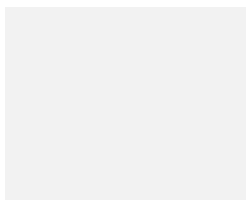


Old Oak and Park Royal Development Corporation Local Plan

Integrated Impact Assessment - Adoption Statement,
including Statement of Environmental Particulars

MAY 2022

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This report dated 06 May 2022 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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Abbreviations

cSAC	candidate Special Area of Conservation
DCS	Development Capacity Study
EqIA	Equalities Impact Assessment
GLA	Greater London Authority
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
HS2	High Speed 2
IIA	Integrated Impact Assessment
LNR	Local Nature Reserve
LPA	Local Planning Authority
OAPF	Opportunity Area Planning Framework
OPDC	Old Oak and Park Royal Development Corporation
NPPG	National Planning Policy Guidance
pSPA	potential Special Protection Area
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Sites of Community Importance
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
TfL	Transport for London

1 Introduction

1.1 Purpose of the Adoption Statement

1.1.1 This Adoption Statement represents the conclusion of the Integrated Impact Assessment (IIA) process and fulfils the plan and programme adoption requirements of the Strategic Environmental Assessment (SEA) Regulations. In accordance with Regulation 16 (4) of the SEA Regulations, this statement sets out the following:

- How environmental considerations have been integrated into the plan or programme (Chapter 2 of this document);
- How the environmental report has been taken into account (Chapter 2 of this document);
- How opinions expressed in response to the consultation on the IIA Reports have been taken into account (Chapter 3 of this document);
- How the results of any consultations have been taken into account (Chapter 3 of this document);
- The reasons for choosing plan or programme as adopted, in the light of the other reasonable alternatives dealt with (Chapter 4 of this document); and
- The measures that could be taken to monitor the significant environmental effects of the implementation of the plan or programme (Chapter 5 of this document).

1.2 Development of OPDC’s Local Plan and the London Plan

1.2.1 OPDC’s Local Plan was developed whilst two versions of the Mayor of London’s London Plan were in place. During its production, OPDC’s Local Plan was developed to be in general conformity with both versions of the Adopted London Plan. The relationship between the Local Plan and London Plan is set out in Table 1-1:

Table 1-1: OPDC Local Plan and London Plan development stages

	Year						
	2016	2017	2018	2019	2020	2021	2022
OPDC Local Plan	Regulation 18 consultation (February to March)	Regulation 19(1) consultation (June to September)	Regulation 19(2) consultation (June to July) Submission and commencement of Examination (October)	Examination hearings (April to July) Publication of Interim Findings (September and October)	Post Submission Modifications developed to address Interim Findings and other relevant updates (January to December)	Main Modifications consultation undertaken (May to June)	Modifications Hearings (January)
London Plan	2016 London Plan adopted (March)	Draft New London Plan consultation (December)	Draft New London Plan showing Minor Suggested Changes published (August)	Examination of the Draft New London Plan (January to May)	Intend to Publish London Plan published (February)	2021 London Plan adopted (February)	N/A

1.3 Integrated Impact Assessment

1.3.1 The term Integrated Impact Assessment (IIA) can be used to describe the process of covering more than one type of impact assessment into a single process. Integrating different types of impact assessments into a single process can improve efficiencies in both the assessment itself, as many of the issues covered in the different forms of assessment overlap, as well as simplifying outcomes and recommendations for policy makers. Where more detail on certain issues is required or necessary, this can be undertaken and included within the IIA. This approach has been adopted by the Mayor of London, who has taken an integrated approach to assessing the impacts of his strategies, incorporating the requirements of SEA, Sustainability Appraisal (SA), Health Impact Assessment (HIA), and Equalities Impact Assessment (EqIA). This IIA draws together the following impact assessments:

- Sustainability Appraisal and Strategic Environmental Assessment;
- Health Impact Assessment;
- Equalities Impact Assessment; and
- Habitats Regulations Assessment (a separate, but parallel process).

1.3.2 Table 1-2 below sets out the IIA process to date.

1.4 Sustainability Appraisal and Strategic Environmental Assessment

1.4.1 SA is the process of identifying the social, economic and environmental effects of a plan to ensure that sustainable development is at the heart of the plan-making process. It applies a holistic assessment of the likely effects of the plan on social, economic and environmental objectives. Section 19 of the Planning and Compulsory Purchase Act 2004¹ requires a local planning authority (LPA) to carry out SA of a plan. The Town and Country Planning (Local Planning) (England) Regulations 2012² dictate that, after adopting a plan, the LPA must make the SA Report available.

1.4.2 SEA is a legal requirement set out in The Environmental Assessment of Plans and Programmes Regulations 2004³ (the SEA Regulations).

1.4.3 National Planning Policy Guidance (NPPG)⁴ states that SA should incorporate the requirements of SEA into one coherent process. The SA has been applied as an iterative process during the preparation of the Plan to help contribute towards the objective of achieving sustainable development. This Adoption Statement satisfies the requirements of Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.

¹ Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Accessed: 23/02/22]

² Available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Accessed: 23/02/22]

³ Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Accessed: 23/02/22]

⁴ Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Accessed: 23/02/22]

1.5 Health Impact Assessment

- 1.5.1 NPPG⁵ states that: *“Plan-making bodies will need to discuss their emerging strategy for development at an early stage with NHS England, local Clinical Commissioning Groups, Health and Wellbeing Boards, Sustainability and Transformation Partnerships/Integrated Care Systems (depending on local context), and the implications of development on health and care infrastructure... A health impact assessment may be a useful tool to use where there are expected to be significant impacts”.*
- 1.5.2 According to the NHS London Healthy Urban Development Unit: *“A health impact assessment (HIA) helps ensure that health and wellbeing are being properly considered in planning policies and proposals”.*
- 1.5.3 Consequently, Arcadis undertook a high-level assessment of the possible health impacts of the Local Plan. As OPDC is a pioneer for having public health expertise based within its core team, they ensured that public health expertise is provided by the Local Authorities, TfL, GLA Health Team and Public Health England, as well as from the OPDC Health Advisor. This has been integrated into the IIA process.

1.6 Equalities Impact Assessment

- 1.6.1 The Equality Act 2010 includes a public sector equality duty which requires public organisations and those delivering public functions to show due regard to the need to:
- Eliminate unlawful discrimination, harassment, victimisation;
 - Advance equality of opportunity; and
 - Foster good relations between communities.
- 1.6.2 Consequently, Arcadis undertook a high-level assessment of the possible equalities impacts of the Local Plan. This has been integrated into the IIA process.

1.7 Habitats Regulations Assessment

- 1.7.1 European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the ‘Habitats Directive’) requires that any plan or programme likely to have a significant impact upon a Natura 2000 site (Special Area of Conservation (SAC) and Special Protection Area (SPA)), which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. The overarching process is referred to as Habitats Regulations Assessment (HRA). In addition, it is a matter of law that candidate SACs (cSACs), Sites of Community Importance (SCI), Ramsar sites and potential SPAs (pSPAs) are also considered in this process.
- 1.7.2 An HRA screening exercise was undertaken to determine if the Local Plan (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests.

⁵ Available at: <https://www.gov.uk/guidance/health-and-wellbeing> [Accessed: 23/02/22]

1.7.3 HRA is a parallel process to the IIA process and has been reported separately. However, its findings are relevant to the IIA and *vice versa* so the two processes need to interact. NPPG⁶ states that, “*the sustainability appraisal should take account of the findings of a Habitats Regulations Assessment, if one is undertaken*”. The findings of the HRA screening exercise have been considered in all IIA Reports where relevant. The HRA screening exercise, in the form of a Report, was submitted alongside the Regulation 19(2) Second Revised Draft Local Plan and associated IIA⁷. A Habitats Regulations Assessment (February 2021) of the Post Submission Proposed Modifications was also undertaken and published in March 2021⁸.

⁶ Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Accessed: 23/02/22]

⁷ Available at: https://www.london.gov.uk/sites/default/files/28._ia_and_hra_0.pdf [Accessed: 02/03/22]

⁸ Available at: https://www.london.gov.uk/sites/default/files/opdc_ia_addendum_hra_and_if_documents_february_2021.pdf [Accessed: 17/03/22]

Table 1-2: The SA process

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment	Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment	When and Where Completed	
Determining the scope of the Local Plan including specifying the opportunities or issues the authority wants to solve	A. Setting the context and objectives, establishing the baseline and deciding on the scope	Identify related plans/programmes		Identify health related plans/programmes (as part of SA) linked into local Joint Strategic Needs Assessments	Review of relevant policies and strategies	Completed as part of Reg 18 ⁹ (February 2016)
		Identify environmental protection objectives		Derivation of health - related themes	Derivation of equality-related themes	Completed as part of Reg 18
		Baseline data and likely future trends	Identify all European sites within and up to 20km from the OPDC area	Gather baseline data relating to health (as part of SA)	Baseline data and likely future trends	Completed as part of Reg 18
		Identify sustainability issues and opportunities	Contact Natural England for details of all European sites (including conservation objectives) and consultation purposes	Identify health specific issues and relevant health determinants using the London Healthy Urban Development Unit tool (as part of SA)	Identify equalities specific issues	Completed as part of Reg 18
		Develop objectives, indicators and targets (Assessment Framework)	Liaise with SA team to ensure the Assessment Framework covers European sites appropriately	Ensure inclusion of health specific objectives, indicators and targets in SA Assessment Framework	Ensure inclusion of equalities specific objectives, indicators and targets in SA Assessment Framework	Completed as part of Reg 18

⁹ Available at: https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_draft_ia_report_new_cover.pdf [Accessed: 02/03/22]

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment	Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment	When and Where Completed	
	Prepare SA Scoping Report, incorporating HRA and HIA	HRA information incorporated in SA Scoping Report	HIA information incorporated in SA Scoping Report.	EqIA information incorporated in SA Scoping Report.	Completed as part of Reg 18	
	Consult on the scope of the SA including HIA, EqIA and HRA (5 weeks)	<i>Consultation as part of SA Scoping Report consultation including consultation with Natural England</i>	<i>Consultation as part of SA Scoping Report consultation.</i>	<i>Consultation as part of SA Scoping Report consultation.</i>	Completed as part of Reg 18	
	Review of scoping consultation responses and preparation of Final Scoping Report to inform next stage.				Completed as part of Reg 18	
Generating options and preferred options for the strategy and implementation plan to resolve these challenges; appraising the options and predicting their effects (Regulation 18 Local Plan)	B1/B2. Developing, refining and appraising strategic options, policy options and preferred policy options	Assess objectives against the Assessment Framework		HIA effects evaluated through SA Framework – including mitigation	EqIA effects evaluated through SA Framework	Completed as part of Reg 18
		Develop, refine and appraise strategic options	Consider HRA implications of the options.		Screening exercise of proposed strategic options	Completed as part of Reg 18
		Evaluate/select preferred policy options				Completed as part of Reg 18
	C. Prepare Initial SA Report				Completed as part of Reg 18	
Consultation on Local Plan (Regulation 18)	Consultation on Initial SA Report (non-statutory)				Completed as part of Reg 18	
	Review of consultation responses and necessary actions to inform next stage				Reg 19(1) amended	

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment	Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment	When and Where Completed	
					following Reg 18 consultation responses	
Selecting finalised preferred policy options for the strategy and implementation plan and deciding priorities	B3/B4. Assessing the effects of the Local Plan Preferred Options	Predict and assess effects of options taken forward		HIA effects evaluated through SA Framework – including mitigation	EqIA effects evaluated through SA Framework	Reg 19(1) and updated in Reg 19(2)
		Proposed mitigation measures				Reg 19(1) and updated in Reg 19(2)
		Propose monitoring programme	Monitoring as part of SA	Monitoring as part of SA	Monitoring as part of SA	Reg 19(1) and updated in Reg 19(2)
Production of the Draft Local Plan	C. Prepare SA Report		HRA Screening of draft Local Plan. HRA Screening Report produced separately and <i>sent to Natural England for agreement of findings.</i>	HIA documented in SA Report, documented through appropriate SA objectives	EqIA documented in SA Report, documented through appropriate SA objectives	Reg 19(1) ¹⁰ (April 2017)
Consultation of Draft Local Plan (Regulation 19)	D. Consultation on the SA Report		As above.	<i>HIA Consultation included in SA Report consultation</i>	<i>EqIA Consultation included in SA Report consultation</i>	Reg 19(2) amended following Reg 19(1) consultation responses
	D. Prepare a supplementary	Assess significant changes	Prepare updated HRA Report	HIA assessment of significant changes	EqIA assessment of significant changes	Reg 19(2) ¹¹ (June 2018)

¹⁰ Available at: https://www.london.gov.uk/sites/default/files/27._integrated_impact_assessment_1.pdf [Accessed: 02/03/22]

¹¹ Available at: https://www.london.gov.uk/sites/default/files/28._ia_and_hra_0.pdf [Accessed: 02/03/22]

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment	Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment	When and Where Completed	
Production of Local Plan for submission	or revised SA Report if necessary	Prepare supplementary or revised SA Report	following Natural England comments (if necessary).	undertaken as part of SA and options around mitigation or reduction of effect identified	undertaken as part of SA	
	IIA Addendum: Local Plan Hearing (May 2019) ¹²				May 2019	
	IIA Addendum: OPDC Schedule of References to Reasonable Alternatives (June 2019) ¹³				June 2019	
	IIA Addendum: OPDC Schedule considering supporting study options as Reasonable Alternatives (June 2019) ¹⁴				June 2019	
	IIA Addendum: Post Submission Proposed Modifications (February 2021) ¹⁵				February 2021	
Adoption of final Local Plan	D. Adoption Statement				This Report (May 2022)	

¹² Available at: https://www.london.gov.uk/sites/default/files/opdc-024_opdc_response_to_hearing_actions_matte_r_2_-_integrated_impact_assessment.pdf [Accessed: 02/03/22]

¹³ Available at: https://www.london.gov.uk/sites/default/files/opdc-033_opdc_ia_ra_schedule_1_200619.pdf [Accessed: 17/03/22]

¹⁴ Available at: https://www.london.gov.uk/sites/default/files/opdc-034_opdc_ia_ra_schedule_2_270619.pdf [Accessed: 17/03/22]

¹⁵ Available at: https://www.london.gov.uk/sites/default/files/opdc_ia_addendum_hra_and_if_documents_february_2021.pdf [Accessed: 02/03/22]

2 How environmental considerations have been integrated into the Local Plan

2.1 Overview

- 2.1.1 The purpose of the IIA is to integrate sustainability considerations into the plan and help it to achieve its key objectives. This is accomplished using a collaborative and iterative relationship between those carrying out the IIA and the plan-makers, based on a phased approach at key stages throughout its development.
- 2.1.2 NPPG¹⁶ specifies five stages to the SA Process, as follows:
- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope (Scoping)
 - Stage B: Developing and refining alternatives and assessing effects
 - Stage C: Prepare the IIA Report
 - Stage D: Seek representations on the IIA Report from consultation bodies and the public (Consultation)
 - Stage E: Post adoption reporting and monitoring
- 2.1.3 The IIA of the OPDC Local Plan was undertaken in accordance with this guidance. The following subsections set out how the IIA has influenced the Local Plan at each of these key stages.

2.2 Scoping

- 2.2.1 Scoping represents the initial stage in the IIA process for the Local Plan and sets the scope for the remainder of the process. The output of this stage was a Scoping Report that formed the basis for consultation with statutory bodies on the proposed scope of the IIA.
- 2.2.2 The scope of the IIA was determined through collecting information on the environmental, social and economic characteristics of the area. This enabled key issues, opportunities and trends to be identified. A review of other relevant environmental protection objectives and policies was also undertaken. The review of these documents focussed upon identifying key environmental and sustainability objectives that would need to be considered in the IIA and the Local Plan. The scope of the appraisal was documented in a Scoping Report, issued for consultation with the statutory bodies and the public in September 2015.
- 2.2.3 Following the consultation, responses were analysed, and amendments made to the scope as appropriate. A finalised Scoping Report was published and is available on OPDC's website¹⁷.
- 2.2.4 To ensure that a robust assessment of the emerging Local Plan was undertaken, it was necessary to understand the existing conditions and characteristics of the OPDC area, for example, population dynamics, levels of deprivation, health, employment patterns and the condition of housing stock and

¹⁶ Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Accessed: 08/12/21]

¹⁷ Available at: https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_ii_a_scoping_report_-_finalised_version1.pdf [Accessed: 24/02/22]

its affordability. Details of the identified issues and opportunities are provided in the IIA Scoping Report.

- 2.2.5 The IIA Framework (Table 2-1) underpins the assessment methodology and comprises a series of sustainability objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. The 18 IIA Objectives have been developed using the review of other relevant plans, programmes and environmental objectives, the baseline data and the key issue and opportunities. The IIA Framework was amended following receipt of the Scoping Report consultation responses from statutory consultees in 2015.
- 2.2.6 The IIA Scoping Report was consulted on between 9th September and 9th October 2015 with the three statutory consultees: Natural England, the Environment Agency and Historic England. The IIA Scoping Report was finalised in December 2015¹⁸ in light of responses received during the consultation window. Appendix E of the IIA Scoping Report sets out Arcadis' response to the Scoping Consultation representations. IIA Objectives sub-objectives and indicators were amended and added within the IIA Framework to reflect the representations received during this consultation period.

