

OPDC
OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION

Policy Formulation Reports Spatial Vision

October 2018



MAYOR OF LONDON

Spatial Vision

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
21	<p>Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:</p> <ul style="list-style-type: none"> • set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth
69	<p>The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see.</p>
155	<p>Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p>

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
<p>Title: What is the role of a Local Plan?</p> <p>Paragraph: 001</p> <p>Reference ID: 12-001-20170728</p> <p>Revision Date: 28 07 2017</p>	<p>National planning policy places Local Plans at the heart of the planning system, so it is essential that they are in place and kept up to date. Local Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design.</p>

Any other relevant national guidance/policy

Policy / paragraph reference	Policy and paragraph text
	None applicable

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
	None applicable

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
	None applicable

Supplementary Planning Guidance (SPG)

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Vision	<p>Old Oak and Park Royal will be a sustainable, affordable and inclusive new community, built on brownfield land in central London. There is an opportunity to integrate and deliver best practice standards of design, housing delivery and affordability, healthy living, utility planning and smart regeneration from the outset. The scale of development and investment proposed at Old Oak is transformative in nature and can help unlock significant social, economic, environmental and social benefits.</p> <p>The area will be a highly accessible location, focussed around a world class transport 'super-hub' that will house one of the country's most connected and largest railway interchanges that could have the same regenerative potential as King's Cross St. Pancras station. In addition, there will be significant regional and local transport connections. Combined, these improvements present a once in a lifetime opportunity to create a new piece of London that is recognised world-wide as a leading regeneration exemplar.</p>

Old Oak and Park Royal will be connected into its surroundings and new development will enable the free and easy movement of people to and from the area. There will be improved local connections to Harlesden, Acton, Kensal, White City and Shepherds Bush. These connections present opportunities for shared growth with the potential to unlock additional regeneration sites in the wider area.

Old Oak will provide a unique employment opportunity. Located in Zone 2 west London and only 10 minutes from Heathrow and 8 minutes from Euston, it will be a highly attractive new commercial area with capacity to accommodate 55,000 new jobs across a mix of uses and in a variety of high quality buildings. Its excellent connections to central London, Heathrow and Birmingham will drive new demand for hotel uses and associated services. Linking the planned growth at Old Oak with the current regeneration around White City will ensure these locations can drive west London's economy.

Old Oak will achieve the principles of Lifetime Neighbourhoods, embedding design to support health and wellbeing from its beginning. Old Oak will be integrated into its surroundings and will be recognised and promoted for its high design quality. In conformity with the London Plan, the area could be a new urban quarter accommodating a minimum of 24,000 new homes in a series of new places / neighbourhoods in a mix of housing types and tenures. High quality affordable homes will be an essential part of the housing offer.

Old Oak will be served by a network of new streets and amenity spaces that will provide opportunities for walking, cycling and social engagement. There will be a range of new ancillary town centre uses within a new contemporary High Street. This new High Street will become an attractive destination for the area's sizeable new residential and employee population supporting social interaction and recreational activities. Alongside town centre uses, new catalyst and cultural uses would help give Old Oak a sense of place that could make this area an attractive destination.

Today Park Royal performs a vital role in supporting the London economy. Building on the area's existing success and excellent access to Heathrow, the A40 and the A406 there is a fantastic opportunity for Park Royal to become London's and the UK's leading industrial location and to establish itself as a globally recognised centre for developing innovations such as smart technology. To support this Park Royal will be protected and strengthened where possible. To achieve this there are opportunities to improve the way Park Royal operates through improved transport infrastructure, utility provision, better coordination of services and a better environment for businesses and employees. There is also scope to consider how the significant area of Park Royal can be used more efficiently both to help existing businesses grow, attract new and diverse business and also to accommodate relocated businesses from Old Oak.

Within Park Royal there is an opportunity for an additional 10,000 new jobs across a range of industrial uses making this whole area a sizeable employment generator. Outside of the industrial land, there will be opportunities for a minimum 1,500 new homes and other employment types connected by a network of improved streets and public realm.

