converted from miles

<sup>2</sup> Mostly private hire bus (including school buses)

<sup>3</sup> Local London bus services (Department for Transport, 2020)

<sup>4</sup> Express services, excursions and tours (Department for Transport, 2020)

<sup>5</sup> Harlesden Station to Blackhorse Road Station

<sup>6</sup> Willesden Station to Wraysbury Station

2018/219 data on the purposes of travel, where this purpose may be considered a reason for visiting a European site, is included in Table 5-3 below.

Table 5-3 – Summary of 2018/2019 National Travel Survey data for London residents – purpose of travel (Gov.uk, 2020b and 2020c)

Purpose	Average trip length (km) <sup>7</sup>	Average trip duration (minutes)
Visiting friends elsewhere (i.e. locations excluding private homes)	7.2	25
Sport/entertainment	7.4	26
Holiday/Day trip	35.2	54
Other (including just walk)	1.6	22

The data above indicates that the distances travelled for visiting friends, sport/entertainment and “other” reasons are, on average, below the distance required to reach Lee Valley SPA/Ramsar site (14.3 km) and/or South West London Waterbodies SPA/Ramsar site (16.3 km). The average trip duration for these purposes is also below the minimum duration required to reach either of the European sites by any mode of transport.

The data suggests that the main reason for visiting either of these European sites is therefore most likely to be holiday/day trip. Given the abundance of alternative locations for holidays/day trips both within and outside London, and the challenges of accessing either of these European sites (particularly using public transport) from the OPDC area, both of these European sites are considered unlikely to be subject to significant impacts from increased recreational pressure as a result of implementation of the OPDC Local Plan.

As a result, all policies have been screened out in relation to Lee Valley SPA/Ramsar Site and South West London Waterbodies SPA/Ramsar site.

Following the initial screening of the OPDC Local Plan, policies contained within three of the sub-headings in the plan can be screened out completely from further assessment, on the basis that no identifiable impact pathway exists linking the policies with the European sites and/or because there will be no foreseeable adverse impact on European sites through Policy implementation. In addition, several further policies under each of the sub-headings have been screened out of further assessment on a similar reasoning. Table 5-4 provides a summary of the policies screened out of further assessment.

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<sup>7</sup> Converted from miles

Table 5-4 - Policies screened out of further assessment

Policy	Justification	Assessment Category <sup>8</sup>
<p><b>Strategic Policies</b></p> <p>SP1, SP2, SP6, SP8, SP9, SP10</p>	<p>Policy SP1 aims to deliver a world-class transport super-hub at Old Oak Common, supporting the creation of a new part of London that acts as a catalyst for growth at national, regional and local levels.</p> <p>Policy SP2 aims to deliver a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</p> <p>Policy SP6 aims to create a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.</p> <p>Policy SP8 aims to contribute to the All London Green Grid by delivering new or enhanced green infrastructure and open spaces that provide for a range of functions, serving people and nature.</p> <p>Policy SP9 aims to deliver a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</p> <p>Policy SP10 aims to deliver development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</p> <p>These are high level policies that provide the key big policy statements for the OPDC area and can therefore be screened out – detailed thematic policies to deliver the Strategic Policies are described below and assessed on their own merits.</p>	<p>A, B</p>
<p><b>Places</b></p> <p>P1, P1C1, P2, P4C1, P5, P6, P7, P7C1, P7C2, P8, P8C1, P9, P10, P10C1, P10C2, P10C3, P10C4, P10C5, P11, P12</p>	<p>Places policies relate to the delivery and design of new town centres, including aspects such as public realm, heritage and character and building heights.</p> <p>These policies are not anticipated to have any impacts on European sites.</p>	<p>B</p>
<p><b>Design</b></p> <p>D1, D2, D3, D4, D5, D6, D7, D8</p>	<p>Policies D1 to D8 relate to the aim to deliver a high quality and well-designed built environment.</p> <p>None of these policies are anticipated to have any impacts on European sites.</p>	<p>F</p>

<sup>8</sup> Taken from David Tyldesley Associates (2021).

Policy	Justification	Assessment Category <sup>8</sup>
<p><b>Environment</b></p> <p>EU1, EU2, EU3, EU4, EU5, EU7, EU8, EU9, EU10, EU11, EU12, EU13</p>	<p>Policy EU1 relates to the provision of a high quality green infrastructure and open space network.</p> <p>Policy EU2 aims to secure an overall increase in green cover and a net gain in biodiversity.</p> <p>Policy EU3 relates to the efficient and sustainable use of water resources and water management.</p> <p>Policy EU4 aims to minimise air pollution and make a positive contribution to overall improvement in air quality.</p> <p>Policy EU5 relates to the assessment and minimisation of noise and vibration impacts as a result of development.</p> <p>Policy EU7 relates to the submission of a Circular and Sharing Economy Statement for major development proposals.</p> <p>Policy EU8 promotes the use of high-quality durable and adaptable materials.</p> <p>Policy EU9 aims to ensure developments meet/exceed on-site carbon emissions standards and address the risks of overheating.</p> <p>Policy EU10 aims to promote the delivery of low carbon, energy efficient and integrated electricity, heat and cooling networks.</p> <p>Policy EU11 aspires to position Old Oak and Park Royal as a world leading location for the adoption of smart city technologies, systems and approaches.</p> <p>Policy EU12 relates to extraction of minerals.</p> <p>Policy EU13 stipulates that proposals must treat/contain/control contamination.</p> <p>These policies aim to protect/enhance the natural environment and are unlikely to lead to any adverse effects on European sites.</p>	<p>D, G</p>
<p><b>Transport</b></p> <p>T1, T2, T4, T5, T6, T9</p>	<p>Policy T1 aims to provide “healthy streets” which are future-proofed against changes in the surrounding context, lifestyle and technology.</p> <p>Policy T2 aims to provide new and enhanced walking infrastructure.</p> <p>Policy T4 aspires to an exemplar low carbon development, promoting a shift towards sustainable transport.</p> <p>Policies T5 and T6 aim to deliver/contribute towards rail and bus infrastructure and capacity.</p> <p>Policy T9 stipulates the requirement for transport assessments and travel plans in accordance with Transport for London’s Best Practice Guidance.</p> <p>These policies are unlikely to result in detrimental impacts to European sites.</p>	<p>G, A</p>

Policy	Justification	Assessment Category <sup>8</sup>
<p><b>Housing</b></p> <p>H2, H3, H4, H5, H6, H7, H8, H9, H10</p>	<p>Policy H2 relates to provision of affordable housing.</p> <p>Policy H3 relates to the housing mix required.</p> <p>Policy H4 relates to the provision of family housing and requirement for access to amenity space.</p> <p>Policy H5 aims to resist the loss of existing residential accommodation and promotes bringing vacant residential properties back into use.</p> <p>Policy H6 details the provisions for Private Rented Sector accommodation.</p> <p>Policy H7 relates to the provision of purpose-built shared housing schemes.</p> <p>Policy H8 aims to safeguard existing traveller sites and secure a sufficient supply of plots/pitches to meet the needs of gypsy and traveller households.</p> <p>Policy H9 relates to the provision of specialist housing to support the needs of older and/or vulnerable people.</p> <p>Policy H10 relates to the provision of student accommodation.</p> <p>None of these policies are anticipated to have any significant impacts on European sites.</p>	<p>G</p>
<p><b>Employment</b></p> <p>E1, E2, E3, E4, E5</p>	<p>Policy E1 relates to the protection, strengthening and intensification of land within the designated SIL boundary.</p> <p>Policy E2 relates to the provision of employment floorspace outside of the SIL.</p> <p>Policy E3 relates to the provision of affordable workspaces and small business units to support small businesses and start-ups.</p> <p>Policy E4 relates to the provision of work-live units.</p> <p>Policy E5 relates to the delivery of a Local Labour, Skills and Employment Strategy and Management Plan.</p> <p>None of these policies are anticipated to have any impacts on European sites.</p>	<p>F, G</p>
<p><b>Town Centre and Community Uses</b></p> <p>TCC1, TCC2, TCC3, TCC4, TCC5, TCC6, TCC7, TCC8, TCC10</p>	<p>Policy TCC1 relates to the locations for and impacts of town centres uses and.</p> <p>Policy TCC2 relates to the facilities provided by the town centres and how these should support residential amenity and the public realm.</p> <p>Policy TCC3 relates to the provision of high quality social infrastructure facilities.</p> <p>Policy TCC4 relates to the provision of high quality cultural facilities.</p> <p>Policy TCC5 relates to the provision of high quality public and private sports and leisure facilities.</p> <p>Policy TCC6 relates to the retention of public houses.</p> <p>Policy TCC7 relates to objectives and criteria for Catalyst Uses.</p> <p>Policy TCC8 relates to the provision for meanwhile uses.</p> <p>Policy TCC10 relates to the provision of facilities to support a night-time economy.</p> <p>None of these policies are anticipated to have any impacts on European sites.</p>	<p>G</p>

Policy	Justification	Assessment Category <sup>8</sup>
<b>Delivery and Implementation</b>  DI1, DI2, DI3, DI4	<p>Policy DI1 relates to balancing development priorities and the funding and financing of infrastructure to support and mitigate the impacts of development.</p> <p>Policy DI2 relates to the timely delivery of development.</p> <p>Policy DI3 aims to proactively engage with stakeholders and encourage active participation in the planning and delivery of development.</p> <p>Policy DI4 relates to OPDC's planning powers and monitoring of Key Performance Indicators.</p> <p>None of these policies are anticipated to have any impacts on European sites</p>	B

Table 5-5 provides a justification for the policies screened in for further assessment.

Table 5-5 – Policies screened in for further assessment

Policy	Justification
<b>Strategic Policies</b>  SP3, SP4, SP5, SP7	<p>The following strategic policies have been screened in on the basis of links with specific policies detailed within this table:</p> <p>Policy SP3 aims to create a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities. This is linked with Policy SP7 (linked with Policy P3) which aims to deliver a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport. These policies could result in impacts on European sites through increased visitor pressure.</p> <p>Policy SP4 aims to create sustainable communities by providing a range of housing types and affordabilities, that meets local, and that contributes to strategic housing needs, supported by a range of high quality social infrastructure facilities that server the current and future community. This policy is linked with policy H1 and could result in impacts on European sites through increased visitor pressure.</p> <p>Policy SP5 aims to support the delivery of 36,350 new jobs over the plan period. This could lead to effects on European sites through increased air pollution as a result of increased commuter and business-related travel/transport.</p>
<b>Places</b>  P3, P4	<p>Policy P3 aspires that the Grand Union Canal (which is directly linked to the River Thames) will be key artery through the OPDC area, providing new bridges, walking and cycling routes as well as passenger, leisure and freight transport.</p> <p>Policy P4 is closely linked to Policy P3, aiming to contribute to/deliver improvements which support public access into green infrastructure assets including the Grand Union Canal.</p> <p>An increase in people movements and increased accessibility could lead to increased visitor pressure on Richmond Park SAC and Wimbledon Common SAC which can be accessed via public rights of way along the River Thames. Increased freight transport could lead to a reduction in air quality, impacting habitats within nearby European sites.</p>
<b>Environment</b>  EU6	<p>Policy EU6 relates to waste management and requires the relocation of waste sites within the OPDC area to, ideally, other sites within the borough, or other sites within west London and Greater London where waste sites within the OPDC area are lost to a non-waste use. This policy has the potential to result in increased road and non-road-based transport within Greater London (leading to reduced air quality), potentially in areas close to European sites.</p>

Policy	Justification
<p><b>Transport</b></p> <p>T3, T7, T8</p>	<p>Policy T3 aims to deliver and/or contribute to new cycle infrastructure, ensuring this connects into and supports the wider, existing cycle network such as the Grand Union Canal.</p> <p>Policy T7 aims to maximise efficient and sustainable ways of delivering goods including rail and water.</p> <p>Policy T8 aims to maximise use of rail and water transport for construction deliveries and removal of construction waste.</p> <p>An increase in people movements along the Grand Union Canal (which is directly linked to the River Thames) could lead to increased visitor pressure on Richmond Park SAC and Wimbledon Common SAC which can be accessed via public rights of way along the River Thames.</p> <p>Increased transport along the Grand Union Canal could lead to a reduction in air quality, impacting habitats within nearby European sites.</p>
<p><b>Housing</b></p> <p>H1</p>	<p>Policy H1 proposes the delivery of a minimum of 19,850 new homes within the OPDC area.</p> <p>This could lead to potential effects on European sites during operation (e.g. through increased visitor pressure).</p>
<p><b>Town Centre and Community Uses</b></p> <p>TCC9</p>	<p>Policy TCC10 aims to contribute towards the need for visitor accommodation (58,000 required across London by 2041).</p> <p>This could lead to effects on European sites through increased air pollution as a result of increased transport of visitors to and around the city and also increased visitor pressure on nearby European sites.</p>

## 6 DETAILED SCREENING OF THE OPDC LOCAL PLAN POLICIES

The detailed screening of the OPDC Local Plan policies in relation to the European sites is presented below, and is based on the findings of the initial screening exercise.

### 6.1 Potential Impacts

The Local Plan was reviewed and the following potential impact types were identified that may have adverse impacts on European sites and their qualifying species.

#### **Habitat degradation as a result of increased air pollution**

Changes in air quality from increased traffic (both construction and operational) and development as a result of implementation of policies SP5, P3, P4, EU6, T7, T8, H1 and TCC9 could have impacts on nearby European sites. For example, changes in air quality as a result of increased population and road/rail-based traffic may affect habitats that are sensitive to increased nitrogen deposition if sustainable transport modes are not implemented. This is in contrast to the conservation objectives for Wimbledon Common SAC and Epping Forest SAC which aim to maintain/restore the extent, distribution, structure and function of the qualifying habitats.

Potential adverse impacts on air quality as a result of increased population and therefore road/rail-based traffic may affect habitats that are sensitive to increased nitrous oxides (NO<sub>x</sub>), nitrogen deposition (N) and sulphur dioxide (SO<sub>2</sub>). The deposition of pollutants on vegetation can damage the vegetation directly or can affect plant health and productivity. In addition, the characteristics of the soil can be altered (for example pH) which in turn can affect plant health, productivity and species composition. The following pollutants are of most concern with respect to vehicular and rail emissions:

#### **Nitrogen oxides (NO<sub>x</sub>)**

Nitrogen oxides are produced in combustion processes, partly from nitrogen compounds in fuel, but mostly by a direct combination of atmospheric nitrogen and oxygen in flames. Nitric oxide (NO) and nitrogen dioxide (NO<sub>2</sub>) are collectively known as NO<sub>x</sub>. The UK emits around 0.82 million tonnes of NO<sub>2</sub> per year (National Atmospheric Emissions Inventory (NAEI), 2020a). In 2018, fuel combustion accounted for just under 97% of NO<sub>x</sub> emissions in the UK, of which road transport accounted for 31% and other forms of transport (including off-road vehicles and mobile machinery) accounted for 21% (NAEI, 2020a).