¹⁸ Available at: https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_iaa_scoping_report_-_finalised_version1.pdf
[Accessed: 24/02/22]

Table 2-1: SA Framework

IIA Objective and sub-objectives		Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
1	<p>To enhance the built environment and encourage ‘place-making’</p> <ul style="list-style-type: none"> Optimise development opportunities to develop and enhance local distinctiveness and character Ensure new buildings and public spaces are appropriately designed and constructed including enabling the creation of safe and welcoming spaces and access for all Create new, accessible and managed open spaces- public, communal, private and children’s play space, public realm and spaces where children can play independently, which reflect the needs of the community. Maximise the contribution that the arts, culture and heritage can make to a community including building creativity, art, intrigue, character and surprise into the built environment Increase in the legibility of public spaces and increase walking and cycling routes within and adjacent to Old Oak and Park Royal Encourage the use of contemporary technology in the public realm to support design, delivery and management Encourage adherence to the principles of Lifetime Neighbourhoods Maximise delivery of active frontages in appropriate locations <p>Link to objectives 12 (heritage), 5 (housing); 13 (community cohesion); 14 (crime and fear of crime); 15 (health and wellbeing)</p>	<ul style="list-style-type: none"> <i>Provision of publicly accessible open space in accordance with the London Plan Categorisation:</i> <ul style="list-style-type: none"> Regional Parks (400ha): 3.2 to 8km from homes; Metropolitan Parks (60ha): 3.2km from homes; District Parks (20ha): 1.2km from homes; Local Parks and Open Spaces (2ha): 400m from homes; Small Open Spaces (under 2ha): less than 400m from homes; Pocket Parks (under 0.4ha): less than 400m from homes; Linear Open Spaces (Variable): wherever feasible. <i>Proportion of accessible open spaces created which have a long term management and funding plan.</i> <i>Integration with the All London Green Grid Area Frameworks</i> <i>Number of new buildings and public spaces designed to be inclusive</i> <i>Proportion of new development incorporating an appropriate level of open space for recreation</i> <i>Legibility and quality of the pedestrian and cycle environment</i> <i>Proportion of new development incorporating Lifetime Neighbourhoods principles</i> <i>Proportion of people who are happy with their local environment as a place to live</i> <i>Proportion of new development using technology to improve legibility</i> 	<p>SEA: Population, Human Health, Material Assets, Cultural Heritage, Landscape HIA EqIA</p>
2	<p>To optimise the efficient use of land through increased development densities and building heights, where appropriate</p>	<ul style="list-style-type: none"> <i>Housing density in comparison to neighbourhood quality</i> <i>Density of commercial development in comparison to existing (2015) levels</i> 	<p>SEA: Population, Human Health, Biodiversity,</p>

IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
<ul style="list-style-type: none"> Optimise housing density in a way that makes the most efficient use of land whilst meeting housing needs Optimise development density in a way that makes the most efficient use of land whilst meeting commercial needs and responding to sensitive areas <p>Link to objectives 7 (natural resources use); and 8 (waste)</p>		Soil, Water, Landscape, Material Assets HIA
<p>3</p> <p>Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land</p> <ul style="list-style-type: none"> Increase accessibility to household and commercial sustainable waste management facilities Improve soil quality and achieve more effective geoconservation where appropriate Contribute to a scheme of strategic land remediation <p>Link to objectives 4 (natural resources use); 6 (waste); and 12 (reuse of existing buildings)</p>	<ul style="list-style-type: none"> <u>Amount (hectares) of previously developed land available (Office for National Statistics Local Profiles)</u> <i>Quality of soil resources</i> <i>Materials balance as a result of construction activities</i> <i>Development and implementation of a strategic land remediation scheme</i> <i>Amount of soil remediated on site</i> 	SEA: Population, Human Health, Biodiversity, Soil, Water, Landscape, Material Assets HIA
<p>4</p> <p>Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network</p> <ul style="list-style-type: none"> Increase the co-location of services and facilities, in accessible locations by walking, cycling and public transport Increase the connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks including via green infrastructure networks and the canal Prioritise walking and cycling over other forms of transport Increases the opportunity for the transport of goods and people by rail transport Consider the impact of construction on local infrastructure on local businesses and communities Support the testing and implementation of future transport modes Mitigate the impact of construction traffic Maximise the accessibility of stations 	<ul style="list-style-type: none"> <u>Distribution of major transport systems – roads, rail links</u> <i>Modal shift of existing travel patterns verses future travel patterns</i> <i>Connectivity of the cycling and walking network</i> <i>Km of designated cycling and walking routes</i> <i>Proportion of goods arriving and leaving the area by rail in comparison to road</i> <i>Proportion of waste and freight arriving and leading the area by canal.</i> <i>Proportion of shared spaces within the urban environment</i> <i>Controlled parking zones, car clubs and travel plan measures implemented</i> <i>Number of accessible public transport interchanges and bus stops (source: Equal Life Chances for All 2009)</i> 	SEA: Population, Human Health, Air, Climatic Factors, Material Assets, Landscape HIA EqIA

IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
<p>Link to objectives 7 (climate change); 11 (pollution); and 14 (safety)</p>	<ul style="list-style-type: none"> <i>Number of local businesses negatively affected by construction activities</i> <i>Increase in traffic on the highway network in and around the OPDC area</i> 	
<p>5</p> <p>Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local and regional needs</p> <ul style="list-style-type: none"> Provision of adaptable homes for independent living for older and disabled people Provision of innovative housing typologies to meet needs Provision of homes to need the needs of older people including extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes Provision of housing suitable for family accommodation including single-parent families Increase in use of high quality design including meeting energy efficiency standards Provision of facilities to meet identified needs of Gypsies, Travellers and Travelling Show people Ensure all new homes meet Lifetime Homes standards <p>Link to objectives 1 and 6 (sustainable design); 13 (community cohesion and social exclusion); 14 (secured by design); 15 (health)</p>	<ul style="list-style-type: none"> <u>Dwelling Stock (Office for National Statistics Local Profiles).</u> <i>Household density (Office for National Statistics Local Profiles)</i> <i>Proportion of LSOAs in the bottom 10% for housing deprivation</i> <i>Proportion of dwellings meeting all of the health and wellbeing credits in the Code for Sustainable Homes</i> <i>Proportion of dwellings that meet internal space standards</i> <i>Proportion of dwellings with a high SAP rating</i> <i>Proportion of the population considered to be homeless (source: Equal Life Chances for All 2009)</i> <i>Amount of family size housing (source: Equal Life Chances for All 2009)</i> <i>Proportion of single parent families living in unsuitable accommodation</i> <i>Amount of affordable housing (source: Equal Life Chances for All 2009)</i> <i>Amount of Lifetime Homes (source: Equal Life Chances for All 2009)</i> <i>Proportion of market, affordable and specialist housing delivered.</i> 	<p>SEA: Population, Human Health, Climatic Factors, Material Assets HIA EqIA</p>
<p>6</p> <p>Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect</p> <ul style="list-style-type: none"> Minimise the proportion of new development at risk of flooding from all sources including surface water, groundwater and reservoir flooding Minimise the increase in risk of flooding elsewhere 	<ul style="list-style-type: none"> <u>River catchment areas (Environment Agency Thames Catchment Flood Management Plan, 2009).</u> <u>Distribution of areas at risk of fluvial flooding (Environment Agency Fluvial Flood Map)</u> <u>Areas susceptible to surface water flooding (Environment Agency Surface Water Flood Map)</u> 	<p>SEA: Biodiversity, Human Health, Water, Air, Climatic Factors, Material</p>

IIA Objective and sub-objectives		Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
	<ul style="list-style-type: none"> Increase the use of sustainable design including Sustainable Urban Drainage, natural ventilation and shading for temperature adaptation <p>Link to objectives 10 (habitat connectivity); 7 (energy efficiency); 12 (sustainable adaptation and reuse of existing buildings)</p>	<ul style="list-style-type: none"> <i>Proportion of energy usage in buildings using sustainable design compared with standard construction</i> 	Assets, Landscape HIA EqIA
7	<p>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</p> <ul style="list-style-type: none"> Enable the area to be more self-sufficient in terms of energy generation and storage Increase the proportion of energy generated from low, zero or negative carbon energy sources, through consideration of measures from the outset Increase the proportion of journeys made by non-motorised transport Increase the use of sustainable design to minimise the resource requirements and outputs of new development <p>Link to objectives 4 (minimise the need to travel); 7 (sustainable design); and 12 (sustainable adaptation and reuse of existing buildings)</p>	<ul style="list-style-type: none"> <u>Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles)</u> <u>All energy consumption by sector (Office for National Statistics Local Profiles and DECC)</u> <i>Energy consumption per capita</i> <i>Proportion of properties generating energy from low or zero carbon sources, including solar.</i> <i>Proportion of new developments incorporating district heating or heat pumps</i> <i>Greenhouse gas emissions per capita compared with London and national averages</i> <i>Proportion of journeys made by non-motorised transport</i> <i>Proportion of energy generated from low, zero or negative carbon energy sources</i> 	SEA: Population, Human Health, Air, Climatic Factors, Material Assets HIA EqIA
8	<p>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</p> <ul style="list-style-type: none"> Promote the creation of a circular economy for the management of waste Increase the use of recycled materials for the construction of buildings and infrastructure Address the displacement of waste management to other areas Enable the sustainable management of contaminated soils and hazardous waste Increase accessibility to household and commercial sustainable waste management facilities 	<ul style="list-style-type: none"> <u>Number of active / historic landfills on the site (Environment Agency)</u> <u>Percentage of household waste sent for reuse, recycling or composting (ONS Local Profiles)</u> <u>Amount of residual waste per household (ONS) sent to landfill or incineration</u> <u>Amount of commercial and industrial waste produced (Defra)</u> Amount of waste recycled and re-used within the area Amount of waste transported within the area 	SEA: Biodiversity, Population, Human Health, Soil, Water, Climatic Factors, Material Assets, Landscape HIA EqIA

IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
<ul style="list-style-type: none"> Maximise use of innovative waste collection and waste management techniques including smart technology <p>Link to objectives 7 (resources use); 2 (efficient use of land); 3 (remediation)</p>		
<p>9 Improve the quality of the water environment</p> <ul style="list-style-type: none"> Promote the improved efficiency in the use of water domestically and commercially Promote the improved quality of local watercourses Prevent the risk posed to the water environment from the run-off of contaminants Ensure that infrastructural capacity is sufficient to accommodate new development ahead of occupation <p>Link to objectives 1 (biodiversity); 3 (climate change adaptation); 4 (climate change contributions); 5 (pollution); 7 (remediation); and 12 (Grand Union Canal)</p>	<ul style="list-style-type: none"> <u>Water and groundwater quality (Environment Agency)</u> <i>Development of a site wide drainage strategy</i> <i>Water consumption per capita</i> <i>Increase in infrastructural capacity as a proportion of new development</i> <i>Increased use of existing infrastructure</i> 	<p>SEA: Water, Human Health, Soil, Landscape</p> <p>HIA</p>
<p>10 Create and enhance biodiversity and the diversity of habitats across the area and its surroundings</p> <ul style="list-style-type: none"> Conserve or enhance existing biodiversity across the plan area, including on brownfield sites Increase the connectivity of habitats across the area and its surroundings Create new areas dedicated to nature conservation Seek to reduce the potential wide ranging impacts on international sites <p>Link to objectives 3 (remediation); 6 (climate change adaptation); 9 (water environment); 11 (pollution); and 12 (Grand Union Canal)</p>	<ul style="list-style-type: none"> <u>Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Sites of Importance for Nature Conservation (SINCs) and Local Wildlife Sites (MAGIC, www.magic.gov.uk and Local Authority websites).</u> <u>Key Biodiversity Action Plan (BAP) species and habitats present (London BAP)</u> <i>Protected species with favourable conservation status</i> <i>Habitat connectivity</i> <i>Condition of Wormwood Scrubs Local Nature Reserve</i> <i>Condition of Grand Union Canal area of nature conservation</i> <i>Increase in areas of greenspace for biodiversity including inaccessible areas</i> 	<p>SEA: Biodiversity, Flora, Fauna</p> <p>HRA</p>
<p>11 To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p>	<ul style="list-style-type: none"> <u>Number and distribution of Air Quality Management Areas (AQMA) (Air Quality Archive¹⁹)</u> 	<p>SEA: Population,</p>

¹⁹ Available at: <http://uk-air.defra.gov.uk/aqma/maps> [Accessed: 23/02/22]

IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
<ul style="list-style-type: none"> Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities through the use of mitigation measures and the locating of future sensitive users away from pollution generators Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators Ensure that new waste management facilities do not negatively impact on sensitive uses including existing and future homes and building occupants. Reduce emissions from construction and demolition sites Minimise light pollution <p>Link to objectives 4 (sustainable transport); 7 (climate change); 15 (health)</p>	<ul style="list-style-type: none"> <i>Number of new local air quality monitoring points</i> <i>Ill health attributed to air, noise or light pollution</i> <i>Proportion of the population affected by high levels of noise during construction and post construction including a breakdown by equality group</i> <i>Proportion of the population affected by light pollution from traffic or industry during construction and post construction including a breakdown by equality group</i> <i>Proportion of population living within areas with regular exceedances in NOx and particulates</i> 	<p>Human Health, Air, Material Assets</p> <p>HIA</p> <p>EqIA</p>
<p>To conserve and enhance the historic environment, heritage assets and their settings</p> <ul style="list-style-type: none"> Promote the historical interpretation of heritage assets, including the canal, through the use of multifunctional green infrastructure Minimise heritage assets lost to new development to designated and undesignated assets. Avoid adverse impacts on the setting of heritage assets, including those outside the OPDC area Maximise the reuse and adaptation of heritage assets for place-making and minimising the embedded carbon in new development Enhance local views and landscapes Reduce the number of Heritage Assets at Risk in and around the area Reduce impacts on heritage assets and their settings in areas adjacent to the plan area Enhance areas of greenspace in connection with areas of importance for heritage protection 	<ul style="list-style-type: none"> <u>Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens (www.magic.gov.uk).</u> <i>Decrease in the number of Heritage Assets at Risk in and around the area</i> <i>Increase in the number of heritage assets identified and protected through the development of Local List</i> <i>Increase in the number of heritage assets highlighted and enhanced or utilised for place-making and interpretation</i> <i>Development of a local views strategy and proportion of new developments adhering to its principles</i> <i>Increase in the number of heritage assets re-used for development</i> 	<p>SEA: Cultural Heritage, Material Assets, Biodiversity, Climatic Factors, Landscape</p> <p>HIA</p>

IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
<p>Link to objectives 1 (place-making), 3 (reuse of existing buildings), 6 (energy efficiency), 7 (energy generation and sustainable design), 8 (use of recycled materials) and 18 (encourage inward investment).</p>		
<p>13</p> <p>Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare</p> <ul style="list-style-type: none"> • Improve the quality of the public realm and increase the provision, accessibility and quality of public open spaces including play spaces • To increase connectivity and avoid physical barriers and severance across the area through measures including green infrastructure, creating physical and social linkages with the surrounding communities • Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision <p>Link to objectives 1 (place-making); 4 (accessibility); 5 (housing); 14 (crime and fear of crime); 15 (health)</p>	<ul style="list-style-type: none"> • <i>Number of offices converted to residential under permitted development rights</i> • <i>Schemes to reduce the impact of construction on the local community</i> • <i>Connectivity of pedestrian linkages across the area</i> 	<p>SEA: Population, Human Health, Climatic Factors, Landscape, Material Assets</p> <p>HIA EqIA</p>
<p>14</p> <p>Improve safety and reduce crime and the fear of crime</p> <ul style="list-style-type: none"> • Increase natural surveillance and other measures to design out crime • Encourage increased safety through the use of traffic management and calming methods <p>Link to objectives 1 (place-making); 4 (sustainable transport); 5 (housing); 13 (community cohesion); 15 (health)</p>	<ul style="list-style-type: none"> • <u>Crime rates (Indices of Deprivation)</u> • <i>Road traffic accidents and diversity profiling (source: Equal Life Chances for All 2009)</i> • <i>Percentage of people who feel that there is less discrimination in their neighbourhood than 3 years ago (source: Equal Life Chances for All 2009)</i> • <i>Percentage of the local population who feel personal safety on buses, tubes and trains (source: Equal Life Chances for All 2009)</i> • <i>Percentage of women who feel safe using local bus, tube, trains, black cabs, and mini cabs at night, alone (source: Equal Life Chances for All 2009)</i> • <i>Proportion of developments incorporating Secured by Design principles</i> 	<p>SEA: Population, Human Health, Material Assets</p> <p>HIA EqIA</p>
<p>15</p> <p>Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</p>	<ul style="list-style-type: none"> • <u>Health Deprivation and Disability (Indices of Deprivation for England 2010)</u> 	<p>SEA: Population,</p>

IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
<ul style="list-style-type: none"> • Increase accessibility to social infrastructure including health care facilities, schools, social care and community facilities • Increase the capacity of local social infrastructure • Encouragement of opportunities for buildings with a shared community use and the co-location of services • Facilitate the supply of local food through the provision of space for uses such as allotments or farmers markets • Reduce the potential for an over-concentration of hot food takeaways in the local area • Minimise construction phase impacts on communities, in relation to both physical and psychological health <p>Link to objectives 1 (place-making); 4 (accessibility); 5 (housing); 13 (social and economic wellbeing)</p>	<ul style="list-style-type: none"> • <i>Proportion of the population living within walking distance of health care facilities</i> • <i>Proportion of the population living within walking distance of education facilities</i> • <i>Proportion of the population living within walking distance of social care facilities</i> • <i>Proportion of the population living within walking distance of community facilities</i> • <i>Proportion of the population with access to space for the growing of food locally</i> • <i>Increase in the capacity of local social infrastructure</i> • <i>Childhood obesity rates</i> • <i>Life expectancy</i> 	<p>Human Health, Material Assets, Soil, Air, Water, Landscape HIA EqIA</p>
<p>16</p> <p>To improve the education and skills levels of all members of the population, particularly vulnerable groups</p> <ul style="list-style-type: none"> • Increase in the availability of formal education across all age groups, including adults from all equality groups • Increase in the availability of informal education and training for all <p>Link to objectives 4 (accessibility); 13 (community cohesion); 15 (health and wellbeing); 117 (social and economic wellbeing); 18 (sustainable economic growth)</p>	<ul style="list-style-type: none"> • <u>Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles).</u> • <u>Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles).</u> • <u>Education, Skills and Training Deprivation (Indices of Deprivation for England 2010).</u> • <i>Proportion of the population with access to appropriate education facilities by sustainable transport modes</i> • <i>Decrease in educational underachievement gap between disadvantaged groups and the wider community (source: Equal Life Chances for All 2009)</i> 	<p>SEA: Population Human Health, Material Assets HIA EqIA</p>
<p>17</p> <p>Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training</p> <ul style="list-style-type: none"> • Provision of access to a range of high quality local employment opportunities, a proportion of which will be directed towards local people, both during construction and permanent jobs, including those from disadvantaged groups 	<ul style="list-style-type: none"> • <u>Number of wards with LSOAs in the bottom 20% most deprived (Indices of Deprivation for England 2010)</u> • <i>Proportion of new employment and training opportunities being awarded to local people via local procurement arrangements</i> 	<p>SEA: Population, Human Health, Material Assets</p>

IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
<ul style="list-style-type: none"> Encourage workforces to reflect local and regional diversity in all occupations and at all levels Provision of access to a range of work-based and other training opportunities, a proportion of which will be directed towards local people, including those from disadvantaged groups Provision of a range of accessible retail stores, including food stores and smaller affordable shops for social enterprises Increase in the provision of facilities for childcare Encouragement of employer's to adopt the London Living Wage <p>Link to objectives 15 (health and wellbeing); 116 (education and training) and 18 (sustainable economic growth)</p>	<ul style="list-style-type: none"> <i>Proportion of new employment and training opportunities being awarded to local women via local procurement arrangements</i> <i>Employment rate by excluded group compared to employment rate of all Londoners (source: Equal Life Chances for All 2009)</i> <i>Workforce profile at all levels (source: Equal Life Chances for All 2009)</i> <i>Proportion of the community living within walking distance of a local shop (see Table 3-5)</i> <i>Levels of Child Poverty (source: Equal Life Chances for All 2009)</i> <i>Number of childcare places (source: Equal Life Chances for All 2009)</i> <i>Take-up of subsidised childcare places (including those for disabled children) benchmarked against the LDA Childcare Affordability Programme (source: Equal Life Chances for All 2009)</i> 	<p>HIA EqIA</p>
<p>To encourage inward investment alongside investment within existing communities, to create sustainable economic growth</p> <ul style="list-style-type: none"> Increase in the net number of businesses registered in the area Increase infrastructure and utilities capacity, including broadband connections Ensure workspace meets the needs of new and emerging businesses, including affordable, flexible and micro/SME workspace Deliver retail that does not negatively impact on neighbouring town centres Encourage the development of employment growth sectors including clean, green and healthy businesses Support the relocation of business from Old Oak to Park Royal. Intensify the use of workspaces within Park Royal <p>Link to objectives 16 (education and training) and 17 (social and economic wellbeing).</p>	<ul style="list-style-type: none"> <u>Economy Local Profiles (ONS)</u> <u>Employment by industry (ONS- NOMIS)</u> <i>Proportionate coverage of broadband across the area</i> <i>Proportion of new employment development that includes an element of affordable workspace</i> <i>New businesses categorised as 'health-led'</i> <i>New businesses that contribute to the growth of the low carbon goods and services sector</i> <i>Amount of new employment floorspace in Old Oak</i> <i>Amount of new industrial floorspace in Park Royal</i> 	<p>SEA: Population, Human Health, Material Assets HIA EqIA</p>

2.3 Developing and refining alternatives and assessing effects and preparing IIA Report

- 2.3.1 This section sets out information chronologically for how alternatives were developed and refined, effects were assessed and the associated IIA reporting. For further information regarding Reasonable Alternatives see section 4.2.

Spatial Vision and Narratives

- 2.3.2 Good practice guidance recommends that the key aims and principles of the plan should be assessed against the IIA Objectives, in order to test their compatibility and to determine whether they accord with broad sustainability principles.
- 2.3.3 The Regulation 18 OPDC Local Plan draft Spatial Vision was: *“A thriving part of London connected to the UK and internationally. Old Oak and Park Royal will be a centre for innovation and growth that will shape west London and strengthen London’s role as a global city. A new commercial hub with catalyst uses, alongside a diverse network of vibrant neighbourhoods, will help create a London destination recognised as an exemplar in large-scale housing and employment led regeneration”*.
- 2.3.4 Between Regulation 18 and Regulation 19(1), the Spatial Vision was amended to recognise more fully how the OPDC area, and the purpose of the Local Plan, can help support its local current employment and residential offering, whilst also at the same time address the inequalities that currently exist as it enables the creation of new neighbourhoods. The Vision also aims to place the geographical area of OPDC within its wider London setting.
- 2.3.5 The Regulation 19(1) and 19(2) OPDC Local Plan Spatial Vision was: *“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. It will comprise a network of places including an innovative industrial area in Park Royal and a high-density new vibrant part of London at Old Oak. It will be home to a diverse and intense mix of uses, places and people. Development will pioneer international excellence in sustainability, health and well-being and design quality to deliver tangible benefits for both local communities and London”*.
- 2.3.6 The Spatial Vision for OPDC was reviewed against the IIA Objectives. Chapter 6 of the IIA Regulation 19(2) Report presents the complete compatibility of the Spatial Vision and Narratives against the IIA Objectives (see link in Table 3-2).
- 2.3.7 The Spatial Vision for the ‘Going Local’ and the ‘Thinking Big’ sections have been appraised against the 18 IIA Objectives. The main issue regarding the ‘Thinking Big’ narratives revolves around the increased production of waste that would be brought about through the implementation of narrative 1, 3, and 4, consequently resulting in a negative impact against IIA Objective 8 though it’s worth noting that the Circular Economy aspirations may further mitigate these. Only one negative impact was recorded for the ‘Going Local’ narratives against IIA Objective 4 relating to biodiversity. This is mainly due to the Wormwood Scrubs Local Nature Reserve (LNR) being adjacent to Old Oak Common train station. Construction works with regards to further improvements or expansion of the station would likely have a negative effect on the LNR if not appropriately mitigated.

Strategic Options

Housing Quanta

- 2.3.8 Within the 2016 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. 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 was clearly stated to be a minimum.
- 2.3.9 In having regard to the then minimum Opportunity Area targets set by the London Plan, the evidence base gathered by the OPDC enabled the authority to determine how much development was required, the extent to which this development could be accommodated, and the interventions that may be required in order to do so.
- 2.3.10 Within the Regulation 18 Development Capacity Study (DCS), the appropriate testing process calculated the minimum residential capacities and densities required to deliver 25,500 homes across the available areas for residential development, based on the then emerging illustrative masterplan for Old Oak, set out in the OAPF. The testing process also sought to ensure that the development quanta approach accords with then 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.
- 2.3.11 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 2016 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 within the Regulation 19(2) Local Plan. 60,700 new jobs would be delivered across the full development period. More detail can be found in Section 2.2 of the IIA Addendum: Local Plan Hearings²⁰.

Spatial Distribution

- 2.3.12 The 2016 London Plan identified Park Royal and Old Oak Common as two Opportunity Areas and identified minimum targets for new housing development. The current London Plan (2021) combines the two Opportunity Areas identifying housing targets for the London Plan ten-year housing period and indicative targets for the total housing development. The London Plan includes a range of other policy requirements for development planning in the OPDC area.
- 2.3.13 Planning requirements for the Old Oak and Park Royal Opportunity Areas set out in Table A1.1 of the 2016 London Plan are repeated in Boxes 2.1 and 2.2.

²⁰ Available at: https://www.london.gov.uk/sites/default/files/opdc-024_opdc_response_to_hearing_actions_matte_r_2_-_integrated_impact_assessment.pdf [Accessed: 03/03/22]

- 2.3.14 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: Principles L1, L2 and L3.
- 2.3.15 Combined, the 2016 and 2021 London Plans 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 and policies set out in the Local Plan. More detail can be found in Section 2.3 of the IIA Addendum: Local Plan Hearings²¹.

Affordable Housing

- 2.3.16 The Regulation 18 IIA Report appraises approaches to affordable housing provision. The four strategic options considered are briefly described below:
- 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.
 - 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.
 - 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.
 - 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.
- 2.3.17 No significant effects were predicted against Approaches 1, 2 and 3 of the assessment. However, significant negative effects were predicted in relation to the assessment of Approach 4, in relation to IIA Objectives: 13 (community cohesion and social exclusion); 14 (safety, crime and the fear of crime); and 15 (health and wellbeing).

Policies and Site Allocations

- 2.3.18 The aim of the OPDC Local Plan policies is to set the scene and provide clear direction as to how the area will be developed throughout the Local Plan period. The policies seek to transform the area, in order to meet London’s strategic housing need, provide commercial floor space to suit and support a

²¹ Available at: https://www.london.gov.uk/sites/default/files/opdc-024_opdc_response_to_hearing_actions_matte_r_2_-_integrated_impact_assessment.pdf [Accessed: 03/03/22]

diverse economy as well as support London's growing population with social infrastructure facilities. The policies also seek to protect current communities, existing green spaces as well as aim to provide more opportunities for greening and water protection, especially in light of a changing climate.

Regulation 18

- 2.3.19 The policy options for development were assessed against the IIA Objectives using a matrix-based approach, with the initial appraisal stage being reported in the Regulation 18 Local Plan. The appraisal approach allowed the identification of positive and negative effects, as well as the identification of potential cumulative effects. Mitigation measures and recommendations were suggested, to either offset or alleviate any predicted adverse impacts, or to enhance any opportunities for enhancing sustainable development. The policies were then re-assessed following the Regulation 18 consultation (as set out below), and this iterative process has been continued throughout the IIA process.
- 2.3.20 A summary of the assessment of the draft policies is provided in Chapter 7 of the IIA Regulation 18 Report²² and the complete results of the assessment are presented in Appendix G.
- 2.3.21 The Regulation 18 IIA Report summarised that the majority of predicted effects arising from the assessment of the draft policies were positive. The assessment led to the prediction of major positive effects against all of IIA Objectives. The volume of development being proposed within the OPDC boundary over the course of the Local Plan to 2038 will be substantial. The regeneration catalysts, which are Crossrail/HS2, will bring much needed improved connectivity for existing residents and business, as well as open up the area for new mixed-use neighbourhoods and communities, such as those that were proposed across Old Oak North and Old Oak South in the longer term; and Scrubs Lane in the short term. The direction of the Local Plan presents an opportunity to protect a significant Strategic Industrial Location (Park Royal) as well as create new employment and industrial floorspace for emerging industries and small businesses within this area. It also importantly sets out guidance for how Wormwood Scrubs will be conserved and enhanced as Metropolitan Open Land.
- 2.3.22 However, such a volume of development will not be without its challenges. The existing transport network, businesses and residents will be impacted, with a significant amount of change in their area over a long period of time. This natural conflict is acknowledged within the Local Plan policies and addressed with specific policies aimed at ensuring proposed development can adequately deal with effects on residential amenity including noise, air quality and construction impacts.
- 2.3.23 Overall, the Local Plan policies work well together in ensuring that this part of west London can be transformed into a mixed-use area, providing much needed housing, across a range of tenures, employment floorspace, new social infrastructure, contributing to the greening of the area, generating benefits for existing communities and ensuring development is able to meet a changing climate.

Regulation 19(1)

- 2.3.24 The Regulation 19(1) Draft Local Plan was amended from the Draft Regulation 18 version in response to consultation comments, evidence base outputs and recommendations from OPDC's Place Review Group. This saw a change in the structure to provide a clearer differentiation between Strategic Policies, Place Policies and Development Management Policies. The draft reflects the role of a Regulation 19 document by providing proposed policies instead of policy options. Further emphasis on existing and future local communities was also provided.

²² Available at: https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_draft_ia_report_new_cover.pdf [Accessed: 03/03/22]

- 2.3.25 Between the Regulation 18 and Regulation 19(1) stages, the Strategic Policies evolved from the Overarching Spatial Policies and as a result of the restructuring of the Spatial Vision provides greater clarity in how the Old Oak and Park Royal Development Corporation envisages the area to look at end of the plan period.
- 2.3.26 When compared to the Regulation 18 Draft Local Plan, the Regulation 19(1) Draft Local Plan provided a much clearer emphasis, through its Places chapter, on pulling out the individual distinctiveness of its sub-areas, such as Park Royal's long industrial history, as well as recognising the forthcoming Crossrail/HS2 interchanges and how this is already changing the area and bringing investment into it. Specific Place and cluster policies give a much stronger direction as to how new and existing neighbourhoods can be developed and improved in order to ensure that the scale of development will respond to both the surrounding context and improved public transport connectivity. Site allocations were also provided to define how many new homes and jobs will be provided.
- 2.3.27 The IIA Report was previously updated to reflect both minor wording changes in policies between the Regulation 18 and the previous version of the report used to assess the Regulation 19(1) Revised Draft Local Plan. This is part of the iterative nature of the IIA process.
- 2.3.28 Appendix C of the Regulation 19(1) IIA Report²³ sets out Arcadis' response to the Regulation 18 Draft IIA Report consultation representations (see link in Table 3-2). Changes made, as a result of the representations received at this stage include adding references to local-level Conservation Areas and emphasising the difference between designated and undesignated assets.

Regulation 19(2)

- 2.3.29 Amendments were made to the revised draft Local Plan in light of Regulation 19(1) consultation responses, updated supporting studies, the Draft New London Plan²⁴ and changes to national planning guidance. The amendments are contained with the Regulation 19(2) Second Revised Draft Local Plan.
- 2.3.30 The Regulation 19(2) IIA Report²⁵ was prepared following an update to the Regulation 19(1) IIA Report to assess the proposed changes set out in the Regulation 19(2) Second Revised Draft Local Plan (see link in Table 3-2). The Regulation 19(2) IIA Report concluded that the revisions resulted in no significant change to the assessment outcomes of Local Plan Policies. Following on from the assessment as part of the Reg 18 consultation, the policies have been amended and altered to reflect the recommendations from the Regulation 18 IIA. Table 2-2 sets out how the policies of the OPDC local Plan have evolved between Regulation 18, Regulation 19(1) and Regulation 19(2).
- 2.3.31 The Strategic Policies have been expanded upon compared to the 'Overarching Strategic Policies' in Regulation 18 Draft Local Plan assessment as a result of the further studies and strategies and the review of the Places Group.
- 2.3.32 Compared to the assessment of the Places section carried out for the Regulation 18 Draft Local Plan, the Places policies was amended in order to cement the strategic direction and aid delivery of these Places, the clusters and the site allocations identified. Further Place policies have been written in order to provide greater clarity of how different parts of the OPDC area will be developed and what would be acceptable in various locations. Some policies have identified Clusters which specify

²³ Available at: https://www.london.gov.uk/sites/default/files/27._integrated_impact_assessment_1.pdf [Accessed: 02/03/22]

²⁴ The New London Plan 2021 has now been adopted, but the draft Plan 2021 was considered when preparing the Regulation 19(2) IIA Report.

²⁵ Available at: https://www.london.gov.uk/sites/default/files/28._iia_and_hra_0.pdf [Accessed: 02/03/22]

guidance for parts of the Place with more certainty, such as a greater direction on where tall buildings would be acceptable in relation to its surroundings. Most Place policies have identified site allocations as part of their remit.

2.3.33 The Town Centre policies include the Social Infrastructure elements assessed as part of the Regulation 18 Draft Local Plan. TCC1, TCC3 and TCC4 are new policies that arose out of the Regulation 18 consultation period.