	Wormwood Scrubs is located between Old Oak and White City and will be protected as an important amenity and ecological asset. There are opportunities to improve access to the Scrubs to enable people to more readily enjoy this space and move more easily between these areas. There will also be opportunities to carry out sensitive enhancements.
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Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	Options were not provided for the Spatial Vision.

Key Consultation Issues

Regulation 18 consultation

What the issue is	Who raised the issue	What we're doing to address this issue
Recognising communities: The Spatial Vision, Objectives and Mission Statement should refer to existing and future local communities including the need to ensure their protection, integration with Old Oak and that they benefit from the regeneration.	Hammersmith and Fulham Disability Forum, Hammersmith and Fulham Historic Buildings Group, The Hammersmith Society, Midland Terrace Residents' Group, Dioceses of London, Harlesden Neighbourhood Forum, Grand Union Alliance, Old Oak Interim Forum, Brent Council and 19 residents	Change proposed. The spatial vision has been updated and includes two narratives 'thinking big' and 'going local'. The 'going local' narrative recognises the benefits that the redevelopment and regeneration of the area will bring to local communities and businesses. This includes, inter alia, improving life chances and fairness, enhancing day to day quality of life, generating benefits from development for local people, providing a mix of homes at different affordabilities, supporting local economies, creating an attractive local environment, conserving and enhancing environmental and heritage assets and ensuring development connects to local communities and neighbourhoods.
Grand Union Alliance proposed vision: The Spatial Vision should be based on the Grand Union Alliance's community based vision (see end of	Grand Union Alliance	Change proposed. The spatial vision has been updated to take on board elements of the Grand Union Alliance spatial vision, along with suggested alterations from other stakeholders.

appendix).		
Further detail: The Spatial Vision and Objectives should include information for each of the policy themes in a similar manner to the Old Oak and Park Royal Opportunity Area Planning Framework.	The Hammersmith Society	Change proposed. The spatial vision now more closely ties into the strategic policies. Rather than having objectives, for the Regulation 19 Local Plan, the strategic policies provide the objectives associated with the spatial vision. However, the spatial vision is high level and succinct and does not repeat all the policy detail in the strategic policies.
Sports stadium: The Spatial Vision and Objectives should support the delivery of a stadium to act as a community hub and catalyst for wider development.	20 local residents and QPR (NQP Development Services)	Change proposed. The spatial vision does not directly reference the potential for a stadium, but identifies the area as a home to a diverse and intense mix of uses. The vision narratives expand on this and identify that the area will become a destination for people from across London and the UK that will be home to a mix of cultural and leisure uses. Policy SP6 (Places and Destinations) supports the potential for catalyst uses in the area, which includes sports stadia. Policy TCC8 sets out the detailed criteria against which catalyst uses would be assessed.
Protecting SIL: Objective 1 should be more flexible in protecting Park Royal as an industrial area to help deliver sustainable communities	Midland Terrace Residents' Group, Old Oak Interim Forum	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the area's London-wide role. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities.
Accessibility and inclusivity: The Spatial Vision, Objectives and Mission Statement should	GLA, Hammersmith and Fulham Disability Forum, 1 local resident	Change proposed. The spatial vision narratives now reference the importance of regeneration showcasing high quality design

make specific reference to accessibility and inclusivity.		as part of new development that will set new international standards in accessible and inclusive high density commercial, industrial and residential development and open space design and management.
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Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Development should create an inclusive, thoughtfully designed green community	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. These aspirations are embedded within the spatial vision.
The Plan needs to address how to balance global city development values with local neighbourhood aspirations	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The spatial vision recognises the local aspirations and role the area can play at a more strategic level on the 'thinking big' and 'going local' narratives.
The plan does not mention the negative aspects of early delivery such as there being current unpleasant uses that will not support good policy outcomes and causes questionable living conditions for new residents	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The impacts of delivery and construction are both recognised as key challenges in the opportunities and challenges element of the spatial vision. Individual applications are considered against relevant development plan policies. If proposals do not adequately mitigate impacts of current uses, they would be refused planning permission.
Agree that the plan should have national and local ambitions, but have concerns about the	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. OPDC considers that the plan strikes the right balance between ambitious and aspiration, but at