#### **Ammonia (NH<sub>4</sub>)**

Agriculture accounted for approximately 87% of total ammonia emissions in the UK in 2018 (NAEI, 2020b). Other significant contributions to the total come from waste disposal (4%) and road transport (2%) (DEFRA, 2018).

#### **Effects of pollutants**

Nitrogen deposition is the term used to describe the transfer of nitrogen from the atmosphere to the earth. Nitrogen is an essential plant nutrient, and, as such, some of the nitrogen-containing pollutants, such as NO<sub>x</sub> and ammonia, can be absorbed by plants. However, too much nitrogen can lead to eutrophication, creating conditions which favour plants with a high demand for nitrogen. Many lower plants (bryophytes and lichens) and communities that thrive in low nutrient conditions, such as heathlands, undergo changes in species composition as a result of the 'fertiliser effect' of eutrophication. Grass species can increase and species diversity of bryophytes and lichens can decline.

Acid deposition represents the mix of pollutants, which include NO<sub>x</sub> and ammonia, that together lead to the acidification of soils and freshwater. Acidification - a loss of alkali nutrients (calcium, magnesium and potassium) through leaching and their replacement with acidic elements such as hydrogen and aluminium - is toxic to plants.

A high proportion of employees within Park Royal currently travel to work by car with approximately 35% of journeys within a 5 km radius (OPDC, 2021c). Given the distances between the OPDC area and the



European sites which could be impacted by reduced air quality (Wimbledon Common SAC 8.3 km south and Epping Forest SAC 17.8km north-east), and that the OPDC Local Plan supports sustainable travel by public transport, significant effects on European sites are not anticipated as a result of increased pedestrian movements and employment opportunities.

Any construction sites or routes used by construction/transportation vehicles within 50 m of a European site (Institute of Air Quality Management, 2014) and any European site within 200 m of the Affected Road Network (ARN)<sup>9</sup> (Highways England, 2019) could lead to significant effects and would require assessment at the project level. The main access routes to the OPDC area are the M4, A40 and North/South Circular, all of which are more than 500 m from European sites therefore no significant effects as a result of vehicle emissions during construction are anticipated.

In 2019, less than 13% of UK freight was transported via water<sup>10</sup> (Gov.uk, 2020d). By 2035 (close to the end of the OPDC Plan period), the Port of London Authority (2016) aims to increase the use of the River Thames for freight transport to over 4 million tonnes per year (excluding infrastructure projects), increase the number of cargo handling facilities and champion the Thames as a default choice for moving spoil and materials from infrastructure projects close to the river. Any increase in the transport of freight along the River Thames may also result in increased freight transport along the connecting Grand Union Canal. However, currently, none of Grand Union Canal access points within the OPDC area (Twyford Tip, Old Oak Common Sidings and Old Oak Wharf) are in operation (Transport for London, 2021a).

Given the distance of the Grand Union Canal and the connecting River Thames (6.1 km and 2.1 km respectively) from Wimbledon Common SAC, any increase in freight transport along these watercourses is not expected to result in significant emissions and impacts on European sites.

An increased reliability on rail transport for the delivery of construction/freight materials is considered beneficial as NO<sub>x</sub> emission factors for rail (0.0000024 kilotonnes) are approximately 30% less than NO<sub>x</sub> emission factors for HGVs in urban areas (0.0000034 kilotonnes for rigid HGVs and 0.0000039 kilotonnes for articulated HGVs) (NAEI, 2018). Road transport is responsible for 51% of NO<sub>x</sub> emissions in London, compared to 3% for the Rail sector (Transport for London, 2019). The rail network is situated further from the European sites than the main road access routes into the OPDC area (M4, A40 and North/South Circular) and the impact of rail-based emissions is therefore likely to be less than that caused by road-based transport.

Transport for London (TfL) are proposing to extend the Ultra Low Emission Zone (ULEZ) in October 2021 (Transport for London, 2021b) and this will incorporate the OPDC area, further contributing to reducing air pollutants (including NO<sub>x</sub>) emitted from road traffic within the Local Plan area. This is considered a positive benefit to European sites.

**It is concluded that policies SP5, P3, P4, EU6, T7, T8, H1, and TCC9 would be unlikely to result in significant effects on habitats associated with European sites as a result of increased air pollution.**

## **Habitat degradation and disturbance to habitats and species through increased recreational activity during operational stage**

An increase in population (as a result of at least 19,850 new homes, improved travel infrastructure and additional visitor accommodation as a result of implementation of policies SP3, SP4, SP7, P3, P4, T3, H1 and TCC9) could lead to increased recreational pressure as a result of additional people in the OPDC

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<sup>9</sup> Defined as “roads that trigger the traffic screening criteria and adjoining roads within 200m” (Highways England, 2019).

<sup>10</sup> Includes all UK coastwise and one-port freight movements by sea, and inland waterway traffic (Department for Transport, 2019).

area and the potential consequent increases in people visiting the European sites such as trampling of vegetation, soil compaction and erosion. This is in contrast to the conservation objectives for Wimbledon Common and Richmond Park SACs which aim to maintain/restore the extent, distribution, structure and function of qualifying habitats and habitats of qualifying species (i.e. stag beetle).

The Local Plan aspires to improving public transport with increased train and tube links and there is a risk that this could increase accessibility to European sites. However, the nearest tube/train station is approximately 950m from Richmond Park SAC (Norbiton station) and 1.7 km from Wimbledon Common SAC (Southfields Underground Station). To access these stations from the OPDC area requires a change of tube line or connecting main line train and it is therefore considered unlikely that any significant number of people would make these journeys from the OPDC area on a regular basis.

As the OPDC Local Plan includes for the provision of green/open space (including at least 4ha of new parks under Policy SP8) and enhancements and improved access to Wormwood Scrubs under policy P12, the number of OPDC residents and visitors choosing to visit European sites in preference to similar, closer, local destinations (e.g. Hyde Park and Regents Park which are both within 5 km of the OPDC area) is considered to be low. Any increase in visitor numbers as a result of development within the OPDC area is therefore unlikely to cause a significant disturbance to habitats and species within European sites.

The improved cycle network along the Grand Union Canal proposed under policies P3 and P4 will provide no direct links to any European sites (Wimbledon Common SAC and Richmond Park SAC are both south of the River Thames) as the nearest bridge across the River Thames (Kew Bridge) is approximately 1 km from the Grand Union Canal southern towpath (approximately 3.7km outside of the OPDC boundary) and a further 3.35 km from the nearest European site (Richmond Park SAC). It is considered unlikely that any significant number of cyclists would travel this distance (which is above the average 5.1 km (3.2 mile) cycle trip length for London residents in 2018/2019) (2020a), particularly as only 17% of respondents to a 2017/2018 survey in Richmond Park SAC arrived at the site by bicycle with car being the most popular mode of transport of the site (37% of respondents) (The Royal Parks, 2019).

**It is concluded that policies SP3, SP4, SP7, P3, P4, T3, H1 and TCC9 would be unlikely to result in significant effects on habitats and species associated with European sites as a result of increased recreational pressure.**

## 6.2 Summary of potential impacts

Table 6-1 provides a summary of the features of the European sites that could be affected by policies within the OPDC Local Plan, either on their own, or in-combination with other plans and policies.

Table 6-1 – Features of European sites that could be affected by the OPDC Local Plan

Potential impacts of Local Plan	Policies leading to potential impacts	European sites and features potentially affected	Conclusion following detailed assessment
Increased recreational pressure through trampling of sensitive vegetation, and physical disturbance of qualifying interest species	SP3, SP4, SP7, P3, P4, T3, H1, TCC9	Stag beetle populations at Richmond Park SAC and Wimbledon Common SAC  Heathland habitats at Wimbledon Common SAC	Screened out due to distances people are required to travel, ease of travel to these locations and presence of alternative recreational areas within a shorter distance (e.g. Wormwood Scrubs (within OPDC area and with proposed improvements to public access under policy P12), Hyde Park (4.2 km) and Regents Park (4.4 km))
Increases in air pollution due to increase in road/rail traffic as a result of residential/industrial development and additional employment; relocation of waste facilities/treatment outside of the OPDC area	SP5, P3, P4, EU6, T7, T8, H1, TCC9	Heathland habitats of Wimbledon Common SAC  Beech forests and wet heath habitats of Epping Forest SAC	Screened out due to distance from OPDC area

### 6.3 Avoidance and Mitigation Potential

This screening exercise has not identified any likely significant effects on any European sites as a result of implementation of the plan. As such, no specific avoidance or mitigation measures (above and beyond standard mitigation measures that are required of developments, such as pollution prevention) are considered necessary.

### 6.4 Screening Summary

Following the initial screening of the OPDC Local Plan, a number of policies were screened out completely from further assessment on the basis either of no identifiable impact pathway linking the policies with the European sites or that there will be no foreseeable adverse impact on European sites through Policy implementation (refer to Table 5-4).

Policies SP3, SP4, SP5, SP7, P3, P4, EU6, T3, T7, T8, H1, and TCC9 were screened in for more detailed screening. Potential impacts identified comprised:

- Habitat degradation as a result of increased air pollution in relation to Wimbledon Common SAC and Epping Forest SAC.
- Disturbance to habitats and species through increased recreational activity, during the operational stage in relation to Richmond Park SAC and Wimbledon Common SAC.

**It is considered that any air quality effects that may arise from the OPDC Local Plan policies are very unlikely to be significant, given the distance between the European sites and the OPDC area.** The implementation of standard mitigation measures that are required of developments (such as pollution prevention) to meet with National Policies and frameworks also provide a further ‘safety net’ to ensure that significant damage to European sites is avoided.

It is also considered that any disturbance effects that may arise from increased recreational activity are very unlikely to be significant, given the proximity of alternative green/open spaces to the OPDC area.

## 6.5 In-Combination Effects

The HRA also needs to consider in-combination effects between the various elements of the OPDC Local Plan itself and that the 'screened in' policies within the OPDC Local Plan may have a significant impact in combination with other plans and projects within the local area.

Most of the policies were screened out completely from further assessment at the initial screening stage on the basis either of no identifiable impact pathway linking the policies with the European sites or that there will be no foreseeable adverse impact on European sites through Policy implementation.

Only twelve policies were screened in for more detailed screening, but it was concluded that their implementation would not result in significant effects on any European site. As such, it is considered unlikely that there would be significant in-combination effects on European sites as a result of the implementation of the Plan as a whole.

### 6.5.1 Other plans or projects

Only the effects of other plans or projects which (like those of the plan under consideration here) alone would not be likely to be significant, need to be included in the in-combination assessment. The in-combinations steps should be carefully scoped to relate only to relevant stages of other plans or projects and only to those which could make the possible adverse effects of the subject plan or project more likely or more significant (David Tyldesley Associates, 2021). If the effects of other plans or projects will already be significant on their own, they are not added to those associated with the OPDC Local Plan.

To be relevant to the in-combination assessment, the residual effects of other plans or projects will need to either make the unlikely effects of the OPDC Local Plan likely, or insignificant effects of the plan significant, or both. An assessment has therefore been made of the 'other' plans and projects listed in Table 6-2 with a view to determining whether or not they would result in impacts which, in combination with the policies set out in the OPDC Local Plan could lead to significant impacts on European sites.

Table 6-2 outlines relevant plans and projects that were considered in-combination with the OPDC Local Plan.

Table 6-2 - In-combination effects

Plan/project	Potential effect of plan/Policy	Conclusion
Greater London Authority – London Plan	Strategic plan for the Greater London Authority area which encompasses the OPDC area. Anticipated increases in population, employment, travel and risk of climate change across the Greater London Authority area could add to the threats/likelihood of increased recreational pressure and air pollution on European sites, resulting in negative impacts on European sites.	<p>The London Plan is a strategic document, which outlines the approach for development across Greater London, including the OPDC area. The policies provide overarching principles which are complemented by and further detailed within Borough Local Plans.</p> <p>All seven of the European sites considered within Table 4-1 of this report are partially or wholly within the Greater London Authority boundary and have therefore been considered as part of a Habitats Regulations Screening Assessment of the Draft London Plan (AECOM, 2018) which concludes that “the growth objectives of the London Plan can be delivered without an adverse effect on the integrity of European sites”</p>
London Borough of Brent – Local Plan	Increased housing in the neighbouring Borough of Brent, particularly that close to the boundary with the OPDC area, could lead to increased recreational pressure on European sites.	<p>All SPAs and SACs considered within Table 4-1 of this report have been considered as part of a Habitats Regulations Assessment of the London Borough of Brent Local Plan (Brent Council, 2020).</p> <p>The London Borough of Brent is further from the two European sites most likely to experience increased recreational pressure due to proximity to the OPDC boundary (Richmond Park SAC and Wimbledon Common SAC).</p> <p>The HRA (Brent Council, 2020) concludes that “the policies and proposals contained within the emerging Brent Local Plan is not likely to have significant effects on the qualifying features and integrity of the identified European sites.”</p>