Table 2-2: Policies set out in the OPDC Local Plan between Regulation 18, Regulation 19(1), Regulation 19(2) and Post Submission Modified Draft

Regulation 18	Regulation 19(1)	Regulation 19(2)	Post Submission Modified Draft
Overarching Spatial Policies (renamed to Strategic Policies)			
OSP1: Optimising Growth	SP1: City in the West	SP1: Catalyst for Growth	SP1: Catalyst for Growth
OSP2: Land Use	SP2: Good Growth	SP2: Good Growth	SP2: Good Growth
OSP3: Connections and Open Spaces	SP3: Health, Wellbeing and Active Lifestyles	SP3: Improving Health and Reducing Health Inequalities	SP3: Improving Health and Reducing Health Inequalities
OSP4: Densities and Building Heights	SP4: Thriving Communities	SP4: Thriving Communities	SP4: Thriving Communities
OSP5: Places	SP5: Economic Resilience	SP5: Economic Resilience	SP5: Economic Resilience
	SP6: Places and Destinations	SP6: Places and Destinations	SP6: Places and Destinations
	SP7: Connecting People and Places	SP7: Connecting People and Places	SP7: Connecting People and Places
	SP8: Green Infrastructure and Open Space	SP8: Green Infrastructure and Open Space	SP8: Green Infrastructure and Open Space
	SP9: Built Environment	SP9: Built Environment	SP9: Built Environment
	SP10: Integrated Delivery	SP10: Integrated Delivery	SP10: Integrated Delivery
Places (including Cluster Policies and assessment of site allocations)			
P1 Old Oak South	P1: Old Oak South	P1: Old Oak South	P1: Old Oak South
P2 Old Oak North	P2: Old Oak North	P2: Old Oak North	P2: Old Oak North
P3 Old Oak High Street	P3: Grand Union Canal	P3: Grand Union Canal	P3: Grand Union Canal
P4 Grand Union Canal	P4: Park Royal	P4: Park Royal West	P4: Park Royal West
P5 Park Royal	P5: Old Park Royal	P5: Old Park Royal	P5: Old Park Royal
P6 Park Royal Centre	P6: Park Royal Centre	P6: Park Royal Centre	P6: Park Royal Centre
P7 North Acton	P7: North Acton and Acton Wells	P7: North Acton and Acton Wells	P7: North Acton and Acton Wells
P8 Scrubs Lane	P8: Old Oak Lane and Old Oak Common Lane	P8: Old Oak Lane and Old Oak Common Lane	P8: Old Oak Lane and Old Oak Common Lane
P9 Old Oak West	P9: Channel Gate	P9: Channel Gate	P9: Channel Gate

Regulation 18	Regulation 19(1)	Regulation 19(2)	Post Submission Modified Draft
P10 Wormwood Scrubs	P10: Scrubs Lane	P10: Scrubs Lane	P10: Scrubs Lane
	P11: Willesden Junction	P11: Willesden Junction	P11: Willesden Junction
	P12: Wormwood Scrubs	P12: Wormwood Scrubs	P12: Wormwood Scrubs
Sustainable Development			
SP1: Sustainable Development			
Design			
D1: Strategic Policy for design	D1: Securing high quality design	D1: Securing high quality design	Principles for securing high quality design
D2: Streets and public realm	D2: Public Realm	D2: Public Realm	D1: Public Realm
D3: Public amenity space	D3: Inclusive design	D3: Inclusive design	D2: Inclusive design
D4: New buildings	D4: Well-designed buildings	D4: Well-designed buildings	D3: Well-designed buildings
D5: Existing buildings	D5: Tall buildings	D5: Tall buildings	D4: Tall buildings
D6: Heritage	D6: Amenity	D6: Amenity	D5: Amenity
D7: Amenity	D7: Key views	D7: Key views	D6: Key views
D8: Inclusive design	D8: Heritage	D8: Heritage	D7: Heritage
	D9: Play Space	D9: Play Space	D8: Play Space
Housing			
H1: Strategic Policy for Housing	H1: Housing Supply	H1: Housing Supply	H1: Housing Supply
H2: Housing supply	H2: Affordable Housing	H2: Affordable Housing	H2: Affordable Housing
H3: Housing mix	H3: Housing Mix	H3: Housing Mix	H3: Housing Mix
H4: Affordable housing	H4: Family Housing	H4: Family Housing	H4: Family Housing
H5: Existing housing	H5: Existing Housing	H5: Existing Housing	H5: Existing Housing
H6: Housing in the Private Rented Sector	H6: Build to Rent	H6: Build to Rent	H6: Build to Rent
H7: Housing with shared facilities	H7: Purpose-built Co-Living and other housing with shared facilities	H7: Purpose-built Co-Living and other housing with shared facilities	H7: Purpose-built Co-Living and other housing with shared facilities
H8: Specialist housing for older people and/or vulnerable people	H8: Gypsy and Traveller Accommodation	H8: Gypsy and Traveller Accommodation	H8: Gypsy and Traveller Accommodation
H9: Gypsy and Travellers accommodation	H9: Specialist Housing	H9: Specialist Housing	H9: Specialist Housing
H10: Student housing	H10: Student Accommodation	H10: Student Accommodation	H10: Student Accommodation
Employment			

Regulation 18	Regulation 19(1)	Regulation 19(2)	Post Submission Modified Draft
E1: Strategic Policy: Delivering a diverse economy	E1: Protecting existing economic and employment functions	E1: Protecting, strengthening and intensifying the Strategic Industrial Location	E1: Protecting, strengthening and intensifying the Strategic Industrial Location
E2: Old Oak	E2: New B use class employment floorspace	E2: Employment sites outside of Strategic Industrial Location	E2: Employment sites outside of Strategic Industrial Location
E3: Park Royal	E3: Supporting small businesses	E3: Supporting small businesses and Start ups	E3: Supporting small businesses and Start ups
E4: Open workspaces	E4: Work-live units	E4: Work-live units	E4: Work-live units
E5: Local access to employment and training	E5: Local access to training, employment and economic opportunities	E5: Local access to training, employment and economic opportunities	E5: Local access to training, employment and economic opportunities
Town Centre Uses (renamed to Town Centre and Community Uses)			
TC1: Strategic Policy: Town centre uses	TCC1: Locations for town centre uses	TCC1: Locations for and impacts of town centre uses	TCC1: Locations for and impacts of town centre uses
TC2: Town centre hierarchy	TCC2: Vibrancy	TCC2: Vibrancy	TCC2: Vibrancy
TC3: Vibrancy	TCC3: A-class uses	TCC3: A-class uses	TCC3: Social infrastructure
TC4: Retail and eating and drinking establishment needs	TCC4: Social infrastructure	TCC4: Social infrastructure	TCC4: Culture and Art
TC5: Culture, sports and leisure facilities	TCC5: Culture and Art	TCC5: Culture and Art	TCC5: Sports and Leisure
TC6: Visitor accommodation	TCC6: Sports and Leisure	TCC6: Sports and Leisure	TCC6: Public Houses
TC7: Hours of operation for night time economy uses	TCC7: Public Houses	TCC7: Public Houses	TCC7: Catalyst Uses
	TCC8: Catalyst Uses	TCC8: Catalyst Uses	TCC8: Meanwhile Uses
	TCC9: Meanwhile Uses	TCC9: Meanwhile Uses	TCC9: Visitor Accommodation
	TCC10: Visitor Accommodation	TCC10: Visitor Accommodation	TCC10: Night-time economy uses
	TCC11: Night-time economy uses	TCC11: Night-time economy uses	
Social Infrastructure			
SI1: Strategic Policy: Social infrastructure			
SI2: Educational			
SI3: Health			
SI4: Community facilities			

Regulation 18	Regulation 19(1)	Regulation 19(2)	Post Submission Modified Draft
SI5: Public houses			
Transport			
T1: Strategic Policy for Transport	T1: Roads and streets	T1: Roads and streets	T1: Roads and streets
T2: Walking	T2: Walking	T2: Walking	T2: Walking
T3: Cycling	T3: Cycling	T3: Cycling	T3: Cycling
T4: Rail	T4: Parking	T4: Parking	T4: Parking
T5: Buses	T5: Rail	T5: Rail	T5: Rail
T6: Roads and streets	T6: Buses	T6: Buses	T6: Buses
T7: Parking	T7: Freight, servicing and deliveries	T7: Freight, servicing and deliveries	T7: Freight, servicing and deliveries
T8: Freight, servicing and deliveries	T8: Construction	T8: Construction	T8: Construction
T9: Construction	T9: Transport Assessments and Travel Plans	T9: Transport Assessments and Travel Plans	T9: Transport Assessments and Travel Plans
T10: Transport Assessments and Travel Plans			
Environment and Utilities			
EU1: Strategic Policy for the environment and utilities	EU1: Open Space	EU1: Open Space	EU1: Open Space
EU2: Smart	EU2: Urban Greening and Biodiversity	EU2: Urban Greening and Biodiversity	EU2: Urban Greening and Biodiversity
EU3: Water	EU3: Water	EU3: Water	EU3: Water
EU4 Waste management	EU4: Air Quality	EU4: Air Quality	EU4: Air Quality
EU5: Waste minimisation, and use as a resource	EU5: Noise and vibration	EU5: Noise and vibration	EU5: Noise and vibration
EU6: Energy	EU6: Waste	EU6: Waste	EU6: Waste
EU7: Digital communications infrastructure	EU7: Circular and Sharing economy	EU7: Circular and Sharing economy	EU7: Circular and Sharing economy
EU8: Green infrastructure and biodiversity	EU8: Sustainable materials	EU8: Sustainable materials	EU8: Sustainable materials
EU9: Extraction of minerals	EU9: Minimising Carbon Emissions and Overheating	EU9: Minimising Carbon Emissions and Overheating	EU9: Minimising Carbon Emissions and Overheating
EU10: Air quality	EU10: Energy Systems	EU10: Energy Systems	EU10: Energy Systems
EU11: Noise	EU11: Smart Technology	EU11: Smart Technology	EU11: Smart Technology
EU12: Land contamination	EU12: Extraction of minerals	EU12: Extraction of minerals	EU12: Extraction of minerals

Regulation 18	Regulation 19(1)	Regulation 19(2)	Post Submission Modified Draft
	EU13: Land contamination	EU13: Land contamination	EU13: Land contamination
Delivery and Implementation			
	Policy DI1: Balancing priorities & securing infrastructure delivery	Policy DI1: Balancing priorities & securing infrastructure delivery	Policy DI1: Balancing priorities & securing infrastructure delivery
	Policy DI2: Timely delivery & optimised phasing	Policy DI2: Timely delivery & optimised phasing	Policy DI2: Timely delivery & optimised phasing
	Policy DI3: Stakeholder engagement & being a proactive planning authority	Policy DI3: Stakeholder engagement & being a proactive planning authority	Policy DI3: Stakeholder engagement & being a proactive planning authority
	Policy DI4: Planning powers & monitoring	Policy DI4: Planning powers & monitoring	Policy DI4: Planning powers & monitoring

Cumulative effects

2.3.34 The cumulative effects of the OPDC Local Plan were identified in the Regulation 19(2) IIA Report (section 7.12). The cumulative and synergistic effects identified were:

- Crime Rates & Fear of Crime - Crime and fear of crime may reduce in response to wider regeneration initiatives in addition to the Local Plan provisions.
- Health of the Population - Levels of health and well-being have the potential to improve in the long term.
- Housing Provision - Housing will be provided to meet local needs and would contribute to regional targets.
- Access to Goods & Services - Access to services and facilities for local people and visitors would be improved.
- Sustainable Economic Growth - The Local Plan would help facilitate employment creation, business development and economic growth.
- Economic Inclusion - Promotion of employment in areas of high employment / income deprivation.
- Biodiversity - The Local Plan seeks to ensure protection of biodiversity resources. However, potential negative impacts could occur as a result of development within brownfield sites and intensification of development in the area.
- Townscape Quality - Protection and enhancement of landscape and townscape through regeneration of town centres and brownfield sites.
- Heritage Assets - Heritage assets would be directly affected by the Local Plan, and there is potential for undesignated heritage assets to be affected also.
- Air Quality & Energy Efficiency - Potential negative effects of traffic growth, or positive effects from a reduction in congestion and improved connectivity.
- Climate Change - Potential negative and positive contributions towards climate change.
- Sustainable Travel - Potential positive effects as a result of promotion of sustainable travel
- Natural Resources - The prudent use of natural resources.

- 2.3.35 All of these effects were identified as having a positive potential trend, with biodiversity, heritage, climate change, sustainable transport, natural resources, air quality and energy efficiency identified as having a positive and negative potential trend.
- 2.3.36 Updated IIA Reports are part of the iterative nature of the IIA process. The results of these assessments are presented in the various IIA Reports as well as the supporting Appendices and Addendums. For transparency, between the Regulation 19(1) and Regulation 19(2) documents, changes are set out as tracked changes. An IIA Monitoring Framework was also proposed, which links back to the Authority Monitoring Report, and which emphasises how the IIA objectives can be measured against elements that the Planning Policy team were already considering.
- 2.3.37 Appendix C of the Regulation 19(2) IIA Report sets out Arcadis' response to the Regulation 18 and Regulation 19(1) IIA Reports consultation representations. Arcadis responded to the IIA-related representations at this stage, but no changes to the IIA Report were proposed as a result of these comments.

Examination

2019 Local Plan Hearings

- 2.3.38 The Local Plan was submitted to the Secretary of State for independent Examination in October 2018. Examination hearings took place between April and July 2019.
- 2.3.39 The IIA Addendum: Local Plan Hearings²⁶ was prepared in May 2019 and provides responses to the Inspector's queries on the IIA process and sets out how the IIAs that have been undertaken in relation to each iteration of the Local Plan have met the requirements of SEA Regulations.
- 2.3.40 The IIA Addendum: OPDC Schedule of References to Reasonable Alternatives²⁷ was prepared in June 2019 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.
- 2.3.41 The IIA Addendum: OPDC Schedule considering supporting study options as Reasonable Alternatives²⁸ was prepared in June 2019 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.

Interim findings on Sustainability Appraisal

- 2.3.42 Following the 2019 Local Plan hearings, the Planning Inspector issued his Interim findings on the Sustainability Appraisal²⁹. The findings confirmed that “*overall, an adequate Sustainability Appraisal has been carried out in substance*” including in relation to matters regarding reasonable alternatives and that “*Because I have found the Sustainability Appraisal carried out to date to have been adequate, I do not expect matters of substance to be revisited other than those which are the subjects of Modification Proposals themselves*”.

²⁶ Available at: https://www.london.gov.uk/sites/default/files/opdc-024_opdc_response_to_hearing_actions_matte_r_2_-_integrated_impact_assessment.pdf [Accessed: 02/03/22]

²⁷ Available at: https://www.london.gov.uk/sites/default/files/opdc-033_opdc_ii_ra_schedule_1_200619.pdf [Accessed: 17/03/22]

²⁸ Available at: https://www.london.gov.uk/sites/default/files/opdc-034_opdc_ii_ra_schedule_2_270619.pdf [Accessed: 17/03/22]

²⁹ Available at: <https://www.london.gov.uk/sites/default/files/opdc-id-34acargiantinspectorssustainabilityinterimfindingsrevisedafterfurtherstudy.pdf> [Accessed: 17/03/22]

Post Submission Proposed Modifications

- 2.3.43 Post Submission Proposed Modifications were proposed by OPDC to address the Inspector's Interim Findings, to ensure general conformity with the London Plan, reflect changes to the Use Class Order made in September 2020 and reflect modifications requested by the Inspector during the examination prior to issuing the Interim Findings. The Post Submission Proposed Modifications included Main Modifications. These 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).
- 2.3.44 These modifications were assessed in the IIA Addendum: Post Submission Proposed Modifications³⁰, which considers whether the Proposed Modifications alter the findings of the IIA Regulation 19(2) Report (see link in Table 3-2). The Post Submission Proposed Modifications were published for public consultation between 17th May and 5th July 2021 in the Post Submission Modified Draft Local Plan (May 2021) and accompanying modification tables. The Post Submission Proposed Modifications to policies and site allocations (including the newly proposed site allocations) overall, resulted in positive changes to the IIA outcomes. No main modification proposed resulted in a negative effect, minor or major, recorded against any of the IIA Objectives. The key spatial changes as a result of the Post-Submission Proposed Modifications were a slight decrease in housing being delivered across the plan period alongside an increase in employment floorspace being provided. Although, there was an increase in employment floorspace there was 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. 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'.
- 2.3.45 It was concluded that the cumulative and synergistic effects identified at Regulation 19(2) would not change because of these modifications.

Further Modifications

- 2.3.46 Following the close of public consultation on the Post Submission Modified Draft Local Plan, OPDC proposed a series of further modifications, which are set out in Table A-1 in Appendix A of this Statement.
- 2.3.47 All of the further modifications were considered to be unsubstantial, and therefore, would not result in a change in the previously identified IIA effects.

