

Policy Formulation Reports Strategic Policies Chapter

October 2018



SP1: Catalyst for Growth

Legislation, Policy and Guidance Context

National Planning Policy Framework (NPPF)

Paragraph Reference	Paragraph
17	<p>Planning should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.</p> <p>Planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.</p>
34	<p>Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework.</p>
156	<p>Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:</p> <ul style="list-style-type: none"> • the homes and jobs needed in the area; <p>the provision of retail, leisure and other commercial development;</p> <ul style="list-style-type: none"> • the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); • the provision of health, security, community and cultural infrastructure and other local facilities;

National Planning Practice Guidance (NPPG)

Paragraph Reference	Paragraph
https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment	Housing and economic land availability assessment

London Plan (2016) Policies

Policy/paragraph reference	Paragraph
2.1	<p>The Mayor and the GLA Group will, and all other strategic agencies should, ensure:</p> <p>a) that London retains and extends its global role as a sustainable centre for business, innovation, creativity, health, education and research, culture and art and as a place to live, visit and enjoy; and</p> <p>b) that the development of London supports the spatial, economic, environmental and social development of Europe and the United</p>

2.13	<p>Kingdom, in particular ensuring that London plays a distinctive and supportive part in the UK's network of cities.</p> <p>B Development proposals within opportunity areas and intensification areas should:</p> <p>e support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas especially areas for regeneration.</p>
2.16	<p>A The Mayor will, and boroughs and other stakeholders should, identify, develop and promote strategic development centres in outer London or adjacent parts of inner London with one or more strategic economic functions of greater than sub-regional importance (see para 2.77) by:</p> <ul style="list-style-type: none"> a) co-ordinating public and private infrastructure investment b) bringing forward adequate development capacity c) placing a strong emphasis on creating a distinct and attractive business offer and public realm through design and mixed use development as well as any more specialist forms of accommodation d) improving Londoners' access to new employment opportunities.
4.1	<p>A The Mayor will work with partners to:</p> <ul style="list-style-type: none"> a2) maximise the benefits from new infrastructure to secure sustainable growth and development c) support and promote outer London as an attractive location for national government as well as businesses, giving access to the highly-skilled London workforce, relatively affordable work space and the competitive advantages of the wider London economy <p>C In preparing LDFs, boroughs should:</p> <ul style="list-style-type: none"> d) promote and develop existing and new cultural and visitor attractions especially in outer London and where they can contribute to regeneration and town centre renewal
6.1	<p>A The Mayor will work with all relevant partners to encourage the closer integration of transport and development through the schemes and proposals shown in Table 6.1 and by:</p> <ul style="list-style-type: none"> a encouraging patterns and nodes of development that reduce the need to travel, especially by car b seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand c supporting development that generates high levels of trips at locations with high levels of public transport accessibility and/or capacity, either currently or via committed, funded improvements including, where appropriate, those provided by developers through the use of planning obligations d improving interchange between different forms of transport, particularly around major rail and Underground stations, especially where this will enhance connectivity in outer London <p>A The Mayor will work with strategic partners to:</p>

6.2	<p>c increase the capacity of public transport in London over the Plan period by securing funding for and implementing the schemes and improvements set out in Table 6.1.</p> <p>Table 6.1:</p> <table border="1"> <thead> <tr> <th rowspan="2">Scheme</th> <th rowspan="2">Description</th> <th rowspan="2">Cost</th> <th colspan="3">Anticipated completion date</th> </tr> <tr> <th>2013-16</th> <th>2017-22</th> <th>2022+</th> </tr> </thead> <tbody> <tr> <td>Crossrail 1</td> <td>Core scheme: Maidenhead and Heathrow in the west to Shenfield and Abbey Wood in the east</td> <td>H</td> <td></td> <td>x</td> <td></td> </tr> <tr> <td>High Speed 2</td> <td>London to the West Midlands and beyond.</td> <td>H</td> <td></td> <td></td> <td>x</td> </tr> </tbody> </table>	Scheme	Description	Cost	Anticipated completion date			2013-16	2017-22	2022+	Crossrail 1	Core scheme: Maidenhead and Heathrow in the west to Shenfield and Abbey Wood in the east	H		x		High Speed 2	London to the West Midlands and beyond.	H			x
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Crossrail 1	Core scheme: Maidenhead and Heathrow in the west to Shenfield and Abbey Wood in the east	H		x																		
High Speed 2	London to the West Midlands and beyond.	H			x																	
6.3	<p>D Boroughs should take the lead in exploiting opportunities for development in areas where appropriate transport accessibility and capacity exist or is being introduced. Boroughs should facilitate opportunities to integrate major transport proposals with development in a way that supports London Plan priorities.</p>																					
6.4	<p>B The Mayor will work with strategic partners to improve the public transport system in London, including cross-London and orbital rail links to support future development and regeneration priority areas, and increase public transport capacity by:</p> <p>a implementing Crossrail, the Mayor’s top strategic transport priority for London (see Policy 6.5 and paragraph 6.21)</p> <p>h improving and expanding London’s international and national transport links for passengers and freight (for example, High Speed 2)</p> <p>C DPDs should identify development opportunities related to locations which will benefit from increased public transport accessibility.</p>																					
7.1	<p>F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.</p>																					

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
SD1	Opportunity Areas

A To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will:

- 1) Provide support and leadership for the collaborative preparation and implementation of planning frameworks that:
 - a) set out a clear strategy for accommodating growth
 - b) assist in delivering specific infrastructure requirements that unlock capacity for new homes and jobs
 - c) support regeneration
 - d) are prepared in a timely manner.
- 2) Bring together the range of investment and intervention needed to deliver the vision and ambition for the area
- 3) Support and implement adopted planning frameworks, in order to give them appropriate material weight in planning decisions
- 4) ensure that his agencies (including Transport for London) work together and with others to promote and champion Opportunity Areas, and identify those that require public investment and intervention to achieve their growth potential
- 5) ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities
- 6) ensure that Opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration
- 7) monitor progress in delivering homes, jobs and infrastructure, taking action where necessary to overcome any barriers to delivery
- 8) ensure that development facilitates ambitious transport mode share targets.

B Boroughs, through Development Plans and decisions, should:

- 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas
- 2) Support development which creates employment opportunities and housing choice for Londoners
- 3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary
- 4) recognise that larger areas can define their own character and density
- 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function
- 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12
- 7) include ambitious transport mode share targets
- 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration
- 9) ensure planning frameworks are subject to public and stakeholder consultation
- 10) work with the Mayor, local communities and other stakeholders to review appropriate locations and identify new Opportunity Areas.

These should be distinct and significant locations that have capacity

	<p>for at least 5,000 new jobs and/or 2,500 new homes.</p> <p>Old Oak / Park Royal</p> <p>2.1.57 The Mayor has established the Old Oak and Park Royal Development Corporation (OPDC) to drive forward regeneration of this area. A Local Plan has been published which recognises the huge regeneration potential of the area and sets out a clear strategy for how redevelopment should help to optimise economic growth and regeneration potential, create a new town centre and bring tangible benefits for local communities and Londoners.</p> <p>2.1.58 Old Oak Common station (connecting HS2, the Elizabeth Line and National Rail) is set to open in 2026. There are significant opportunities to bring forward regeneration in advance of this date around the existing and potential new rail stations in the area. This includes North Acton on the Central line and Willesden Junction on the Bakerloo Line and London Overground, as well as the potential new local stations at Hythe Road and Old Oak Common Lane on the Overground.</p> <p>2.1.59 Park Royal is a strategically-important industrial estate for the functioning of London's economy and should be protected, strengthened and intensified.</p>
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Supplementary Planning Guidance (SPG)

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Objective 1	<p>CREATE: To create a successful and inclusive new urban quarter, supporting delivery of 24,000 new homes in Old Oak and 1,500 new homes in non-industrial locations in Park Royal. This will include a mix of affordable and market tenures and typologies that meet the needs of new and existing residents. Development of new homes should achieve best practice standards of architecture and urban design, along with the delivery of appropriate levels of new social, physical and green infrastructure to support the future population. This will help create a vibrant and distinctive places / neighbourhoods, and contribute to an integrated, healthy and sustainable place.</p>

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	<p>No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.</p>

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
<p>Catalyst uses: General support for catalyst uses in the area, with a number of suggestions for types of catalyst uses that could be supported and the criteria that could be applied for assessing applications.</p> <p>Opposition and support for a proposed sports stadium in the area. Opposition focussed on a sports stadium's significant infrastructure requirements and its impact on amenity. Support focussed on a sports stadium's ability to support placemaking and potentially justify higher densities.</p>	<p>General support: Old Oak Interim Forum, Old Oak Park (DP9), The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group, 6 residents, 1 local business</p> <p>Oppose a sports stadium: Midland Terrace Resident's Group, Old Oak Interim Forum, Old Oak Park (DP9), Grand Union Alliance, 1 local resident (in opposition)</p> <p>Support a sports stadium: QPR, 7 local residents, 2 local businesses and 2,185 standard QPR supporter responses</p>	<p>Noted. The Local Plan supports the potential for catalyst uses in the area, in Policy SP6. The Local Plan now includes a criteria based policy (TCC8) to assess the acceptability of different catalyst uses. This approach will ensure that for any future catalyst use to be appropriate it will be assessed against a range of policy requirements. This policy will be supported by evidence from a Catalyst Uses Study.</p>

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support policy SP1	Imperial College, T.A.S.B. Investments Ltd, Association for Consultancy and Engineering (ACE), Hammersmith and Fulham Council	Noted.
Support para 3.8	Imperial College, Hammersmith and Fulham Council, ArtWest	Noted.
Need to amend the figure to change the label of the line to Watford from 'West London Line' to 'London Overground'	Transport for London	Change proposed. The figure has been amended to change titling the line as 'West London Line' to 'London Overground' and the 'West London Line' titling has been moved lower down on the image to the correct location.

The wording of the Local Plan should reflect the uncertainties of the delivery of an Elizabeth Line station at Kensal Canalside and that feasibility work is underway	Transport for London	Change proposed. Wording has been inserted to recognise that feasibility work into the delivery of Kensal Canalside station is underway.
The new Overground stations at Hythe Road and Old Oak Common Lane should be removed from this image which shows existing context	Transport for London	Change proposed. This map is an existing context map so it is inappropriate for it to show the proposed overground stations and these have therefore been removed.
The potential for early interim catalysts for growth should be acknowledged in the Policy and the supporting text	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. The potential for catalyst uses is referenced in Policy SP6 (Connecting People and Places). It is considered that it would result in unwarranted repetition to also include it here.
There is a typo. 'benifits' should read 'benefits'	Royal Borough of Kensington and Chelsea	Change proposed. The typo has been corrected.
Para 3.8 refers to the need to ensure any impacts on surrounding town centres are mitigated, but this should be amended to require no detrimental impacts. This requirement should also be reflected in Policy SP6.	Royal Borough of Kensington and Chelsea	Change proposed. The wording has been revised to reflect the wording in the NPPF requiring proposals to not result in significant adverse impacts (para 27). This wording has also been carried across into the lead in to policy TCC1.
Policy should reflect that the rail interchange is being built in an area of deprivation which poses challenges for balancing the needs of existing residents with that of new arrivals	Old Oak Interim 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. Recognition that the development is being built within a deprived part of London is set out in the supporting text to SP1 and it is felt that this text, along with other text in the policy and supporting text, recognise the need to balance the needs of existing communities with those of new arrivals.
New development is likely to result in rising rent levels in Harlesden, impacting further on the deprivation of the area.	Harlesden Lets	No change proposed. A lack of new housing being built is likely to have a similar or worse effect on house prices in Harlesden. There is a need to build new housing in London to meet needs.
Policy asserts that regeneration will bring	Grand Union Alliance, Wells House Road Residents	No change proposed. OPDC considers that the Local

benefits to surrounding areas but other policies in the Local Plan do not guarantee this will be the case.	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	Plan's policies will bring benefits to surrounding communities - this will include new transport infrastructure, homes, jobs and ancillary uses. The Integrated Impact Assessment has assessed the impact of the Local Plan's policies and this shows that the policies will deliver significant benefits to surrounding areas
Should re-order the policy so that the larger points (new part of London) are reviewed higher than the more detailed points (deliver a new transport super-hub).	West London Line Group	No change proposed. OPDC does not consider that the ordering of the policy is a matter that affects the soundness of the policy and therefore does not propose to amend its ordering.
Paragraph should reference that it is important that the station also include strong links to other public transport, particularly local rail services.	West London Line Group	No change proposed. The need for the station to be adequately embedded in the public realm, to allow for the movement of passengers to other transport modes is covered in Policy P1C1.
Should make reference to the proposed Westway Circus London Overground station	West London Line Group	No change proposed. This is not a committed scheme, is not supported by TfL and is not within the OPDC area so there is not a need to make reference to this proposal.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support for delivering a range of uses to support London's role as a global city	Imperial College	Noted.
Recognition of a potential new station at Kensal Canalside is welcomed. Place policies should be aligned with this.	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.
Support amendment that new town centres won't	Royal Borough of Kensington and Chelsea	Noted.

adversely impact existing centres.		
Amendments to the Local Plan successfully reflect uncertainties in delivering a new station at Kensal Canalside.	Transport for London	Noted.
Potential for early catalyst uses and infrastructure should be recognised in the policy and supporting text.	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. For the purposes of the Local Plan, catalyst uses are uses that can stimulate significant and positive change, rather than infrastructure. The benefits of increased PTALs and development capacity from a connection to Willesden Junction Station from Old Oak North are set out in policies P2 and P11 and are not required to be repeated in Policy SP1.
Support for the Mayor in steering London to be a world leader in industry, economy, communication, environment, and high quality of life for all of its people. OPDC represents an opportunity to create a new London.	Grand Union Alliance	Noted.
Aspiration to meeting local needs and complementing surrounding centres has been watered down from 'promoting' to 'supporting'.	Harlesden Neighbourhood Forum	No change proposed. Policy SP1 has been strengthened to include both promoting and supporting. The supporting text relating to complement the wider network of town centre was removed to avoid repetition with policy SP6.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Cultural Principles	<ul style="list-style-type: none"> • Ensure the Local Plan highlights the importance of culture to the area. • Ensure that character, heritage and culture sit at the heart of placemaking. • Develop a Cultural Strategy to further consider opportunities for culture in the OPDC area.