Plan/project	Potential effect of plan/Policy	Conclusion
London Borough of Ealing – Development Core Strategy	Increased housing in the neighbouring Borough of Ealing, could lead to increased recreational pressure on European sites.	<p>South West London Waterbodies SPA/Ramsar Site, Wimbledon Common SAC and Richmond Park SAC were considered as part of a Habitats Regulations Assessment of the London Borough of Ealing Development Core Strategy (Ealing Council, 2011).</p> <p>The HRA (Ealing Council, 2011) concludes that the Development Plan Documents are “not likely to give rise to impacts (either alone or in combination with other plans or projects) on the European sites listed above.”</p> <p>Although published nearly ten years ago (February 2011), the conclusions of the HRA screening report (Ealing Council, 2011) are largely based on the distance of the European sites from the London Borough of Ealing Boundary and are therefore unlikely to change significantly with the future publication of the Local Plan.</p>
London Borough of Hammersmith and Fulham – Local Plan	Increased housing in the neighbouring Borough of Hammersmith and Fulham, particularly that close to the boundary with the OPDC area, could lead to increased recreational pressure on European sites.	Richmond Park SAC has been considered as part of a Strategic Environmental Assessment (SEA) Adoption Statement for the Hammersmith & Fulham Local Plan (London Borough of Hammersmith and Fulham, 2018) which states that this site would not be significantly adversely impacted upon by any of the policies in the Local Plan.
Royal Borough of Kensington and Chelsea – Local Plan	Increased housing in the neighbouring Royal Borough of Kensington and Chelsea, particularly that close to the boundary with the OPDC area, could lead to increased recreational pressure on European sites.	<p>Wimbledon Common SAC and Richmond Park SAC were considered as part of a Habitats Regulations Assessment of the Royal Borough of Kensington and Chelsea Local Plan (The Royal Borough of Kensington and Chelsea, 2015).</p> <p>The HRA (The Royal Borough of Kensington and Chelsea, 2015) concludes that “none of the policies that are being reviewed are likely to have a significant/any effect on the relevant Natura 2000 sites.”</p>

Plan/project	Potential effect of plan/Policy	Conclusion
West London Waste Authority – West London Waste Plan	Safeguarding existing sites for waste management will minimise the risk of new sites being required elsewhere in London (potentially close to European sites).	<p>Richmond Park SAC, Wimbledon Common SAC and South West London Waterbodies SPA and Ramsar site were considered as part of a Habitats Regulations Assessment of the West London Waste Plan (Mouchel, 2010).</p> <p>The HRA (Mouchel, 2010) concludes that “the West London Waste Plan will not have a significant effect on Natura 2000 or Ramsar Sites.”</p> <p>A subsequent update of the HRA (London Borough of Hillingdon, 2014) during the West London Waste Plan consultation/submission phase determined that the previous conclusion of no likely significant effect remained valid due, in part, to “the significant reduction in proposed sites for allocation” and “the distance of the proposed allocated sites from Natura 2000 sites”.</p>
High Speed 2 Limited – Provision of new station at Old Oak Common	The site is located within the OPDC area. With an anticipated 250,000 passengers each day, the new station could result in an increase in rail transport leading to reduced air quality and an increase in pedestrians within/visitors to the OPDC area.	<p>All of the stations on the HS2, Elizabeth Line or Great Western Mainline are more than 2.5 km from the European sites under consideration. It is not anticipated that significant numbers of passengers would travel this additional distance specifically to visit any of the European sites.</p> <p>A HRA screening for HS2 has concluded no likely significant effects on any of the European sites under consideration (Booz and Co (UK) Ltd and Temple Group Ltd, 2011).</p> <p>No in-combination effects are anticipated.</p>

## 6.6 Conclusion

This HRA Screening of the OPDC Post Submission Modifications to the Regulation 19(2) Second Revised Draft Local Plan has considered the potential implications of the plan for European sites within 20 km of the OPDC area boundary.

It is important to note that none of the policies set out in the OPDC Local Plan would lead to direct impacts upon European sites.

It is considered that the only effects likely to arise as a result of implementation of the OPDC Local Plan are reduced air quality (as a result of construction activities and increased transport during the construction and operational phases) and increased population. These factors could impact the European sites through habitat degradation and increased recreational pressure.

The closest European site is more than 7 km from the OPDC boundary. It is considered that potential effects are very unlikely to be significant, given the distance between the European sites and the nature of the developments likely to arise from the OPDC Local Plan policies, as well as the standard mitigation measures that are required of such developments (such as pollution prevention).

The assessment of in-combination effects of various plans and policies revealed that it is not considered that the OPDC Local Plan would contribute to significant in-combination effects, primarily due to the distance of the plans, policies and projects from the European sites.

It has therefore been concluded that the OPDC Local Plan is unlikely to have any significant effects on the European sites identified, either alone or in-combination with other plans or projects. **As such, it is not proposed to undertake Appropriate Assessment.**

We seek Natural England's opinion and agreement or otherwise with this conclusion.



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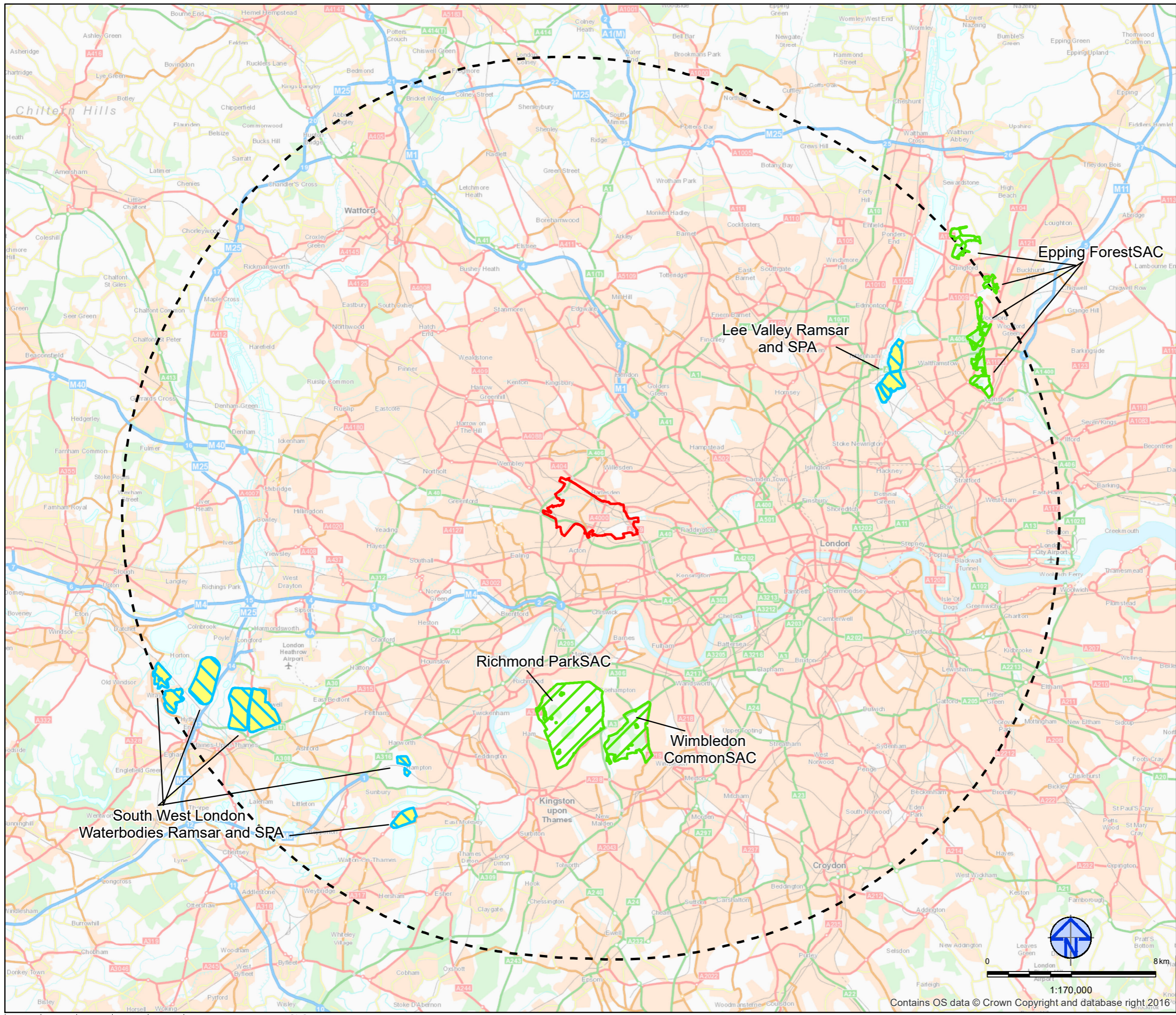
# DRAWINGS

**DRAWING 001-UA008107-UE31D-01**

**European sites surrounding the OPDC area**







**NOTES:**

**Legend:**

- Site Boundary
- Special Protection Area
- Special Area of Conservation
- Ramsar Site
- 20km Study Area

Rev	Date	Description	Drawn	Check	Approv
01	22/02/17	First draft	RM	LF	SKW

**Client** Old Oak and Park Royal Development Corporation (OPDC)

**PROJECT:** OPDC Habitats Regulations Assessment Screening Report

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

**Site**  
OPDC AREA

**Client**  
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**TITLE:**

European Sites surrounding the OPDC area

Drawn	R.MILLMAN	Date	22FEB17	Signed
Checked	L.FAY	Date	22FEB17	Signed
Approved	S.WALTERS	Date	22FEB17	Signed
Scale:	1:170,000	Datum:	AOD	
Original Size:	A3	Grid:	OS	
Suitability Code:	S2	Project Number:	UA008107	

Issued for information

Drawing Number:	001-UA008107-UE31D-	Revision:	01
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# APPENDICES

## APPENDIX A

### European sites surrounding the OPDC area

Site Name	Qualifying Features		Vulnerabilities <sup>1</sup>	Site Condition Assessment <sup>2</sup>
	Habitats	Species		
Richmond Park SAC	N/A	Annex II species that are a primary reason for selection of this site <ul style="list-style-type: none"> <li>Stag beetle (<i>Lucanus cervus</i>)</li> </ul>	The site is surrounded by urban areas and therefore experiences high levels of recreational pressure. The whole site has been declared a National Nature Reserve (NNR).	Area favourable: 0% Area unfavourable but recovering: 100% Area unfavourable - no change: 0% Area unfavourable - declining: 0% Area destroyed / part destroyed: 0%
Wimbledon Common SAC	Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site <ul style="list-style-type: none"> <li>North Atlantic wet heaths with <i>Erica tetralix</i></li> <li>European dry heaths</li> </ul>	Annex II species that are a primary reason for selection of this site <ul style="list-style-type: none"> <li>Stag beetle (<i>Lucanus cervus</i>)</li> </ul>	The site is located in an urban area and therefore experiences heavy recreational pressure	Area favourable: 0% Area unfavourable but recovering: 94.99% Area unfavourable - no change: 5.01% Area unfavourable - declining: 0% Area destroyed / part destroyed: 0%

<sup>1</sup> Taken from Natura 2000 data forms (SAC and SPA) and Ramsar Information Sheets.

<sup>2</sup> Condition summary of the underlying Sites of Special Scientific Interest (SSSI) based on information provided by Natural England (2021b).

Site Name	Qualifying Features		Vulnerabilities <sup>1</sup>	Site Condition Assessment <sup>2</sup>
	Habitats	Species		
Lee Valley SPA	N/A	<p>This site qualifies under <b>Article 4.1</b> of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p><b>Over winter:</b> Bittern (<i>Botaurus stellaris</i>)</p> <p>This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p><b>Over winter:</b> Gadwall (<i>Anas strepera</i>) Shoveler (<i>Anas clypeata</i>)</p>	<p>The whole area is affected by rather eutrophic water quality; but this is to be addressed via AMP3 funding under the Urban Waste Water Treatment Directive. The other main threat is that of human recreational pressure, but this is already well regulated through zoning of water bodies within the Lee Valley Regional Park. The majority of the site is already managed in accordance with agreed management plans in which nature conservation is a high or sole priority. There is also a potential problem from over-extraction of surface water for public supply, particularly during periods of drought. This will be addressed through the Environment Agency review of consents. The threat from potential development pressures in this urbanised and urban-fringe area is largely covered by the relevant provisions of the Conservation Regulations (1994) (which is now superseded by the Conservation of Habitats and Species Regulations 2010 (as amended)).</p>	<p>Area favourable: 52.2%</p> <p>Area unfavourable but recovering: 47.8%</p> <p>Area unfavourable - no change: 0%</p> <p>Area unfavourable - declining: 0%</p> <p>Area destroyed / part destroyed: 0%</p>

Site Name	Qualifying Features		Vulnerabilities <sup>1</sup>	Site Condition Assessment <sup>2</sup>
	Habitats	Species		
Lee Valley Ramsar site	N/A	<p><b>Ramsar criterion 2</b></p> <p>This site supports the nationally scarce plant species whorled water milfoil (<i>Myriophyllum verticillatum</i>) and the rare or vulnerable invertebrate <i>Micronecta minutissima</i> (a water-boatman)</p> <p><b>Ramsar criterion 6</b></p> <p>Species/populations occurring at levels of international importance:</p> <p>Qualifying Species/populations (as identified at designation):</p> <p>Species with peak counts in spring/autumn:</p> <p>Northern shoveler (<i>Anas clypeata</i>)</p> <p>Species with peak counts in winter:</p> <p>Gadwall (<i>Anas strepera strepera</i>)</p>	N/A	See above.



Site Name	Qualifying Features		Vulnerabilities <sup>1</sup>	Site Condition Assessment <sup>2</sup>
	Habitats	Species		
South West London Waterbodies SPA	N/A	<p>This site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p><b>Over winter:</b></p> <p>Gadwall (<i>Anas strepera</i>)</p> <p>Shoveler (<i>Anas clypeata</i>)</p>	<p>There is an issue surrounding the potential future decommissioning of reservoirs once they are no longer required for the purposes of water supply; as well as the potential impacts of maintenance works, which may require winter draw-down of reservoirs. Discussions will be required with the current owners and occupiers regarding the future management, maintenance and decommissioning of the larger reservoirs, in order to maintain the site's interest. The threat from potential development pressures in this urbanised and urban-fringe area is largely covered by the relevant provisions of the Conservation Regulations (1994) (superseded by the Conservation of Habitats and Species Regulations 2017 (as amended)). Issues such as arresting (or locally reversing) vegetation succession will be addressed via management plans. Levels of disturbance from recreational activities on one part of the site will be monitored in the winter months to determine their effects on the interest of the site.</p>	<p>Area favourable: 95.6%</p> <p>Area unfavourable but recovering: 3.54%</p> <p>Area unfavourable - no change: 0%</p> <p>Area unfavourable - declining: 0.85%</p> <p>Area destroyed / part destroyed: 0%</p>
South West London Waterbodies Ramsar site	N/A	<p><b>Ramsar criterion 6</b></p> <p>Species/populations occurring at levels of international importance:</p> <p>Qualifying Species/populations (as identified at designation):</p> <p>Species with peak counts in spring/autumn:</p> <p>Northern shoveler (<i>Anas clypeata</i>)</p> <p>Species with peak counts in winter:</p> <p>Gadwall (<i>Anas strepera strepera</i>)</p>	N/A	See above.