Additional Modifications set out in the Inspector's April 2022 Report

- 2.3.48 The Inspector has identified changes to OPDC's proposed modifications and has set out additional modifications within his April 2022 Report³¹. These modifications are set out in Table A-1 of Appendix A and have been considered for potential to affect the IIA. These modifications are considered to be unsubstantial, and therefore, would not result in a change in the previously identified IIA effects.

³⁰ Available at: https://www.london.gov.uk/sites/default/files/opdc_iaa_addendum_hra_and_if_documents_february_2021.pdf [Accessed: 02/03/22]

³¹ Available at: https://www.london.gov.uk/sites/default/files/opdc_local_plan_inspectors_report_appendices_and_annexes.pdf [Accessed: 06/05/22]

2.4 Monitoring

- 2.4.1 The SEA Regulations require that the plan is monitored, to measure the effects of implementing the plan against those predicted through the assessment. This process helps to ensure that any undesirable environmental effects are identified, and remedial action is implemented accordingly. Based on the assessment conducted on the options and identification of potential significant environmental effects, a monitoring framework has been prepared and is presented in Chapter 5 of this Adoption Statement.

2.5 How the findings of the IIA have been taken into account

- 2.5.1 Throughout the plan-making process the OPDC's decision making has been informed by the sustainability performance of options identified during the accompanying IIA process. The IIA has provided recommendations to the OPDC in an iterative process that were typically in the form of policy wording changes, or development management related recommendations for site allocations, designed to help avoid or minimise negative impacts and to enhance positive impacts. Many of these recommendations have been adopted by OPDC and have made a provable improvement to the sustainability performance of the OPDC Local Plan.
- 2.5.2 Table 3.1 of the IIA Addendum: Local Plan Hearings (re-presented in Appendix B) sets out how the recommendations made throughout the IIA process have influenced the development of the Local Plan (see link in Table 3-2). This table sets out how the recommendations were integrated, or the reasons for not taking the recommendations into account. Supporting text and policy wording were updated to reflect some of the recommendations, whereas some recommendations were not taken into account in the Local Plan as it was deemed more appropriate for the detail to be considered with in a Supplementary Planning Document.
- 2.5.3 Further recommendations made by the IIA include that the Spatial Vision was updated to refer to sustainable connections, sustainable development and health. The Spatial Vision was updated to make reference to pioneering international excellence in sustainability and health that would relate to connections and development.
- 2.5.4 Table 2-3 sets out a summary prepared by the OPDC team of the IIA recommendations and how they were incorporated into the OPDC Local Plan.

Table 2-3: Summary from the OPDC team of IIA recommendations and how they were integrated into the Local Plan

IIA Recommendations	Integrated into the Local Plan
Provide cross references between strategic policies and development management policies to ensure environmental guidance is easily accessible.	Policy links have been provided for each policy identifying relevant cross references.
Avoid repetition between policies	Repetition has been removed from policies.
Identify the amount of services and facilities to support the new population.	Policies TCC1 and TCC3 provide guidance for the amount of town centre uses and social infrastructure.
Deliver green infrastructure along new connections.	Policy SP7 requires streets to deliver TfL's Healthy Streets approach which includes green infrastructure. Policy EU1 requires the delivery of Green Streets.
Ensure the movement network is accessible as well as inclusive.	Policy SP7 requires the delivery of a high quality, safe and accessible movement network. Policy SP9 requires the delivery of accessible and inclusive design.
Celebrate the wider historic environment including identification of local views	Policy D7 requires proposals to conserve and enhance the historic environment. Policy D6 provides guidance for managing impacts on local key views.
Improve natural surveillance through design interventions.	Policy D3 provides guidance to deliver both positive and active frontages.
Reduce energy need through design.	Policy EU9 requires proposals to use low carbon heat sources and meet London Plan targets relating to energy use.
Provide a strategy to manage surface water flooding.	Policy EU3 provides guidance to manage surface water flooding via an integrated strategy.
Promote access to Wormwood Scrubs via walking and cycling. Conserve and enhance Wormwood Scrubs	Policy P12 requires proposals to improve access to Wormwood Scrubs. The policy also requires the conservation and enhancement of the space and provides guidance relating to safety.
Include sustainability measures during construction and operation phases.	Various Environment and Utilities Policies provide guidance for delivering sustainability measures during construction and operation phases.
Consider how developments support health and wellbeing of residents.	Policies SP2, SP3, D5 and various Environment and Utilities Policies provide guidance to support health and wellbeing.
Supporting the creation of communities.	Policy SP2 provides guidance to deliver vibrant, mixed and inclusive lifetime neighbourhoods.
Ensure place and cluster policies are clearly depicted on legible maps and diagrams.	Maps and place diagrams have been updated to align further with OS base maps.
Ensure supporting text to Delivery and Implementation Policies set out the specific types of required infrastructure.	Specific types of infrastructure have been identified in supporting text to various policies and depicted on maps and diagrams.

2.6 SEA Checklist

2.6.1 Table 2-4 (re-presented from Table 4-1 of the IIA Addendum: Local Plan Hearings) presents a quality assurance checklist from the Practical Guide to SEA³². This checklist provides a concise overview of where within the Regulation 19 (2) IIA Report various requirements of an Environmental Report have

³² Office of the Deputy Prime Minister (2005) A Practical Guide to the Strategic Environmental Assessment Directive.

been met, and to clarify how and why certain requirements have been satisfied in the way that they have been.

Table 2-4: Completed SEA Quality Assurance Checklist

Requirement for SEA	Comments
Objectives and context	
The plan or programme's purpose and objectives are made clear	Chapter 1 of the Regulation 19(2) IIA 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 Regulation 19(2) IIA Report as well as Appendix B of the Regulation 19(2) IIA 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 IIA Regulation 19(2) Report
Links with other related plans, programmes and policies are identified and explained	IIA Scoping Report, Chapter 3 of the Regulation 19(2) IIA Report as well as Appendix A of the Regulation 19(2) IIA 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 Regulation 19(2) IIA 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 Regulation 19(2) IIA 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. Summarised in the Regulation 19(2) IIA 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 4 & 7 of the Regulation 19(2) IIA Report and Chapter 3 of IIA Addendum: Local Plan Hearings
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

Requirement for SEA	Comments
The environmental effects (both adverse and beneficial) of each alternative are identified and compared	Assessments in the Regulation 19(2) IIA Report 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 of the Regulation 19(2) IIA Report
Reasons are given for selection or elimination of alternatives.	Section 3.4 of the Regulation 19(2) IIA Report
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 Regulation 19(2) IIA 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 Regulation 19(2) IIA 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 Regulation 19(2) IIA 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 Regulation 19(2) IIA 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 Regulation 19(2) IIA 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 effects are identified and evaluated in Chapter 7 of the Regulation 19(2) IIA Report.
Inter-relationships between effects are considered where practicable	Throughout assessment results in Chapter 7 of the Regulation 19(2) IIA 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 Regulation 19(2) IIA Report

Requirement for SEA	Comments
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) of the Regulation 19(2) IIA Report
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 Regulation 19(2) IIA 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. Non-Technical Summary 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. Non-Technical Summary 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 Regulation 19(2) IIA Report.
Explains the methodology used.	Chapter 3 – approach and method, including difficulties, of the Regulation 19(2) IIA Report.
Explains who was consulted and what methods of consultation were used.	Chapter 9 of the Regulation 19(2) IIA Report sets out the next steps, including consultation. Appendix C of the Regulation 19(2) IIA 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) IIA Report.
Identifies sources of information, including expert judgement and matters of opinion.	IIA Scoping Report
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 Regulation 19(1) and (2) IIA 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	

Requirement for SEA	Comments
<p>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.</p>	
<p>Decision-making and information on the decision</p>	
<p>The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme.</p>	<p>Appendix C of the Regulation 19(2) IIA Report.</p>
<p>An explanation is given of how they have been taken into account</p>	
<p>Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.</p>	
<p>Monitoring measures</p>	
<p>Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.</p>	<p>Chapter 8 of the Regulation 19(2) IIA Report.</p>
<p>Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.</p>	
<p>Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)</p>	
<p>Proposals are made for action in response to significant adverse effects.</p>	

3 How the opinions of the Consultation Bodies have been taken into account

3.1 Consultation on the Local Plan

3.1.1 The development of the Local Plan has been informed by ongoing public engagement and consultation, in accordance with the Town and Country Planning Regulations. Table 3-1 sets out the key consultations that took place during the Plan's development.

Table 3-1: Local Plan documents and where to find them

Local Plan Documents	Consultation held	Where to find them
OPDC Draft Local Plan - 2016	4 th February to 31 st March 2016	Available at: https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-opdc/opdc-consultations/opdc-draft-local-plan-2016
Revised Draft Local Plan	29 th June to 11 th September 2017	Available at: https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-opdc/local-plan/previous-versions-local-plan/revised-draft-local-plan
Second Revised Draft Local Plan	14 th June to 30 th July 2018	Available at: https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-opdc/local-plan/previous-versions-local-plan/second-revised-draft-local-plan
Local Plan Main Modifications	17 th May to 5 th July 2021	Available at: https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-opdc/local-plan/submission-and-examination/local-plan-main-modifications-consultation

3.2 Consultation on and Examination of IIA Reports

3.2.1 The IIA Reports that have been prepared, and where they can be accessed online, are set out in Table 3-2.

Table 3-2: IIA Reports and where to find them

IIA Reports	Where to find them
OPDC Local Plan IIA Scoping Report (December 2015)	Available at: https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-op-4
OPDC Local Plan Regulation 18 IIA Report (February 2016)	Available at: https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_draft_ia_report_new_cover.pdf

IIA Reports	Where to find them
OPDC Local Plan Regulation 19(1) IIA Report (April 2017)	Available at: https://www.london.gov.uk/sites/default/files/27._integrated_impact_assessment_1.pdf
OPDC Local Plan Regulation 19(2) IIA Report (May 2018)	Available at: https://www.london.gov.uk/sites/default/files/28._iia_and_hra.pdf
OPDC Local Plan IIA Addendum: Local Plan Hearings (May 2019)	Available at: https://www.london.gov.uk/sites/default/files/opdc-024_opdc_response_to_hearing_actions_matte_r_2_-_integrated_impact_assessment.pdf
OPDC Local Plan Schedule of References to Reasonable Alternatives (June 2019)	Available at: https://www.london.gov.uk/sites/default/files/opdc-033_opdc_iia_ra_schedule_1_200619.pdf
OPDC Schedule considering supporting study options as Reasonable Alternatives (June 2019)	Available at: https://www.london.gov.uk/sites/default/files/opdc-034_opdc_iia_ra_schedule_2_270619.pdf
OPDC Local Plan IIA Addendum: Post Submission Proposed Modifications (February 2021)	Available at: https://www.london.gov.uk/sites/default/files/opdc_iia_addendum_hra_and_if_documents_february_2021.pdf

3.3 Consideration of Representations

- 3.3.1 The opinions expressed throughout the consultations outlined above have informed the scope of the IIA, helping to in turn to shape the development of the Local Plan. This primarily related to changes to indicators and sub-objectives in the IIA Framework, and further details in relation to designated assets within the OPDC boundary which were specially mentioned in the IIA process.
- 3.3.2 Appendix C of the Regulation 19(1) IIA Report (see link in Table 3-2) sets out Arcadis' response to the Regulation 18 Draft IIA Report consultation representations, with the Regulation 19(1) IIA Report reflecting these representations.
- 3.3.3 Appendix C of the Regulation 19(2) IIA Report (see link in Table 3-2) sets out Arcadis' response to the Regulation 18 and Regulation 19(1) IIA Reports consultation representations, with the Regulation 19(2) IIA Report reflecting these changes.

4 The reasons for choosing the adopted Local Plan in light of reasonable alternatives considered

4.1 Reasonable Alternatives

- 4.1.1 SEA Regulation 12 (2) requires that “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”.
- 4.1.2 Information to be provided includes “an outline of the reasons for selecting the alternatives dealt with” (SEA Regulations Schedule 2 (8)) and an overview of types of alternatives considered (development scenarios, site allocations etc.)
- 4.1.3 The identification of reasonable alternatives and the nature of the assessment to be carried out are matters of judgment for the local planning authority, and in due course for the Inspector who conducts the examination of the draft local plan, subject to review by the courts only on public law grounds: see *R (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers* [2015] Env LR 1, at [87]-[89] and *Ashdown Forest Economic Development LLP v Wealden District Council* [2016] PTSR 78, at [42].
- 4.1.4 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 found the following, with regards 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...”. “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 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”.

- 4.1.5 The ‘OPDC Local Plan Schedule of References to Reasonable Alternatives’³³ sets out where reasonable alternatives have been discussed throughout the IIA process within the Local Plan.

³³ Available at: https://www.london.gov.uk/sites/default/files/opdc-033_opdc_ia_ra_schedule_1_200619.pdf [Accessed: 24/02/22]

Chapter 2 of that document provides a list of the IIA documents produced and how reasonable alternatives have been considered and assessed within each report.

- 4.1.6 The 'OPDC Local Plan Schedule considering supporting study options as Reasonable Alternatives'³⁴ sets out 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 IIA. Table 1 of that document sets out any supporting study option and whether these are a reasonable alternative.

4.2 Justification for the selection and rejection of reasonable alternative options

Quanta and Spatial Distribution Options (including consideration of sites)

- 4.2.1 The consideration of reasonable alternatives relating to the quanta and spatial distribution were considered during the 2019 Hearings. The Planning Inspector's October 2019 Interim Findings on the Sustainability Appraisal³⁵ set out his conclusion on these matters. This is further reinforced by his comments in his April 2022 report³⁶.
- 4.2.2 Section 2.2 of the IIA Addendum: Local Plan Hearings explains how the London Plan and OAPF determined the quantity of development, to be delivered through the OPDC Local Plan. Section 2.3 of the IIA Addendum: Local Plan Hearings shows how the spatial strategy adopted in the OPDC Local Plan needs to conform with requirements in the London Plan which limits the scope for the selection and assessment of reasonable alternatives.
- 4.2.3 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 targets would not have been 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.
- 4.2.4 This approach is corroborated by the approach 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 2015³⁷ (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

³⁴ Available at: https://www.london.gov.uk/sites/default/files/opdc-034_opdc_ii_ra_schedule_2_270619.pdf [Accessed: 17/03/22]

³⁵ Available at: <https://www.london.gov.uk/sites/default/files/opdc-id-34acargiantinspectorssustainabilityinterimfindingsrevisedafterfurtherstudy.pdf> [Accessed: 17/03/22]

³⁶ Available at: https://www.london.gov.uk/sites/default/files/opdc_local_plan_inspectors_report_appendices_and_annexes.pdf [Accessed: 06/05/22]

³⁷ Available at: https://lbhounslow.sharepoint.com/:b:/s/InternetLinks/pp/EXF8Gk9imfBOuKOpcvqS_igBwglbqMD0M7AOKs2Tc3JyVQ?e=m9ivkB [Accessed: 28/02/22]

employment (for which the London Plan identifies some locations and employment types to be provided or protected); and the hierarchy of town centre”.

4.2.5 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”.

4.2.6 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 London³⁸. There was considered to be no scope for considering spatial options associated with the development of different sites, because all potential viable sites were identified and were already included within the OPDC Local Plan.

4.2.7 The OPDC Local Plan 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 housing targets to be delivered in the Old Oak and Park Royal Opportunity Area. An approach that did not conform with these requirements would not be in general conformity with the London Plan nor would be sound and would not be in accordance with the relevant legal requirements set out in the Planning and Compulsory Purchase Act 2004.

4.2.8 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.

4.2.9 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 of the IIA Addendum: Local Plan Hearings. 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.

³⁸ Available at: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/strategic-housing-land-availability-assessment> [Accessed 23/02/22]

Table 4-1: Reasonable alternatives considered in the October 2009 Integrated Impact Assessment full report of the replacement London Plan (aka FALP)³⁹

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"> • Strategic Spatial Development Option 1: No change, business as usual scenario • Strategic Spatial Development Option 2: Current London Plan direction plus enhanced growth in metropolitan town centres • Strategic Spatial Development Option 3: Current London Plan direction plus enhanced growth in new Strategic Outer London Development Centres 	<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"> • Housing Option 1: Current Plan Housing Targets – 30,500 homes • Housing Option 2: Increased Housing Target – 33,380 homes • Housing Option 3: Increased Housing Provision – 41,154 homes 	<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>

4.2.10 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.

4.2.11 Reasonable alternatives were considered by the Planning Inspector in his October 2019 Interim Findings on the Sustainability Appraisal. The findings confirmed that “*overall, an adequate Sustainability Appraisal has been carried out in substance*” including in relation to matters regarding reasonable alternatives and that “*Because I have found the Sustainability Appraisal carried out to date to have been adequate, I do not expect matters of substance to be revisited other than those which are the subjects of Modification Proposals themselves*”.

4.2.12 The Inspector’s October 2019 Interim Findings on the Sustainability Appraisal relied on the Sustainability Appraisal of the 2016 London Plan as set out in the above paragraphs. The 2016 London Plan was found sound, to justify OPDC’s approach to minimum targets for housing and indicative estimates for economic floorspace and jobs capacity without testing alternatives through the Local Plan IIA process. The Inspector’s October 2019 Interim Findings did not seek OPDC to review the 25,500 homes or 65,000 Opportunity Area indicative targets.