	<ul style="list-style-type: none"> • Ensure that consultation is meaningful, that it reaches as many people and communities as possible, and that it includes young people and families. • Encourage 'anchor' tenants and cultural institutions to locate in the area, and explore options for attracting and retaining creative businesses and affordable workspace
Future Employment Growth Sectors Study	<p>There are a number of growth sectors which could be supported in Old Oak and Park Royal including:</p> <ul style="list-style-type: none"> • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. <p>Key ways to support these fit into 4 broad themes:</p> <ul style="list-style-type: none"> • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy <p>Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area.</p> <ul style="list-style-type: none"> • Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations.
Housing Evidence Base Statement	<ul style="list-style-type: none"> • There is a significant opportunity at Old Oak and Park Royal to provide a significant number of new homes to meet local and London housing needs. • Given the strategic importance of development envisaged for this area, it is not considered appropriate to assess housing need within the OPDC red line alone. The housing market area has been extended to include the combined area of the London Boroughs of Brent, Ealing and Hammersmith & Fulham. • There is an 86% need for London Affordable Rent housing because of the high cost of housing within the housing market area. This does not necessarily mean that these households would necessarily qualify for council housing. The level of London Affordable Rent housing delivered has a significant impact on financial viability. • OPDC will have overarching 50% affordable housing target measured by habitable room with a tenure split of 30% London

	<p>Affordable Rent and 70% Intermediate housing including Shared Ownership and London Living Rent in order to maximise the overall level of affordable housing delivered.</p> <ul style="list-style-type: none"> • Setting an artificially high family housing target would mean that many units delivered would not have access to acceptable private or communal amenity space or other amenities. These units would unlikely be attractive to families with children.
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Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A

Other evidence base

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

SP2: Good Growth

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
15	Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.
17	<p>Planning should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy)</p> <p>Planning should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.</p>
37	Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
56	The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
57	It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
58	<p>Planning policies and decisions should aim to ensure that developments:</p> <ul style="list-style-type: none"> • will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; • establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit; and • are visually attractive as a result of good architecture and appropriate landscaping
69	Planning policies and decisions, in turn, should aim to achieve places which promote opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street

93	frontages which bring together those who work, live and play in the vicinity. Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.
94	Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, ¹⁶ taking full account of flood risk, coastal change and water supply and demand considerations.
99	Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver climate change mitigation and adaptation.

National Planning Practice Guidance (NPPG)

Climate Change

Policy / paragraph reference	Policy and paragraph text
001	Local planning authorities should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment. To be found sound, <u>Local Plans</u> will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the <u>National Planning Policy Framework</u> .

Design

Policy / paragraph reference	Policy and paragraph text
001	Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.

003	Local planning authorities should secure design quality through the policies adopted in their local plans. Good design is indivisible from good planning, and should be at the heart of the plan making process.
006	<p>Design impacts on how people interact with places. Although design is only part of the planning process it can affect a range of economic, social and environmental objectives beyond the requirement for good design in its own right. Planning policies and decisions should seek to ensure the physical environment supports these objectives. The following issues should be considered:</p> <ul style="list-style-type: none"> • <u>local character (including landscape setting)</u> • <u>safe, connected and efficient streets</u> • <u>a network of greenspaces (including parks) and public places</u> • <u>crime prevention</u> • <u>security measures</u> • <u>access and inclusion</u> • <u>efficient use of natural resources</u> • <u>cohesive and vibrant neighbourhoods</u>
013	<p>The structure, layout and design of places can help reduce their resource requirements in terms of energy demands, water and land take, and help to sustain natural ecosystems. Having a mix of uses and facilities within a neighbourhood can reduce travel demand and energy demands.</p>
014	<p>The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people.</p>
019	<p>A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.</p>
019	<p>Successful places can adapt to changing circumstances and demands. They are flexible and are able to respond to a range of future needs, for example, in terms of working and shopping practices and the requirements of demographic and household change. Buildings often need to change their use over time, for example from offices to housing. Designing buildings that can be adapted to different needs offers real benefits in terms of the use of resources and the physical stability of an area. Design features such as the position and scale of entrances and circulation spaces, and the ability of the construction to be modified, can affect how easily buildings can adapt to new demands. Places that are easy and practical to manage well tend to be more resilient. For example, where maintenance and policing are supported by</p>

	good access, natural surveillance and hard wearing, easy to repair, materials.
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Health and well-being

Policy / paragraph reference	Policy and paragraph text
002	<p>The range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure, include how:</p> <ul style="list-style-type: none"> • potential pollution and other environmental hazards, which might lead to an adverse impact on human health, are accounted for in the consideration of new development proposals; and • access to the whole community by all sections of the community, whether able-bodied or disabled, has been promoted.

London Plan (2016)

Policy / paragraph reference	Policy and paragraph text
3.2	A The Mayor is committed to ensuring equal life chances for all Londoners. Meeting the needs and expanding opportunities for all Londoners – and where appropriate, addressing the barriers to meeting the needs of particular groups and communities – is key to tackling the huge issue of inequality across London.
4.1	The Mayor will work with partners to: b) drive London's transition to a low carbon economy and to secure the range of benefits this will bring
5.1	B Within LDFs boroughs should develop detailed policies and proposals that promote and are consistent with the achievement of the Mayor's strategic carbon dioxide emissions reduction target for London.
5.3	<p>C Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:</p> <ul style="list-style-type: none"> a minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems) c efficient use of natural resources (including water), including making the most of natural systems both within and around buildings d minimising pollution (including noise, air and urban runoff) e minimising the generation of waste and maximising reuse or recycling f avoiding impacts from natural hazards (including flooding) h securing sustainable procurement of materials, using local supplies where feasible

5.18	<p>A New construction, excavation and demolition (CE&D) waste management facilities should be encouraged at existing waste sites, including safeguarded wharves, and supported by:</p> <ul style="list-style-type: none"> b ensuring that major development sites are required to recycle CE&D waste on-site, wherever practicable, supported through planning conditions.
7.1	<p>A In their neighbourhoods, people should have a good quality environment in an active and supportive local community based on the lifetime neighbourhoods principles set out in paragraph 7.4A.</p> <p>C Development should enable people to live healthy, active lives; should maximize the opportunity for community diversity, inclusion and cohesion; and should contribute to people’s sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people’s lives, and should meet the principles of lifetime neighbourhoods.</p>
7.6	<p>A Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.</p> <p>B Buildings and structures should:</p> <ul style="list-style-type: none"> a be of the highest architectural quality e incorporate best practice in resource management and climate change mitigation and adaptation g be adaptable to different activities and land uses, particularly at ground level

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
GG1	<p>Building strong and inclusive communities To build on the city’s tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:</p> <p>A Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal city.</p> <p>B Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.</p> <p>C Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish.</p> <p>D Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the</p>

	<p>daytime, evening and night time.</p> <p>E Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.</p> <p>F Support the creation of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.</p>
GG2	<p>Making the best use of land</p> <p>To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:</p> <p>A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.</p> <p>B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach.</p> <p>C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.</p> <p>D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.</p> <p>E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.</p> <p>F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance</p>
GG3	<p>Creating a healthy city</p> <p>To improve Londoners' health and reduce health inequalities, those involved in planning and development must:</p> <p>A Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.</p> <p>B Promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices.</p> <p>C Use the Healthy Streets Approach to prioritise health in all planning decisions.</p> <p>D Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments.</p> <p>E Plan for improved access to green spaces and the provision of new green infrastructure.</p> <p>F Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.</p> <p>G Seek to create a healthy food environment, increasing the availability of</p>

	healthy food and restricting unhealthy options.
GG4	<p>Delivering the homes Londoners need</p> <p>To create a housing market that works better for all Londoners, those involved in planning and development must:</p> <p>A Ensure that more homes are delivered.</p> <p>B Support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable.</p> <p>C Create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.</p> <p>D Identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset.</p> <p>E Establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.</p>
GG5	<p>Growing a good economy</p> <p>To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:</p> <p>A Promote the strength and potential of the wider city region.</p> <p>B Seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London.</p> <p>C Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.</p> <p>D Ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth.</p> <p>E Ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning.</p> <p>F Promote and support London's rich heritage and cultural assets, and its role as a 24-hour city.</p> <p>G Maximise London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.</p>
GG6	<p>Increasing efficiency and resilience</p> <p>To help London become a more efficient and resilient city, those involved in planning and development must:</p> <p>A Seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050.</p> <p>B Ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, and avoiding contributing to the urban heat island effect.</p> <p>C Create a safe and secure environment which is resilient against the impact of emergencies including fire and terrorism.</p> <p>D Take an integrated approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.</p>

Supplementary Planning Guidance (SPG)

Policy / paragraph reference	Policy and paragraph text
Social Infrastructure SPG Implementation Point 1	In implementing London Plan policies and especially Policy 7.1, the Mayor will, and boroughs and other partners are advised to plan for neighbourhoods which are mixed in use and tenure, and easy and attractive to get around on foot.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Objective 1	CREATE: To create a successful and inclusive new urban quarter, supporting delivery of 24,000 new homes in Old Oak and 1,500 new homes in non-industrial locations in Park Royal. This will include a mix of affordable and market tenures and typologies that meet the needs of new and existing residents. Development of new homes should achieve best practice standards of architecture and urban design, along with the delivery of appropriate levels of new social, physical and green infrastructure to support the future population. This will help create a vibrant and distinctive places / neighbourhoods, and contribute to an integrated, healthy and sustainable place.
Objective 2	CONNECT: To use the catalyst of the new High Speed 2 (HS2)/ Crossrail and National Rail interchange, along with improved local transport connections to regenerate and promote this area as one of London's best connected locations. Old Oak and Park Royal can make a significant contribution to London's competitiveness, in a way that is sustainable, attracts long term investment, meets local needs, and supports the strategic long-term priorities in the Mayor's London Plan (2015). It is also critically important that this area is fully integrated with its surroundings to ensure the free and easy movement of people to, from and within the area.
Objective 3	COMMUNITY: To promote economic growth that helps address deprivation and reduces inequality for local communities and Londoners. To promote community development by providing jobs, homes and social infrastructure that is designed to enhance existing and develop new communities who live, work, commute or access the area. There is an opportunity to coordinate the development and stewardship of public sector land and assets to support the creation of 55,000 new jobs at Old Oak and a further 10,000 new jobs at Park Royal, and work to identify and secure funding streams. There will be a need to deliver training and employment initiatives to support Londoners into employment. This will require close working with the boroughs, key stakeholders, businesses and local communities to ensure local accountability and their involvement.

Objective 4	CONSOLIDATE: To protect and enhance Park Royal as a Strategic Industrial Location. To attract investment that will improve existing operations and maximise the area's industrial potential. There is a need to support the smooth transition of business and industrial relocations. There will also be a need to protect and/or enhance nearby heritage and amenity assets including Wormwood Scrubs and the Grand Union Canal.
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Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
<p>Homes and jobs targets: Question the homes and jobs targets in the Local Plan. Some consultees consider that the figures should be higher, whereas others suggest that the figures should be lower. Request that further work should be undertaken to assess whether the London Plan targets are appropriate and provide justification for why the densities proposed within the Development Capacity Study are appropriate</p>	<p>Hammersmith and Fulham Council, Ealing Council, TITRA, Diocese of London, Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, the Hammersmith Society, Wells House Road Resident's Association, London Sustainable Development Commission, MP for Hammersmith, 4 local residents</p>	<p>No change proposed. The OPDC Local Plan is required to be general conformity with the London Plan and the minimum housing targets for Old Oak and Park Royal. Further work has been undertaken as part of OPDC's Development Capacity Study to test the appropriateness of housing targets in the Local Plan. The Development Capacity Study has been undertaken in accordance with national policy guidance. The Development Capacity Study work has informed the revised targets in the Regulation 19 draft Local Plan. The acceptability of any specific development proposal would be judged against the policies in the Local Plan, which includes policies which ensure that</p>

		design is of a high quality and is in accordance with the principles of sustainable development.
Homes vs Jobs: Too many jobs are proposed and not enough homes	3 local residents	No change proposed. There is a need for the OPDC Local Plan to be in general conformity with the London Plan, which identifies the need to deliver a minimum 25,500 homes and 65,000 jobs in the OPDC area. OPDC considers that the homes and jobs figures to strike the right balance between the need for homes and jobs in the area. The level of transport access and the sites' location make Old Oak and Park Royal an excellent future employment location. This will help London's global competitiveness. This mix of employment and homes will also help create a mixed community. Employment provision is being further tested through OPDC's Future Growth Sectors Study, which will inform the next draft Local Plan.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
There is no mention of how you plan to reduce pollution levels	Robert Covell	No change proposed. The Local Plan sets out a series of measures aimed at reducing pollution levels. This includes, inter alia, prioritising more sustainable modes of transport, in accordance with Policy SP7, requiring development to protect existing and provide new green infrastructure in accordance with SP8, requiring development to deliver an overall improvement in air quality in accordance with Policy EU4, requiring development to

		meet or exceed on-site carbon emissions targets set out in the London Plan in accordance with Policy EU9 and supporting the Circular and Sharing Economy, in accordance with Policy EU7
Support Policy SP2	Mayor of London, T.A.S.B. Investments Ltd, Association for Consultancy and Engineering (ACE), A40 Data Centre B.V, Hammersmith and Fulham Council	Noted.
The good growth policy should reference the transport principles of good growth which are set out in the Mayor's draft Transport Strategy.	Transport for London	No change proposed. The good growth policy in OPDC's Local Plan is specific to OPDC whereas the Mayor's Transport Strategy principles are specific to the Mayor's Transport Strategy. It is therefore not considered appropriate to reference these in OPDC's Good Growth policy in the Local Plan.
Should avoid reference in para 3.11 to hard to define concepts such as community cohesion and empowerment, safety and security and respect of diversity	Old Oak Park Ltd	No change proposed. This text is quoting the principles of lifetime neighbourhoods as defined in DCLG's 'Lifetime Neighbourhoods' document.
Para 3.13 should recognise that not all sites in Park Royal will be suitable for SIL uses above two storeys	A40 Data Centre B.V	No change proposed. The Park Royal Intensification Study identifies different approaches to intensification, some of which would could be achieved by in-fill development and would not require increased building heights. Para 3.32 of the Local Plan identifies that opportunities to intensify Park Royal should be taken, where feasible, recognising that now all sites in Park Royal will be suitable for intensification.
Support SP2b)	Environment Agency	Noted.
Should consider if there is a suitable monitoring indicator for good growth	Hammersmith and Fulham Council	Change proposed. The KPIs have been updated to include monitoring indicators for all strategic policies.