realisation of these ambitions. At the same, time, the plan is not ambitious enough	Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	the same time deliverable.
Twyford Abbey Road open space should be depicted as a residential area.	Deloitte LLP (on behalf of Diageo)	No change proposed. The identified area is publicly accessible open space and it is not appropriate to identify it as a residential area.
Support inclusion of Grand Union Canal as environmental and heritage asset to be conserved and enhanced.	The Inland Waterways Association-Middlesex Branch	Noted.
The challenge of high density development should specifically mention protecting the Grand Union Canal.	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers the section of Higher Density Development within figure 2.1 should provide broad descriptions of the potential impacts related to high density development. Detailed points about high density development and impacts on the Grand Union Canal are picked up in the Grand Union Canal place policy.
Provide reference to Healthy Streets approach.	Transport for London (Group Planning)	Change proposed. Healthy Streets has been included under the Health and Wellbeing section of figure 2.1.
Reference to MTS mode share targets and traffic reduction strategies to help minimise the use of private car should be made.	Transport for London (Group Planning)	Change proposed. References to mode share targets and traffic reduction strategies have been added to the Transit Orientated Development section of figure 2.1.
Spatial Vision narrative is unsound (no reason given why not)	Bernie Timmins	No change proposed. OPDC considers this narrative to be sound.
Spatial Vision narrative on environmental and heritage assets is unsound	Bernie Timmins	No change proposed. OPDC considers this narrative to be sound.
Spatial Vision narrative on day-to-day quality of life is unsound	Bernie Timmins	No change proposed. OPDC considers this narrative to be sound.
Support Spatial Vision's specific reference to excellence in health and wellbeing.	Sport England	Noted.
General support for spatial vision	Queens Park Rangers Football Club and	Noted.

	Stadium Capital Developments, Genesis, Old Oak Park Limited, Fruition Properties, Chris Billington, A Somefun, Hammersmith Society, Harlesden Lets, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
Should note the benefits of a new bridge link connection Willesden Junction Station to EMR site.	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. OPDC considers that figure 2.1 should provide broad descriptions of the opportunities and challenges in delivering the spatial vision. Policy P11 sets out the connectivity benefits for a bridge connecting Old Oak North to Willesden Junction.
Support reference to enhanced access to Wormwood Scrubs for all Londoners.	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
Section should highlight the opportunities for early delivery across the area.	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Change proposed. Text has been added to the end of the final sentence of the Place Making section of figure 2.1.
Agree that area is nationally important and connected location and high standards in sustainability and design	Association for Consultancy and Engineering (ACE)	Noted.
Decision on Elizabeth Line Depot will affect adjacent delivery sites. This should be acknowledged as a challenge. Plan does not identify solutions for managing construction	Old Oak Park Limited	No change proposed. The challenges relating to development of the Elizabeth Line Depot are set out until the Deliverability section of figure 2.1. Managing construction is dealt with through a series of policies in the Local Plan, including SP10, T8 and EU7 and EU8.
Include explicit reference to integrate with the Kensal Canalside Opportunity Area immediately to the East of	Royal Borough of Kensington and Chelsea	Change proposed. Narrative 13 has been amended.