³⁹ Entec (2009) on behalf of the GLA, Integrated Impact Assessment full report of the replacement London Plan. Available at: https://www.london.gov.uk/sites/default/files/ia_report_oct_09.pdf [Accessed: 03/03/22]

- 4.2.13 The Post Submission Proposed Modifications were developed following the adoption of the 2021 London Plan. This London Plan set out a 10-year housing target for OPDC's Local Plan (13,670 homes) and has an indicative Opportunity Area homes and jobs targets (25,500 homes and 65,000 jobs). London Plan policy SD1(B)(5) requires local planning authorities to "*establish the capacity for growth in Opportunity Areas, taking account of the indicative capacity for homes and jobs set out in Table 2.1 [of the London Plan]*".
- 4.2.14 The Post Submission Proposed Modifications relating to development capacities were only made to sites required to be modified to address the impacts of the Inspector's Interim Findings to enable the Local Plan to meet the London Plan ten-year housing target of 13,670 homes for the OPDC area.
- 4.2.15 The modifications were supported by an updated DCS following the PPG guidance for Housing and Economic Land Availability Assessments to establish the capacity for growth in the combined Old Oak and Park Royal Opportunity Area. OPDC's Development Capacity Study Update 2021 confirmed that OPDC could meet the 2021 London Plan 10-year housing target of 13,670 homes thereby demonstrating general conformity with the London Plan.
- 4.2.16 An IIA of the Post Submission Proposed Modifications was carried out and limited to the extent of the modifications in accordance with the Inspector's October 2019 Interim Findings. This included consideration of reasonable alternatives proposed in the modifications to the Local Plan and also provides explanations regarding why a series of policy options were not assessed as alternatives. The reasonable alternatives did not consider a lower capacity option for the 10-year housing target period as it would not enable the Local Plan to be in general conformity with the London Plan and therefore would not have been a reasonable alternative.
- 4.2.17 The changes to housing capacity to meet the 10-year housing target also resulted in a change to the Plan Period home capacity. 19,850 homes are now identified to be delivered during the Plan Period, a reduction from 20,100 in the Regulation 19(2) Local Plan. Considering a lower target for the Plan Period that is based on evidenced capacities was not considered a reasonable alternative as:
- A. The sites with modified capacities are required to ensure general conformity with the London Plan 10-year housing target; and
 - B. Unmodified sites were not within the scope of the IIA of the Post Submission Proposed Modifications as these were considered in the previous IIA documents, 2019 Hearings and are subject to the Inspector's October 2019 Interim Findings.
- 4.2.18 Regarding the Old Oak and Park Royal Opportunity Area indicative 25,500 new homes target, proposing a lower target as a reasonable alternative was not appropriate as the Post Submission Draft Modified Local Plan confirms that the Opportunity Area 25,500 homes target over the lifetime of the development is indicative which reflects the London Plan indicative target.
- 4.2.19 In light of the above, the Planning Inspector has confirmed in his April 2022 (paragraphs 24 to 30) report that the equivalent or replacement policies in the London Plan 2021, which has also been found sound and published while the OPDC LP examination was in progress, make no difference to his conclusion in his October 2019 Interim Findings on the Sustainability Appraisal.

Development Management Policy Options

- 4.2.20 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 4-2 below (and Table 2.2 of the IIA Addendum: Local Plan Hearings). This table sets out reasons for selecting these alternatives or choosing the preferred policy. Some of the reasons for choosing policy options over their alternatives include ensuring accommodation is available for London’s higher education institutions, and to avoid the conversion of live-work units to residential units.

Main Modification Options

4.2.21 Appendix B of the IIA Addendum: Post Submission Proposed Modifications (see link in Table 3-2) appraises the modifications proposed as part of the Examination Hearings. 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 of why they have been considered, are presented in Table 4-2 (represented from Table 2.2 of the IIA Addendum: Post Submission Proposed Modifications). These have been assessed and included in the assessment tables in Appendix A of the IIA Addendum. The rejected ‘reasonable alternative’ options and the reasoning behind not bringing these forward are included in Appendix B of the IIA Addendum. On the whole, the reasonable alternatives considered scored positively in the IIA assessment. Overall, the outcomes were not as strong in terms of overall sustainability of the proposed policies and therefore they were not selected as preferred options.

Table 4-2: Reasonable alternatives to policies proposed in the OPDC 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.
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	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.

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
	of these to be replaced as family homes		
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
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.	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>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 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.
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	n/a	To prevent the loss of public houses and their role in local communities.

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
	not set out stringent requirements for information on accounts and marketing of the property.		
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 require a transport assessment.	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 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.

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
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.

5 Measures to monitor significant environmental effects

- 5.1.1 The IIA has identified the likely effects of the Local Plan on IIA Objectives. An indication of the certainty and timescales of these effects has also been predicted. However, there is a risk that the sustainability effects of the Local Plan, including the effects of specific aspects or the cumulative effects of Local Plan in-combination, are different to those anticipated due to unforeseen circumstances.
- 5.1.2 The SEA Regulations require that potential significant effects which may occur as a result of the implementation of the strategy be monitored. The SEA Regulations state that: *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”*.
- 5.1.3 It is anticipated that the OPDC will be monitoring the implementation and effects of the Local Plan post-adoption to feed into future plan review and revision. Table 5-1 suggests a possible list of indicators that could be considered in developing a OPDC Local Plan Monitoring Framework.

Table 5-1: Proposed Monitoring Framework

IIA Objective	Effect to be Monitored	Possible Indicators	Targets	Potential Data Sources
To enhance the built environment and encourage 'place-making'	Proportion of accessible open spaces Proportion of new development incorporating an appropriate level of open space for recreation	<ul style="list-style-type: none"> Provision of publicly accessible open space in accordance with the London Plan Categorisation Number of new buildings and public spaces designed to be Equalities Act compliant Proportion of new development incorporating Lifetime Neighbourhoods principles Occupant satisfaction with the design and amenity of completed schemes Proportion of new development using technology to improve legibility 	Deliver 30% land as publicly accessible open space	OPDC Planning Team Performance Monitoring Framework & AMR
To optimise the efficient use of land through increased development densities and building heights, where appropriate	Effects of high density developments	<ul style="list-style-type: none"> Density of development 	Increase percentage of homes in most areas with the exception of SIL	OPDC Planning Team Performance Monitoring Framework & AMR
Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	Quality of soil resources	<ul style="list-style-type: none"> Amount of soil remediated on site 	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR Any site wide Remediation Strategy for OPDC
Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	Effects of the plan on service provision and accessibility of key services for the population across the borough.	<ul style="list-style-type: none"> Distribution of major transport systems – roads, rail links Modal shift of existing travel patterns versus future travel patterns Connectivity of the cycling and walking network Km of designated cycling and walking routes Proportion of goods arriving and leaving the area by rail in comparison to road Proportion of waste and freight arriving and leaving the area by canal. Proportion of shared spaces within the urban environment Controlled parking zones, car clubs and travel plan measures implemented Number of accessible public transport interchanges and bus stops (source: Equal Life Chances for All 2009) Number of local businesses negatively affected by construction activities Increase in traffic on the highway network in and around the OPDC area 	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR Index of Multiple Deprivation

IIA Objective	Effect to be Monitored	Possible Indicators	Targets	Potential Data Sources
<p>Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local and regional needs</p>	<p>Effects of the plan on access to housing across the borough.</p>	<ul style="list-style-type: none"> • Dwelling Stock (Office for National Statistics Local Profiles). • Household density (Office for National Statistics Local Profiles) • Proportion of LSOAs in the bottom 10% for housing deprivation • Proportion of dwellings that meet internal space standards • Proportion of dwellings with a high SAP rating • Proportion of the population considered to be homeless (source: Equal Life Chances for All 2009) • Amount of family size housing (source: Equal Life Chances for All 2009) • Proportion of single parent families living in unsuitable accommodation • Amount of affordable housing (source: Equal Life Chances for All 2009) • Amount of Lifetime Homes (source: Equal Life Chances for All 2009) • Proportion of market, affordable and specialist housing delivered. 	<p>Targets to be developed</p>	<p>Index of Multiple Deprivation OPDC Planning Team Performance Monitoring Framework & AMR</p>
<p>Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect</p>	<p>Effects of the development plan on ensuring climate change adaption is incorporated into new developments.</p>	<ul style="list-style-type: none"> • River catchment areas (Environment Agency Thames Catchment Flood Management Plan, 2009). • Distribution of areas at risk of fluvial flooding (Environment Agency Fluvial Flood Map) • Areas susceptible to surface water flooding (Environment Agency Surface Water Flood Map) • Proportion of energy usage in buildings using sustainable design compared with standard construction 	<p>Targets to be developed</p>	<p>OPDC Planning Team Performance Monitoring Framework & AMR</p>
<p>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</p>	<p>Effects of the development plan on ensuring energy efficiency in new developments and achievement of sustainable construction standards in new developments.</p>	<ul style="list-style-type: none"> • Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles) • All energy consumption by sector (Office for National Statistics Local Profiles and DECC) • Energy consumption per capita • Proportion of properties generating energy from low or zero carbon sources, including solar. • Proportion of new developments incorporating district heating or heat pumps • Greenhouse gas emissions per capita compared with London and national averages 	<p>Targets to be developed</p>	<p>OPDC Planning Team Performance Monitoring Framework & AMR</p>

IIA Objective	Effect to be Monitored	Possible Indicators	Targets	Potential Data Sources
		<ul style="list-style-type: none"> Proportion of journeys made by non-motorised transport Proportion of energy generated from low, zero or negative carbon energy sources 		
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	Effects on reducing travel and promoting use of public transport	<ul style="list-style-type: none"> Number of active / historic landfills on the site (Environment Agency) Percentage of household waste sent for reuse, recycling or composting (ONS Local Profiles) Amount of residual waste per household (ONS) sent to landfill or incineration Amount of commercial and industrial waste produced (Defra) Amount of waste recycled and re-used within the area Amount of waste transported within the area 	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR
Improve the quality of the water environment	Monitor the effect of new development on flood risk, the number of new developments that include SuDS and the effects of new development on water quality across the borough.	<ul style="list-style-type: none"> Water and groundwater quality (Environment Agency) Development of a site wide drainage strategy Water consumption per capita Increase in infrastructural capacity as a proportion of new development Increased use of existing infrastructure 	Targets to be developed	Water Framework Directive Environment Agency OPDC Planning Team Performance Monitoring Framework & AMR
Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	Monitor effects of new development on biodiversity assets across the borough. Opportunity for new features to be provide as part of new development e.g. wetlands, landscaping etc.	<ul style="list-style-type: none"> Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Sites of Importance for Nature Conservation (SINCs) and Local Wildlife Sites (MAGIC, www.magic.gov.uk and Local Authority websites). Key Biodiversity Action Plan (BAP) species and habitats present (London BAP) Protected species with favourable conservation status Habitat connectivity Condition of Wormwood Scrubs Local Nature Reserve Condition of Grand Union Canal area of nature conservation Increase in areas of greenspace for biodiversity including inaccessible areas 	Targets to be developed	London BAP OPDC Planning Team Performance Monitoring Framework & AMR Natural England
To minimise air, noise and light pollution, particularly for communities and vulnerable groups	Effect of the plan and new development on air quality across the borough.	<ul style="list-style-type: none"> Number and distribution of Air Quality Management Areas (AQMAs) (Air Quality Archive⁴⁰) Number of new local air quality monitoring points Ill health attributed to air, noise or light pollution 	Targets to be developed	UK Air Quality Strategy

⁴⁰ <http://uk-air.defra.gov.uk/aqma/maps>

IIA Objective	Effect to be Monitored	Possible Indicators	Targets	Potential Data Sources
		<ul style="list-style-type: none"> Proportion of the population affected by high levels of noise during construction and post construction including a breakdown by equality group Proportion of the population affected by light pollution from traffic or industry during construction and post construction including a breakdown by equality group Proportion of population living within areas with regular exceedances in NOx and particulates 		
To conserve and enhance the historic environment, heritage assets and their settings	Protection afforded to the borough's heritage assets through application of the plan's policies.	<ul style="list-style-type: none"> Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens (www.magic.gov.uk). Decrease in the number of Heritage Assets at Risk in and around the area Increase in the number of heritage assets identified and protected through the development of Local List Increase in the number of heritage assets highlighted and enhanced or utilised for place-making and interpretation Development of a local views strategy and proportion of new developments adhering to its principles Increase in the number of heritage assets re-used for development 	Reduce number of heritage assets at risk and list where appropriate	OPDC Planning Team Performance Monitoring Framework & AMR Historic England
Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	Effect of plan on contributing to increasing community cohesion and reducing social exclusion	<ul style="list-style-type: none"> Number of offices converted to residential under permitted development rights Schemes to reduce the impact of construction on the local community Connectivity of pedestrian linkages across the area 	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR
Improve safety and reduce crime and the fear of crime	Effect of plan on contributing to a reduction in crime levels. Number of new developments incorporating Secure by Design Principles	<ul style="list-style-type: none"> Crime rates (Indices of Deprivation) Road traffic accidents and diversity profiling (source: Equal Life Chances for All 2009) Percentage of people who feel that there is less discrimination in their neighbourhood than 3 years ago (source: Equal Life Chances for All 2009) Percentage of the local population who feel personal safety on buses, tubes and trains (source: Equal Life Chances for All 2009) Percentage of women who feel safe using local bus, tube, trains, black cabs, and mini cabs at night, alone (source: Equal Life Chances for All 2009) Proportion of developments incorporating Secured by Design principles 	Targets to be developed	Index of Multiple Deprivation

IIA Objective	Effect to be Monitored	Possible Indicators	Targets	Potential Data Sources
Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	Monitor levels of health and well-being across the borough. The implementation of the plan policies has the potential to improve the green infrastructure network, improve accessibility and provide opportunities for residents to pursue healthy lifestyles. Conversely there may also be risk of loss of areas of open space as a result of new development and increased pressure on health services.	<ul style="list-style-type: none"> Health Deprivation and Disability (Indices of Deprivation for England 2010) Proportion of the population living within walking distance of health care facilities Proportion of the population living within walking distance of education facilities Proportion of the population living within walking distance of social care facilities Proportion of the population living within walking distance of community facilities Proportion of the population with access to space for the growing of food locally Increase in the capacity of local social infrastructure Childhood obesity rates Life expectancy 	Targets to be developed	Index of Multiple Deprivation Office of National Statistics OPDC Planning Team Performance Monitoring Framework & AMR
To improve the education and skills levels of all members of the population, particularly vulnerable groups	Effect of plan on ensuring access to educational opportunities Ensuring that sufficient primary and secondary school capacity is available to accommodate new residents	<ul style="list-style-type: none"> Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles). Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles). Education, Skills and Training Deprivation (Indices of Deprivation for England 2010). Proportion of the population with access to appropriate education facilities by sustainable transport modes Decrease in educational underachievement gap between disadvantaged groups and the wider community (source: Equal Life Chances for All 2009) 	Targets to be developed	Index of Multiple Deprivation OPDC Planning Team Performance Monitoring Framework & AMR
Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	Effects development will have to maximise the social and economic wellbeing of the local and regional population.	<ul style="list-style-type: none"> Number of wards with LSOAs in the bottom 20% most deprived (Indices of Deprivation for England 2010) Proportion of new employment and training opportunities being awarded to local people via local procurement arrangements Proportion of new employment and training opportunities being awarded to local women via local procurement arrangements 	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR
To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	Effects development will have on encouraging inward investment.	<ul style="list-style-type: none"> Economy Local Profiles (ONS) Employment by industry (ONS- NOMIS) Proportionate coverage of broadband across the area Proportion of new employment development that includes an element of affordable workspace 	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR

IIA Objective	Effect to be Monitored	Possible Indicators	Targets	Potential Data Sources
		<ul style="list-style-type: none"> • New businesses categorised as 'health-led' • New businesses that contribute to the growth of the low carbon goods and services sector • Amount of new employment floorspace in Old Oak • Amount of new industrial floorspace in Park Royal 		

6 Conclusion

- 6.1.1 This report satisfies the requirements of an Adoption Statement as per the SEA Regulations. The OPDC Local Plan, at each iteration, has been appraised for its likely significant effects against each of the IIA Objectives within the Framework. The IIA is a process that has been highly integrated with the development of the Local Plan, involving a close working relationship between the IIA team and OPDC. The IIA has provided a structured way of considering the impacts of a wide range of options.
- 6.1.2 The IIA is used as a tool for consultation, providing the public and statutory bodies with a breakdown of how the Local Plan has been developed in a way that will ensure that it can contribute to more sustainable development. The consultation, involvement and engagement process has given stakeholders the opportunity to provide feedback and suggestions towards enhancing the overall sustainability of the Local Plan.
- 6.1.3 Throughout the process, the IIA has provided recommendations which could help avoid or mitigate potential negative effects or enhance positive effects. Recommendations made to OPDC have been a key feature of the IIA process from its inception. Key recommendations made, and the responses to these, are presented in previous IIA reports and summarised in Section 2.5 of this document. OPDC has proved highly receptive to measures for enhancing the sustainability performance of the Local Plan and subsequently made enhancements and amendments throughout.