Support SP2d)	ArtWest	Noted.
SP2 is not sound because it is not based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development	St Quintin and Woodlands Neighbourhood Forum	No change proposed. OPDC does not consider that Policy SP2 is unsound. It is not made clear how specifically Policy SP2 is not meeting objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so. SP2 does not directly deal with objectively assessed needs, which predominantly relates to housing targets. Housing targets are dealt with in Policy SP4.
Do not consider SP2 to be the most appropriate strategy and that an alternative strategy would be more successful and more sustainable	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim 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 Policy SP2 to be the most appropriate strategy to support the sustainable regeneration of the area.
The plan needs to recognise the need for flexibility to respond and adapt to change	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 need for flexibility in design is recognised in Policy SP2. Where appropriate, particularly where evidence is more detailed and proposals are likely to come forward sooner, the Local Plan provides greater detail, but where development is not likely to come forward for a significant amount of time and where there are a number of potential design approaches to support the sustainable regeneration of the area, the Local Plan has been drafted with the need for greater flexibility in mind.
There is a mismatch between quantity and quality, between the ambitions for good	Hammersmith Society, Old Oak Interim Forum, Wells House Road Residents	No change proposed. OPDC considers that the densities proposed are consistent with

<p>growth and the densities being proposed</p>	<p>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</p>	<p>the principles of good growth. the Local Plan shows that the future public transport access will create a highly accessible part of London. OPDC considers it appropriate and both consistent with the NPPF and in general conformity with the London Plan to promote high density development in this location. A series of policies in the Local Plan aim to ensure that where high density development is proposed, in delivers development of a high quality, which appropriately addresses issues such as, inter alia, context and townscape (SP9), access and inclusivity (D2), amenity (D6), open space provision (EU1), air quality (EU4) and noise and vibration (EU5).</p>
<p>Technology might improve efficiency, but will not produce better quality</p>	<p>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</p>	<p>No change proposed. OPDC does not propose to amend its approach to designing, constructing and managing a smart and resilient city as outlined in SP2.</p>
<p>Need to set out the evidence lies behind the simplistic assertion that ‘through high density, transit oriented development the greatest sustainability benefits can be realised’. While the present London Plan reflects a policy of building at higher densities near public transport nodes, the concept that Londoners either wish or need to live in extreme ‘super-densities’ in tall buildings around railway stations has not gone unchallenged in recent years.</p>	<p>Old Oak Interim 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</p>	<p>Change proposed. It is a well understood planning principle that high density development should be delivered in the areas of high public transport access. This helps to reduce journeys by less sustainable transport modes and reduces the need for urban sprawl. There is a need to ensure appropriate quality to this form of development, which the Local Plan policies have sought to achieve. However, the text has been amended to 'some of' to note that there may be some strands of sustainability may not realise</p>

		the greatest benefits through transit orientated development.
Support SP2g)	Harlesden Lets	Noted.
Should promote off-site modular construction.	Harlesden Lets	Noted. Off-site modular construction is supported within policy SP2 (advanced construction).
Good growth is a nebulous concept and its attributes lack precision and measurability.	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 good growth policy is a high level strategic policy. Its measurable attributes are embedded throughout the more detailed other strategic and development management policies in the Local Plan. The Local Plan is also supported by Key Performance Indicators relating to Good Growth.
Policy should give greater steer on how to create exemplary developments	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 Local Plan provides detailed policies on how development will be anticipated to deliver exemplary developments.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Proposed addition of wording to Paragraph 3.8 providing spatial guidance for Park Royal.	John Cox	No change proposed. Policy P4 provides spatial guidance for strengthening and intensifying Park Royal Strategic Industrial Location.
References to the transport principles of Good Growth should be provided in the policy, supporting text and cross referenced with the Transport Chapter.	Transport for London	Change proposed. Policy SP7 is the strategic policy for transport. To ensure, the role of transport in delivering Good Growth is recognised, supporting text to policy SP7 will be amended to make reference to the transport principles for Good Growth.
Consider adding a new strategic policy on the issue of climate change adaptation.	London Borough of Hammersmith and Fulham	No change proposed. Policy SP2 provides guidance for delivering an environmentally

		resilient development, that is adaptive to and resilient to climate change.
First Regulation 19 consultation comments still apply.	A40 Data Centre B.V	Noted.
Support shown for SP2 and SP9.	A40 Data Centre B.V	Noted.
Air pollution created by development will need to be monitored.	Central Acton Neighbourhood Forum	Noted. Policy EU4 provides guidance for ensuring development proposals make a positive contribution to an overall improvement in air quality.
Rail stations should form a walking and local transit convenience, close to homes and jobs.	Grand Union Alliance	Noted. Policy T5 provides guidance to ensure stations are integral parts of the local street and movement network and incorporate active frontages. Place policies provide guidance for delivering development adjacent to relevant stations.
Rail stations should be accessible, of a high quality and mixed used.	Grand Union Alliance	Noted. Policy T5 provides guidance to ensure stations are of an outstanding design quality, are destinations and include a range of land uses.
Objections provided as the Local Plan introduces densities above existing London Plan guidance and greater than previous drafts of the Local Plan. Increasing densities has been consistent through the development of the Local Plan. Density levels are not clearly stated in the plan outside of the glossary which does not accord with the NPPF requirements for clarity. Proposed densities for each site should be published for consultation based on development capacity of site allocations. A review of the Regulation 19(1) Local Plan by Cambridge and Berkeley universities and University of Texas demonstrates average densities of 550u/ha and suggests implications for	Nye Jones, Gail Dobinson, Natasha Salkey, Rachel Ritfeld, Ciara Solmi, Bernie Timmins, Jane Dreaper, M. Szoke, James Trew, Eileen Hannington, Marta Donaghey, Jamie Sutcliffe, TITRA, Pablo Navarrete, Jason Salkely, Elaine Gristock, David Turner, Nicky Guymer, Midland Terrace Residents, Bruce Stevenson, Elaine Gristock, Thomas Dyton, Wells House Road Residents Association, The Hammersmith Society, Old Oak Neighbourhood Forum, St Quintin and Woodlands Neighbourhood Forum	No change proposed. In light of the future excellent national, regional and local public transport links to be provided in the area, Old Oak is considered suitable for high density development and Park Royal is considered suitable for protected and intensified industrial uses. This approach is supported by policies set out in the London Plan and reflected in the designation of two Opportunity Areas with a combined target for a minimum of 25,500 new homes and 65,000 new jobs. Opportunity Areas are London's main reservoirs for growth. As such, the current London Plan 2016 (Policy 2.13) and the Draft New London Plan (Policy SD1) supports development in these areas that potentially

<p>these densities should be made clearer and a reduction in development. Delivering building typologies and sustainable communities at these densities has not been tested and is opposed by local people. Examination provides last opportunity for this issues to be raised.</p>		<p>exceeds defined targets by optimising development densities. The Mayor of London's Housing SPG (2016) paragraphs 7.5.7 and 7.5.8 state that targets should be considered as a minimum, to be exceeded and accelerated where possible and that densities in Opportunity Areas may exceed the relevant density ranges in in the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2). The Draft New London Plan 2017 removes the density matrix and instead requires a broader approach that optimises densities. The density range set out in the Local Plan remains unchanged from the Regulation 18 draft Local Plan.</p> <p>OPDC's Development Capacity Study has been developed in accordance with the National Planning Practice Guidance on Housing and Economic Land Availability Assessments to demonstrate how the London plan targets can be delivered. The Development Capacity Study includes development capacity information set out in the Old Oak North Development Framework Principles, Park Royal Development Framework Principles, the Industrial Land Review, Future Employment Growth Sectors Study, Scrubs Lane Development Framework Principles document and the Victoria Road and Old Oak Lane Framework Principles document.</p> <p>No change proposed. Paragraph 10 of the NPPF (2012) requires that "Plans</p>
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		<p>and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas." The average density has been provided in policy SP9 supporting text. The density ranges are set out in the glossary based on information provided in the Development Capacity Study. Providing densities for each site allocation is not considered to be required to fulfil the role of a Local Plan as a strategic planning document. OPDC considers policies SP9 and D5 are consistent with the requirements of NPPF regarding clarity of Local Plans.</p> <p>No change proposed. The student reviews are noted and reflect the average density of 600 units per hectare for Old Oak North set out in the Old Oak North Development Framework Principles. The Local Plan provides series of policies to ensure that high density typologies, required to optimise development capacity to meet targets, are of the highest design quality to support sustainable communities and appropriately address issues such as, inter alia, context and townscape (SP9), access, inclusivity and Healthy Streets (D2), amenity (D6), provision of 30% publicly accessible open space (EU1), air quality (EU4), high quality social infrastructure provision (TCC4) and noise and vibration (EU5). These policies will be supplemented by forthcoming</p>
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		supplementary planning documents.
There is no precedent listed for the higher range densities	London Borough of Hammersmith and Fulham	No change proposed. High density precedents are set out in the Development Capacity Study and the Precedents study.
Support the strong environmental standards being sought through Chapter 6 (Environment and Utilities), and challenge the OPDC to make a commitment to achieve environmental net-gain as set out in in "A greener future: the Governments 25 Environment Plan".	Environment Agency	Change proposed. OPDC consider that the policies across the Local Plan will help to ensure that development achieves environmental net gain as set out in "A greener future: the Governments 25 Environment Plan". Specific reference to the Governments aims for environmental net gain have been included in the supporting text to Policy SP2 (Good Growth).

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Environmental standards study	<ul style="list-style-type: none"> • High density development poses significant challenges to the quality of development in Old Oak and Park Royal. The adoption of short, medium and long term targets should inform all development and applied rigorously or the overall quality of the development and its impact on London could be significant. • Energy use and associated carbon emissions should be measured and assessed rigorously to ensure that the development supports the Mayor's long term aspirations to create a zero carbon city and to meet the zero carbon development requirements established by the mayor for new development. • Water must be managed with care to comply with the IWMS including achieving green field runoff rates and adopting rainwater harvesting and grey water recycling. • Waste in high density development can be very challenging to manage. Targets should therefore be carefully assessed and adopted by development coming forward.
Circular and Sharing Economy Study	<ul style="list-style-type: none"> • To develop initiatives that will promote CSE in construction and operational phases of the project wide scale buy in from developers and businesses is required. OPDC should establish a team to work to secure support. • Target key sectors including food, logistics, clean technology, the sharing economy and smart technology. • Adopt CSE approaches to design of infrastructure development including for example in looking at clean and low carbon sources

	<p>of energy, water and waste and infrastructure that supports reuse of those resources</p> <ul style="list-style-type: none"> • Adopt innovation in CSE in building design for example in design for disassembly and adaptation. • Work with West London Business and Park Royal Business Groups to promote circular economy. • Embed CSE objectives into procurement policy • Embed CSE requirements into policy as far as possible • Work with the GLA, LWARB and Central Government to promote CE • Establish clear objectives and targets for CSE on projects especially on development that is either funded or is developed on public land • Look at ways to capture and include the value (economic, social and environmental) that CE delivers over the long term in assessing development. • Support investment in business and innovation in the CSE in the OPDC area especially in Park Royal
Smart Strategy	<ul style="list-style-type: none"> • Deliver a secure and open, interoperable digital environment. • Utilise technology and digital systems to: <ul style="list-style-type: none"> ○ assist in the planning, delivery and management of development ○ create opportunities and address challenges ○ enhance quality of life for residents, employees and visitors • Incentivise the growth of emerging smart city economic sectors. • Embed flexibility and agility in the built and natural environment alongside infrastructure to accommodate change. • Explore and support the use of emerging transport modes • Establish and manage an urban digital platform. • Require the use and delivery of the most recent Building Information Modelling data for development and infrastructure proposals. • Deliver integrated utilities infrastructure that is planned and managed through sensors to increase efficiencies and minimise disruptions to the public realm. • Consider using appropriate technology to improve and support the safety of people and the wider built environment. • Make use of emerging construction techniques to support the delivery of resilient low-carbon and energy efficient buildings and spaces that help to actively address pollution.
Statement of Community Involvement	<ul style="list-style-type: none"> • 10 ground rules for engagement are identified: inclusive invitation, authorisation, continuity, independent advice, early involvement, presenting options, choosing between options, consensus, transparent records and feedback on the outcome of community involvement

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
OPDC Circular and Sharing Economy	<ul style="list-style-type: none"> • To develop initiatives that will promote CSE in 	<ul style="list-style-type: none"> • Recommendations are supported by OPDC and will form part of the

Study	<p>construction and operational phases of the project wide scale buy in from developers and businesses is required. OPDC should establish a team to work to secure support.</p> <ul style="list-style-type: none"> • Adopt innovation in CSE in building design for example in design for disassembly and adaptation. • Work with West London Business and Park Royal Business Group to promote circular economy. • Embed CSE objectives into procurement policy • Work with the GLA, LWARB and Central Government to promote CE • Establish clear objectives and targets for CSE on projects especially on development that is either funded or is developed on public land • Look at ways to capture and include the value (economic, social and environmental) that CE delivers over the long term in assessing development. • Support investment in business and innovation in the CSE in the OPDC area especially in Park Royal 	<p>organisations wider corporate objectives but are not considered appropriate for Local Plan policy. Some details may be included in future SPDs.</p>
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Other evidence base

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

SP3: Improving health and reducing health inequalities

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	Planning should take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.
171	Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being

National Planning Practice Guidance (NPPG)

Design

Policy / paragraph reference	Policy and paragraph text
012	The layout and design of buildings and planting can reduce energy and water use and mitigate against flooding, pollution and over heating.

Health and well-being

Policy / paragraph reference	Policy and paragraph text
002	<p>The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing. The importance of this role is highlighted in the <u>promoting health communities section</u>. This is further supported by the 3 dimensions to sustainable development.</p> <p>The range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure, include how:</p> <ul style="list-style-type: none"> • Development proposals can support strong, vibrant and healthy communities and help create healthy living environments which

005	<p>should, where possible, include making physical activity easy to do and create places and spaces to meet to support community engagement and social capital</p> <ul style="list-style-type: none"> • the local plan promotes health, social and cultural wellbeing and supports the reduction of health inequalities • opportunities for healthy lifestyles have been considered (eg planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, <u>green infrastructure</u> and opportunities for play, sport and recreation) <p>A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage:</p> <ul style="list-style-type: none"> • Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport. • The creation of healthy living environments for people of all ages which supports social interaction. It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.
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London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
3.2	<p>E Boroughs should:</p> <ol style="list-style-type: none"> a) work with key partners to identify and address significant health issues facing their area and monitor policies and interventions for their impact on reducing health inequalities b) promote the effective management of places that are safe, accessible and encourage social cohesion c) integrate planning, transport, housing, environmental and health policies to promote the health and wellbeing of communities d) ensure that the health inequalities impact of development is taken into account in light of the Mayor's Best Practice Guidance on Health issues in Planning.
5.3	<p>C Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:</p>

	<p>b avoiding internal overheating and contributing to the urban heat island effect</p> <p>g ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions</p>
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Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
GG3	<p>Creating a healthy city</p> <p>To improve Londoners' health and reduce health inequalities, those involved in planning and development must:</p> <p>A Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.</p> <p>B Promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices.</p> <p>C Use the Healthy Streets Approach to prioritise health in all planning decisions.</p> <p>D Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments.</p> <p>E Plan for improved access to green spaces and the provision of new green infrastructure.</p> <p>F Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.</p> <p>G Seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.</p>
S2	<p>Health and social care facilities</p> <p>A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:</p> <ol style="list-style-type: none"> 1) identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies 2) understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes 3) regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross-boundary issues 4) identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision 5) identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses. <p>B Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care</p>

	should be supported. C New facilities should be easily accessible by public transport, cycling and walking.
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Supplementary Planning Guidance (SPG)

Policy / paragraph reference	Policy and paragraph text
Social Infrastructure SPG Implementation Point 2	In implementing London Plan policies and especially Policy 3.2, and Policy 3.16, the Mayor will, and boroughs and other partners are advised to: <ul style="list-style-type: none"> - apply HIAs wherever a development or plan may have significant implications for people's health and wellbeing. - Consider the possibilities for development plans in Opportunity Areas to improve health outcomes and facilities particularly where these coincide with areas of multiple deprivation

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Objective 1	CREATE: To create a successful and inclusive new urban quarter, supporting delivery of 24,000 new homes in Old Oak and 1,500 new homes in non-industrial locations in Park Royal. This will include a mix of affordable and market tenures and typologies that meet the needs of new and existing residents. Development of new homes should achieve best practice standards of architecture and urban design, along with the delivery of appropriate levels of new social, physical and green infrastructure to support the future population. This will help create a vibrant and distinctive places / neighbourhoods, and contribute to an integrated, healthy and sustainable place.
Objective 3	COMMUNITY: To promote economic growth that helps address deprivation and reduces inequality for local communities and Londoners. To promote community development by providing jobs, homes and social infrastructure that is designed to enhance existing and develop new communities who live, work, commute or access the area. There is an opportunity to coordinate the development and stewardship of public sector land and assets to support the creation of 55,000 new jobs at Old Oak and a further 10,000 new jobs at Park Royal, and work to identify and secure funding streams. There will be a need to deliver training and employment initiatives to support Londoners into employment. This will require close working with the boroughs, key stakeholders, businesses and local communities to ensure local accountability and their involvement.