the OPDC or a reference to link to, “new and existing local communities and neighbourhoods in the surrounding areas...”		
Welcome ambitious vision. References to ‘High quality’ should be given strong definition in policies, measurable specific targets, and relevant key performance indicators to clarify OPDC’s expectations, and to define what ‘success’ will look like.	Environment Agency	No change proposed. Policy SP9 defines what the highest design quality should comprise. Relevant elements of this policy are reflected in the Local Plan Key Performance Indicators.
Supports the OPDC’s acknowledgements about the Park Royal Industrial Estate	Segro	Noted.
Supports the distinctive roles of Park Royal and Old Oak in achieving this in delivering high density and mixed use community	Segro	Noted.
Spatial Vision narrative 4 is sound.	Darren Milne, Kevin Early	Noted.
Too many hot food takeaway shops are having a detrimental effect on health of pupils.	Ark Burlington danes Academy	Noted. Policy TCC2 provides guidance for managing hot food takeaways
Spatial Vision narrative 1 is sound.	Kevin Early	Noted.
Spatial Vision narrative 10 is sound.	Kevin Early	Noted.
Spatial vision is legally compliant and complies with Duty to Cooperate requirement.	Torquil Law	Noted.
Spatial vision is positively prepared and legally compliant. (No justification provided)	Raymond Gill	Noted.
Spatial Vision is not effective due to the lack of emphasis on people.	Friary Park Preservation Group	No change proposed. OPDC considers that the Spatial Vision and 'Going Local' narratives provide appropriate focus on improving life changes, fairness and day to day quality of life for local people.
Spatial Vision narrative 9 is unsound	Friary Park Preservation Group, Sarah Abrahart	No change proposed. OPDC considers this narrative to be sound.
Lack of precise information on the funding of new	Friary Park Preservation Group	No change proposed. It is not considered appropriate to

homes makes this narrative unsound		provide specific clarity on funding arrangements for the delivery of housing here. Funding of housing is provided via a wide variety of sources and it is not the role of the spatial vision to set these out.
Spatial Vision narrative is unsound due to the reliance on flawed, conventional, economic forecasting.	Friary Park Preservation Group	No change proposed. OPDC considers this narrative to be sound based on robust economic evidence base provided in the Whole Plan Viability Assessment.
Spatial Vision narrative 13 is not effective	Friary Park Preservation Group	No change proposed. OPDC consider this narrative to be effective.
Spatial Vision narrative for life chances and fairness is excessively positive and unsound.	Friary Park Preservation Group	No change proposed. OPDC consider this narrative to be sound.
We are a local school who have done a lot of work to improve the health of pupils. New development in the area should not undermine this.	West Twyford Primary School	Noted.
High quality design that lasts and ages well is important.	A Somefun	Noted.
Concerns about ecological affects on Wormwood Scrubs if access is not suitably controlled.	Chloe Fremantle	Noted. Policies related to Wormwood Scrubs are provided in P12. Policies relating to managing the natural environment are provided in Policy SP8 and in the Environment and Utilities Chapter.
Wormwood Scrubs to be excluded from the OPDC area.	Sarah Abrahart	No change proposed. Wormwood Scrubs was included in the OPDC boundary on designation of the Corporation on 1 April 2015.
Spatial Vision narrative 10 is unsound.	Sarah Abrahart	No change proposed. OPDC considers this narrative to be sound.
Spatial Vision should refer to Park Royal as destination.	David Craine	No change proposed. Narrative 3 identifies the whole of the OPDC area to be a destination for London and the UK.
Transport hub should be a place they want to go and not just pass through.	David Craine	Noted. Policies SP1 and P1C1 reflects this aspiration.
New homes should be affordable to local people.	David Craine	Noted. Policy H1 sets out that OPDC will work with developers

		to ensure that wherever possible homes delivered are marketed to and occupied by people who live and work in London. OPDC also has an Affordable Housing Nominations policy for affordable rented and intermediate homes, that prioritises allocations to local people.
Local people should have a tangible sense of benefiting from new development.	David Craine	Noted. Narrative 12 sets this aspiration to be delivered through the policies of the Local Plan.
Spatial Vision will the help to mitigate risk of local people feeling disconnected from new development.	David Craine	Noted.
Support vision, but densities should not necessarily be high density	ArtWest	No change proposed. To deliver the development targets set out in the London Plan development within Old Oak and Park Royal will need to be high density. London Plan and Local Plan policies provide guidance to ensure high density development is high quality.
Need to balance protection of existing facilities and land uses, and delivery of housing, employment, social infrastructure, green space and amenities to serve local needs	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policies SP4, H5, E1, EU1 and TCC4 provide guidance for protecting and managing existing land uses and facilities. This is appropriately reflected in the Spatial Vision Narratives.
The plan should push best practice in sustainability	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Spatial Vision seeks to pioneer international excellence in sustainability and this is reflected through a series of policies in the Local Plan.
Alternative Vision and Objectives suggested by	Hammersmith Society, Wells House Road	Noted. The Community-led vision and objectives submitted