Appendix A

Table A-1: Proposed further modifications and assessment of relevance to the IIA

Date of modification	Modification reference	Location	Modification (further modifications set out in yellow highlight)	Likely significant effects in relation to the IIA?
September 2021	MINOR/2/PSF/26/7	Policies Map	Depiction of HS2 safeguarding area.	No change to IIA effects expected.
September 2021	MINOR/2/PSF/33/4	OPDC Local Plan, para 6.133	Where land is suspected , known or found to be contaminated, or where a sensitive use is proposed or exists, developers will be expected to assess their proposals using the eight stage process outlined in Table 6.2 including submitting a Preliminary Risk Assessment and Site Investigation Scheme as part of planning applications.	No change to IIA effects expected.
September 2021	MINOR/2/PSF/40/33 MINOR/2/PSF/64/8	TCC1 g) and h)	f) g) 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 10.911 in e), i) and ii); and 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 set out in paragraph 10.911 in e), i) and ii);	No change to SA effects expected.
September 2021	MINOR/2/PSF/64/10	OPDC Local Plan, para 7.8	In Old Oak, Outside of designated Strategic Industrial Location (SIL) areas, m Measures to prioritise bus movement, provide segregated facilities for cyclists and create pedestrianised areas will be supported. This will enable the achievement of the sustainable transport hierarchy, as set out in Policy SP7.	No change to SA effects expected.
September 2021	MINOR/2/PSF/64/11	OPDC Local Plan, para 4.61	g) removing through traffic on the Big X; h) supporting fast and reliable bus services and increasing capacity, including the potential for a complementary night shuttle bus service for shift workers; i) removing and rationalising car parking; j) supporting more efficient freight movements; k) better connecting the six rail stations surrounding Park Royal, via the Big X with better public realm, crossings, traffic calming, CCTV, lighting and signage to support walking and cycling; l) creating new public spaces and support street greening within the town centre; m) creating and upgrading pedestrian and cycles lanes facilities to deliver a joined up, accessible walking and cycle route network.	The modification will not materially affect the findings of the SA.
September 2021	MINOR/2/PSF/66/43	OPDC Local Plan, para 3.20	OPDC's Development Capacity Study demonstrates that this target can be achieved over the total development period in the next 30 years, that at least 20,400/19,850 new homes are deliverable within the Local Plan period (2018-38) and that at least 13,670 new homes are deliverable within the London Plan 0-10 year period (2019-29).	No change to SA effects expected.
September 2021	MINOR/2/PSF/66/70	OPDC Local Plan, para 7.25	Investments in The importance of delivering "end-of-journey" cycle facilities in the form of secure cycle parking, lockers and showers for places of work are recognised in the London Cycle Design Standards also vital. 1. https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit	No change to SA effects expected.

Date of modification	Modification reference	Location	Modification (further modifications set out in yellow highlight)	Likely significant effects in relation to the IIA?
September 2021	MINOR/2/PSF/96/6	OPDC Local Plan, para 4.164	Within Channel Gate, 30% of the area brought forward for mixed use development should be provided as publicly accessible open space. This should include the delivery of the new Channel Gate Local Park, of a minimum 2 hectares in size, located either side of the Grand Union Canal. Careful consideration will be given to how the park interacts with the canal towpath and how passivesurveillance over both spaces can be provided. An area of search is currently identified for this Local Park recognising that further detailed work is required to define its precise boundaries. If appropriate, OPDC will seek to apply an equitable equalisation mechanism to ensure delivery of the Local Park is not constrained by site ownership boundaries.	No change to SA effects expected.
September 2021	MINOR/2/PSF/96/7	OPDC Local Plan, para 4.168	Subject to the agreement of Transport for London, should the bus depot no longer be required or is located to a suitable alternative site outside of Channel Gate, then OPDC would support delivery of the site for mixed use development. OPDC would also support proposals for the colocation of the bus garage with mixed use development where this is in accordance with other relevant policies.	No change to SA effects expected.
September 2021	MINOR/2/PSF/99/4	Figure 4.27 Figure 4.30 Figure 4.32	Update relevant figures to remove the area of publicly accessible open space and walking and cycle route between Atlas Wharf site and Collective, and identify an alternative are of public open space andwalking and cycling route to the north of the Atlas Wharf site.	No change to SA effects expected.
September 2021	MINOR/2/PSF/110/2	P7 d) OPDC Local Plan, Para 4.106	Focusing town centre, employment, social infrastructurecommunity, cultural and catalyst uses and Use Class E, B2 and B8 uses that are appropriately designed and serviced to support the within-North ActonNeighbourhood Town Centre within the town centre and along Old Oak Street; The area has the capacity to deliver 4,3006,200 new jobs during the plan period2 delivered across a range of town centre, B1, B2 and B8 usesB2, B8 uses, Use Class E and community and cultural uses.	No change to SA effects expected.
September 2021	MINOR/2/PSF/110/3	TCC2 c)	c) Existing town centre uses should be protected, unless: i. it is no longer economically viable as demonstrated by accounts data and through competitivemarketing for a period of at least 12 months; or ii. the facility can be appropriately replaced or provided elsewhere in the locality; or iii. the facility is located within Park Royal SIL and exceeds the floorspace threshold in PolicyTCC1 c) ii; or iv. It is demonstrated that reprovision would compromise the delivery of housing and job targets, particularly within Site Allocations.	No change to SA effects expected.
September 2021	MINOR/2/PSF/115/4	Figure 3.15 and Tall Building Statement Update Figure 2	Area where tall buildings are appropriate adjusted to clarify the spatial implementation of policy P4C1(k)supporting tall buildings focussed along Coronation Road and proposed modification Figure/PS2/OPDC/3.15.	No change to SA effects expected.
September 2021	MINOR/2/PSF/117/14 and 117/79	Front cover	2018 to 2038 OPDC is the local planning authority for the area and as such is responsible for plan-making including the production of a Local Plan. The OPDC Local Plan sets out OPDC's strategy for the sustainable development of its area as a whole, including the general amount, type and location	No change to SA effects expected.

Date of modification	Modification reference	Location	Modification (further modifications set out in yellow highlight)	Likely significant effects in relation to the IIA?
		OPDC Local Plan, para 1.14	of new development it considers could take place and the policies to which applications for planning permission should conform. The OPDC Local Plan period is 2018 to 2038.	
September 2021	MINOR/2/PSF/117/91	OPDC Local Plan, para 3.4 c)	The Royal Borough of Kensington and Chelsea are lobbying the Mayor of London and TfL for a new Elizabeth Line station at Kensal, which could further increase the area's development capacity. The station's delivery is not yet committed but is safeguarded within the Royal Borough of Kensington and Chelsea's Local Plan , but feasibility work is underway.	No change to SA effects expected.
September 2021	MINOR/2/PSF/117/108	OPDC Local Plan, para 3.56	The western part of Wormwood Scrubs Street's delivery is reliant on development being brought forward on the Intercity Express Programme (IEP) depot site	No change to SA effects expected.
September 2021	MINOR/2/PSF/117/136	OPDC Local Plan, para 4.16	Delivering Old Oak Street as a high quality route will be particularly important for connectivity as well as providing walking and cycling access to the Scrubs Lane.	No change to SA effects expected.
September 2021	MINOR/2/PSF/117/147	P8	Public realm and movement a) Contributing to and /or enabling improvements to existing routes and junctions and delivery of new routes as shown in figure 4.27; b) Ensuring new and improved routes can accommodate walking, cycling, bus and other vehicular traffic during the construction and operational phases by: i. delivering improvements to underpasses; ii. delivering segregated cycle lanes along Victoria Road, Old Oak Common Lane, Union Way Park Road and where possible on Old Oak Lane; and iii. widening Old Oak Common Lane to include generous footpaths and segregated cycle lanes.	No change to SA effects expected.
September 2021	MINOR/2/PSF/117/204	OPDC Local Plan, para 10.4	The town centre hierarchy looks to focus town centre uses into four-three principle locations:	No change to SA effects expected.
September 2021	MINOR/2/PSF/117/218	Table 11.1	There are also significant infrastructure requirements for these sites, including a new access to North Acton station, a new proposed London Overground station at Old Oak Common Lane and the need for infrastructure associated with the West London Orbital Route.	No change to SA effects expected.
September 2021	MINOR/2/PSF/117/219	Table 11.1	The area's capacity to deliver new homes and jobs is limited largely to land in and around the Westway Estate and land around the Atlas Junction neighbourhood town centre , including the Oaklands site.	No change to SA effects expected.
September 2021	MINOR/2/PSF/117/220	Table 11.1	Channel Gate is currently in mixed land ownership, and portions have been but is being acquired through the High Speed Rail (London – West Midlands) Act 2017 for the construction of the HS2 route and station at Old Oak Common.	No change to SA effects expected.

Date of modification	Modification reference	Location	Modification (further modifications set out in yellow highlight)	Likely significant effects in relation to the IIA?
September 2021	MINOR/2/PSF/131/8	OPDC Local Plan, para 4.58	The site is adjacent to the Twyford Waste and Recycling Centre-Transfer Station which is safeguarded for waste apportionment purposes through the West London Waste Plan 2016 (see Policy EU6). If the Twyford Waste and Recycling Centre-Transfer Station 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.	No change to SA effects expected.
September 2021	MINOR/2/PSF/133/5	P7 m)	Safeguarding for and if relevant and appropriate, contribute to and / or deliver the potential proposed Old Oak Common Lane Station and land for the delivery of the West London Orbital Line station and services within Acton Wells	No change to SA effects expected.
September 2021	MINOR/2/PSF/133/6	OPDC Local Plan, para 4.118	Development proposals within Acton Wells should safeguard land to enable the potential delivery of the West London Orbital Line, which is proposed to may include an interchange with Old Oak Common Lane Station and passenger services making use of running on the existing Dudding Hill Line. OPDC strongly supports the delivery of the West London Orbital and is working with TfL, west London boroughs and other relevant is currently undertaking work with stakeholders to undertake further work to further develop the business case for the scheme proposal, including options for funding, reviewing the feasibility of the scheme and updating the business case. The scheme is formally recognised in the London Plan. Development proposals should also safeguard land for the potential delivery of the Chiltern Line to Old Oak Common Station. Applicants should refer to OPDC's IDP for the most up-to-date requirements	No change to SA effects expected.
September 2021	MINOR/2/PSF/133/7	P7C2 b) ii)	is integrated with a proposed potential new Old Oak Common Lane Station;	No change to SA effects expected.
September 2021	MINOR/2/PSF/133/8	P7C2 d)	Supporting the delivery of a proposed potential new Old Oak Common Lane London Overground Station to enhance public transport access and as an integral part of the built environment by providing:	No change to SA effects expected.
September 2021	MINOR/2/PSF/133/9	OPDC Local Plan, para 4.128	The potential Old Oak Common Lane Station is a TfL transport requirement, to provide an appropriate interchange between services within Old Oak Common Station and other local services. The Station will need to be designed to support this role. The station is not currently considered to be needed to support the quantum of development envisaged in this plan required to directly support Old Oak's development transport needs; however, it is identified in the London Plan as a scheme that local plans should support and to support strategic transport needs, development should safeguard for and if relevant and appropriate, contribute to and / or deliver the station. Particularly given the station's important strategic function for wider transport connectivity and its strong business case, OPDC strongly supports the delivery of this rail station and will be working proactively with TfL, Network Rail and other relevant stakeholders to secure its delivery.	No change to SA effects expected.
September 2021	MINOR/2/PSF/133/10	OPDC Local Plan, para 4.129	The station is being designed to serve the North London Line Richmond branch and the proposed but there are also proposals for a West London Orbital line route , running from Hounslow to Brent Cross and making use of on the existing Dudding Hill Line, with trains potentially stopping at Old Oak Common Lane Station. This is one of the schemes identified in table 10.1 in the London Plan and supported by its policy T1. Proposals should safeguard for the delivery of any infrastructure associated with this connection and if appropriate, contribute to or otherwise facilitate delivery of the scheme.	No change to SA effects expected.

Date of modification	Modification reference	Location	Modification (further modifications set out in yellow highlight)	Likely significant effects in relation to the IIA?
September 2021	MINOR/2/PSF/141/1	OPDC Local Plan, Para 10.29	In respect of health, <u>the 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 supported by expansions to existing facilities in the area.</u> The Local Authorities and <u>Clinical Commissioning Groups (CCGs)</u> have confirmed that the preferred approach for the delivery of <u>this the on-site</u> floorspace is within one building, which allows the provision of healthservices at scale and provides for cost efficiencies. <u>However, requirements will need to be kept under review, including the potential for a second facility in the longer-term.</u> The Social Infrastructure NeedsStudy has assessed <u>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 the Cargiant site allocation in Old Oak NorthNorth Acton and Acton Wells as the preferred option,</u> based on currentprojections.	No change to SA effects expected.
November 2021	MINOR/2/PSF2/64/11A Respondent/comment ref 64/11	OPDC Local Plan, Para 4.61	<ul style="list-style-type: none"> <u>removing through traffic on the Big X;</u> <u>supporting fast and reliable bus services and increasing capacity, including the potential for a complementary nightshuttle bus service for shift workers;</u> <u>removing and rationalising car parking;</u> <u>supporting more efficient freight movements;</u> <u>better connecting the six rail stations surrounding Park Royal, via the Big X with better public realm, crossings, trafficcalming, CCTV, lighting and signage to support walking and cycling;</u> <u>creating new public spaces and support street greening within the town centre;</u> <u>creating and upgrading pedestrian and cycles lanes facilities to deliver a joined up, accessible walking and cyclistroute network.</u> 	The modification will not materially affect the findings of the SA.
November 2021	MINOR/2/PSF2/64/11 Respondent/comment ref 64/11	OPDC Local Plan, Para 4.97	<ul style="list-style-type: none"> <u>removing through traffic on the Big X;</u> <u>supporting fast and reliable bus services and increasing capacity, including the potential for a complementary nightshuttle bus service for shift workers;</u> <u>removing and rationalising car parking;</u> <u>supporting more efficient freight movements;</u> <u>better connecting the six rail stations surrounding Park Royal, via the Big X, with better public realm, crossings, trafficcalming, CCTV, lighting and signage to support walking and cycling;</u> <u>creating new public spaces and support street greening within the town centre;</u> <u>creating and upgrading pedestrian and cycles lanes facilities to deliver a joined up, accessible walking and cycle route network.</u> 	The modification will not materially affect the findings of the SA.
November 2021	MINOR/2/PSF2/96/3 Respondent/comment ref 96/3	OPDC Local Plan, para 4.108	At the time of the publication of this Local Plan, the Quattro site in Acton Wells is safeguarded within the West London Waste Plan (2015). Proposals should accord with this designation or any future policy guidance provided within an updated West London Waste Plan or other Development Plan Document. <u>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 PlanPolicy EU6. In regard to this, the waste site ceased operation in November 2018 when the site was first used by HS2 Ltd and its waste use has been relocated by Quattro to other sites elsewhere in West London.</u>	No change to SA effects expected.