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph	Policy and paragraph text
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reference	
	No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Public health: Support for wider role of public health and looking at a broader range of health provision and how this could be achieved through the healthy new town concept.	LSDC, Brent Council, Midland Terrace Resident's Group, Old Oak Park (DP9), 1 local resident	<p>Noted. OPDC is also supportive and acknowledges the importance of public health and has appointed a dedicated Health Advisor who will be working collaboratively with a range of stakeholders to help embed public health objectives into relevant policies and strategies.</p> <p>The revised Local Plan includes details of required on-site healthcare provision in Policy TCC4, in relevant place policies and in OPDC's infrastructure Delivery Plan (IDP).</p>

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Policies need to reflect that there is a high level of deprivation and obesity in the area	NHS Brent CCG,	No change proposed. The high levels of deprivation and obesity in the local area are referenced in Figure A1.9 in the appendix. Policy SP3 recognises the need for the development of the area to assist in improving health and tackling health inequalities. The requirements of SP3 are delivered through a series of policies in the Local Plan that address open space and play space provision, indoor

		daylight and sunlight standards, outdoor impacts such as wind, noise and air quality and policies aimed at reducing pollution, such as SP7 (connecting people and places) and EU9 (minimising carbon emissions and overheating). The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study, incorporating SA/SEA requirements.
Support approach to and recognition of importance of health and well-being	Sport England	Noted.
The healthy streets approach should be recognised as a core element to this policy and reference to T1 should be made in the supporting text.	Transport for London	Change proposed. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. However, reference has been made to how healthy streets can contribute to a healthy outdoor environment in the supporting text. The policy links box includes the transport chapter, in recognition that the requirements set out in the transport chapter have a relation to improving health and reducing health inequalities. This is not limited to the Healthy Streets Approach and also relates to issues such as controlling car parking and promoting electric vehicle charging and promoting the movement of freight and construction materials by rail and the canal. The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
Support Policy SP3	Sport England,	Noted.

	Hammersmith and Fulham Council, West Twyford Primary School, Hammersmith Society	
Policy SP3 should acknowledge the role that sport and leisure activities can play in supporting health and well-being.	Sport England	No change proposed. There are a number of determinants of good or poor health and well-being and all cannot all be referenced in this policy or in supporting text. The policy links box includes the environment and utilities and town centre and community uses chapters, in recognition that the requirements set out in these chapters, which includes access to sports and leisure activities, has a relation to improving health and reducing health inequalities. The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
Whilst OPDC was not successful in its bid to be a Healthy New Town, a set of principles could be developed and included in Policy SP3 that set out how the OPDC area will deliver innovation and best practice in health and well-being outcomes	Healthy Urban Development Unit	No change proposed. There are a multitude of determinants of health and there are a range of policies throughout the Local Plan aimed at improving health and reducing health inequalities. OPDC considers that all these would support the area being developed as a Healthy New Town, in spirit if not in designation. It is not considered appropriate to repeat these policy requirements under Policy SP3.
the policy could make reference to the need to address adverse environmental impacts and link to policy EU4, EU5 and EU13	Healthy Urban Development Unit	Change proposed. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. However, reference has been made to how environmental impacts should be addressed in the outdoor environment. The policy links box includes the

		environment and utilities chapter, in recognition that the requirements set out in this chapter have a relation to improving health and reducing health inequalities. The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
Need to recognise the need for coordinating construction activities and mitigation measures to minimise the impact on existing and future communities	Healthy Urban Development Unit	No change proposed. The requirements for coordinating construction activities and ensuring appropriate mitigation measures are covered elsewhere in the Local Plan in policies SP10 and T8.
Support requirement for Health Impact Assessments	Healthy Urban Development Unit	Noted.
The supporting text could also refer to the role that EIAs play in addressing human health issues	Healthy Urban Development Unit	No change proposed. The need to produce Environmental Impact Assessments (EIAs) is governed by separate legislation. It is not felt necessary to identify that such assessments consider human health impacts. Such assessments also assess development impacts on other aspects and it is considered that if reference is made in SP3 to human health being a consideration within EIAs, other elements of the document would need to make reference to the other aspects dealt with in an EIA, adding unwarranted factual detail to the Local Plan.
North Pole Road is dominated by cheap confectionary, discounted alcohol and multipacks. Someone needs to take control of the High Street and improve local residents' health	Ark Burlington Danes Academy	Noted. North Pole Road is outside of the OPDC area but OPDC is looking to control uses that impact on health within the OPDC such as hot-food takeaways, betting shops, amusement arcades and pay-day loan shops. This is dealt with in Policy TCC2. Issues such as

		the availability of confectionary and discounted alcohol fall outside of the remit of planning.
Projections for improving health are excessively positive and are therefore unsound	Friary Park Preservation Group	No change proposed. OPDC considers that the application of the policy within SP3 and the application of other policies within the plan will help to ensure that development does help to improve health and reduce health inequalities.
The establishment of a Low Emissions Neighbourhood discussed in para 6.47 should be incorporated as a policy requirement in SP3.	Wells House Road Residents Association, Joanna Betts, Francis, Mark and Caroline Sauzier, Lily Gray, Catherine Sookha, Thomas Dyton	No change proposed. OPDC are in discussions about the potential designation of a Low Emissions Neighbourhood (LEN) within the OPDC area. Any designation would need to undergo a separate decision process, within OPDC and TfL and therefore cannot be made a policy requirement through this Local Plan. In addition, air quality matters are one of many determinants of health. Policy SP3 is a high level strategic policy addressing determinants of health in a rounded manner. It is not felt appropriate to address specific air quality matters here, and that instead, these matters should be appropriately addressed in the air quality policy.
Policy SP3 references that most people spend their times indoors, but consideration should also be given to air quality issues outdoors in specific areas used by vulnerable groups such as children (play space) and the elderly (open space in general)	Wells House Road Residents Association, Joanna Betts, Francis, Mark and Caroline Sauzier, Lily Gray, Catherine Sookha, Thomas Dyton	No change proposed. Consideration has been given to the outdoor environment - this is set out in the preceding paragraph to the paragraph dealing with the indoor environment. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. The policy links box includes the environment and utilities and design chapter, in recognition that the

		<p>requirements set out in this chapter have a relation to improving health and reducing health inequalities. This includes policy EU4 on air quality, policy EU1 on open space and policy D9 on play space. The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.</p>
<p>Policy as it stands is unjustified as it does not set out how positive health outcomes will be achieved through other strategic and more detailed policies.</p>	<p>Old Oak Interim 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</p>	<p>No change proposed. OPDC considers that the Local Plan policies will support the reduction of health inequalities and the delivery of improved health. There are a number of facets to this, dealt with across a number of policies throughout the plan. In broad terms, it includes, inter alia, delivering new housing to meet a range of needs, delivering new jobs across a range of sectors and skills levels, delivering new transport infrastructure that prioritises sustainable transport modes and delivering a high quality place, with consideration given to amenity, air quality and ensuring adequate access to open space and town centre and community facilities to meet needs.</p>
<p>The design, size and practicality of living accommodation should also be considered as an important factor impacting on health and well-being.</p>	<p>Harlesden Lets</p>	<p>No change proposed. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. The policy links box includes the housing chapter, in recognition that the requirements set out in this chapter have a relation to improving health and reducing health inequalities. This includes policy H3 on housing mix, which requires</p>

		self-contained housing to meet London Plan and national housing space standards and that requires 90% of homes to meet Building Regulation M4(2) and 10% to meet M4(3). The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
Well-being can reduce the costs in health-care, crime and public resources	Harlesden Lets	Noted.
The proposals for high densities and tall buildings contradicts the desire for a healthy environment	Harlesden Lets	No change proposed. OPDC disagrees that support for tall buildings necessarily negatively impacts on the creation of a healthy environment. The policies in the Local Plan require that development ensures high standards of design of tall buildings. Relevant policies include SP9, D4, D5, D6 and D8, amongst many others.
The policy is silent on a number of key issues that have significant impact on health and health inequalities including air quality (with the exception of indoor air quality mentioned in 3.22), overcrowded homes and gypsy and travellers' accommodation. Further detail should be added and the policy should require proposals to support reducing these specific existing health inequalities.	Harlesden Lets, 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. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. Air quality is referenced in relation to indoor air quality as noted but text has now been inserted referencing air quality in relation to the outdoor environment. The policy links box includes the housing chapter that includes policies on gypsies and travellers and which includes policies for the delivery of new homes to address the chronic demand for new housing in London. The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.

The Local Plan should recognise overcrowding as having a negative impact on health and well-being and set out how this is being addressed	Harlesden Lets, 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. There are a number of determinants of good or poor health and well-being and all cannot all be referenced in this policy or in supporting text. The Local Plan includes policies aimed at tackling overcrowding, particularly by seeking to increase housing supply and provide a range of housing types and tenures (Policy SP4).
Healthy streets will encourage active lifestyles	Association for Consultancy and Engineering (ACE)	Change proposed. Wording has been inserted to recognise the benefits of healthy streets to health and well-being.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The reference to the Healthy Streets approach and mode shift in the supporting text is welcomed although the importance of encouraging active and sustainable travel should be included as a core part of this policy.	Transport for London	No change proposed. Policy SP7 provides guidance to support active and sustainable travel.
Need a commitment that health and welfare and public services will be protected, monitored and if necessary enhanced during all the period of development.	Central Acton Neighbourhood Forum	No change proposed. Policy TCC4 on Social Infrastructure seeks to protect and existing facilities and supports proposals for new and enhanced facilities. Types of social infrastructure can include health, education, emergency service and community infrastructure.
Concern about how proposals, including industrial intensification, will affect the quality of residential areas. SP3 should be at forefront of any redevelopment plans for this site.	Grand Union Alliance	No change proposed. Policy SP3 applies across the whole OPDC area, including Park Royal. Local Plan policies SP9, D4, D5, D6, EU4 and EU5 with London Plan policies and national guidance will be used to ensure existing residential areas benefit from appropriate standards of

		amenity.
<p>It is possible for two adjacent “new city centres” to be formed in the core area, one more associated with the new stations, the other forming a link with Willesden Junction and Harlesden to the north. A new range of jobs, amenities, homes, shops, and street environments can be brought to the area. All buildings should be scaled in relationship to the qualities of pedestrian streets, - dense, but also able to capture the beneficial effects of sun and with small pocket parks. Historically, this sense of mixed, complex city street can be found in St James, Marylebone, Bermondsey, and Bloomsbury.</p>	Grand Union Alliance	<p>Noted. Policy SP6 provides guidance for the distribution of land uses, including town centre and employment uses. Policy TCC1 provides further detail for the location of town centre uses and approach to managing impacts on existing centres. Policies SP9, D2, D4, D5 and D6 provide guidance in relation to the design of the public realm and built form.</p>
<p>Old Oak Common and Park Royal plans should emphasize health as a lead quality by offering clean air, have few polluting vehicles, and a healthy walking environment. This should be complemented by local food production.</p>	Grand Union Alliance	<p>No change proposed. Improving health and reducing health inequalities is part of OPDC's strategic policy approach as demonstrated through the inclusion of Policy SP3. Other policies in the Local Plan will promote improvements in air quality (Policy EU4), promote delivery of the Healthy Streets Approach (T1), support walking (T2) and deliver new urban greening that can include food growing facilities (EU1 and EU2).</p>
<p>The term “healthy streets” could be interpreted to a narrow definition of “streets”. Additional text should be added to clarify that the term encompasses green and blue infrastructure, off road routes etc which all contribute to providing sustainable active travel routes.</p>	Canal & River Trust	<p>No change proposed. The Healthy Streets approach covers 10 themes. This is clearly set out in Policy T1 and in the Mayors Transport Strategy.</p>

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Environmental Standards Study	<ul style="list-style-type: none"> Minimum standards for air quality, noise and vibration should be set that exceed the government targets by ensuring that development assesses and adopts measures to deliver high quality development to support health and well being of local communities.
Development Infrastructure Funding Study	<ul style="list-style-type: none"> The scale of population growth at Old Oak effectively means that we are dealing with a new town. There will be 24,000 new homes, and so social infrastructure requirements are substantial. We see a need for around £191m (gross) of new social infrastructure needed for a thriving new community, including new schools, open space, play space, and community centres. Service providers remain under great pressure to deliver services for less money. This is likely to continue to force significant innovations in service delivery and estates strategies. 30.78 A steering group will be able to keep the OPDC informed of these changes and ensure that the future infrastructure is tailored to future delivery strategies.
Social Infrastructure Needs Study	<ul style="list-style-type: none"> 1 primary school 1 secondary school 1 health hub Expansions to Central Middlesex Hospital and Hammersmith Hospital 4 supernurseries 2 community hubs 2 sports centres
Infrastructure Delivery Plan	<ul style="list-style-type: none"> The items identified in the Infrastructure Schedule for health focus on primary health provision. Other types of health provision may be required as development proposals come forward and the OPDC gains a better understanding of the future population. Currently the proposals focus on the expansion of two existing primary care facilities and the delivery of a new facility within the OPDC area. These projects are supported by Policy TCC4 of the regulation 19 OPDC Local Plan 2017 and the following studies; Development Infrastructure Funding Study (DIFS); Social Infrastructure Needs Study and the Precedents Study.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	N/A	N/A

Other evidence base

Supporting Study	Recommendations
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	<ul style="list-style-type: none">• None
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SP4: Thriving communities

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	<p>Planning should proactively drive and support sustainable economic development to deliver the homes ... and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing ... needs of an area, and respond positively to wider opportunities for growth.</p>
	<p>Planning should take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.</p>
37	<p>Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.</p>
38	<p>Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.</p>
50	<p>To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:</p> <ul style="list-style-type: none"> • plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); • identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.
70	<p>To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.</p>
156	<p>Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:</p> <ul style="list-style-type: none"> • the homes ... needed in the area; • the provision of health, security, community and cultural infrastructure and other local facilities
173	<p>Pursuing sustainable development requires careful attention to viability and</p>

	costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
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National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
<p>What is the purpose of the assessment of housing and economic development needs guidance?</p> <p>Paragraph: 001 Reference ID: 2a-001-20140306</p> <p>Revision date: 06 03 2014</p>	<p>This guidance supports local planning authorities in objectively assessing and evidencing development needs for housing (both market and affordable);</p> <p>The assessment of housing needs includes the Strategic Housing Market Assessment requirement as set out in the National Planning Policy Framework.</p>
<p>What is the primary objective of the assessment?</p> <p>Paragraph: 002 Reference ID: 2a-002-20140306</p> <p>Revision date: 06 03 2014</p>	<p>The primary objective of identifying {housing) need is to:</p> <ul style="list-style-type: none"> • identify the future quantity of housing needed, including a breakdown by type, tenure and size; • provide a breakdown of that analysis in terms of quality and location, and to provide an indication of gaps in current land supply.
<p>What is the definition of need?</p> <p>Paragraph: 003 Reference ID: 2a-003-20140306</p> <p>Revision date: 06 03 2014</p>	<p>Need for housing in the context of the guidance refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.</p> <p>Need for all land uses should address both the total number of homes or quantity of economic development floorspace needed based on quantitative assessments, but also on an understanding of the qualitative requirements of each market segment.</p> <p>Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios,</p>

	only future scenarios that could be reasonably expected to occur.
<p>Can local planning authorities apply constraints to the assessment of development needs?</p> <p>Paragraph: 004 Reference ID: 2a-004-20140306</p> <p>Revision date: 06 03 2014</p>	<p>The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.</p>
<p>What can the Community Infrastructure Levy be spent on (and by whom)?</p> <p>Paragraph: 071 Reference ID: 25-071-20140612</p> <p>Revision date: 12 06 2014</p>	<p>The levy can be used to fund a wide range of infrastructure, including transport, flood defences, schools, hospitals, and other health and social care facilities (for further details, see section 216(2) of the Planning Act 2008, and regulation 59, as amended by the 2012 and 2013 Regulations). This definition allows the levy to be used to fund a very broad range of facilities such as play areas, parks and green spaces, cultural and sports facilities, academies and free schools, district heating schemes and police stations and other community safety facilities. This flexibility gives local areas the opportunity to choose what infrastructure they need to deliver their relevant Plan (the Local Plan in England, Local Development Plan in Wales, and the London Plan in London). Charging authorities may not use the levy to fund affordable housing.</p> <p>Local authorities must spend the levy on infrastructure needed to support the development of their area, and they will decide what infrastructure is needed. The levy is intended to focus on the provision of new infrastructure and should not be used to remedy pre-existing deficiencies in infrastructure provision unless those deficiencies will be made more severe by new development.</p> <p>The levy can be used to increase the capacity of existing infrastructure or to repair failing existing infrastructure, if that is necessary to support development.</p> <p>In London, the regulations restrict spending by the Mayor to funding roads or other transport facilities, including Crossrail, to ensure a balance between the spending priorities of the boroughs and the Mayor.</p> <p>Local authorities must allocate at least 15% of levy receipts to spend on priorities that should be agreed with the local community in areas where development is taking place. This can increase to a minimum of 25% in <u>certain circumstances</u>.</p>