the Hammersmith Society is still relevant	Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	with the Regulation 18 consultation responses have been embedded within the amended Spatial Vision, narratives and policies.
Need to provide for a diverse mix and pioneer rather than be a continuation of things that have gone before	Harlesden Lets	Noted. The Spatial Vision seeks to ensure the OPDC area will be home to a diverse mix of uses, places and people that pioneers international excellence.
Residential figures have increased, there is less open space and high densities.	Regents Network	No change proposed. Residential development capacity has been identified using National Planning Practice Guidance methodologies. This is also accompanied by increased open space requirements of 30% of developable land outside of SIL to be delivered as publicly accessible open space.
Cannot define any part of the area as a neighbourhood as it will be dominated by mega development with no sense of community.	Regents Network	No change proposed. London Plan and Local Plan policies provide guidance to ensure the deliver of Lifetime Neighbourhoods and a high quality built environment.
Westway Circus station should be shown on this map	West London Line Group	No change proposed. Figure 2.2 depicts existing stations and proposed new stations within the OPDC area. As such OPDC considers its inclusion would not be appropriate.
The 'thinking big' and 'going local' narratives are inherently conflicted with one another	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers the two scales of narratives complement each other. This is reflected in the IIA.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Capacity of 7,600 new jobs in Park Royal is incorrect. This should reference the 40,400 instead.	Imperial College	Change proposed. The 7,600 relates to jobs capacity across Park Royal SIL. To provide clarity for the total jobs capacity, this figure is proposed to be replaced with the total 40,400 jobs capacity figure.
Number of new jobs should be amended to reflect the correct figure of 40,400.	Imperial College	Change proposed. The reference to 7,600 relates to the indicative job capacity of Park Royal. To ensure clarity, the total OPDC area plan period indicative job capacity figure of 40,400 will be used and related wording amended.
Suggest additional text is included to ensure that the Local Plan reflects the reality of the years of neglect, OPDC 's role and the roles and individual priorities of the constituent London Boroughs.	John Cox	No change proposed. Contextual information is set out in figure 21.
The proposed deletion of the reference to enhancing the canal as a green and blue link, referring only the green element could be open to misinterpretation in terms of targeting enhancement opportunities, to the detriment of the canal.	Canal & River Trust	No change proposed. The proposed deletion has been made to align with the definition of green infrastructure within the Local Plan glossary. This confirms that green infrastructure includes blue infrastructure and the Blue Ribbon Network.
The Council welcomes the amendment to the Going Local Objective 13. Remain concerned that the strategic policies within the plan do not seek to deliver the proposed east-west connection between the OPDC area and Kensal over the Plan Period. The Council supports the amendment to the Key Diagram at Figure 2.2 and subsequent maps / diagrams throughout the Plan, which indicate the east-west link between the OPDC area and Kensal OA	Royal Borough of Kensington and Chelsea	No change proposed. Places policies identify connections to Kensal Canalside within place diagrams and in supporting text to Policy P10. OPDC considers references to a potential new station at Kensal Canalside are appropriate to be made in Strategic Policies chapter.