Site Name	Qualifying Features		Vulnerabilities <sup>1</sup>	Site Condition Assessment <sup>2</sup>
	Habitats	Species		
Epping Forest SAC	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (Quercion robori-petraeae or Illici-Fagenion)</li> </ul> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>Northern Atlantic wet heaths with <i>Erica tetralix</i></li> <li>European dry heaths</li> </ul>	<p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>Stag beetle (<i>Lucanus cervus</i>)</li> </ul>	<p>After neglect of the pollard cycle for over 100 years, re-pollarding of ancient beech trees was started in the early 1990s, and creation of maiden pollards was begun in 1995. The forest's epiphytic bryophyte population had been declining due to the death of pollards, shading and pollution from acid rain. The reintroduction of pollarding and wood pasture management is helping to reverse the decline. The slow recovery can also be attributed to the reduction of atmospheric pollutants since the passing of the 1956 Clean Air Act.</p> <p>There is an active policy to leave felled timber on the ground to increase the habitat for stag beetle and other saproxylic insects.</p> <p>In 1988, the Corporation of London, who own and manage the forest, agreed a management strategy with English Nature (now Natural England) to take forward the management outlined above. A comprehensive management plan was completed and consented in 1998.</p> <p>The site is subject to the provisions of the Epping Forest Act of 1878.</p>	<p>Area favourable: 35.48%</p> <p>Area unfavourable but recovering: 48.17%</p> <p>Area unfavourable - no change: 14.53%</p> <p>Area unfavourable - declining: 1.83%</p> <p>Area destroyed / part destroyed: 0%</p>

# APPENDIX B

## Conservation objectives

### European Site Conservation Objectives for Richmond Park Special Area of Conservation Site code: UK0030246



With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;**

- **The extent and distribution of the habitats of qualifying species**
- **The structure and function of the habitats of qualifying species**
- **The supporting processes on which the habitats of qualifying species rely**
- **The populations of qualifying species, and,**
- **The distribution of qualifying species within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

#### **Qualifying Features:**

S1083. *Lucanus cervus*; Stag beetle

#### **Explanatory Notes: European Site Conservation Objectives**

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2017 as amended from time to time (the "Habitats Regulations"). They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment', including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where available) will also provide a framework to inform the measures needed to conserve or restore the European Site and the prevention of deterioration or significant disturbance of its qualifying features.

These Conservation Objectives are set for each habitat or species of a [Special Area of Conservation \(SAC\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in regulation 3 of the Habitats Regulations.

**Publication date:** 27 November 2018 (version 3). This document updates and replaces an earlier version dated 30 June 2014 to reflect the consolidation of the Habitats Regulations in 2017.

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# European Site Conservation Objectives for Wimbledon Common Special Area of Conservation

Site code: UK0030301



With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;**

- **The extent and distribution of qualifying natural habitats and habitats of qualifying species**
- **The structure and function (including typical species) of qualifying natural habitats**
- **The structure and function of the habitats of qualifying species**
- **The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely**
- **The populations of qualifying species, and,**
- **The distribution of qualifying species within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

## **Qualifying Features:**

H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath

H4030. European dry heaths

S1083. *Lucanus cervus*; Stag beetle

## **Explanatory Notes: European Site Conservation Objectives**

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2017 as amended from time to time (the "Habitats Regulations"). They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment', including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where available) will also provide a framework to inform the measures needed to conserve or restore the European Site and the prevention of deterioration or significant disturbance of its qualifying features.

These Conservation Objectives are set for each habitat or species of a [Special Area of Conservation \(SAC\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in regulation 3 of the Habitats Regulations.

**Publication date:** 27 November 2018 (version 3). This document updates and replaces an earlier version dated 30 June 2014 to reflect the consolidation of the Habitats Regulations in 2017.

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# European Site Conservation Objectives for Lee Valley Special Protection Area Site Code: UK9012111



With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;**

- **The extent and distribution of the habitats of the qualifying features**
- **The structure and function of the habitats of the qualifying features**
- **The supporting processes on which the habitats of the qualifying features rely**
- **The population of each of the qualifying features, and,**
- **The distribution of the qualifying features within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

## **Qualifying Features:**

- A021 *Botaurus stellaris*; Great bittern (Non-breeding)
- A051 *Anas strepera*; Gadwall (Non-breeding)
- A056 *Anas clypeata*; Northern shoveler (Non-breeding)

## **Explanatory Notes: European Site Conservation Objectives**

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitats Regulations'). They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment' including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives, and the accompanying Supplementary Advice (where this is available), will also provide a framework to inform the management of the European Site and the prevention of deterioration of habitats and significant disturbance of its qualifying features

These Conservation Objectives are set for each bird feature for a [Special Protection Area \(SPA\)](#).

Where these objectives are being met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.

**Publication date:** 21 February 2019 (version 3). This document updates and replaces an earlier version dated 30 June 2014 to reflect the consolidation of the Habitats Regulations in 2017.



**European Site Conservation Objectives for  
South West London Waterbodies Special Protection  
Area  
Site Code: UK9012171**



With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;**

- **The extent and distribution of the habitats of the qualifying features**
- **The structure and function of the habitats of the qualifying features**
- **The supporting processes on which the habitats of the qualifying features rely**
- **The population of each of the qualifying features, and,**
- **The distribution of the qualifying features within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

**Qualifying Features:**

A051 *Anas strepera*; Gadwall (Non-breeding)

A056 *Anas clypeata*; Northern shoveler (Non-breeding)

**Explanatory Notes: European Site Conservation Objectives**

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitats Regulations'). They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment' including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives, and the accompanying Supplementary Advice (where this is available), will also provide a framework to inform the management of the European Site and the prevention of deterioration of habitats and significant disturbance of its qualifying features

These Conservation Objectives are set for each bird feature for a [Special Protection Area \(SPA\)](#).

Where these objectives are being met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.

**Publication date:** 21 February 2019 (version 3). This document updates and replaces an earlier version dated 30 June 2014 to reflect the consolidation of the Habitats Regulations in 2017.

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# European Site Conservation Objectives for Epping Forest Special Area of Conservation

## Site Code: UK0012720



With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;**

- **The extent and distribution of qualifying natural habitats and habitats of qualifying species**
- **The structure and function (including typical species) of qualifying natural habitats**
- **The structure and function of the habitats of qualifying species**
- **The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely**
- **The populations of qualifying species, and,**
- **The distribution of qualifying species within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

### **Qualifying Features:**

H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath

H4030. European dry heaths

H9120. Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*); Beech forests on acid soils

S1083. *Lucanus cervus*; Stag beetle

### **Explanatory Notes: European Site Conservation Objectives**

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2017 as amended from time to time (the "Habitats Regulations"). They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment', including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where available) will also provide a framework to inform the measures needed to conserve or restore the European Site and the prevention of deterioration or significant disturbance of its qualifying features.

These Conservation Objectives are set for each habitat or species of a [Special Area of Conservation \(SAC\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in regulation 3 of the Habitats Regulations.

**Publication date:** 27 November 2018 (version 3). This document updates and replaces an earlier version dated 30 June 2014 to reflect the consolidation of the Habitats Regulations in 2017.

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# OPDC LOCAL PLAN SCHEDULE OF REFERENCES TO REASONABLE ALTERNATIVES

20 June 2019



## 1 Purpose of this document

- 1.1 This document has been prepared in response to a request by the Planning Inspector to provide a schedule of locations in the Integrated Impact Assessment (IIA) documents where Reasonable Alternatives have been discussed. The Inspector also requested a schedule of locations in documents, contemporaneous to the IIA, where references to Policy Options and Reasonable Alternatives occurred. This information is summarised in section 2 and tables 1 and 2.

## 2 Documents referring to Reasonable Alternatives

- 2.1 Throughout the development of the Local Plan and accompanying IIA documents, Reasonable Alternatives have been considered and assessed. Where Reasonable Alternatives were not provided, these documents also set out the reasoning for this. The following documents are those containing this information. Further detailed information is provided in tables 1 and 2.
- 2.1.1 **January 2016. OPDC Planning Committee Report and OPDC Board Report regarding Regulation 18 consultation** – these documents present and explain the approach taken to alternatives to Planning Committee and Board members prior to the commencement of the Regulation 18 consultation;
- 2.1.2 **February 2016. OPDC Draft Local Plan (Regulation 18)** – sets out the reasonable alternatives for the four strategic options for delivering affordable housing and other alternative policies throughout the document;
- 2.1.3 **February 2016. OPDC Integrated Impact Assessment (including Habitats Regulations Assessment Screening) (Draft for Regulation 18 Consultation and Appendices)** – sets out the approach to alternatives appraisal including a summary and detailed appraisal matrix for the 4 strategic alternatives for affordable housing and the other alternative policies within the Regulation 18 Local Plan;
- 2.1.4 **June 2018. OPDC Integrated Impact Assessment (including Habitats Regulations Assessment Screening) (to accompany the OPDC Regulation 19 (2) Second Revised Draft Local Plan)** – sets out the reasoning for not providing reasonable alternatives for development capacities; and
- 2.1.5 **April 2019. OPDC Integrated Impact Assessment Addendum** – clarifies the reasoning why reasonable alternatives for development capacities are not provided, the role of a post-addendum statement and how policy recommendations made through the IIA process have been incorporated into the Local Plan or reasons for not incorporating them.

## 3 Table 1: References to Reasonable Alternatives in the IIA documentation

### Document Location Key:

1: OPDC, Integrated Impact Assessment (including Habitats Regulations Assessment Screening) Draft for Regulation 18 Consultation 4 February 2016<sup>1</sup>

2: OPDC, Integrated Impact Assessment (including Habitats Regulations Assessment Screening) Draft for Regulation 18 Consultation 4 February 2016 Appendices<sup>2</sup>

3: OPDC, Integrated Impact Assessment (including Habitats Regulations Assessment Screening) June 2018 (to accompany the OPDC Regulation 19 (2) Second Revised Draft Local Plan)<sup>3</sup>

4: OPDC, Integrated Impact Assessment Addendum April 2019<sup>4</sup>

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<sup>1</sup> [https://www.london.gov.uk/sites/default/files/opdc\\_draft\\_local\\_plan\\_draft\\_ia\\_report\\_new\\_cover.pdf](https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_draft_ia_report_new_cover.pdf)

<sup>2</sup> [https://www.london.gov.uk/sites/default/files/opdc\\_draft\\_local\\_plan\\_draft\\_ia\\_report\\_appendices\\_new\\_cover.pdf](https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_draft_ia_report_appendices_new_cover.pdf)

<sup>3</sup> [https://www.london.gov.uk/sites/default/files/28\\_ia\\_and\\_hra.pdf](https://www.london.gov.uk/sites/default/files/28_ia_and_hra.pdf)

<sup>4</sup> [https://www.london.gov.uk/sites/default/files/opdc-024\\_opdc\\_response\\_to\\_hearing\\_actions\\_matter\\_2\\_-\\_integrated\\_impact\\_assessment.pdf](https://www.london.gov.uk/sites/default/files/opdc-024_opdc_response_to_hearing_actions_matter_2_-_integrated_impact_assessment.pdf)

Options Appraised/ Referenced	Document Location	Details
Appraisal of Strategic Options	1 (Reg 18 IIA): Section 3.2.1	Introduces that the appraisal focusses on strategic and policy alternatives.
	1 (Reg 18 IIA): Section 4.1 and 4.2	Introduces approach to alternatives appraisal and references where to find results.
	1 (Reg 18 IIA): Chapter 5 And 3 (Reg 19(2) IIA): Chapter 5	Summarises appraisal results for 4 strategic alternatives (affordable housing) and explains what the alternatives are.
	2 (Reg 18 IIA Appendices): Appendix F, pages 194-199 And 3 (Reg 19(2) IIA): Appendix E, pages 430-434	Detailed appraisal matrix for 4 strategic alternatives.
	3 (Reg 19(2) IIA): Section 3.4	Explains how development capacities were set in the London Plan/FALP/OAPF and options for these were, therefore, not reasonable alternatives.  Introduces how options were appraised through the IIA.  Explains that the reasons for OPDC's decisions on which strategic options to take forward were based upon the sustainability strengths and weaknesses of each option identified in the IIA.
	4 (Addendum): Sections 1.4, 2.2, 2.3 and 2.4	Clarifies the information in Reg 19(2) Section 3.4 with further detail on the hierarchy of plans and why the broad spatial strategy and quantum of growth were set in the London Plan and are therefore not reasonable alternatives for this IIA.
	4 (Addendum): Section 2.4	Further clarity on what was appraised in the IIA of the London Plan/FALP/OAPF.  Further clarity on why the <u>only</u> reasonable alternatives available to OPDC were strategic affordable housing options and a range of policy options.
	4 (Addendum): Section 3	Clarifies that the SEA Directive/Regulations requirements to give reasons for selecting the proposed approach in light of the alternatives is typically satisfied within the forthcoming post-adoption statement of the Plan.
Appraisal of Preferred Policies and Policy Options	1 (Reg 18 IIA): Section 4.5	Introduces that the appraisal focusses on strategic and policy alternatives and where to find the results.
	2 Appendix G pages 200- 424	Detailed appraisal matrices for preferred and reasonable alternative policies.
	3 (Reg 19(2) IIA): Section 4.4	Explains how policy options were appraised and also references the iteration of appraisal as the Local Plan evolved between the Reg 19(1) and Reg 19(2)

Options Appraised/ Referenced	Document Location	Details
		consultations.
	4 (Addendum): Section 2.4	Table 2.2 reiterates the preferred and reasonable alternative policy options appraised in Reg 18 Appendix G including reasons for their selection or rejection in light of the preferred policy options. It clarifies that for policies where no alternatives have been discussed, there were no reasonable alternatives identified.
	4 (Addendum): Section 3	Table 3.1 clarifies how policy recommendations made through the IIA process have been incorporated into the Local Plan or reasons for not incorporating them.

3.1 Table 1 clearly demonstrates to the reader that the IIA documentation sets out how, when and why reasonable alternatives have been generated and assessed and where reasonable alternatives are not provided the reasoning for this.