London Plan (2016)

Policy / paragraph reference	Policy and paragraph text
3.3	<p>D) Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1, if a target beyond 2025 is required, boroughs should roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target.</p> <p>Da) Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need (see Policy 3.8) and supply in line with the requirement of the NPPF</p> <p>E) Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including: - opportunity and intensification areas and growth corridors (see policies 2.13 and 2.3)</p>
3.16	<p>E) Boroughs should ensure that adequate social infrastructure provision is made to support new developments. If the current use of a facility is no longer needed, boroughs should take reasonable steps to identify alternative community uses where the needs have been identified. Adequate provision for social infrastructure is particularly important in areas of major new development and regeneration and should be addressed in opportunity area planning frameworks and other relevant area action plans.</p>
7.1	<p>B Development should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure</p>

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
H1	<p>A. Table 4.1 sets the ten-year targets for net housing completions which each local planning authority should plan for. Boroughs must include these targets in their Development Plan documents.</p> <p>B. To ensure that ten-year housing targets are achieved:</p> <ol style="list-style-type: none"> 1. boroughs should prepare delivery focused Development Plans which: <ol style="list-style-type: none"> a. allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification b. encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2 c. enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA. 2. boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development

	<p>Plans and planning decisions, especially the following sources of capacity:</p> <ul style="list-style-type: none"> a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary b) mixed-use redevelopment of car parks and low-density retail parks c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses d) the redevelopment of surplus utilities and public sector owned sites e) small housing sites (see Policy H2 Small sites) f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function. <p>C. Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.</p> <p>D. Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 which identify the sources of housing capacity (including windfall) expected to contribute towards achieving housing targets and should work with the Mayor to resolve any anticipated shortfalls.</p> <p>E. Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.</p> <p>F. On sites that are allocated for residential and mixed-use development there is a general presumption against single use low-density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development.</p>
H3	<p>A. The strategic target is for 50 per cent of all new homes delivered across London to be affordable. Specific measures to achieve this aim include:</p> <ul style="list-style-type: none"> 1. requiring residential and mixed-use developments to provide affordable housing through the threshold approach (Policy H6 Threshold approach to applications) 2. using grant to increase affordable housing delivery beyond the level that would otherwise be provided 3. affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio 4. public sector land delivering at least 50 per cent affordable housing across its portfolio 5. strategic partners with agreements with the Mayor aiming to deliver at least 60 per cent affordable housing across their portfolio. <p>B. Affordable housing should be provided on site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners. Affordable housing must only be provided off-</p>

	site or as a cash in lieu contribution in exceptional circumstances.
S1	<p>C. Boroughs, in their Development Plans, should undertake a needs assessment of social infrastructure to meet the needs of London’s diverse communities.</p> <p>D. In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans.</p> <p>E. Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.</p> <p>F. Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.</p> <p>G. New facilities should be easily accessible by public transport, cycling and walking.</p> <p>H. Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless:</p> <ol style="list-style-type: none"> 1. there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood, or; 2. the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services. <p>I. Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.</p>
S2	<p>A. Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:</p> <ol style="list-style-type: none"> 1. identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies 2. understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes 3. regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross-boundary issues 4. identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision 5. identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses. <p>B. Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported.</p> <p>C. New facilities should be easily accessible by public transport, cycling and</p>

	walking.
S3	<p>A. To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:</p> <ol style="list-style-type: none"> 1. identify and address local needs and any shortages in supply, both locally and sub-regionally, including cross-boundary issues 2. identify sites for future provision through the Local Plan process, particularly in areas with significant planned growth and/or need 3. ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need. <p>B. Development proposals for education and childcare facilities should:</p> <ol style="list-style-type: none"> 1. locate facilities in areas of identified need 2. locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling 3. locate entrances and playgrounds away from busy roads, with traffic calming at entrances 4. link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to encourage walking and cycling 5. maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures 6. encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities 7. ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach 8. ensure that facilities incorporate suitable, accessible outdoor space 9. locate facilities next to parks or green spaces, where possible 10. ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.

S4	<p>A. Boroughs should:</p> <ol style="list-style-type: none"> 1. undertake audits of existing play and informal recreation provision and opportunities, and assessments of need, considering the quantity, quality and accessibility of provision 2. produce strategies on play and informal recreation facilities and opportunities, supported by Development Plan policies, to address identified needs. <p>B. Development proposals for schemes that are likely to be used by children and young people should:</p> <ol style="list-style-type: none"> 1. increase opportunities for play and informal recreation and enable children and young people to be independently mobile 2. for residential developments, incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: <ol style="list-style-type: none"> a. provides a stimulating environment b. can be accessed safely from the street by children and young people independently c. forms an integral part of the surrounding neighbourhood d. incorporates trees and/or other forms of greenery. 3. incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently 4. for large-scale public realm developments, incorporate incidental play space to make the space more playable 5. not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand
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Social Infrastructure Supplementary Planning Guidance (SPG) 2015

Policy / paragraph reference	Policy and paragraph text
Chapter 3 Planning for Social Infrastructure	<p>Future social infrastructure requirements will be determined by projections of future population needs and capacity of current provision to meet those needs.</p> <p><i>Future population needs</i></p> <p>Estimates of future social infrastructure requirements will be influenced by population projections and housing trajectories. The 2015 London Plan is based on the GLA's own population and household projections. These are considered more authoritative than projections currently provided by ONS and Department for Communities and Local Government (DCLG). It is not only the size, but the composition of the future population and housing stock that should be considered when assessing future service need. In particular, residential unit size and tenure and future population characteristics are important considerations. Residential unit size and tenure will influence the type of occupancy of housing stock. For example, large privately owned housing tends to have lower occupancy rates, whereas social rented housing is likely to have the highest occupancy rates, which will have significant impacts on local population numbers.</p> <p>The socio-economic characteristics (including age, household composition, disability, and ethnicity) of the future population living in existing and planned developments will play a key role in determining their specific social</p>

	<p>infrastructure needs. For example, an ageing population will place a higher burden on health and social care services (see Chapter 5 of this SPG), while rising birth rates impact on the required number of school places and safe places to play. The type of migration, both inwards and outwards, will also have an important impact on the future composition of a population.</p> <p><i>Current infrastructure surplus or deficit</i></p> <p>The analysis of the condition and capacity of existing social infrastructure in stage 2 may identify geographic areas of current surplus or deficiency. Combining this information with projections of population growth, demographic change and associated service needs, will help to identify localities with future deficiencies or surpluses in services/facilities. In commercial areas, the social infrastructure needs of increased daytime populations resulting from business, office and retail floor space projections should also be considered. In the unique circumstances of the Central Activity Zone (CAZ), London Plan Policy 2.12 requires boroughs to work with social infrastructure providers to meet the needs of both local residents and the large numbers of visitors and workers.</p> <p><i>Future social infrastructure requirements</i></p> <p>Once future population needs have been determined and areas of surplus or deficit identified, this information should be used to forecast associated social infrastructure services/facilities requirements – including access, space requirements and/or the need to remodel services.</p> <p>Boroughs should work with service providers to agree any standards of provision for different services and subsequent space requirements as these are a matter for local determination. Analytical tools available to support this analysis are listed in Figure 5 below.</p> <p>Identified future social infrastructure requirements should then be mapped to compare current capacity and accessibility of services/facilities with the location and scale of new demand.</p>
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Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Objective 1	<p>CREATE: To create a successful and inclusive new urban quarter, supporting delivery of 24,000 new homes in Old Oak and 1,500 new homes in non-industrial locations in Park Royal. This will include a mix of affordable and market tenures and typologies that meet the needs of new and existing residents. Development of new homes should achieve best practice standards of architecture and urban design, along with the delivery of appropriate levels of new social, physical and green infrastructure to support the future population. This will help create a vibrant and distinctive places / neighbourhoods, and contribute to an integrated, healthy and sustainable place.</p>
Objective 3	<p>COMMUNITY: To promote economic growth that helps address deprivation and reduces inequality for local communities and Londoners. To promote community development by providing jobs, homes and social infrastructure that is designed to enhance existing and develop new communities who live, work, commute or access the area. There is an opportunity to coordinate the</p>

	development and stewardship of public sector land and assets to support the creation of 55,000 new jobs at Old Oak and a further 10,000 new jobs at Park Royal, and work to identify and secure funding streams. There will be a need to deliver training and employment initiatives to support Londoners into employment. This will require close working with the boroughs, key stakeholders, businesses and local communities to ensure local accountability and their involvement.
Principle L1	The core development area is focussed at Old Oak (see figure 17). This area should be redeveloped as a sustainable and healthy mixed-use part of west London. In conformity with the London Plan this new urban quarter should be comprehensively redeveloped to accommodate a minimum of 24,000 new homes, and 55,000 jobs. To achieve this, there will be a requirement for significant new transport, utility and social infrastructure provision to meet the requirements of the future population. OPDC will, through its Local Plan, carry out work to further consider the deliverable quantum of development.

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
OSP2	There was no Thriving Communities Policy in the Regulation 18 Local Plan. However, OSP2 covered homes targets and the need to provide the social infrastructure to support the new population. No reasonable alternative policy options were identified. This is because OPDC's Local Plan must be in general conformity with the London Plan and seek to meet the identified homes targets as set out in table 4.1 in the draft London Plan 2017.
S1	Require new social infrastructure to be provided solely on-site rather than looking to expand surrounding existing facilities. This approach would help with placemaking, by delivering a range of community facilities on-site in earlier development phases. This approach may also have benefits on the transport network as new residents would not have to travel as far to access community uses. However, this option would not help to knit the residents and employees on early sites with the existing community and may leave these sites feeling isolated in early years.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Homes and jobs targets: Question the homes and jobs targets in the Local Plan. Some consultees	Hammersmith and Fulham Council, Ealing Council, TITRA, Diocese of London, Grand Union Alliance,	No change proposed. The OPDC Local Plan is required to be general conformity with the London Plan and the

<p>consider that the figures should be higher, whereas others suggest that the figures should be lower. Request that further work should be undertaken to assess whether the London Plan targets are appropriate and provide justification for why the densities proposed within the Development Capacity Study are appropriate</p>	<p>Midland Terrace Resident's Group, Old Oak Interim Forum, the Hammersmith Society, Wells House Road Resident's Association, London Sustainable Development Commission, MP for Hammersmith, 4 local residents</p>	<p>minimum housing targets for Old Oak and Park Royal. Further work has been undertaken as part of OPDC's Development Capacity Study to test the appropriateness of housing targets in the Local Plan. The Development Capacity Study has been undertaken in accordance with national policy guidance. The Development Capacity Study work has informed the revised targets in the Regulation 19 draft Local Plan. The acceptability of any specific development proposal would be judged against the policies in the Local Plan, which includes policies which ensure that design is of a high quality and is in accordance with the principles of sustainable development.</p>
<p>New social infrastructure: Infrastructure should be included as part of the development. It was recognised that these may be isolated in the early phases so the expansion of existing facilities should be explored; however, it was also noted that existing education and health infrastructure may already be under strain/ have no spare capacity.</p>	<p>Brent Council; Royal Borough of Kensington and Chelsea; Diocese of London; Midland Terrace Resident's; Old Oak Interim Forum; Hammersmith and Fulham Council, 1 local resident</p>	<p>Change proposed. OPDC's Local Plan is now supported by more detailed evidence on social infrastructure. This includes the allocation of sites to deliver required on-site infrastructure. Social infrastructure requirements are set out in Policies TCC4 and in the place policies, specifically Policy P1 (Old Oak South), P2 (Old Oak North) and North Acton and Acton Wells (P7).</p>

Regulation 19 (1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
<p>Do not consider Policy SP4 on Thriving Communities to be 'positively prepared' in respect of the housing element of these policies and based on a strategy which seeks to meet objectively</p>	<p>St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and</p>	<p>No change proposed. As set out in the Housing Evidence Statement, the Strategic Housing Market Assessment (SHMA) considered the objectively assessed housing need within the land within</p>