as a 'key route'.		
Welcome added references. Hythe Road and Old Oak Common Stations should be referred to as 'potential' new stations throughout the document.	Transport for London	Change proposed. All text and image references will be referred to as potential stations.
TfL requests that the Major Town Centre/Commercial Centre shading is removed from the Elizabeth Line depot site area. This is potentially misleading as this site has been removed as a site allocation within the local plan period. This comment is also relevant to a number of other figures in the document e.g. Figure 3.7, 3.15, 10.3	Transport for London	No change proposed. The supporting text to Policy P1 supports early delivery of the Elizabeth Line Depot. OPDC considers it appropriate to provide guidance for the depot should this be achieved.
Could 'protection' also be added to the Vision?	Wormwood Scrubs Charitable Trust	No change proposed. Spatial Vision narrative 9 sets out the aspiration to conserve and enhance Wormwood Scrubs. Policy P12 also sets out the need to conserve and enhance Wormwood Scrubs.
The Scrubs is more than just MOL and its unclear what the Local Plan means by Metropolitan Park. It is the size and range of potential uses of the Scrubs that has Metropolitan value and this role must protect all habitats and uses of value.	Wormwood Scrubs Charitable Trust	Noted. Policy P12 sets out the roles of Wormwood Scrubs. The glossary is proposed to be amended to define a Metropolitan Park. The London Plan defines the functions of a Metropolitan Park. Policies P12, EU1 and EU2 provide guidance for conserving and enhancing Wormwood Scrubs including biodiversity assets.
The scrubs have Metropolitan value. Addition/change suggested to Thinking Big (5)	Wormwood Scrubs Charitable Trust	No change proposed. References to Wormwood Scrubs being Metropolitan Open Land and a Metropolitan Park illustrate that the Scrubs has metropolitan value.
Natural heritage should be recognised. Changes to Going Local (9) suggested.	Wormwood Scrubs Charitable Trust	No change proposed. Natural heritage is addressed through environmental and heritage assets stated in narrative 9.
Support the overall spatial vision and encourage OPDC to work proactively with all interested parties.	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.

<p>Transport Orientated Development – should note that the provision of a new bridge link between the Station and the regeneration area to the south, landing in the European Metals Recycling (EMR) site, will bring about significant benefits.</p>	<p>Queens Park Rangers Football Club and Stadium Capital Developments</p>	<p>No change proposed. The supporting text to Policy P2 sets out the benefits and challenges to delivering a new walking and cycling route between Willesden Junction and Old Oak North.</p>
<p>Place Making/Deliverability – should be noted that early delivery of new housing and commercial space is being achieved at Oakland and the other sites offer an opportunity to deliver early development and assist wider development, including EMR site.</p>	<p>Queens Park Rangers Football Club and Stadium Capital Developments</p>	<p>No change proposed. Policy SP9 provides guidance that supports the delivery of early development. A reference to a single specific site within the spatial vision is not considered to be required.</p>
<p>Grand Union Canal and Wormwood Scrubs – Support the reference to enhancing access to Wormwood Scrubs so that it can be enjoyed by more Londoners.</p>	<p>Queens Park Rangers Football Club and Stadium Capital Developments</p>	<p>Noted.</p>
<p>Would like to see a strengthening of the policy requirements relevant to tall buildings. Wording should be changed.</p>	<p>Grand Union Alliance</p>	<p>No change proposed. The Draft New London Plan requires local planning authorities to identify locations where tall buildings are an appropriate form of development in principle. Policy SP9 provides guidance to ensure buildings respond appropriately to the setting of sensitive locations including heritage assets, open spaces, existing residential communities. Tall buildings will need to take into account the surrounding sensitive locations and accord with national, London Plan policies, Local Plan policies and other material considerations. Relevant Local Plan policies include D4, D5, D6 and D8 and place policies.</p>

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study

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| <ul style="list-style-type: none">• The Spatial Vision and Narratives have been informed by a comprehensive and iterative review of all relevant evidence base documents and reflects recommendations and aspirations of local communities. The vision provides a vision for the twenty year plan period to deliver sustainable development |
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Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	<ul style="list-style-type: none">• None

Other evidence base

Supporting Study	Recommendations
	<ul style="list-style-type: none">• None