## 4 Table 2: References to Policy Options and Reasonable Alternatives in OPDC Documents

Options Appraised/ Referenced	Document Location	Details
Appraisal of Strategic Options	Regulation 18 Local Plan: Paragraphs 7.38 to 7.42	States the four strategic options for delivering affordable housing.
Appraisal of Preferred Policies and Policy Options	Regulation 18 Local Plan: Paragraphs 1.14 to 1.18 and figures 4 and 5.	Identifies within each chapter there are a series of policies which take two forms: 'preferred policies' or 'policy options' and that realistic alternatives are included where relevant.
Appraisal of Preferred Policies and Policy Options	Regulation 18 Local Plan: Paragraph 1.20	Identifies that all draft Local Plan policy options, including the alternative policy options, have been appraised in OPDC's IIA.
Appraisal of Preferred Policies and Policy Options	Regulation 18 Local Plan: Overarching Spatial Policies, Places, Thematic Policies and Delivery Implementation Chapters.	Policy sections within each chapter comprise a 'Preferred Policy Option' and 'Alternative Policy Option(s)' or where no 'Alternative Policy Option' is identified a reason for why an Alternative Policy Option has not been provided.
Appraisal of Preferred Policies and Policy Options	Planning Committee Report Regulation 18 Local Plan consultation (6 January 2016): Section 5	Identifies the use of policy options and alternative policy options within the Regulation 18 Local Plan. The figure within paragraph 5.4 identifies that Alternative Policy Options "Sets out realistic alternatives for the policy and explains potential positive and negatives of the alternative and why at this stage the option is not

Options Appraised/ Referenced	Document Location	Details
Appraisal of Preferred Policies and Policy Options	Board Report Re: Planning Matters: Regulation 18 Local Plan consultation (25 January 2016): Section 3	<p>preferred.”</p> <p>Identifies the use of policy options and alternative policy options within the Regulation 18 Local Plan.</p> <p>The figure within paragraph 3.12 identifies that Alternative Policy Options “Sets out realistic alternatives for the policy and explains potential positive and negatives of the alternative and why at this stage the option is not preferred.”</p>

## 5 Conclusion

- 5.1 Through the four IIA documents referred to in Table 1, this document demonstrates that the IIA has identified what the reasonable alternatives are, that these were the only reasonable alternatives available to OPDC in light of other options, that their selection has been justified and that they have been appraised through the IIA process.
- 5.2 In addition, the Regulation 18 Local Plan and associated Planning Committee and Board reports demonstrate that references were made to preferred policies and alternative policies that were considered to be reasonable.
- 5.3 This complies with the requirements of the SEA Directive which, in Article 5(1) requires that:

### Box 2.6: SEA Directive Art. 5(1)

*Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.*

- 5.4 And the SEA Regulations which, in Schedule 2, paragraph 8 require that:

### Box 2.7: SEA Regulations Schedule 2, paragraph 8

*... an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.*

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## **OPDC Local Plan**

### **Schedule summarising and explaining decisions taken on alternatives and rejected alternatives at previous stages of plan preparation**

12 February 2021

## 1. Purpose of this document

1.1. The Planning Inspector's Interim Findings on Sustainability Appraisal (ID-34a) require OPDC to summarise and explain decisions taken on reasonable alternatives and rejected reasonable alternatives at previous stages of plan preparation. This document provides this information.

1.2. The previous stages comprise:

- OPDC Regulation 18 Draft Local Plan (2016)
- GLA Old Oak and Park Royal Opportunity Area Planning Framework (2015)
- GLA Old Oak – A Vision for the Future document (2013)

1.3. Determining if an alternative is reasonable is a matter of evaluative and qualitative assessment by the local planning authority, i.e. it is a matter of planning judgment. SEA Guidance states that "only reasonable, realistic and relevant alternatives need to be put forward". The SEA Directive and associated legislation do not define what constitutes a reasonable alternative, or how many alternatives must be considered. Reasonableness in the context of considering "reasonable alternatives" is informed by the objectives sought to be achieved by the Local Plan. An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan is not a "reasonable alternative" (case of R (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers [2015] EWHC 776 (Admin)).

## 2. Summaries and explanations of decisions taken on alternatives and rejected alternatives at previous stages of plan preparation

### Regulation 18 Draft Local Plan (2016)

In the drafting of policies for the Regulation 18 Draft Local Plan, the plan making process generated a number of alternatives that were assessed within the Integrated Impact Assessment (IIA) of the Regulation 18 Draft Local Plan.

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
D5: Alterations and extensions	1. Guidance is not provided for alterations, extensions and shopfronts.	n/a	To support the delivery of a high quality built environment.
D7: Amenity	1. London Plan policies are used to manage amenity	n/a	To recognise specific requirements of high density development in delivering an appropriate standard of amenity.
H1 Affordable housing	1. Fixing the percentage	n/a	Would not enable sufficient flexibility to optimise affordable housing delivery.
	2. Product dependent range	n/a	Would not provide sufficient clarity and would add greater complexity to the development management process.
	3. Viability based percentage	To align with London and national guidance in seeking to facilitate development while securing appropriate levels of affordable housing.	n/a



Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
	4. Negotiate a target on a site specific basis	n/a	Would not provide sufficient clarity and would add greater complexity to the development management process.
H2: Housing supply	1. Seek to deliver a higher number of new homes within the Local Plan period.	n/a	For the Local Plan period, the Local Plan does not provide targets greater than those defined in the London Plan based on testing set out in the Development Capacity Study. However, policy SP10 seeks to ensure that an optimised and comprehensive approach is taken to the development of site allocations so that targets can be met or exceeded. This reflects London Plan policy 2.13(B)(c).
H3: Housing mix	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)	n/a	To ensure that new homes will have adequately sized rooms and efficient room layouts which are functional and fit for purpose.
H5: Existing housing	1. Take a more flexible approach to the loss of existing stock. 2. Allow the conversion of smaller family sized units and not require a proportion of these to be replaced as family homes	n/a	1. To ensure the loss of existing housing stock to other uses does not undermine the overall housing supply. 2. To prevent the loss of much needed family sized units.
H6: Housing in the Private Rented Sector	1. Make it mandatory for PRS proposals to sign up to London Rental Scheme (LRS)	n/a	Following the change in Mayor, this proposal was no longer sought.
H7: Housing with shared facilities	1. Encourage the conversion or loss of shared housing without replacing it.	n/a	Policy H7 was amended to provide criteria to manage the conversion or loss of existing shared housing to ensure that appropriate shared housing was not removed from the market.
H10: Student accommodation	1. Require student housing proposals to be linked to specified educational institutions	To help to demonstrate there is a local or London-wide supply and ensure the accommodation will be supporting London's higher education institutions.	n/a

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
E2: Old Oak	<p>1. Support for focusing B1(a) uses in and around Old Oak Common Station is not provided.</p> <p>2. Support for B1(b) and B1(c) uses in Old Oak north is not provided.</p>	n/a	<p>1. To support the development of a commercial centre in Old Oak South.</p> <p>2. Specific support for B1(b) uses is not provided in policy P2; however, a range of B1 uses are supported within Old Oak North including specifically B1c along the Haul Road.</p>
E3: Park Royal	<p>1. SIL boundary is not extended.</p> <p>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.</p>	n/a	<p>1. To ensure the ability for intensifying Park Royal is optimised.</p> <p>2. The release of the Channel Gate High Speed 2 construction work sites would prohibit the Local Plan from meeting the London Plan jobs targets for Park Royal Opportunity Area and intensification aspirations.</p>
E4: Open workspace	<p>1. Delivery of onsite open workspace is required for residential and/or commercial proposals. 2</p> <p>2. Delivery of small-scale workspaces is supported with coordinated delivery of rented small-scale residential units outside of the SIL.</p>	2. To avoid conversion to residential units of live-work units provided in a single unit.	1. Policies E2 and E3 were drafted to support a range of employment floorspaces, and not solely focus on open workspaces, to support a diverse employment offer.
TC2: Town centre hierarchy	<p>1. Identify Old Oak High Street as a Metropolitan Centre.</p> <p>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.</p> <p>3. Two centres are designated in Old Oak - a District Centre to the south</p>	n/a	<p>1. To reflect the quantity of retail and leisure floorspace required to support the needs of development as defined in the Retail and Leisure Needs Study.</p> <p>2. / 3. To reflect the geographic size of Old Oak North and Old Oak South and deliver a comprehensive and coordinated town centre over the long term.</p> <p>4. To ensure local business and residential communities are well served by town centre uses.</p>

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
	<p>of the canal around Old Oak Common Station and a Neighbourhood Centre to the north of the canal.</p> <p>4. Park Royal is not identified as a Neighbourhood Centre and a different approach is taken to town centre uses in the area.</p>		
TC3: Vibrancy	1. Take a more flexible approach to betting shops, pay-day loan shops and takeaways.	n/a	To support the health and well-being of local people and the vibrancy of town centres.
TC4: A-Class needs	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.	n/a	To reflect the evidence base in the Retail and Leisure Needs study recommending the delivery of a Major Town Centre during the plan period and to manage impacts the vitality and viability of surrounding town centres.
TC5: Culture, sports and leisure facilities	1. Set a quantum threshold for culture, sports and leisure uses.	n/a	To support the ability for culture, sports and leisure uses to aid with placemaking and support the potential for a major cultural, sports or leisure use to locate in the area and act as a catalyst for regeneration.
TC7: Evening night time economy	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.	n/a	To manage the cumulative impacts of night-time economy uses on residential uses.
SI1: Strategic policy for social infrastructure	1. Require new social infrastructure to be provided solely on-site rather than looking to expand surrounding existing facilities.	n/a	To ensure the needs of residents in early phases of development are met and help to knit together new and existing communities.
SI2: Education	1. Do not promote the OPDC area as a location for	n/a	To reflect the development potential of the OPDC area and the potential for

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
	higher education uses		education facilities to act as catalyst uses for the area.
SI5: Pubs	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.	n/a	To prevent the loss of public houses and their role in local communities.
T1: Strategic policy for transport	1. Giving priority to car travel	n/a	To support the delivery of the Healthy Streets, prevent congestion on the local street network, prevent contribution to air pollution and support the health and well-being of local communities.
T7: Car parking	1. Setting less stringent car parking standards. 2. Car free – no residential car parking. Only blue badge. 3. Take a more flexible approach to parking standards for new commercial developments in Old Oak.	n/a	1. To avoid contributing to congestion on the local street network. 2. To reflect the potential need for private vehicle transport before public transport services are improved and increased. 3. To reflect the excellent levels of future public transport accessibility and prevent congestion on the local street network.
T8: Freight, servicing and deliveries	1. No controls over deliveries and servicing. 2. Ban deliveries and servicing by larger vehicles.	n/a	1. To manage the impact of increased freight and servicing vehicles on the local street network. 2. To avoid unduly negatively impacting commercial uses.
T9: Construction	1. There is no control or co-ordination of construction transport 2. All freight has to be moved by rail or water	n/a	1. To protect local amenity and manage impacts on the local street network. 2. To recognise that it is not practical to move all freight by rail or water.
T10: Transport Assessments and Travel Plans	1. Requiring a transport assessment for all developments. 2. Increasing the threshold for schemes that	n/a	1. To align with TfL guidance and recognise that very small-scale developments are unlikely to have a minimal impact on the road network. 2. To prevent development being delivered without the adequate

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
	require a transport assessment.		assessment of its impacts on the transport network.
EU2: Smart technology	1. That the provision of interoperable, open and usable data is not specifically required.	n/a	To support the delivery of an appropriately open data environment to benefit local people and consultation activities.
EU4: Waste management	1. Safeguard all waste sites in Old Oak.	n/a	To enable development capacity to be optimised in Old Oak North where waste management capacity of lost waste sites can be managed elsewhere.
EU5: Circular economy and resource efficiency	1. Safeguard all waste sites in Old Oak.	n/a	To enable development capacity to be optimised in Old Oak North where waste management capacity of lost waste sites can be managed elsewhere.
EU6: Decentralised energy	1. To delete the policy reference to 'major' development, so that the policy requirements apply to 'all' development.	n/a	To recognise that delivering energy systems may negatively impact the viability of non-major development proposals.
EU7: Digital communications	1. OPDC does not specifically seek to integrate contemporary technology and accommodate future technologies to address challenges and create opportunities.	n/a	To ensure Old Oak and Park Royal is sufficiently robust to address challenges and create opportunities to support local residential and business communities.

The IIA Addendum (May 2019) table 2.2 provides further information to the above table. The addendum can be found appended to the IIA Addendum of the Post Submission Draft Local Plan (February 2021).

### Old Oak and Park Royal Opportunity Area Planning Framework (2015)

During the production of the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF), a range of approaches and potential alternatives were considered in the plan making process in relation to:

- Need/demand for development;
- Intensity of development;
- Location of development;
- Timing of development; and
- Details on the development's implementation.

In considering the approaches to the above, the plan making process was required to meet, at the time minimum, London Plan development targets and have regard to the availability of land for development informed by landowner discussions. This restricted the ability to generate reasonable alternatives and resulted in the guidance that is published in the OAPF.

An example of how alternatives were considered in the plan making process is acknowledged in the IIA of the OAPF. This refers to the Old Oak Common Redevelopment Scenarios internal study that was undertaken by Jones Lang LaSalle in association with Peter Brett Associates in March 2014 to inform the preparation of the OAPF.

This considered two development scenarios for the period between 2026 to 2032 that delivered either a residential focused-led development or a commercial-focused led development for that phase.

The IIA recognises that these scenarios do not present a 'preferred alternative' but they do inform the OAPF's guidance. Therefore, while these are not a reasonable alternative that warranted assessment, it illustrates that alternatives were considered in the plan making process.

It should be noted that the quantum of development in the OPDC area is set out in the London Plan, which sits above the OPDC Local Plan in the development plan hierarchy. The quantum of growth for the OPDC area was devised, appraised (in the London Plan's accompanying IIA) refined, examined, found sound and adopted through the London Plan. The testing of alternatives for the London Plan was undertaken in two iterations of the IIA: the IIA for the Consultation draft replacement London Plan (Spatial Development Strategy for Greater London) (Entec, October 2009) as well as the IIA of the FALP (Amec, December 2013).

#### Old Oak – A Vision for the Future document (2013)

The 'Old Oak – A Vision for the Future' document was published in 2013 and suggested how the Old Oak area could evolve and change over a 30 year period to create a new sustainable and successful part of London. The vision looked at ways to maximise the considerable investment, sustainable infrastructure and economic opportunities presented by the delivery of HS2 and the Elizabeth line, and explored how the Old Oak Common High Speed 2 station could be properly integrated with surrounding neighbourhoods, communities and town centres.