<p>assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development</p>	<p>Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton</p>	<p>the Old Oak and Park Royal red-line boundary as would usually be the case for a local authority in identifying its housing market area for determining housing need and in accordance with the NPPF and existing guidance on assessing housing need in strategic housing market assessments. Based on a current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). However, as Opportunity Areas identified in the London Plan with the capacity to provide at least 25,500 homes, Old Oak and Park Royal can also help to meet city-wide housing need. The Development Capacity Study is part of the evidence base of this Local Plan identified the actual capacity for new homes in the area based on the requirements of a Housing and Economic Land Availability Assessment, as required by the Planning Practice Guidance. Given the overall quantum of homes to be delivered (approx. 20,000 over the Local Plan period), the objectively assessed housing needs within OPDC's red-line boundary will be met in full. However, the development will also help to meet wider housing needs in the wider housing market area of London Boroughs of Brent, Ealing and Hammersmith & Fulham and also help meet strategic London-wide housing need. OPDC considers it is a sound approach to meet local objectively assessed needs and fulfil a role in meeting the needs of the host local</p>
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		authorities and the wider London area. The targets in OPDC's Local Plan are considered to be in general conformity with the Mayor's London Plan targets for the area.
Support aims of policy, but encourage OPDC to work with partners to enable early delivery.	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Noted.
Overall supports delivery of much needed housing and associated social infrastructure but suggests that more housing could be delivered. More information could be provided in the Local Plan on how OPDC will influence/encourage delivery.	Association for Consultancy and Engineering (ACE)	No change proposed. As outlined in SP10, OPDC's Development Capacity Study has assessed the capacity for new homes in the area. This is reflected in OPDC's housing targets. Timing and phasing is critical to the delivery of OPDC's housing targets. OPDC's Absorption Rate Study has assessed typical delivery rates across large regeneration schemes in London over recent years, and has concluded, given the scale of the site, that there are multiple delivery markets within Old Oak and Park Royal that means that the housing targets may be delivered. In addition, OPDC has carried out a Social Infrastructure Study to identify the social infrastructure requirements for the area. The Delivery and Implementation Chapter 11 details how as a proactive planning authority, OPDC will support the timely delivery of new homes and optimised phasing to meet, and where possible, exceed the housing targets.
Projections for thriving communities seem excessively positive and therefore unsound.	Friary Park Preservation Group	No change proposed. This strategic policy aims to promote lifetime neighbourhoods, social cohesion and the integration of new and existing communities through the delivery of new homes to meet housing needs along

		with new social infrastructure.
There is no justification for an 'objectively-assessed need' for 24,000 new homes at Old Oak.	St Quintin and Woodlands Neighbourhood Forum, 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. As set out in the Housing Evidence Statement, the Strategic Housing Market Assessment (SHMA) considered the objectively assessed housing need within the land within the Old Oak and Park Royal red-line boundary as would usually be the case for a local authority in identifying its housing market area for determining housing need and in accordance with the NPPF. Based on this approach, and the OPDC area's current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). The Development Capacity Study identified the actual capacity for new homes in the area based on the requirements of a Housing and Economic Land Availability Assessment, as required by the Planning Practice Guidance. Given the overall quantum of homes to be delivered (approx. 20,000 over the Local Plan period), the objectively assessed housing needs within OPDC's red-line boundary will be met in full. However, the development will also help to meet wider housing needs in the wider housing market area of London Boroughs of Brent, Ealing and Hammersmith & Fulham and as Opportunity Areas help meet strategic London-wide housing need.
OPDC has not considered an alternative vision with a lower housing target for Old Oak which would be significantly more successful and sustainable.	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara,	No change proposed. The legal requirement is to test 'reasonable' alternatives that are sufficiently distinct to enable their meaningful comparison. The Further

	<p>Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton</p>	<p>Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified the preferred option as being to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. Old Oak and Park Royal are specifically referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the GLA developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015. The FALP, together with the OAPF set a strategic development capacity target for the OPDC area and it would therefore not have been appropriate to test lower development capacities as reasonable alternatives, particularly as these would have not have been in general conformity with the London Plan. OPDC have also undertaken a Development Capacity Study, in accordance with NPPG guidance, which shows that the London Plan Opportunity Area targets are achievable. It should be noted that LBHF's Issues and Options consultation was undertaken in advance of the consultation on and publication of the Mayor's</p>
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		Old Oak and Park Royal Opportunity Area Planning Framework and in advance of the publication of the London Plan (2015).
The housing targets are based on the land that is available for development. This involves rafting over areas that may be too difficult and expensive.	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. OPDC's Development Capacity Study has assessed the capacity for new homes in the area. The challenges of delivering this, including relocating, reconfiguring and decking over a number of large-scale operations are referenced in the supporting text for Policy SP10.
The housing targets should be reduced to be consistent with the 'central' classification in the London Plan or the plan should be found unsound.	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. In light of the future excellent national, regional and local public transport links to be provided in the area, Old Oak is considered suitable for high density development and Park Royal is considered suitable for protected and intensified industrial uses. This approach is supported by policies set out in the London Plan and reflected in the designation of two Opportunity Areas with a combined target for a minimum of 25,500 new homes and 65,000 new jobs. Opportunity Areas are London's main reservoirs for growth. As such, the current London Plan 2016 (Policy 2.13) supports development in these areas to exceed the defined targets by optimising development densities. The Mayor of London's Housing SPG (2016) states that targets should be considered as a minimum, to be exceeded and accelerated where possible and that densities in Opportunity Areas may exceed the relevant density ranges in the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2).

		Policy SP9 in this Local Plan requires development to respond to local character and context but 'reflecting' local context would be inappropriate, especially given the area's identification as opportunity areas and potential as set out in the London Plan, for the area to deliver high densities and tall buildings. The draft London Plan 2017 removes the density matrix and instead requires a design-led approach that optimises densities.
Policy SP4 promotes lifetime neighbourhoods, social cohesion and the integration of new and existing communities. Policy SP4ii is of no direct relevance to the achievement of this objective and should be deleted as a sub-clause.	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. The regeneration of Old Oak and Park Royal can play an important role in meeting both local objectively assessed need and London-wide housing need. In creating a new part of London, a whole range of new homes will be delivered to meet a diverse housing need, including private sale, affordable, built-to-rent and specialist homes, all provided as part of a mixed and balanced community with lifetime neighbourhoods as envisaged in the Thriving Communities Policy.
As part of the strategic policy for housing there should be a mix of housing types but with the overwhelming priority on social rented housing at rents that people on low incomes can afford.	Harlesden Lets	No change proposed. SP4a)i) explains that proposals should provide a range of housing tenures, types and sizes that deliver mixed and inclusive communities and help meet local and London-wide need. Chapter 8, and particularly Policy H2, detail the requirements for different types of affordable housing, including London Affordable Rent (based on target rents, formerly known as social rent). The tenure requirements are in accordance with the Mayor of London's Affordable Housing

		and Viability SPG (2017) and the draft London Plan 2017.
Diversity in design should be recognised so that apartments, houses, town houses, mansion blocks as well as dwellings for elderly residents and easily-adaptable homes for disabled people are all part of the mix.	Harlesden Lets	No change proposed. SP4a)i) explains that proposals should provide a range of housing types and sizes that deliver mixed and inclusive communities. Policy H3 states that housing should be flexibly designed and adaptable. Policy H9 supports the delivery of specialist housing to meet the needs of older people and other people with specialist housing needs, such as people with physical disabilities.
SP4(a)i should be amended to: 'homes that provide a proportionate level of all types of homes to meet objectively assessed need (as required by the NPPF) which will positively contribute to meeting London-wide need'.	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 to policy. However, some additional text has been added to the supporting text which clarifies that the overall capacity of the development will enable OPDC to meet its objectively assessed need as well as contribute towards meeting London-wide housing need.
The OPDC's evidence base does not provide evidence to support delivery of a 50% affordable housing target	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. In accordance with the NPPF, the Local Plan needs to meet the full, objectively assessed needs for market and affordable housing in the local housing market area. As set out in the Housing Evidence Statement, according to OPDC's Strategic Housing Market Assessment (SHMA), there is a 45% affordable housing need in the area. As Opportunity Areas, Old Oak and Park Royal can also help to meet city-wide housing need. The latest 2017 GLA SHMA published along with the Draft London Plan identifies that London's affordable housing need has increased to 65 per cent because needs have not been met. Therefore a 50

		<p>per cent affordable housing target for OPDC is considered to be appropriate for the following reasons: the Draft London Plan 2017 specifies an overarching 50% affordable housing target; including 50 per cent affordable housing for public sector land, Strategic Industrial Locations, and Locally-Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses. The Mayor's draft Housing Strategy also sets a target for Mayoral organisations for an average of 50 per cent of homes on land brought forward under the current administration to be affordable. An Affordable Housing Viability Assessment (2017) has been undertaken which assessed the viability of delivering 35% and 50% affordable housing by habitable room in the following tenure split: 70% London Affordable Rent/30% Intermediate; 43% London Affordable Rent/57% Intermediate; 30% London Affordable Rent/70% Intermediate. This concluded that: 70% of the affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing; 30% London Affordable Rent/70% Intermediate is viable on all the sites tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing. Accordingly, it is considered that this provides evidence to support a 50% affordable housing target for OPDC.</p>
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<p>The proposed tenure split will not meet the objectively assessed housing need.</p>	<p>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</p>	<p>No change proposed. The strategic policy refers to OPDC's overarching 50% affordable housing target. However, some supporting text has been added to clarify that the quantum of housing enables OPDC to meet its objectively assessed need. Details on housing tenure are contained in Policy H2.</p>
<p>Add after 'population', 'of all ages, abilities/disabilities and income' (to ensure delivery of mixed and inclusive communities).</p>	<p>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</p>	<p>No change proposed. Policy SP9a)vi) sets out how the built environment will be required to demonstrate a high standard of accessible and inclusive design. Policy D3 sets out more details of requirements for accessible and inclusive development that is compliant with the latest guidance and deliver design solutions that meet the requirements of all users.</p>
<p>Add (c) securing delivery of active community involvement and ownership.</p>	<p>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</p>	<p>No change proposed. Policy DI3d) supports community ownership and management programmes. It is not considered necessary to repeat this in this strategic policy.</p>
<p>Add (d) delivering tangible and measurable benefit to existing deprived and excluded community members in surrounding neighbourhoods.</p>	<p>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</p>	<p>No change proposed. The main focus of this policy is homes and infrastructure and integration of new and existing communities. The spatial vision and strategic policies as a whole describe how the regeneration of Old Oak and Park Royal can benefit existing deprived communities in surrounding neighbourhoods. Figure 2.1 in the Spatial Vision provides a summary of the opportunities to create a socially, environmentally and economically sustainable community in Old Oak and Park Royal.</p>
<p>Support for the aspiration to</p>	<p>Association for Consultancy</p>	<p>Noted. The housing targets</p>

deliver the amount of homes to meet a range of needs and in fact more homes could be delivered to meet the housing need, subject to infrastructure and viability considerations	and Engineering (ACE)	are minimum targets.
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Regulation 19 (2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Old Oak North Masterplan consultants should guide homes and jobs figures and not be guided by existing targets.	Thomas Dyton, Wells House Road Residents Association	No change proposed. The Old Oak North Development Framework Principles has been developed by OPDC based on the outputs of the AECOM masterplan consortium of consultants. The consultants undertook a robust assessment of the technical constraints within the Old Oak North area and parts of Scrubs Lane. The deliverability of policies P2 and P10 were also tested, including development capacity for new homes and jobs. This assessment has resulted in amendments to the policies P2 and P10 which includes adjustments to the new homes (6,300 to 6,500) and new jobs (5,100 to 3,600).
There is a need for a commitment to continue to delivery public services while development takes place and to address any negative impacts from construction on local amenity.	West Acton Residents Association	Noted. Policies SP4 and TCC4 provide guidance for the timely delivery of social infrastructure. Policies D6, EU4 and EU5 provide guidance to ensure development does not cause unacceptable harm to existing communities.
Community may be lost during and after development. Consideration of supporting communities in high density development should be provided.	West Acton Residents Association, Anita Ringsell	Noted. Policy SP4 and TCC4 seek to provide social infrastructure facilities to support sustainable communities.
There should be no more flats as there is an over-supply of flats in the area and	Maria Lonergan	No change proposed. The Old Oak and Park Royal Opportunity Areas can

<p>not enough infrastructure.</p>		<p>provide at least 25,500 new homes in accordance with the London Plan. The OPDC Strategic Housing Market Assessment identifies a need for 99,000 homes across Brent, Ealing and Hammersmith & Fulham. Development in OPDC needs to help to meet this overall need. The Infrastructure Delivery Plan (IPD) identifies the infrastructure required to support the regeneration of the area, including social, transport, utility and green infrastructure.</p>
<p>We welcome the recognition in 3.21 and elsewhere in the document that major development schemes such as OOP are required to provide significant new infrastructure, and that this requirement will need to be balanced against affordable housing and other matters.</p>	<p>Old Oak Park Limited</p>	<p>Noted.</p>
<p>Object to Policy SP4 because of excessive and unjustified housing targets. Independent academic research from the University of Cambridge suggests that the housing targets should be reduced to 18,000 homes for local communities to be sustainable in the future.</p>	<p>Nye Jones, Gail Dobinson, Rachel Ritfeld, Ciara Solmi, Jane Dreaper, James Trew, Stephanie Hewett, Eileen Hannington, Marta Donaghey, Jamie Sutcliffe, Pablo Navarrete, Jason Salkely, Elaine Gristock, David Turner, Nicky Guymenr, TTRA, Thomas Dyton (WHRRRA), Midland Terrace Residents, St Quintin and Woodlands Neighbourhood Forum, Wells House Road Residents Association, Mark Walker, Alison Brayshaw, Catherine Goodall, The Hammersmith Society, West Acton Residents Association</p>	<p>No change proposed. In light of the future excellent national, regional and local public transport links to be provided in the area, Old Oak is considered suitable for high density development and Park Royal is considered suitable for protected and intensified industrial uses. This approach is supported by policies set out in the London Plan and reflected in the designation of two Opportunity Areas with a combined target for a minimum of 25,500 new homes and 65,000 new jobs. Opportunity Areas are London's main reservoirs for growth. As such, the current London Plan 2016 (Policy 2.13) and the Draft New London Plan (Policy SD1) supports development in these areas that potentially exceeds defined targets by</p>

		<p>optimising development densities. The Mayor of London's Housing SPG (2016) paragraphs 7.5.7 and 7.5.8 state that targets should be considered as a minimum, to be exceeded and accelerated where possible and that densities in Opportunity Areas may exceed the relevant density ranges in in the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2). The Draft New London Plan 2017 removes the density matrix and instead requires a broader approach that optimises densities. The density range set out in the Local Plan remains unchanged from the Regulation 18 draft Local Plan. The OPDC Development Capacity Study identified the indicative capacity for new homes in the area based on the requirements of the Government's Housing and Economic Land Availability Assessment, as required by National Planning Practice Guidance. This supports Policy SP4 In delivering at least 20,100 additional homes between 2018 to 2038. No change proposed. The student reviews are noted and reflect the average density of 600 units per hectare for Old Oak North set out in the Old Oak North Development Framework Principles. The Local Plan provides series of policies to ensure that high density typologies, required to optimise development capacity to meet targets, are of the highest design quality to support sustainable communities and appropriately address issues such as, inter alia, context</p>
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		and townscape (SP9), access and inclusivity (D2), amenity (D6), open space provision (EU1), air quality (EU4) and noise and vibration (EU5). These policies will be supplemented by forthcoming supplementary planning documents.
Concerns about the commitment to build genuinely affordable homes.	Thomas Dyton (WHRRA), Central Acton Neighbourhood Forum, Wells House Road Residents Association, West Acton Residents Association	No change proposed. Policy SP4a)ii) sets out a requirement to deliver 20,100 homes and supports the attainment of 50% affordable housing, subject to viability. This is in conformity with the draft London Plan and is supported by OPDC's Strategic Housing Market Assessment (SHMA) which identifies a need for approximately 50% affordable homes. Policy H2c) and Table 8.2 provide for the delivery of "genuinely" affordable homes that meet the requirements of the National Planning Policy Framework and the draft London Plan.
Need for a long-term commitment to public services and support for the existing communities while the development takes place.	Thomas Dyton (WHRRA) Wells House Road Residents Association	No change proposed. Development will be guided by OPDC's Strategic Vision (Chapter 2). This means that benefits from development will be generated for existing communities, for example; by providing affordable housing for local people, opportunities for local businesses, conserving existing heritage assets and providing convenient access to town centre uses, shops, schools, parks, community facilities, leisure and sports. In addition, Policy D6 requires new development to deliver an appropriate standard of amenity (including Daylight, Sunlight and Microclimate), as well as implementing the Agent of Change principle so that that new development

		does not cause unacceptable harm to the amenity of existing uses.
Education should be a prime consideration, encouraging integrated, accessible schools at every level. There is a need for technical education and training. With new, high levels of accessibility, this will be an ideal location for joint ventures with local industry in developing job skills.	Grand Union Alliance	No change proposed. The Social Infrastructure Needs Study identifies the educational needs derived from the projected growth in population in the OPDC area. The infrastructure required to meet this need are set out in OPDC's Infrastructure Delivery Plan. In accordance with Policy TCC4, OPDC is working with service providers to develop a preferred approach to the delivery of new education facilities. In terms of local industry and skills, Policy E3 requires proposals which generate new employment floorspace to provide affordable work space, shared workspace to support small businesses and start ups. Policy E5 requires major development proposals to provide access for local people to training and employment and supply chain opportunities.
Support the aims of Policy SP4 but would encourage the OPDC to work with partners, to deliver as much early development as possible..	HGH Consulting on behalf of Queens Park Rangers Football Club and Stadium Capital Developments	Noted. Policy SP10 and Policy DI2 supports the early delivery of homes where this is appropriately supported by infrastructure.
Proposals for the 'heart' of a new Old Oak (a high density commercial development around the HS2/Queen Elizabeth Line station) no longer feature in the document and have been pushed back beyond the 2018-38 plan period. On the other, a housing target dating from the 2015 OAPF and included in a brief annexe to the 2015 Further Alterations to the London Plan has continued to be treated as sacrosanct.	Midland Terrace Residents, St Quintin and Woodlands Neighbourhood Forum	No change proposed. The Elizabeth Depot site is expected to continue to be delivered but after the Local Plan period (2038). Development of the sites adjacent to the Old Oak Common Station continue to be included in the plan period. The published Further Alterations to the London Plan (FALP) (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs.