Date of modification	Modification reference	Location	Modification (further modifications set out in yellow highlight)	Likely significant effects in relation to the IIA?
November 2021	MINOR/2/PSF2/66/73 Respondent/comment ref 66/73	OPDC Local Plan, para 8.25	Following adoption of the Local Plan, OPDC will also revisit this policy and its associated viability evidence at the earliest opportunity within 5 years of adoption of the Local Plan to ensure that any increased development value can maximise the delivery of social rent or London Affordable Rent homes	No change to SA effects expected.
November 2021	MINOR/2/PSF2/66/75 Respondent/comment ref 66/75	OPDC Local Plan, para 9.9	Wherever feasible, sites should deliver high plot ratios through industrial intensification where feasible, subject to transport impacts, agent of change, delivery of a high quality public realm, and all other relevant planning policy considerations. Applicants must set out all options explored for intensification in their Planning Statements. OPDC will only accept schemes that provide industrial intensification, except where robust evidence has been provided by the applicant demonstrating that it is not feasible and/or the considerations above cannot be met.	No change to SA effects expected.
January 2022	MINOR/2/PSF2/OPDC/4.58	OPDC Local Plan, para 4.58	The site is adjacent to the Twyford Waste and Recycling Centre Transfer Station which is safeguarded for waste apportionment purposes through the West London Waste Plan 2016 (see Policy EU6). If the Twyford Waste and Recycling Centre Transfer Station 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. 100 Twyford Abbey Road is also a safeguarded site through the West London Waste Plan (2015). If 100 Twyford Abbey Road 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.	No change to SA effects expected.
January 2022	MM/2/PSF2/OPDC/Places1-8	<p>OPDC Local Plan, para 4.19</p> <p>OPDC Local Plan, Para 4.32</p> <p>OPDC Local Plan, Para 4.67</p> <p>OPDC Local Plan, Para 4.100</p>	<p><u>Old Oak South</u> Addition after third sentence to paragraph 4.19: Based on the development capacities proposed for Old Oak South, it is expected that tall buildings will predominantly be in the range of 20-30 storeys, with taller buildings up to 45 storeys close to the Old Oak Common Station. Tall building proposals will be considered against all relevant development plan policies and material considerations.</p> <p><u>Old Oak North</u> Addition after second sentence to paragraph 4.32: Based on the development capacity modelling and precedents set out in the Old Oak North Intensification Study, development in Old Oak North is expected to predominantly be in the range of 2 to 5 industrial storeys; however, heights could exceed this range to deliver tall buildings dependent on the type and form of industrial uses proposed. Tall building proposals will be considered against all relevant development plan policies and material considerations.</p> <p><u>Park Royal West</u> Addition after fifth sentence to paragraph 4.67: Outside of SIL, based on the residential development capacities proposed for Park Royal West, it is expected that tall buildings here will predominantly be in the range of 20 to 30 storeys. Tall building proposals will be considered against all relevant development plan policies and material considerations.</p> <p><u>Park Royal Centre</u> Addition after third sentence to paragraph 4.100:</p>	No change to SA effects expected. The tall building heights are based on existing development capacities for site allocations within the Local Plan. Assessment of tall buildings has been specifically assessed and the allocations have been appraised as

Date of modification	Modification reference	Location	Modification (further modifications set out in yellow highlight)	Likely significant effects in relation to the IIA?
		<p>OPDC Local Plan, Table 4.1</p> <p>OPDC Local Plan, Para 4.144</p> <p>OPDC Local Plan, Para 4.165</p> <p>OPDC Local Plan, Table 4.2</p>	<p><u>Based on the development capacities proposed for Park Royal Centre, it is expected that tall buildings will predominantly be in the range of 15 to 25 storeys. Tall building proposals will be considered against all relevant development plan policies and material considerations.</u></p> <p><u>North Acton and Acton Wells</u> Addition after first sentence to the first column, first row cell of Table 4.1: <u>Based on the development capacities proposed for North Acton and Acton Wells and existing planning approvals, it is expected that tall buildings south of the Central Line will predominantly be in the range of 20 to 55 storeys and tall buildings north of the Central Line will predominantly be in the range of 20 to 35 storeys. Tall building proposals will be considered against all relevant development plan policies and material considerations.</u></p> <p><u>Old Oak Lane and Old Oak Common Lane</u> Addition after first sentence to paragraph 4.144: <u>Based on the development capacities proposed for Old Oak Lane and Old Oak Common Lane, it is expected that tall buildings will predominantly be in the range of 20 to 25 storeys. Tall building proposals will be considered against all relevant development plan policies and material considerations.</u></p> <p><u>Channel Gate</u> Addition after fourth sentence to paragraph 4.165: <u>Based on the development capacities proposed for Channel Gate, it is expected that tall buildings will predominantly be in the range of 20 to 30 storeys. Tall building proposals will be considered against all relevant development plan policies and material considerations.</u> Deletion of existing final sentence of 4.165.</p> <p><u>Scrubs Lane</u> Addition as new fourth paragraph to the second column, sixth row of Table 4.2: <u>Based on the development capacities proposed for Scrubs Lane, it is expected that tall buildings will predominantly be in the range of 20 to 25 storeys. Tall building proposals will be considered against all relevant development plan policies and material considerations.</u></p>	<p>positive (either minor or major) (see Table D-2 of the Regulation 19 SA).</p> <p>Policy D4: Tall buildings (was numbered D5 when Regulation 19 SA appraisal was completed and re-numbered during IIA Addendum) sets out guidance for proposals for tall buildings and has been appraised in the SA.</p>
January 2022	<p>MINOR/2/PSF2/OPDC/9.19</p> <p>MINOR/2/PSF2/OPDC/10.60</p> <p>MINOR/2/PSF2/OPDC/E2</p>	<p>New addition to OPDC Local Plan, para 9.19</p> <p>OPDC Local Plan, para 10.60</p> <p>New Addition to Policy E2</p>	<p><u>Conversely, given the long term phasing of certain sites outside of SIL, there is potential for premises and sites to stay in productive use as interim employment uses prior to their planned redevelopment for mixed use in line with Table 3.1. Any proposals to support the effective functioning of these uses ahead of the sites' comprehensive redevelopment would be assessed against policy TCC8 (Meanwhile Uses) and other relevant planning policies.</u></p> <p>Meanwhile uses are likely to play a huge role in early place making in the OPDC area, particularly in Old Oak, where there will be many temporarily vacant land parcels awaiting development in the longer term and where meanwhile uses can help provide facilities to support its designation as a Cultural Quarter (see Policy SP6). (see Policy SP6). <u>Meanwhile uses can also support the effective use of land, in advance of comprehensive development, through the provision of interim employment uses.</u></p> <p><u>Provides "meanwhile" uses in accordance with Policy TCC8</u></p>	<p>No change to SA effects expected.</p>

Date of modification	Modification reference	Location	Modification (further modifications set out in yellow highlight)	Likely significant effects in relation to the IIA?
February to April 2022	MINOR/2/PSF2/OPDC/Numbering	General	References to policies and supporting text updated to reflect removal of policies such as D1 and TCC3.	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/General	General	Factual, formatting, grammar or tense errors corrected.	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/foreword	Foreword	New foreword provided.	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/3.3	Para 3.3	The Mayor's London Plan identifies that the OPDC area can deliver a minimum indicative 25,500 homes	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/3.39	Para 3.39	OPDC's Cultural Principles document sets out how the OPDC area could play a significant role in supporting the Mayor's aspirations to promote London as the world's cultural and arts capital as set out in the Mayor's Draft Culture Strategy.	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/3.79	Para 3.79	Tall buildings are defined in OPDC's evidence base1 as buildings providing above 15 or more residential storeys or being 48 metres above ground level.	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/Table 3.1	Table 3.1	First row, fifth column. Provide reference that commercial or industrial floorspace is provided in Net Internal Area (NIA)	No change to SA effects expected.
February to April 2022	MINOR/PS/Q5(3))	Para 4.20	Tracked change Local Plan modified to align with Schedule of Minor Modifications (MINOR/PS/Q5(3)) "set out in the Local Plan and the further detail set out in the IDP, in accordance with Policy SP10."	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/4.50	Para 4.50	Alongside the canal, there are a number of current and proposed Local Heritage Listings which should be used to inform the design of development in areas adjacent to the canal.	No change to SA effects expected.

Date of modification	Modification reference	Location	Modification (further modifications set out in yellow highlight)	Likely significant effects in relation to the IIA?
February to April 2022	MINOR/2/PSF2/OPDC/4.58	Para 4.58	Amend publication date of the West London Waste Plan to 2015 from 2016.	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/4.95	Para 4.95	The housing target will be reviewed as part of future iterations of the Local Plan and further guidance for the potential delivery of these sites will be included in a Park Royal Supplementary Planning Document (SPD).	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/4.147	Para 4.147	The existing Collective development demonstrates the development potential within Atlas Junction town centre.	No change to SA effects expected.
February to April 2022	MINOR/PS/OPDC M6(2)	Para 4.225	Tracked change Local Plan modified to align with Schedule of Minor Modifications (MINOR/PS/OPDC M6(2)) including over- and adjacent-station development, where deliverable viable.	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/6.78	Para 6.48	TfL have recently proposed to introduce d an ultra-low emission zone (ULEZ) that would covers the OPDC area. This is an area within which all cars, motorcycles, vans, minibuses, buses, coaches and heavy goods vehicles (HGVs) will need to meet exhaust specific emission standards (ULEZ standards) or pay a daily charge to travel.	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/8.5	Para 8.5	The London Plan identifies that the Old Oak and Park Royal Opportunity Areas have the capacity to deliver at least an indicative 25,500 homes.	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/General	E1d)	d) provide adequate servicing and delivery space in accordance with Policy T 87 . Particular consideration should be given to the need for appropriate yard space provision to allow for the viable function of businesses	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/11.13	Para 11.13	The Community Infrastructure Levy (CIL) is a levy on new development 'of an amount per square metre Gross Internal Area (GIA)' of net additional floorspace. It is usually set at a different rate for different types of floorspace and can be set at different rates for different areas. These variations in rates reflect differences in development viability and thus profitability for different types of land use. OPDC is the CIL charging authority for the OPDC area. The infrastructure projects or types of infrastructure that a CIL charging authority intends to spend CIL income on is set out in a 'Regulation 123' List. Infrastructure in a Regulation 123 List cannot also be funded by money raised through Section 106 agreements, to avoid double dipping, i.e. a developer being required to pay twice for the same piece of infrastructure. OPDC's draft CIL charging schedule and Regulation 123 list are is available on OPDC's website.	No change to SA effects expected.

Date of modification	Modification reference	Location	Modification (further modifications set out in yellow highlight)	Likely significant effects in relation to the IIA?
February to April 2022	MINOR/PS2/OPDC/P1/1	Glossary	Tracked change Local Plan modified to align with Schedule of Minor Modifications (MINOR/PS2/OPDC/P1/1) High Speed 2 is a planned rail line dedicated for high speed trains that will connect London to Birmingham after 2028 from 2026 and then, along a Y shaped route, to Crewe and Manchester in the West and the East Midlands, South Yorkshire and Leeds in the East from 2033.	No change to SA effects expected.
February to April 2022	MINOR/PS/Q1e	Glossary	Tracked change Local Plan modified to align with Schedule of Minor Modifications (MINOR/PS/Q1e) The result of a complex interplay of different elements, e.g. the cultural and social factors which have combined to create identity, the physical or built elements that make up the place and the people associated with it through memories, association and activity. Also referred to as 'sense of place'. Permitted development rights are a national grant of planning permission which allow certain building works and changes of use to be carried out without having to make a planning application. Permitted development rights are subject to conditions and limitations to control impact and to protect local amenity.	No change to SA effects expected.
February to April 2022	MINOR/2/PSF2/OPDC/A1.2 MINOR/2/PSF2/OPDC/A1.3 MINOR/2/PSF2/OPDC/A1.5 MINOR/2/PSF2/OPDC/A1.6 MINOR/2/PSF2/OPDC/A1.9	Appendix	A1.2. The OPDC has a number of key aims, including: a) transforming one of London's most inaccessible areas into a well-connected, world-class transport interchange; b) enabling delivery of new housing and commercial development, surrounded by sustainable and thriving neighbourhoods and valued open space; c) protecting, intensifying and strengthening Park Royal Strategic Industrial Locations ; and A1.3. OPDC is the local planning authority for the area and as such is responsible for plan-making including the production of a Local Plan. The OPDC Local Plan sets out OPDC's strategy for the sustainable development of its area as a whole, including the general amount, type and location of new development it considers could take place and the policies to which applications for planning permission should conform. The OPDC Local Plan period is 2018 to 2038. A1.5. This document OPDC's Local Plan is a Development Plan Document (DPD) and is part of the Government's Government's planning policy system introduced by the Planning and Compulsory Purchase Act 2004. A1.76. Alongside the National Planning Policy Framework (NPPF), London Plan, Old Oak and Park Royal Opportunity Area Planning Framework, West London Waste Plan DPD, any 'made' Neighbourhood Plans and any adopted Supplementary Planning Documents (SPDs), OPDC's Local Plan once adopted will be is a key planning policy document against which planning applications within the OPDC area will be assessed (see figure A1.1). Paras A1.9 and A1.10 deleted: Relation to Local Authority Planning Documents Until OPDC adopts its own Local Plan for the OPDC area, the development plan documents (DPDs) from the London Boroughs of Brent, Ealing and Hammersmith and Fulham, that applied to the OPDC area and that that were either adopted, or in production, at the time of OPDC's establishment (1st April 2015), will continue to form part of OPDC's Development Plan.	No change to SA effects expected.

Date of modification	Modification reference	Location	Modification (further modifications set out in yellow highlight)	Likely significant effects in relation to the IIA?
	MINOR/2/PSF2/OPDC/A1.11 MINOR/2/PSF2/OPDC/A1.35		As OPDC progresses its Local Plan, the weight of these Local Authority DPDs covering parts of the OPDC area will diminish as they are superseded by the growing material weight of OPDC's Local Plan. The exception to this rule is the West London Waste Plan, which was adopted by OPDC Board in July 2015 as a DPD. A1.11. Delete: The OAPF should be read in conjunction with the Local Plan, but as this draft Local Plan progresses through its various regulatory stages, its policies accrue greater weight than the guidance and principles in the OAPF. Para A1.35 minor amendment to refer to 'a' potential new London Overground Station. Figure A1.4 New and Updated Supporting studies referenced.	
February to April 2022	MINOR/2/PSF2/OPDC/A1.33	Appendix para A1.33	Catalysed by this new station, the OPDC area can play a significant role in supporting good growth in London through the delivery of a new commercial centre, a new major town centre, new high density residential neighbourhoods, protecting and enhancing the Park Royal industrial location and providing a full range of supporting ancillary uses. The scale of development envisaged currently represents one of the UK's largest regeneration projects, identified in the London Plan as being capable of delivering <u>an indicative a minimum</u> 25,500 homes and 65,000 jobs and with the potential for development to generate an additional £7.6 billion per annum of gross value added to the UK economy.	No change to SA effects expected.
February to April 2022	MM5/PS/Q3k	EU3(c)	<u>ensure sufficient capacity within the sewerage network by, as part of applicants' Water Efficiency, SuDS and Drainage Statement, demonstrating how the development will</u> 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;	No change to SA effects expected.
February to April 2022	MM2/PS/Q3l	EU4(c)	<u>delivering ensuring the Air Quality Assessment required under a) identifies mitigation measures to be implemented to reduce:</u>	No change to SA effects expected.
February to April 2022	MM/PS2/OPDC/T/1	7.1	<u>Transport is the catalyst for the comprehensive regeneration of the OPDC area Old Oak and plays an integral role in protecting, strengthening and intensifying the Park Royal industrial estate.</u>	No change to SA effects expected.
February to April 2022	MM/PS2/OPDC/H1/7	8.10	OPDC's Development Capacity Study shows that the OPDC area can deliver 1,3 <u>5980</u> homes per annum over this period. <u>However</u> , OPDC will undertake the following strategies to seek to support the attainment of this Mayoral target, including:	No change to SA effects expected.
February to April 2022	MM380	E2(a)(ii)	a) ii) is well designed for their intended purpose having regard to providing flexibility for a range of appropriate identified future employment growth sectors, <u>as demonstrated through an applicant's Design and Access Statement;</u>	No change to SA effects expected.

Date of modification	Modification reference	Location	Modification (further modifications set out in yellow highlight)	Likely significant effects in relation to the IIA?
February to April 2022	MM443	DI3(e) and paragraphs 11.38 and 11.39	<p>Requirement to undertake post occupancy surveys removed to reflect deletion of process requirements throughout the Local Plan.</p> <p>DI3(e) requiring developers and/or management companies of major development proposals to undertake a post-occupancy survey to:</p> <ul style="list-style-type: none"> i. ensure relevant policies are successfully implemented; and ii. identify appropriate mitigation measures should survey information demonstrate relevant policies are not being successfully implemented; <p>11.38 Continual learning and dissemination of acquired knowledge holds the key to delivering high standards of development. To support this, OPDC will require developers or management companies of major developments to undertake a post-occupancy survey. The survey should look at the performance of buildings and the public realm to help to:</p> <ul style="list-style-type: none"> highlight any immediate teething problems by management companies outside of the planning process regarding the performance of the relevant building or development; that can be addressed and solved; identify any gaps in communication and understanding that impact on building operation; support the delivery of lifetime neighbourhoods and the creation of a resilient city, responsive to change; provide lessons that can be used to improve design and procurement on future projects; and act as a benchmarking aid to compare across projects and over time. <p>11.39 OPDC has produced a template for the post-occupancy survey, which can be found on OPDC's website. OPDC will also publish a Supplementary Planning Document providing further guidance to identify which specific policy objectives will be subject to post-occupancy evaluation.</p>	As a process requirement, this modification will not materially affect the findings of the SA.

Appendix B

Table B-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)
Strategic Policies			
Places	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.

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, 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.
	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	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)
	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 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.

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	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.
Design	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 incorporated into the design of open space in accordance with the proposed water policy in the Environment and Utilities Chapter.	Yes	Policy EU2 sets out the role of green infrastructure in relation to SuDS.
	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.

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	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.
Environment and Utilities	No recommendations.	n/a	n/a
Transport	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 D2 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.
	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

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Housing	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.
	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 D2. 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.

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	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 D7 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.
	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.	No	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 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.
	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.	No	Policy SP2 and SP3 provide guidance for supporting health and wellbeing.

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	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.	No	This would repeat policy SP3 which provides guidance for improving health and reducing health inequalities. This applies to housing. Housing mix policies have been consolidated to policy H3.
	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.	No	This would repeat policy SP3 which provides guidance for improving health and reducing health inequalities. This applies to housing.
	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.	Yes	Policy H10 provides this guidance.
Employment	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.
Town Centres and Community Uses	No recommendations.	n/a	n/a
Delivery and Implementation	No recommendations.	n/a	n/a

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