The vision was not developed as planning guidance or planning policy. The document was a vision for the area, showing one way in which the area could be developed. The document also confirmed that it should not be construed as providing guidance for development coming forward within the area and does not have any material weight for the determination of planning applications for the area that it covered.

In light of its role and production process, the vision document was not required to be subject to the Sustainability Appraisal process required for development plan documents and supplementary planning guidance. Therefore, the process for defining and selecting or rejecting alternatives was not undertaken.

However, its content for suggesting how Old Oak could be development was used to inform the Further Alterations to the London Plan (FALP) (2015) and the Old Oak and Park Royal Opportunity Area Planning Framework (2015); both of these documents were subject to their own IIA process. This is detailed above and in the IIA Addendum (May 2019) appended to the IIA Addendum of the Post Submission Draft Local Plan (February 2021).



## **OPDC Local Plan**

# **Schedule considering supporting study options as Reasonable Alternatives for the purposes of the Integrated Impact Assessment**

27 June 2019

# 1. Purpose of this document

- 1.1. This document has been prepared in response to a request by the Planning Inspector to provide a schedule of instances where Local Plan supporting studies consider options and whether these should be considered as Reasonable Alternatives and subject to additional assessment for the purposes of the Integrated Impact Assessment in accordance with the Strategic Environmental Assessment (SEA) Directive.
- 1.2. Determining if an alternative is reasonable is a matter of evaluative and qualitative assessment by the planning authority, i.e. it is a matter of planning judgment. SEA Guidance states that “only reasonable, realistic and relevant alternatives need to be put forward”. The SEA Directive and associated legislation do not define what constitutes a reasonable alternative, or how many alternatives must be considered. Reasonableness in the context of considering "reasonable alternatives" is informed by the objectives sought to be achieved by the Local Plan. An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan is not a "reasonable alternative" (case of R (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers [2015] EWHC 776 (Admin)). Table 1 assists in demonstrating OPDC’s planning judgement in this context by demonstrating that alternative options were considered as part of the underlying work undertaken to prepare the Local Plan and that the options considered within the Integrated Impact Assessment are the only reasonable alternatives available to be assessed.
- 1.3. Table 1 sets out the following information:
  - Supporting study – the title of supporting study available [here](#).
  - Overview of supporting study and any options – sets out the scope of any options or confirms if the supporting study does not include options. Where options are identified not to be included the scope of the supporting study is summarised.
  - Option summary – sets out the preferred option or alternative option. Where options aren’t included N/A is shown.
  - Is the Option a reasonable alternative? – confirms if the option should be assessed as an additional reasonable alternative for the purposes of the Integrated Impact Assessment. Responses to this comprise:
    - N/A – where an option is not presented or has been already been subject to assessment or where the Local Plan policies are drafted to be flexible to accommodate all options;
    - No – where an option is presented but was not included within the Integrated Impact Assessment for assessment as it did not meet the objectives of the Local Plan; Objectives for the Local Plan comprise the Spatial Vision Narratives, Strategic Policies ‘Our Proposed Outcomes’ and Place Visions.
  - Location of options – provides a reference to where within supporting studies any options are defined.



**Table 1: Consideration of supporting studies options as reasonable alternatives**

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
SD1	Duty to Cooperate Statement	This study did not include an options analysis. It sets out information demonstrating how OPDC has met the Duty to Cooperate.	N/A	N/A	N/A
SD2	Integrated Impact Assessment and Habitats Regulation Assessment	N/A	N/A	N/A	N/A
SD3	Socio-Economic Baseline Study	This study did not include an options analysis. It provides a baseline of socio-economic and demographic indicators against which to measure the impacts of the Old Oak and Park Royal regeneration project over time.	N/A	N/A	N/A
SD4	Statement of Community Involvement	This document did not include an options analysis. Explains how OPDC involves the community in deciding planning applications and preparing planning policy for the area	N/A	N/A	N/A
SD5	Old Oak North Development Framework Principles	Delivery of either a viaduct or retention of the embankment for the Hythe Road Station.	<b>Preferred option:</b> Delivery of a viaduct	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	Section 3.2.6
			<b>Alternative option:</b> Retention of embankment	No. Delivering an embankment would not enable development capacity to be optimised and would restrict accessibility across the area, as such it is not considered to be a reasonable alternative as it would not deliver the following plan objectives: <ul style="list-style-type: none"> <li>SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> </ul>	Section 3.2.6

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				<ul style="list-style-type: none"> <li>SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>	
SD6	Park Royal Development Framework Principles	Options analysis for amendments to the Park Royal Neighbourhood Centre boundary	<b>Preferred option:</b> Extend the neighbourhood boundary (Area C)	N/A as this preferred option was included within Local Plan policy which was assessed within the IIA	Appendix 2
			<b>Preferred option:</b> Extend the neighbourhood boundary (Area D)	N/A as this preferred option was included within Local Plan policy which was assessed within the IIA	Appendix 2
			<b>Alternative option:</b> Extend the neighbourhood boundary (Area A)	No. Area A is would not support the vitality of the centre and impact on opportunities to meet demand for industrial development. Therefore, it is not considered to be a reasonable alternative as it would not deliver the following plan objectives: <ul style="list-style-type: none"> <li>Spatial Vision Narrative 7: Park Royal will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth.</li> <li>SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of</li> </ul>	Appendix 2

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				<p>active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres</p> <ul style="list-style-type: none"> <li>• P4 Vision: Park Royal West will continue to be London's leading location for large, medium and small industrial businesses. The protection and intensification of industrial space, along with a co-ordinated approach to infrastructure investment and delivery will improve its functionality and environment; strengthening Park Royal's competitive position, and helping businesses to grow sustainably.</li> </ul>	
			<p><b>Alternative option:</b> Extend the neighbourhood boundary (Area B)</p>	<p>No. Area B would not support the timely delivery of development or the vitality of the centre. Therefore, it is not considered to be a reasonable alternative as it would not deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• Spatial Vision Narrative 7: Park Royal will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth.</li> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and</li> </ul>	<p>Appendix 2</p>

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				<p>Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres</p> <ul style="list-style-type: none"> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> <li>• P4 Vision: Park Royal West will continue to be London's leading location for large, medium and small industrial businesses. The protection and intensification of industrial space, along with a co-ordinated approach to infrastructure investment and delivery will improve its functionality and environment; strengthening Park Royal's competitive position, and helping businesses to grow sustainably.</li> </ul>	
			<p><b>Alternative option:</b> Extend the neighbourhood boundary (Area E)</p>	<p>No. Area E would not support the vitality of the centre and impact on opportunities to meet demand for industrial development. Therefore, it is not considered to be a reasonable alternative as it would not deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• Spatial Vision Narrative 7: Park Royal will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth.</li> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment</li> </ul>	<p>Appendix 2</p>

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				<p>opportunities across a range of sectors and skill levels.</p> <ul style="list-style-type: none"> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres</li> <li>• P4 Vision: Park Royal West will continue to be London's leading location for large, medium and small industrial businesses. The protection and intensification of industrial space, along with a co-ordinated approach to infrastructure investment and delivery will improve its functionality and environment; strengthening Park Royal's competitive position, and helping businesses to grow sustainably.</li> </ul>	
			<p><b>Alternative option:</b> Extend the neighbourhood boundary (Area F)</p>	<p>No. Area F has reduced ability to support future development and mitigate conflicts with SIL and would not support the vitality of the centre. Therefore, it is not considered to be a reasonable alternative as it would not deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• Spatial Vision Narrative 7: Park Royal will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth.</li> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to</li> </ul>	Appendix 2

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				<p>access a range of employment opportunities across a range of sectors and skill levels.</p> <ul style="list-style-type: none"> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres</li> <li>• P4 Vision: Park Royal West will continue to be London's leading location for large, medium and small industrial businesses. The protection and intensification of industrial space, along with a co-ordinated approach to infrastructure investment and delivery will improve its functionality and environment; strengthening Park Royal's competitive position, and helping businesses to grow sustainably.</li> </ul>	
SD7	Scrubs Lane Development Framework Principles	Two height options for each tall building within each cluster.	<p><b>Preferred option:</b> A single tall building in each cluster with height determined by relevant development plan policies and material considerations.</p>	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	Page 49 onwards
			<p><b>Alternative option:</b> A lower height of 10 storeys for each tall building in each cluster.</p>	<p>No. Delivering a lower height for each of the tall buildings would not enable development capacity to be optimised and would not support local wayfinding to key routes into Old Oak North. As such, this option is considered to not deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> </ul>	Page 49 onwards

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				<ul style="list-style-type: none"> <li>SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>	
SD8	Victoria Road and Old Oak Lane Development Framework Principles	This study did not include an options analysis. The study provides a local vision, principles and site specific guidance.	N/A	N/A	N/A
SD9	Character Areas Study	This study did not include an options analysis. The study carried out a baseline analysis to define character areas and the existing physical character of each area.	N/A	N/A	N/A
SD10	Grand Union Canal Massing and Enclosure Statement	This study did not include an options analysis. It sets out different proposed building heights in relation to the width of the canal at three specific locations and adjacent spaces to achieve a 1:1.5 height and width ratio considered to be appropriate for the canal.	N/A	N/A	N/A
SD11	Heritage Strategy	This study did not include an options analysis. It provides a comprehensive review of historic themes, existing and potential heritage designations and define character areas.	N/A	N/A	N/A
SD12	Old Oak Outline Historic Area Assessment and Addendum	This study did not include an options analysis. It provides a summary of historical development and identifies existing and potential heritage assets.	N/A	N/A	N/A
SD13	Tall Buildings Statement	This study did not include an options analysis. It provides a definition of tall buildings and defines the methodology used and the resultant appropriate locations for tall buildings in principle.	N/A	N/A	N/A
SD14	Views Study	This study did not include an options analysis. It identifies important views and provides recommendations and guidelines in terms of future development.	N/A	N/A	N/A

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
SD15	Air quality study	This study did not include an options analysis. It set out recommendations for mitigation and measures to ensure the highest possible air quality is achieved for future residents and workers.	N/A	N/A	N/A
SD16	Circular and Sharing Economy Study	This study did not include an options analysis. It sets out principles to be implemented, case studies and supporting information to enable the Circular and Sharing Economy to be implemented in the OPDC area.	N/A	N/A	N/A
SD17	Decontamination study	This study did not include an options analysis. It sets out the approach to, and guidance for developers on, dealing with land contamination and remediation.	N/A	N/A	N/A
SD18	Energy, Daylight and Overheating in Tall Buildings Study	This study did not include an options analysis. It sets out information to understand the viability and technical feasibility of meeting and surpassing the draft new London Plan aspirational targets for passive energy performance in tall developments and high density areas.	N/A	N/A	N/A
SD19	Environmental Modelling Framework Study.	<p>This study did not include an options analysis. It establishes a suite of environmental metrics and assessment tools to be used to assess development proposals including daylight levels in buildings, sunlight levels in areas of open space, wind analysis, and solar gain and overheating of buildings.</p> <p>The Environmental Modelling Framework considered a sample portion of the former masterplan within Old Oak South. Within this, 4 options for 3 individual blocks were considered. It did not consider alternative options to the former masterplan. The four options were used to consider alternative massing arrangements which could be</p>	N/A	N/A	N/A



SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options		
		<p>considered at the development management and/or SPD stages. The Local Plan policies allow a flexible approach to accommodate different massing options.</p> <p>This work is being progressed through the Passive Energy Performance, Daylight and Overheating in High Density Development SPD.</p>					
SD20	Environmental standards study	Options for energy infrastructure	Old Oak Standard Practice	N/A. No preferred option is recommended. The policy allows flexibility for all options to be considered to deliver local smart energy grids.	Appendix B.1		
			Old Oak Best Practice		Appendix B.1		
			Old Oak Pioneering Practice		Appendix B.1		
			Park Royal Standard Practice		Appendix B.1		
			Park Royal Best Practice		Appendix B.1		
		Options for waste management	Old Oak Business as usual	N/A. No preferred option is recommended. The policy allows flexibility for all options to be considered subject to according with the London Waste Recycling Board's (LWARB) guidance on recycling and storage. SPD guidance is being developed to supplement the Local Plan policy.	Appendix B.2		
			Old Oak Low Waste		Appendix B.2		
			Old Oak Zero Waste		Appendix B.2		
			Park Royal Business as usual		Appendix B.2		
			Park Royal Low Waste		Appendix B.2		
		Options for carbon emissions	Old Oak Business as Usual	N/A. No preferred option is recommended. The policy allows flexibility for all options to be considered subject to meeting or exceeding the on-site carbon emission targets set out in the London Plan energy hierarchy.	Appendix B.3		
			Old Oak Best Practice		Appendix B.3		
			Old Oak Pioneering Practice		Appendix B.3		
			Park Royal Business as Usual		Appendix B.3		
			Park Royal Best Practice		Appendix B.3		
			Park Royal Pioneering Practice		Appendix B.3		
		SD21	Integrated Water Management Study	Options for stormwater management	Green source control features	N/A. No preferred option is recommended. The policy allows flexibility for all options to be considered in accordance with the water	Section 6.1
					Streetscape strategic SuDS network		

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
			Discharge of attenuated stormwater into the Grand Union Canal	management hierarchy defined within the Local Plan.	
			Residual attenuation provided underground		
			Residual attenuation provided above ground		
		Options for water recycling options.	Building scale greywater recycling	N/A. No preferred option is recommended. The policy allows flexibility for all options to be considered in accordance with the water management hierarchy defined within the Local Plan.	
			Strategic scale wastewater recycling		
			Strategic scale storm water recycling		
SD22	North Acton District Energy Study	Options for supply of heat to North Acton.	<b>Preferred option:</b> Business as Usual: A business as usual case representing each of the developer's own proposed energy strategies was assembled to compare against the heat network scenarios	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	Pages 22 and 23
			<b>Alternative option:</b> Gas CHP scheme	No. A Gas CHP scheme was not considered to be a reasonable alternative as the delivery of a single large source of heat is not available for North Acton given the progressed status of developments in the area. As such, it would not deliver the following plan objective:  SP10 Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.	Pages 22 and 23
			<b>Alternative option:</b> CHP with small Aqua Heat Pump scheme	No. A Gas CHP scheme was not considered to be a reasonable alternative as the delivery of a single large source of heat is not available for North Acton given the progressed status of developments in the area. As such, it would not deliver the following plan objective:	Pages 22 and 23