		<p>This target is for the total development beyond which includes phases after the plan period. This target continues to be included in the current and Draft New London Plan. To demonstrate how these targets will be met and ensure general conformity with the London Plan, OPDC's Development Capacity Study has been developed in accordance with the National Planning Practice Guidance on Housing and Economic Land Availability Assessments. The Development Capacity Study includes development capacity information set out in the Old Oak North Development Framework Principles, Park Royal Development Framework Principles, the Industrial Land Review, Future Employment Growth Sectors Study, Scrubs Lane Development Framework Principles document and the Victoria Road and Old Oak Lane Framework Principles document. OPDC's plan period overall target is for 20,100 new homes.</p>
<p>Planning Inspector Mr A Thickett on the 2014 FALP EiP noted that it cannot be assumed that it will be appropriate to increase densities over the existing Density Matrix guidelines in all cases.... Opportunity Areas and large sites have the potential to determine their own character and identity but they should still have regard to their surroundings. Meeting the pressing need for housing in London will require new, innovative and possibly unpopular solutions but care must be taken not to damage</p>	<p>Midland Terrace Residents, St Quintin and Woodlands Neighbourhood Forum</p>	<p>No change proposed. The Mayor of London's Housing SPG (2016) states that targets should be considered as a minimum, to be exceeded and accelerated where possible and that densities in Opportunity Areas may exceed the relevant density ranges in in the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2). Policy SP9 in this Local Plan requires development to respond to local character and context but only reflecting local context and not the evolving context</p>

<p>its environment such that it becomes an unpleasant place to visit, live and work.</p>		<p>would be inappropriate, especially given the area's identification as opportunity areas and potential as set out in the London Plan, for the area to deliver high densities. The Draft New London Plan 2017 removes the density matrix and instead requires a broader approach that optimises densities. The density range set out in the Local Plan remains unchanged from the Regulation 18 draft Local Plan. The Spatial Vision and the Going Local Narratives set out aspirations to benefit local people's quality of life and ensure development complements surrounding neighbourhoods. These aspirations are embedded in the policies of the Local Plan. Particularly, Policy SP2 provides guidance to deliver Good Growth and sustainable development, Policy SP3 provides guidance to improve health and reduce health inequalities, Policies SP4 and SP5 provide guidance for the delivery and distribution of a wide range of homes and jobs, Policy SP6 provides guidance to celebrate local context, Policy SP7 provides guidance to ensure new streets and routes connect to existing neighbourhoods, Policy SP9 provides guidance to ensure development is high density, high quality and positively responds to local context, character and heritage. In addition to the strategic policies, policies D6, EU4 and EU4 provide guidance to deliver an appropriate standard of amenity.</p>
<p>The housing target was set pre-Brexit and takes no</p>	<p>Midland Terrace Residents, St Quintin and Woodlands</p>	<p>No change proposed. At the time of writing, formal</p>

<p>account of changing demographic forecasts for London's population growth.</p>	<p>Neighbourhood Forum</p>	<p>negotiations regarding Britain's future relationship with the EU have yet to reach agreement on the rules governing the movement of people between Britain and countries within the EU, as well as the rights of British and EU citizens already living abroad. The outcome of these negotiations has the potential to dramatically influence future patterns of migration. It is possible to explore some hypothetical scenarios for the country as a whole, assuming a range of future migration flows between the UK and Europe, but the uncertainties are far greater when considering the impact on individual regions or local authorities. As well as uncertainty about the overall level of international migration, there are further questions about how the distribution of those migration flows between UK regions might change and what the knock-on effects on domestic migration might be. At the current time, it therefore does not seem appropriate to attempt to explicitly account for The referendum result in the projections. The value of making speculative assumptions about the final outcome and its repercussions seems limited. More valuable is to ensure that the underlying assumptions for the projections are transparent so that they provide a suitable basis for additional analysis. This is something that will be drawn out in future versions of the Local Plan when the impact of Brexit on population is better known.</p>
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HS2, TfL, and other bodies have flagged up the non-viability of development of key sites at the heart of the 2013 'vision' for Old Oak.	Midland Terrace Residents, St Quintin and Woodlands Neighbourhood Forum	No change proposed. The Crossrail Depot site is expected to continue to be delivered but outside of the Local Plan period. This means that the development capacity associated with the site, including housing units, will be delivered after 2038 and OPDC's housing targets are not reliant on these sites coming forward for delivery in the plan period.
There is a need for social infrastructure and affordable homes that are genuinely needed not lots of student halls.	West Acton Residents Association	No change proposed. Policy SP4 provides for the delivery of 50% affordable housing, subject to viability and delivering and/or contributing to new high quality social infrastructure and improving existing. In relation to North Acton, Policy P7c)ii) will deliver appropriate levels of student accommodation in accordance with Policy H10 in that it does not undermine the delivery of conventional housing.
The opportunity to build 1,000s of much needed Social Homes for Rent in the OPDC has been missed.	Eric Leach	No change proposed. Policy H2c) and Table 8.2 provide for the delivery of "genuinely" affordable homes that meet the requirements of the National Planning Policy Framework and the draft London Plan. 30% of the affordable homes will be provided as low-cost London Affordable Rent (social rent) in accordance with the draft London Plan.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	Approximately 20,100 new homes can be delivered during the 20 year plan period.
Absorption Rate	<ul style="list-style-type: none"> Given the scale of the site, the research concludes that there are

Study	<p>multiple markets within Old Oak and Park Royal and therefore promotes an average delivery rate of up to 700 private homes a year.</p> <ul style="list-style-type: none"> • Homes for rent (affordable and market) do not compete with private homes for sale as they are targeted at a different market and can increase the overall number of homes delivered on the site. • Shared ownership homes compete for purchasers with entry level market homes for sale.
Housing Evidence Statement	<ul style="list-style-type: none"> • There is significant opportunity at Old Oak and Park Royal to provide a significant number of new homes to meet local and London housing needs. • Setting an artificially high family housing target would mean that many units delivered would not have access to acceptable private or communal amenity space or other amenities. These units would unlikely be attractive to families with children.
Strategic Housing Market Assessment (SHMA)	<ul style="list-style-type: none"> • Between 2018 and 2038 there is a need for 1,200 homes within the OPDC redline boundary and 99,000 homes within the housing market area defined across the London Boroughs of Brent, Ealing and Hammersmith and Fulham. • Over the Plan period 44,400 households cannot afford market housing and have a requirement for affordable housing. • 86% of these households can only afford low-cost housing such as social rent, i.e.: London Affordable Rent. 14% can afford intermediate housing.
Gypsy & Traveller Accommodation Needs Assessment (GTANA)	<ul style="list-style-type: none"> • There is no need for additional pitches during the Local Plan period in accordance with Planning Policy for Traveller Sites (PPTS).
Affordable Housing Viability Assessment (AHVA)	<ul style="list-style-type: none"> • 70% of the affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing. • 30% London Affordable Rent & 70% Intermediate is viable on all the sites tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing.
Social Infrastructure Needs Study	<ul style="list-style-type: none"> • 1 primary school • 1 secondary school • 1 health hub • Expansions to Central Middlesex Hospital and Hammersmith Hospital • 4 supernurseries • 2 community hubs • 2 sports centres
Sports Courts and Swimming Pools Study	<ul style="list-style-type: none"> • Identifies that LBHF is currently reasonably well served by swimming pools but there is an under-provision of sports courts. • As the population grows, there will be increased pressure on swimming pools and the under-provision of sports courts will be further exacerbated. • Identifies that the Old Oak and Park Royal area is currently

	<p>deficient in access to public sports halls and swimming pools.</p> <ul style="list-style-type: none"> Identifies that population projections for the Old Oak and Park Royal area are likely to give rise to a need for approximately 13 sports courts and two 12x25m swimming pools, or 1 sports court per 3,000 residents and 1sqm of swimming pool space for every 90 residents.
Development Infrastructure Funding Study	<ul style="list-style-type: none"> There is a need for over £1.5billion infrastructure to support development in Old Oak.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Strategic Housing Market Assessment (SHMA)	<ul style="list-style-type: none"> There is a high need for family sized housing (50%) across all tenures. 	<ul style="list-style-type: none"> SHMA does not take account of the high density flatted typology which is not appropriate for high levels of family housing as many units would not have access to acceptable private or communal amenity space or other amenities. These units would unlikely be attractive to families with children. Family housing units may also be unaffordable, particularly in the intermediate sector. There is also an impact, identified in the AHVA that it impacts on the viability of delivering 50% affordable housing.
OPDC Strategic Housing Market Assessment	Deliver 51% of affordable housing and 64% of market housing as family housing units to meet the identified need	<p>The identified need for family housing has to be considered against the design and nature of the proposed development at Old Oak and Park Royal and development viability and economics.</p> <ul style="list-style-type: none"> The average density is expected to be high density and the built form is expected to be high density blocks of flats rather than lower density houses with generous private gardens, making a high family housing target challenging and undesirable as many units would be unable to access appropriate amenity and play space. A further consideration is the affordability of family housing and particularly the affordability of family intermediate housing. The Affordable Housing Viability Assessment modelling shows

		<p>that this has an impact on the viability of delivering high levels of affordable housing.</p> <p>A 25% family housing target (including SHMA compliant mix for London Affordable Rent) is considered to be an appropriate balance. This will provide the following benefits:</p> <ul style="list-style-type: none"> • It requires the housing market to deliver a minimum level of family housing provision slightly above the London average market delivery; • It meets the acute need for London Affordable Rent family housing identified in the SHMA but also provide some market family and intermediate family housing to meet needs; • It helps to ensure that all family units are appropriately designed and located to be suitable for families. Setting an artificially high family housing target would mean that many units delivered would not have access to acceptable private or communal amenity space or other amenities. These units would unlikely be attractive to families with children.
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SP5 – Resilient Economy

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
7	<p>There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:</p> <ul style="list-style-type: none"> • an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure...
17	<p>Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should.....</p> <ul style="list-style-type: none"> • proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;
19	<p>Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.</p>
20	<p>To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.</p>
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; • set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; • support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan

	<p>and to allow a rapid response to changes in economic circumstances;</p> <ul style="list-style-type: none"> • plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; • identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and <p>facilitate flexible working practices such as the as the integration of residential and commercial uses within the same unit.</p>
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver the jobs needed in the area.

National Planning Practice Guidance (NPPG)

Paragraph Reference	Paragraph
<p>Title: What is the role of a Local Plan?</p> <p>Paragraph: 001 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. They are also a critical tool in guiding decisions about individual development proposals, as Local Plans (together with any neighbourhood plans that have been brought into force) are the starting-point for considering whether applications can be approved. It is important for all areas to put an up to date plan in place to positively guide development decisions.</p>
<p>What is the purpose of the assessment of housing and economic development needs guidance?</p> <p>Paragraph: 001 Reference ID: 2a-001-20140306</p> <p>Revision date: 06 03 2014</p>	<p>This guidance supports local planning authorities in objectively assessing and evidencing development needs for housing (both market and affordable); and economic development (which includes main town centre uses).</p>
<p>What is the primary objective of the assessment?</p> <p>Paragraph: 002 Reference ID: 2a-002-20140306</p> <p>Revision date: 06 03 2014</p>	<p>The primary objective of identifying need is to:</p> <ul style="list-style-type: none"> • identify the future quantity of land or floorspace required for economic development uses including both the quantitative and qualitative needs for new development; and • provide a breakdown of that analysis in terms of quality and location, and to provide an indication of gaps in current land supply.

<p>What is the definition of need?</p> <p>Paragraph: 003 Reference ID: 2a-003-20140306</p> <p>Revision date: 06 03 2014</p>	<p>Need for all land uses should address both the total number of homes or quantity of economic development floorspace needed based on quantitative assessments, but also on an understanding of the qualitative requirements of each market segment.</p>
<p>Can local planning authorities apply constraints to the assessment of development needs?</p> <p>Paragraph: 004 Reference ID: 2a-004-20140306</p> <p>Revision date: 06 03 2014</p>	<p>The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.</p>

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
2.16	<p>A The Mayor will, and boroughs and other stakeholders should, identify, develop and promote strategic development centres in outer London or adjacent parts of inner London with one or more strategic economic functions of greater than sub-regional importance (see para 2.77) by:</p> <p>d) improving Londoners' access to new employment opportunities.</p>
2.17	<p>Strategic</p> <p>A The Mayor will, and boroughs and other stakeholders should, promote, manage and, where appropriate, protect the strategic industrial locations (SILs) designated in Annex 3 and illustrated in Map 2.7, as London's main reservoirs of industrial and related capacity, including general and light industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions.</p> <p>Planning decisions</p> <p>B Development proposals in SILs should be refused unless:</p> <p>a they fall within the broad industrial type activities outlined in paragraph 2.79</p> <p>b they are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework or borough development plan document</p> <p>c the proposal is for employment workspace to meet identified needs for small and medium sized enterprises (SMEs) or new emerging industrial sectors; or</p> <p>d the proposal is for small scale 'walk to' services for industrial occupiers such as workplace crèches or cafes</p> <p>C Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities.</p> <p>LDF preparation</p>