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				SP10 Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.	
			<b>Alternative option:</b> CHP with large Aqua Heat Pump scheme	No. A Gas CHP scheme was not considered to be a reasonable alternative as the delivery of a single large source of heat is not available for North Acton given the progressed status of developments in the area. As such, it would not deliver the following plan objective:  SP10 Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.	Pages 22 and 23
			<b>Alternative option:</b> Heat pump only scheme:	No. A heat pump only scheme was not considered to be a reasonable alternative as the delivery of a single large source of heat is not available for North Acton given the progressed status of developments in the area. As such, it would not deliver the following plan objective:  SP10 Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.	Pages 22 and 23
SD23	Sites of Importance for Nature Conservation Statement	This study did not include an options analysis. It summarises status of existing SINC designations within the OPDC area.	N/A	N/A	N/A
SD24	Smart strategy	This study did not include an options analysis. The study reviewed contemporary and emerging technologies that can shape the development within the OPDC area across a suite of themes including transport, public realm, utilities and climate mitigation.	N/A	N/A	N/A

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
		The ideas do not form options but are a long list of possible technologies that should be further considered when bringing forward plans for investment in infrastructure, monitoring and other elements of the plan.			
SD25	Utilities study	Options for electricity supply infrastructure.	<b>Preferred Option:</b> A Combined approach involving: Large Developer Engagement / Introduction of an IDNO / Investment ahead of need	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	Section 3.3.11.17
			<b>Alternative Option:</b> No intervention	No. The no intervention option was not considered to be a reasonable alternative as it would not deliver sufficient infrastructure to meet the demands of development. As such, it would not deliver the following plan objective:  SP10 Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.	Section 3.3.11.17
		Options for decentralised energy strategy	<b>Preferred Option:</b> Public sector-led network delivery	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	Section 3.4.12
			<b>Alternative Option:</b> OPDC encourages improved market response	No. The no intervention option was not considered to be a reasonable alternative as it would not sufficiently guarantee that infrastructure would meet the demands of development. As such, it would not deliver the following plan objective:  SP10 Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.	Section 3.4.12

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
			<b>Alternative Option:</b> Leave to the market	No. The no intervention option was not considered to be a reasonable alternative as it would not deliver sufficient infrastructure to meet the demands of development. As such, it would not deliver the following plan objective:  SP10 Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.	Section 3.4.12
		Options for gas supply infrastructure.	<b>Preferred Option:</b> OPDC fund reinforcement work	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	Section 3.5.6
			<b>Alternative Option:</b> Allow National Grid (Gas) to Progressively Expand the Network	No. The no intervention option was not considered to be a reasonable alternative as it would not sufficiently guarantee that infrastructure would meet the demands of development. As such, it would not deliver the following plan objective:  SP10 Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.	Section 3.5.6
			<b>Alternative Option:</b> OPDC safeguard land for medium pressure gas networks and Pressure Reducing Stations	No. The no intervention option was not considered to be a reasonable alternative as it would not sufficiently guarantee that infrastructure would meet the demands of development. As such, it would not deliver the following plan objective:  SP10 Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.	Section 3.5.6
		Options for potable water infrastructure. (short term)	<b>Preferred Option:</b> OPDC enter into a Cost Sharing Agreement with Thames Water to Deliver Increased Water Supply Capacity Ahead of Need	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	Section 4.8.1

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
			<b>Alternative Option:</b> Thames Water Proactively Extend the Potable Water Supply Network	No. The no intervention option was not considered to be a reasonable alternative as it would not sufficiently guarantee that infrastructure would meet the demands of development. As such, it would not deliver the following plan objective:  SP10 Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.	Section 4.8.1
		Options for potable water infrastructure. (long term)	<b>Preferred Option:</b> OPDC Update their Local Plan Policy to Promote the use of Water Recycling Systems	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	Section 4.8.2
			<b>Alternative Option:</b> Rely on current London Plan Policy	No. This option was not considered to be a reasonable alternative as it would not deliver the following plan objective:  SP10 Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.	Section 4.8.2
		Options for Foul & Surface Water Drainage infrastructure.	<b>Preferred Option:</b> SuDS provided within areas of public open space to act as Site Control Features / Discharge surface water to the Grand Union Canal	N/A. Both the preferred options and the alternative option were included in Local Plan policies as approaches to manage potential flooding.	Section 5.7
			<b>Alternative Option:</b> SuDS Provided on Plot to act as Source Control Features		Section 5.7
SD26	Waste Apportionment Study	Options for safeguarding waste capacity in the OPDC area	<b>Preferred option:</b> Safeguard the Powerday site and those in WLWP	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	Section 3

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
			<p><b>Alternative option:</b> Safeguard EMR site</p>	<p>No. This option would sterilise land and prevent the delivery of key infrastructure needed to support development. Therefore, safeguarding the EMR site is not considered to be a reasonable alternative as it would not deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• Spatial Vision Narrative 2: Old Oak will become a major new London centre providing high-density mixed use development, that will shape west London and support London’s continued growth.</li> <li>• Spatial Vision Narrative 13: New development will connect local existing and new communities and neighbourhoods in the surrounding areas through high quality walking, cycling, public transport and vehicular links.</li> <li>• SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor’s ambition for 80% of</li> </ul>	Section 3

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				<p>journeys in London to be made by walking, cycling or public transport.</p> <ul style="list-style-type: none"> <li>• SP9 Proposed Outcome: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> <li>• P2 Vision: New connections will unlock Old Oak North to support the early delivery of a high density residential led place. Neighbourhoods within Old Oak North will contain a diverse mix of homes alongside new employment spaces, cultural uses, social infrastructure, town centre uses and the Grand Union Canal food and beverage quarter. These uses, publicly accessible open spaces and the area's heritage, including the Grand Union Canal and the Rolls Royce Building, will ensure Old Oak North is a vibrant new place, that people will want to live in, work in and visit.</li> </ul>	
SD27	Waste in tall buildings	This study did not include an options analysis. It identifies the issues and challenges of meeting the Mayor's waste recycling standards in dense urban development. Based on this information, provide recommendations for policy within the Local Plan and guidance within SPDs.	N/A	N/A	N/A
SD28	Waste management strategy	Options for operational phase waste storage, collection and transfer within buildings	Manual	N/A. No preferred option is recommended. Policy allows flexibility for all options to be considered subject to accord with the London Waste Recycling Board's (LWARB) guidance on recycling and	Table 8
			Manual + Facilities management		Table 8
			Facilities management		Table 8
			Waste chutes		Table 8



SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
			Automated Waste Collection System	storage. SPD guidance is being developed to supplement the Local Plan policy.	Table 8
		Options for construction phase resource recovery technologies	Construction waste materials recovery facility	N/A. No preferred option is recommended. Policy allows flexibility for all options to be considered subject to according with the London Waste Recycling Board's (LWARB) guidance on recycling and storage. SPD guidance is being developed to supplement the Local Plan policy.	Table 9
	Aggregate screening and crushing		Table 9		
	Wood chipping		Table 9		
	Metals recovery		Table 9		
		Options for operational phase resource recovery technologies	Materials recovery facility	N/A. No preferred option is recommended. Policy allows flexibility for all options to be considered subject to according with the London Waste Recycling Board's (LWARB) guidance on recycling and storage. SPD guidance is being developed to supplement the Local Plan policy.	Table 10
	Mechanical biological treatment		Table 10		
	Mechanical heat treatment		Table 10		
	Aerobic composting		Table 10		
	Anaerobic digestion		Table 10		
	Moving grate incineration		Table 10		
	Fluidised bed incineration		Table 10		
	Rotary kiln incineration		Table 10		
	Pyrolysis		Table 10		
	Gasification		Table 10		
		Plasma gasification	Table 10		
SD29	Waste Technical Paper	This study did not include an options analysis. Identifies waste management capacity in the Western Riverside area and models whether there is enough capacity to meet the borough apportionment targets and other waste arisings.	N/A	N/A	N/A
SD30	Wormwood Scrubs Survey	This study did not include an options analysis. It sets out findings of a survey aimed to determine user priorities for any potential improvements Wormwood Scrubs.	N/A	N/A	N/A
SD31	A40 Study	Options for improving the A40.	A40 Tunnel(s): 1. 2 lane 2 way tunnel between Hanger Lane & Savoy Circus	N/A – No preferred option is recommended. Policy allows flexibility for improvements to the A40.	Page 2

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
			<p>2. 2 lane outbound only tunnel between Hanger Lane &amp; Savoy Circus</p> <p>3. 2 lane 2 way tunnel between Hanger Lane &amp; Edgware Road</p> <p>4. 2 lane 2 way tunnel between Savoy Circus &amp; Edgware Road</p> <p>Flyunders / short tunnel: A package of more localised grade separated schemes was assessed incorporating flyunders at Gypsy Corner and Savoy Circus plus a short tunnel at Hanger Lane for the A40/A406(N) interchange.</p> <p>At Grade Option: A package of potential at-grade junction enhancement schemes was also assessed. The schemes included introducing 2-way working at Hanger Lane and bus and cycle only links to Old Oak Common at Gypsy Corner and Savoy Circus.</p>		<p>Page 2</p> <p>Page 3</p>
SD32	Bus Strategy Update	Options for phase 3 and beyond (HS2 Station, GWR, Elizabeth Line opening (2026+)), further options are set-out but no preferred option is identified.	<p>Phase 3 options:</p> <ul style="list-style-type: none"> <li>Extension of route 283 to WJ station Old Oak North entrance (required to connect WJ and HS2 in the absence</li> </ul>	N/A - No preferred option is recommended. Neither option would be deliverable in light of the walking/cycling modes bridge proposed for the connection between Old Oak North and Harlesden.	Page 11

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
			<p>of a rail connection). +2-3 vehicles, £0.75m p.a.</p> <ul style="list-style-type: none"> <li>Save at least £1.25m (-5 vehicles) compared to the above and unlock land by removing the need for any standing at WJ if a bus enabled bridge were built between Old Oak North and WJ over the WCML. It would allow routes 220 and 302 to provide high frequency and quicker journey times connections between OOC/HS2 and Harlesden/WJ spreading the benefits of regeneration north.</li> </ul>		
SD33	Car Parking Study	This study did not include an options analysis. It provides a review of the proposed parking policy in the Local Plan from a market and viability perspective.	N/A	N/A	
SD34	Construction and Logistics Strategy	Two approaches for best practice construction activity: A) Best practice Construction Logistics Plans B) Other recommended strategy measures	<p>A) Best practice Construction Logistics Plans</p> <ol style="list-style-type: none"> <li>1. Management arrangements</li> <li>2. Vehicle volumes &amp; planned measures</li> <li>3. Vehicle safety standards &amp; protecting VRUs</li> <li>4. Routing &amp; site access</li> <li>5. Delivery management system</li> </ol>	N/A – No preferred option is recommended. All approaches are considered appropriate construction logistics measures and are all included in the Local Plan.	Page 15



SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
			<p><b>Alternative option:</b> A fully integrated single entrance upper level ticket hall with unpaid, but fully integrated link to the north of the railway cutting.</p>	<p>No. This option is not considered to be a reasonable alternative as it would likely require a lengthy construction programme, which would not deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP1 Proposed outcome: A world-class transport super-hub at Old Oak Common, supporting the creation of a new part of London that acts as a catalyst for growth at national, regional and local levels.</li> <li>• SP2 Proposed outcome: Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.</li> <li>• SP7 Proposed outcome: Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development</li> </ul>	Page 12
SD36	Old Oak Strategic Transport Study	This study did not include an options analysis. It identifies the transport interventions required to mitigate impacts of planned future growth	A long-list of potential transport interventions have been identified across seven categories.	N/A. No preferred option is recommended. Local Plan policies allow for flexibility relevant interventions appropriate to the Local Plan, to be delivered to mitigate impacts of planned future growth.	Pages 93-118
SD37	Park Royal Transport Strategy	A series of transport interventions have been developed to meet the increased demand for travel in Park Royal's constrained transport network.	A long-list of 30 potential transport interventions have been identified across four categories.	N/A. No preferred option is recommended. Local Plan policies allow for flexibility relevant interventions appropriate to the Local Plan, to be delivered to improve transport within Park Royal.	Page 55
SD38	Public Realm, Walking and Cycling Strategy	This study did not include an options analysis. It provides 10 key recommendations to improve walking, cycling, streets and public realm in Old	N/A	N/A	

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
		Oak and Park Royal. The strategy does not identify alternative options.			
SD39	Willesden Junction Station Feasibility Study	Identifies options for improvements to the station and environs.	Option 1: Central	N/A. No preferred option is recommended. The Willesden Junction Station Feasibility Study represents the GRIP 2 stage for a Network Rail study. The following GRIP3 stage will involve selecting a preferred option.  As such, the policy allows for a flexible approach to enable any or a combination of options to be delivered.	Section 5.0
			Option 2: Dual		Section 6.0
			Option 3: Offset		Section 7.0
SD40	Absorption Rate Study	This study did not include an options analysis. It assesses typical residential and office accommodation delivery rates to recommend absorption rates for the OPDC area.	N/A	N/A	N/A
SD41	Affordable Housing Viability Assessment (AHVA)	Delivery of different affordable housing tenure mixes including social rent/London Affordable Rent and intermediate housing	<b>Preferred option:</b> 30% social rent/London Affordable Rent and 70% Intermediate housing	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.  The Regulation 18 IIA considered four strategic options relating to affordable housing which are unrelated to the options set out in the AHVA.	Page 10
			<b>Alternative option:</b> 70% social rent/London Affordable Rent and 30% Intermediate housing	No. This option would not contribute to local or strategic needs to deliver 50% affordable housing as required in the draft new London Plan, so would not deliver the following plan objectives:	Page 10
			<b>Alternative option:</b> 43% social rent/London Affordable Rent and 57% Intermediate housing	<ul style="list-style-type: none"> <li>SP4: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>SP10: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>	Page 10

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
		Delivery of different bed size mixes	<p><b>Preferred option:</b> 25% family housing including Strategic Housing Market Assessment (SHMA) bed requirements for social rent/London Affordable Rent</p> <p><b>Alternative option:</b> SHMA bed requirements for social rent/London Affordable Rent, market mix for intermediate and private</p> <p><b>Alternative option:</b> Market mix all tenures</p>	<p>N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.</p> <p>No. This option would not meet the local needs for family sized affordable homes so it would not deliver the following plan objectives.</p> <ul style="list-style-type: none"> <li>SP4: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> </ul>	<p>Page 10 and 11</p> <p>Page 10 and 11</p> <p>Page 10 and 11</p>
DS42	Gypsy and Traveller Accommodation Needs Assessment and Addendum	Delivery of Gypsy and Traveller pitches	<p><b>Preferred option:</b> No allocation of site for Gypsy and Traveller pitches</p> <p><b>Alternative option:</b> Allocation of additional pitches to help meet the needs identified in Joint RBKC and LBH&amp;F GTANA. These include expanding the existing site and other new sites</p>	<p>N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.</p> <p>No. This option would not be appropriate because of the nature of the land being an Opportunity Area with the capacity to deliver 25,500 homes, Strategic Industrial Location or Metropolitan Open Land. As such they would not deliver the following plan objectives</p> <ul style="list-style-type: none"> <li>SP4: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>SP5: A strong, resilient and diverse economy, that allows existing businesses</li> </ul>	<p>Section 7 GTANA</p> <p>Section 1 GTANA Addendum</p>

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				<p>to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</p> <ul style="list-style-type: none"> <li>SP9: Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage</li> </ul>	
SD43	Housing Evidence Base Statement	This study did not include an options analysis. It pulls together OPDC's housing policy evidence into one statement.	N/A	N/A	N/A
SD44	Strategic Housing Market Assessment	This study did not include an options analysis. It defines the current and future housing requirements across the relevant housing market area.	N/A	N/A	N/A
SD45	Future Employment Growth Sectors Study	This study did not include an options analysis. It functions mainly as a baseline document providing an assessment of trends in employment growth and sectors.	N/A	N/A	N/A
SD46	Industrial Estates Study	This study did not include an options analysis. It functions mainly as a baseline document, gathering information about industrial estates to understand their characteristics, success factors and how the Park Royal industrial area is performing against these.	N/A	N/A	N/A
SD47	Industrial Land Review and Industrial Land Addendum	Options for changes to the SIL boundary and land use/development priorities in Old Oak and Park Royal	<p><b>Preferred option:</b> Park Royal HS2 construction sites - sites could be promoted for a mix of SIL appropriate uses including Industrial Business Park uses.</p>	<p>N/A. The policy allows for a flexible approach by supporting a range of industrial uses, including those considered to be PIL and/or IBP type uses. This flexibility is in line with the draft new London Plan. The policy included within Local Plan policy has been assessed within the IIA.</p>	Para 9.8-9.9
			<p><b>Alternative option:</b> Return Park Royal HS2 construction sites to SIL</p>		Para 7.35-7.51



SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
			<p>– these sites should be redeveloped as Preferred Industrial Land (PIL)</p> <p><b>Alternative option:</b> Return Park Royal HS2 construction sites to SIL – Redevelopment as a higher density Industrial Business Park (IBP)</p>		
SD48	Park Royal Atlas	This study did not include an options analysis. It provides baseline information relating to businesses in Park Royal.	N/A	N/A	N/A
SD49	Park Royal Intensification Study	Identifies potentially suitable sites and viable options to intensify industrial land	N/A	N/A. No preferred option is recommended. Case study sites potentially suitable for intensification were identified but policy allows flexibility for all sites to be intensified in Park Royal. Site Allocations were selected based on those which meet site allocation criteria. The Local Plan policy was assessed within the IIA.	Appendix C
SD50	Catalyst Uses Study	This study did not include an options analysis. It assesses a variety of potential catalyst use types which may come forward in Old Oak but does not set these out as options to be prioritised.	N/A	N/A	N/A
SD51	Cultural Principles	This study did not include an options analysis. The study sets out a series of recommendations for how the OPDC area can contribute to the local area's and to London's cultural offer and position as the world's preeminent tourist destination.	N/A	N/A	N/A
SD52	Healthy Town Centres Study	Restrictions of hot food takeaways	<p><b>Preferred option:</b> Restriction of hot food takeaways in walking distance of existing or permitted schools:</p> <ul style="list-style-type: none"> <li>• within 200m of primary schools; and</li> <li>• within 400m of secondary schools.</li> </ul>	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	Pages 25/26

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
			<b>Alternative option:</b> Restriction of hot food takeaways within 400m of all existing or permitted schools (primary and secondary).	No. A 400m restriction around both primary and secondary schools would exclude almost all of the OPDC area, including the whole planned Old Oak major town centre and Old Oak Street and so would not deliver the following plan objectives: SP6 proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoners, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets the needs of occupants and surrounding centres.	Pages 25/26
SD53	Retail Leisure Needs Study and Addendum	The study identifies the quantitative need for retail and leisure uses in the OPDC area and makes recommendations for qualitative measures.	<b>Preferred option:</b> Major town centre to encompass the whole of the core Old Oak area.	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.  This policy option was also assessed as Regulation 18 stage, against reasonable alternatives, and identified as the preferred option.	Page 72
			<b>Alternative option:</b> District centre plus Neighbourhood/Local centres across the core Old Oak area.	Yes. This policy option was assessed as a reasonable alternative as part of the Regulation 18 Draft Local Plan against the preferred policy option.	Page 72
SD54	Social Infrastructure Needs Study (SINS)	The study assess social infrastructure needs of new development in the OPDC area and presents options or models for how need may be addressed.	<b>Preferred option:</b> Separate primary and secondary schools.	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	Appendix D
			<b>Alternative option A:</b> All through schools for ages 3-19.	No. The option would not enable the phased delivery of education infrastructure to meet the needs of the development and so would not delivery the following Local Plan Objective:  <ul style="list-style-type: none"> <li>SP10 – Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>	Appendix D
			<b>Alternative option B:</b>	No. The option would not enable the phased delivery of education infrastructure to meet the	Appendix D

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
			A combination of separate primary and secondary schools and all-through schools.	needs of the development and so would not deliver the following Local Plan Objective: <ul style="list-style-type: none"> <li>SP10 – Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>	
			<b>Preferred option:</b> One centrally located health facility to serve the OPDC Development Area (circa 50,000 patient list size).	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	Appendix D
			<b>Alternative option:</b> Two health facilities, one to serve Old Oak North and one to serve Old Oak South (circa 25,000 – 30,000 patient list size each)	No. The option is not supported by the relevant service provider (CCGs) and so would not deliver the following plan objectives: <ul style="list-style-type: none"> <li>SP10 – Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul> <p>Notwithstanding the above, Local Plan Policy TCC4 c) allows flexibility for different models to come forward where this is agreed by OPDC and relevant service providers. While the preferred option is reflected in the Local Plan and IDP, it is clarified that this is based on current modelling, and that any changes in current modelling will be captured in future updates to the IDP.</p>	Appendix D
			<b>Alternative option:</b> Smaller scale health facilities delivered at a neighbourhood level as the development builds-out (circa 7-10,000 patient list size each)	No. The option is not supported by the relevant service provider (CCGs) and so would not deliver the following plan objectives: <ul style="list-style-type: none"> <li>SP10 – Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised</li> </ul>	Appendix D

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				<p>approach to development, making the best use of land.</p> <p>Notwithstanding the above, Local Plan Policy TCC4 c) allows flexibility for different models to come forward where this is agreed by OPDC and relevant service providers. While the preferred option is reflected in the Local Plan and IDP, it is clarified that this is based on current modelling, and that any changes in current modelling will be captured in future updates to the IDP.</p>	
			<p><b>Alternative option:</b> Phased health facility opening to match the population build-up over time or short-term use of meanwhile floorspace while the population builds-up and sites for facilities become available.</p>	<p>No. The option is not supported by the relevant service provider (CCGs) and so would not deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• SP10 – Proposed Outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul> <p>Notwithstanding the above, Local Plan Policy TCC4 c) allows flexibility for different models to come forward where this is agreed by OPDC and relevant service providers. While the preferred option is reflected in the Local Plan and IDP, it is clarified that this is based on current modelling, and that any changes in current modelling will be captured in future updates to the IDP.</p>	Appendix D
SD55	Sports Courts and Swimming Pools Study	This study did not include an options analysis. The study provides an overview of the current public access sports halls and swimming pools provision within and around the London Borough of Hammersmith and Fulham (LBHF) and the likely need arising from future growth	N/A	N/A	N/A
SD56	Development Capacity Study	This study did not include an options analysis. It assessed the development potential of sites in accordance with the National Planning Practice Guidance having been informed by supporting studies, relevant existing London	N/A	N/A	N/A

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
		development scheme precedents and OPDC permitted schemes to define a densities and development capacities for each site.			
SD57	Development Infrastructure Funding Study	Historic testing of different development scenarios	Scenario 1: including a stadium	N/A. Stadiums are considered to be a catalyst use which are managed through policy TCC8. This Local Plan policy was assessed within the IIA.	Section 29
			Scenario 2: Powerday stays in operation	N/A. Powerday (aka Old Oak Sidings) waste management site is safeguarded for continued use during the plan period through policy P2. This Local Plan policy was assessed within the IIA.	
			Scenario 3: the depot site comes forward in 2026, not 2041	N/A. The Elizabeth Line Depot is identified in the Regulation 19(2) Local Plan to be developed after the plan period within policy SP10. This Local Plan policy was assessed within the IIA.	
			Scenario 4: the depot site stays as a depot, and is not developed	N/A. For the purposes of the Local Plan and plan period, the Elizabeth Line Depot is identified in the Regulation 19(2) Local Plan to be developed after the plan period within policy SP10. This Local Plan policy was assessed within the IIA.	
SD58	Infrastructure Delivery Plan	This study did not include an options analysis. Identifies the infrastructure required to support the regeneration of the area, including social, transport, utility and green infrastructure.	N/A	N/A	N/A
SD59	The Land at Abbey Road Development Options Appraisal Report	Assesses different potential land uses and development options for the land at Abbey Road site	<b>Preferred option:</b> Industrial uses	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	Chapter 6 and 9
			<b>Alternative option:</b> Residential use (including consideration of hotel and student accommodation)	No. The residential development options appraised were shown not to be viable within the report so they would not support timely delivery or policy compliant amounts of affordable housing or help meet demand for industrial development. Therefore, this option is not considered to be a reasonable alternative as it would not deliver the following plan objectives: <ul style="list-style-type: none"> <li>Spatial Vision Narrative 7: Park Royal will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial</li> </ul>	Chapter 5 and 9

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				<p>Location to support London's economy with opportunities for intensification and innovative growth.</p> <ul style="list-style-type: none"> <li>• SP4 Proposed outcome: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.</li> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> <li>• P4 Vision: Park Royal West will continue to be London's leading location for large, medium and small industrial businesses. The protection and intensification of industrial space, along with a co-ordinated approach to infrastructure investment and delivery will improve its functionality and environment; strengthening Park Royal's competitive position, and helping businesses to grow sustainably.</li> </ul>	
			<p><b>Alternative option:</b> Business Park/Offices</p>	<p>No. The business park/office use development option appraised were not viable so they would not support timely delivery or help meet demand for industrial development. Therefore, this option is not</p>	<p>Chapter 7 and 9</p>

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				<p>considered to be a reasonable alternative as they would not deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• Spatial Vision Narrative 7: Park Royal will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth.</li> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> <li>• P4 Vision: Park Royal West will continue to be London's leading location for large, medium and small industrial businesses. The protection and intensification of industrial space, along with a co-ordinated approach to infrastructure investment and delivery will improve its functionality and</li> </ul>	

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				environment; strengthening Park Royal's competitive position, and helping businesses to grow sustainably.	
			<b>Alternative option:</b> Hotel retail or car showroom	<p>No. Hotel, retail or car showroom uses were not considered to be a reasonable alternative it would not help meet demand for industrial development. As such they would not deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• Spatial Vision Narrative 7: Park Royal will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth.</li> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP6 Proposed outcome: Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres</li> </ul> <p>P4 Vision: Park Royal West will continue to be London's leading location for large, medium and small industrial businesses. The protection and intensification of industrial space, along with a co-ordinated approach to infrastructure investment and delivery will improve its functionality and environment; strengthening Park Royal's competitive</p>	Paragraph 9.3



SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				position, and helping businesses to grow sustainably.	
			<b>Alternative option:</b> Extant consent	<p>No. The extant consent is not considered to be a reasonable alternative as due to a lack of demand, difficulties in obtaining casino licence, high levels of competition from the neighbouring Park Royal leisure park and better located hotels and that it would not help meet demand for industrial development. As such, it would not deliver the following plan objectives:</p> <ul style="list-style-type: none"> <li>• Spatial Vision Narrative 7: Park Royal will continue to be London’s largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London’s economy with opportunities for intensification and innovative growth.</li> <li>• SP5 Proposed outcome: A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.</li> <li>• SP10 Proposed outcome: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> <li>• P4 Vision: Park Royal West will continue to be London’s leading location for large, medium and small industrial businesses. The protection and intensification of industrial space, along with a co-ordinated approach to infrastructure investment and delivery will improve its functionality and environment; strengthening Park Royal’s</li> </ul>	Chapter 8

SD ref	Supporting study	Overview of supporting study and any options	Option summary	Should the option be assessed as an additional reasonable alternative?	Location of options
				competitive position and helping businesses to grow sustainably.	
SD60	Whole Plan Viability Study (WPVS)	Delivery of 0 to 50% affordable housing and other planning contributions and sustainability options	<b>Preferred option:</b> 50% affordable housing plus planning contributions plus sustainability options where this is viable	N/A. This preferred option was included within Local Plan policy which was assessed within the IIA.	
			<b>Alternative option:</b> Less than 50% affordable housing plus planning contributions plus sustainability options	No. This option would not contribute to local or strategic needs to deliver 50% affordable housing as required in the draft new London Plan, so it would not deliver the following plan objectives: <ul style="list-style-type: none"> <li>• SP4: Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community</li> <li>• SP10: Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.</li> </ul>	
SD61	Post Occupancy Evaluation Study	This study did not include an options analysis. The purpose of the study was to set out the case for post occupancy evaluations, develop a scope for post occupancy evaluations, explore best practice in collecting data, establish draft templates for energy and water data capture and for qualitative surveys of residents to get feedback, and provide advise on how the policy could be developed.	N/A	N/A	N/A

<b>SD ref</b>	<b>Supporting study</b>	<b>Overview of supporting study and any options</b>	<b>Option summary</b>	<b>Should the option be assessed as an additional reasonable alternative?</b>	<b>Location of options</b>
SD62	Precedents Study	This study did not include an options analysis.	N/A	N/A	N/A
SD63	Quantitative Tracking Survey	This study did not include an options analysis.	N/A	N/A	N/A