	<p>D In LDFs, boroughs should identify SILs on proposals maps and develop local policies based on clear and robust assessments of need to protect their function, to enhance their attractiveness and competitiveness for industrial type activities including access improvements.</p>
<p>4.1</p>	<p>Strategic A The Mayor will work with partners to: a1 promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises, including the voluntary and community sectors a2 maximise the benefits from new infrastructure to secure sustainable growth and development b drive London’s transition to a low carbon economy and to secure the range of benefits this will bring c support and promote outer London as an attractive location for national government as well as businesses, giving access to the highly-skilled London workforce, relatively affordable work space and the competitive advantages of the wider London economy d support and promote the distinctive and crucial contribution to London’s economic success made by central London and its specialist clusters of economic activity e sustain the continuing regeneration of inner London and redress its persistent concentrations of deprivation f emphasise the need for greater recognition of the importance of enterprise and innovation g promote London as a suitable location for European and other international agencies and businesses.</p>
<p>4.2</p>	<p>Strategic A The Mayor will and boroughs and other stakeholders should: a support the management and mixed use development and redevelopment of office provision to improve London’s competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises b recognise and address strategic as well as local differences in implementing this policy to: – meet the distinct needs of the central London office market, including the north of the Isle of Dogs, by sustaining and developing its unique and dynamic clusters of ‘world city’ and other specialist functions and business environments, and – consolidate and extend the strengths of the diverse office markets elsewhere in the capital by promoting their competitive advantages, focusing new development on viable locations with good public transport, enhancing the business environment including through mixed use redevelopment, and supporting managed conversion of surplus capacity to more viable, complementary uses d seek increases in the current stock where there is authoritative, strategic and local evidence of sustained demand for office-based activities in the context of policies 2.7, 2.9, 2.13 and 2.15–2.17 LDF preparation B LDFs should: a enhance the environment and offer of London’s office locations in terms of physical attractiveness, amenities, ancillary and supporting activities as well</p>

	<p>as services, accessibility, safety and security....</p> <p>c work with sub-regional partners to develop co-ordinated, phased strategies to manage long term, structural changes in the office market, focusing new capacity where there is strategic as well as local evidence of demand, encouraging renewal and modernisation in viable locations and supporting changes of surplus office space to other uses....</p>
4.4	<p>Strategic</p> <p>A The Mayor will work with boroughs and other partners to:</p> <p>a adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including for good quality and affordable space</p> <p>b plan, monitor and manage release of surplus industrial land where this is compatible with a) above, so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.</p> <p>LDF preparation</p> <p>B LDFs should demonstrate how the borough stock of industrial land and premises in strategic industrial locations (Policy 2.17), locally significant industrial sites and other industrial sites will be planned and managed in local circumstances in line with this strategic policy and the location strategy in Chapter 2, taking account of:</p> <p>a the need to identify and protect locally significant industrial sites where justified by evidence of demand</p> <p>b strategic and local criteria to manage these and other industrial sites</p> <p>c the borough level groupings for transfer of industrial land to other uses (see Map 4.1) and strategic monitoring benchmarks for industrial land release in supplementary planning guidance</p> <p>d the need for strategic and local provision for waste management, transport facilities (including inter-modal freight interchanges), logistics and wholesale markets within London and the wider city region; and to accommodate demand for workspace for small and medium sized enterprises and for new and emerging industrial sectors including the need to identify sufficient capacity for renewable energy generation</p> <p>e quality and fitness for purpose of sites</p> <p>f accessibility to the strategic road network and potential for transport of goods by rail and/or water transport</p> <p>g accessibility to the local workforce by public transport, walking and cycling</p> <p>h integrated strategic and local assessments of industrial demand to justify retention and inform release of industrial capacity in order to achieve efficient use of land</p> <p>i the potential for surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.</p>
4.10	<p>Strategic, planning decisions and LDF preparation</p> <p>A The Mayor will, and boroughs and other relevant agencies and stakeholders should:</p> <p>a support innovation and research, including strong promotion of London as a research location and encourage the application of the products of research in the capital's economic development</p> <p>b give strong support for London's higher and further education institutions and their development, recognising their needs for accommodation and the special status of the parts of London where they are located, particularly the</p>

	<p>Bloomsbury/Euston and Strand university precincts</p> <p>c work with developers, businesses and, where appropriate, higher education institutions and other relevant research and innovation agencies to ensure availability of a range of workspaces, including start-up space, co-working space and 'grow-on' space</p> <p>d support the development of green enterprise districts such as that proposed in the Thames Gateway</p> <p>e promote clusters of research and innovation as focal points for research and collaboration between businesses, HEIs, other relevant research and innovation agencies and industry</p> <p>f support the evolution of London's science, technology, media and telecommunications (TMT) sector, promote clusters such as Tech City and Med City¹ ensuring the availability of suitable workspaces including television and film studio capacity.</p>
4.12	<p>A. Working with strategic partners, principally the London Enterprise Partnership, the Mayor will provide the spatial context to co-ordinate the range of national and local initiatives necessary to improve employment opportunities for Londoners, to remove barriers to employment and progression and to tackle low participation in the labour market.</p> <p>B. Strategic development proposals should support local employment, skills development and training opportunities.</p>

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
GG5	<p>Growing a good economy</p> <p>To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:</p> <p>A Promote the strength and potential of the wider city region.</p> <p>B Seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London.</p> <p>C Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.</p> <p>D Ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth.</p> <p>E Ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning.</p> <p>F Promote and support London's rich heritage and cultural assets, and its role as a 24-hour city.</p> <p>G Maximise London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.</p>
E1	<p>A Improvements to the competitiveness and quality of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.</p> <p>B Increases in the current stock of offices should be supported, where there is authoritative, strategic and local evidence of sustained demand for office-based activities, taking into account projected demand for office-based employment and office floorspace to 2041 in Table 6.1.</p>

	<p>C The unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the CAZ, NIOD (Northern Isle of Dogs) (see Policy SD4 The Central Activities Zone (CAZ) and Policy SD5 Offices, other strategic functions and residential development in the CAZ) and other nationally-significant office locations (such as Tech City, Kensington & Chelsea and the Royal Docks Enterprise Zones), should be developed and promoted. These should be supported by improvements to walking, cycling and public transport connectivity and capacity. Future potential reserve locations for CAZ-type office functions are identified at Stratford and Old Oak Common, capitalising on their current and potential public transport connectivity to central London, the UK and beyond.</p> <p>D The diverse office markets in outer and inner London (outside the CAZ and NIOD) should be consolidated and - where viable - extended, focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity including:</p> <ol style="list-style-type: none"> 1) the strategic outer London office location at Croydon town centre 2) other town centre office locations (see Town Centre Network office guidelines in Figure A1.4) 3) existing urban business parks (such as Chiswick Park, Stockley Park and Bedfont Lakes), taking steps towards greater transport sustainability of these locations 4) locally-oriented, town centre office provision to meet local needs. <p>E Existing viable office floorspace capacity in outer and inner London locations outside the CAZ and NIOD should be retained, supported by borough Article 4 Directions to remove permitted development rights where appropriate, facilitating the redevelopment, renewal and re-provision of office space where viable and releasing surplus office capacity to other uses (see Policy SD9 Town centres: Local partnerships and implementation and office guidelines in Figure A1.4).</p> <p>F Boroughs should consult upon and introduce Article 4 Directions to ensure that the CAZ, NIOD, Tech City, the Royal Docks Enterprise Zones, Kensington & Chelsea and geographically-defined parts of other existing and viable strategic and local office clusters (such as those in and around the CAZ, in town centres and other viable business locations – see part D.3 above) are not undermined by office to residential permitted development rights.</p> <p>G Development proposals should:</p> <ol style="list-style-type: none"> 1) take into account the need for lower cost and affordable workspace (see Policy E2 Low-cost business space and Policy E3 Affordable workspace) 2) examine the scope for the re-use of otherwise surplus large office spaces for smaller units 3) support the redevelopment, intensification and change of use of surplus office space to other uses including housing.
E2	<p>A The provision, and where appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand.</p> <p>B Development proposals that involve the loss of existing B1 space (including creative and artist studio space) in areas where there is an identified shortage of lower-cost space should:</p> <ol style="list-style-type: none"> 1) demonstrate that there is no reasonable prospect of the site being used for business purposes, or 2) ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or

	<p>3) demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.</p> <p>C Development proposals for new B1 business floorspace greater than 2,500 sqm (gross external area) should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.</p>
E3	<p>A In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. Such circumstances include workspace that is:</p> <ol style="list-style-type: none"> 1) dedicated for specific sectors that have social value such as charities or social enterprises 2) dedicated for specific sectors that have cultural value such as artists' studios and designer-maker spaces 3) dedicated for disadvantaged groups starting up in any sector 4) providing educational outcomes through connections to schools, colleges or higher education 5) supporting start-up businesses or regeneration. <p>B Particular consideration should be given to the need for affordable workspace for the purposes in part A above:</p> <ol style="list-style-type: none"> 1) where there is existing affordable workspace on-site 2) in areas where cost pressures could lead to the loss of affordable workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones) 3) in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area. <p>C Boroughs, in their Development Plans, are encouraged to consider more detailed affordable workspace policies in light of local evidence of need and viability. These may include policies on site-specific locations, or defining areas of need for certain kinds of affordable workspace.</p> <p>D Affordable workspace policies defined in Development Plans and Section 106 agreements should include ways of monitoring that the objectives in part A above are being met, including evidence that they will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact. Applicants are encouraged to engage with workspace providers at an early stage to ensure that the space is configured and managed efficiently.</p> <p>E Leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with sub-market rents, meeting the objectives in part A, over the long term.</p> <p>F The affordable workspace elements of a mixed-use scheme should be operational prior to residential elements being occupied.</p>
E4	<p>A A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained. This should make provision for:</p> <ol style="list-style-type: none"> 1) light and general industrial uses 2) storage and logistics/distribution including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points 3) secondary materials and waste management 4) utilities infrastructure 5) land for sustainable transport functions including intermodal freight

interchanges, rail and bus infrastructure

- 6) wholesale markets
- 7) emerging industrial-related sectors
- 8) flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population
- 9) low-cost industrial and related space for micro, small and medium-sized enterprises (see also Policy E2 Low-cost business space) taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function).

B London's land and premises for industry, logistics and services falls into three categories:

- 1) Strategic Industrial Locations (SIL) – see Policy E5 Strategic Industrial Locations (SIL)
- 2) Locally Significant Industrial Sites (LSIS) - see Policy E6 Locally Significant Industrial Sites
- 3) non-Designated Industrial Sites⁷⁸ - see below.

C The retention and provision of industrial capacity across the three categories of industrial land set out in part B should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.

D The retention and provision of additional industrial capacity should be prioritised in locations that:

- 1) are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport
- 2) provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population
- 3) provide capacity for micro, small and medium-sized enterprises
- 4) are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision.

E Any release of industrial capacity in line with part C should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure.

F Efficient wholesale market functions should be retained to meet London's requirements whilst enabling opportunities to consolidate composite wholesale markets to meet long-term wholesaling needs.

G Boroughs should ensure that the need to retain sufficient industrial and logistics capacity is not undermined by permitted development rights by introducing Article 4 Directions where appropriate.

H Development proposals for large-scale (greater than 2,500 sqm GIA) industrial floorspace should consider the scope to provide smaller

	<p>industrial units suitable for SMEs, in particular where there is a local shortage and demand for such space.</p>
E5	<p>A Strategic Industrial Locations (identified in Figure 6.2 and Table 6.3) should be managed proactively through a plan-led process to sustain them as London's main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London's economy.</p> <p>B Boroughs, in their Development Plans, should:</p> <ol style="list-style-type: none"> 1) define the detailed boundary of SILs in policies maps having regard to the scope for intensification, co-location and substitution (set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function), and use the adopted Local Plan SIL boundary as the basis for decision-making 2) develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness (including access improvements and digital connectivity) for the functions set out in part C 3) explore opportunities to intensify and make more efficient use of land in SILs in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London (Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function). <p>C Development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities set out below:</p> <ol style="list-style-type: none"> 1) light industrial (Use Class B1c) 2) general industrial uses (Use Class B2) 3) storage and logistics/distribution uses (Use Class B8) 4) other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets 5) flexible B1c/B2/B8 premises suitable for occupation by SMEs 6) small-scale 'walk to' services for industrial occupiers such as workplace crèches or cafés. <p>D Development proposals for uses in SILs other than those set out in part C above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.</p> <p>E Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. In line with Agent of Change principles (Policy D12 Agent of Change) residential development adjacent to SILs should be designed to ensure that the industrial activities are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development.</p>
E7	<p>Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:</p>

	<p>1) development of mezzanines 2) introduction of small units 3) development of multi-storey schemes 4) addition of basements 5) more efficient use of land through higher plot ratios having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary.</p> <p>B Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SILs could be intensified. Intensification should facilitate the consolidation of the identified SIL to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in part E below and ensure that it does not undermine or compromise the integrity or effectiveness of the SIL in accommodating the industrial-type activities identified in part C of Policy E5 Strategic Industrial Locations (SIL). This approach should only be considered as part of a plan-led process of SIL intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications.</p> <p>C Development Plans and planning frameworks should be proactive and consider whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process should meet the criteria set out in part E below. This approach should only be considered as part of a plan-led process of LSIS intensification and consolidation (and clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications.</p> <p>D Mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where:</p> <ol style="list-style-type: none"> 1) there is no reasonable prospect of the site being used for the industrial and related purposes set out in part A of Policy E4 Land for industry, logistics and services to support London's economic function; or 2) it has been allocated in a Development Plan for residential or mixed-use development on the basis of part D.1; or 3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or 4) suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development. <p>Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in parts E.2 to E.4 below.</p> <p>E The processes set out in Parts B, C and D above must ensure that:</p> <ol style="list-style-type: none"> 1) the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing 2) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour
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	<p>access and operational requirements</p> <p>3) the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied</p> <p>4) appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:</p> <p>a) safety and security (see Policy D10 Safety, security and resilience to emergency and Policy D11 Fire safety)</p> <p>b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict (see Policy T4 Assessing and mitigating transport impacts)</p> <p>c) design quality, public realm, visual impact and amenity for residents (see Policy D1 London's form and characteristics, Policy D2 Delivering good design, Policy D3 Inclusive design, Policy D4 Housing quality and standards, Policy D5 Accessible housing, Policy D6 Optimising housing density, Policy D7 Public realm and Policy D8 Tall buildings)</p> <p>d) vibration and noise (see Policy D13 Noise)</p> <p>e) air quality, including dust, odour and emissions (see Policy SI1 Improving air quality and Policy SI2 Minimising greenhouse gas emissions).</p> <p>F Development Plans and planning frameworks should consider, in collaboration with neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary where:</p> <p>1) this results in mutual advantage to collaboration partners inside and outside London and supports a more efficient use of land</p> <p>2) full regard is given to both the positive and negative impacts of substitution including impacts on servicing the economy inside and outside London, businesses and customers, labour markets and commuting, supply-chains and logistics, congestion, pollution and vehicle miles</p> <p>3) a clearly-defined strategy for the substitution of future demand capacity and/or relocation arrangements where relevant, is in place to support this process.</p> <p>This approach should only be considered as part of a plan-led process of consolidation and intensification (and clearly defined in Development Plan policies maps) and not through ad hoc planning applications.</p>
E8	<p>A Employment opportunities for Londoners across a diverse range of sectors should be promoted and supported along with support for the development of business growth and sector-specific opportunities.</p> <p>B London's global leadership in tech across all sectors should be maximised.</p> <p>C The evolution of London's diverse sectors should be supported, ensuring the availability of suitable workspaces including:</p> <p>1) start-up, incubation and accelerator space for micro, small and medium-sized enterprises</p> <p>2) flexible workspace such as co-working space and serviced offices</p> <p>3) conventional space for expanding businesses to grow or move on</p> <p>4) laboratory space and theatre, television and film studio capacity</p> <p>5) affordable workspace in defined circumstances (see Policy E3 Affordable workspace).</p> <p>D Innovation, including London's role as a location for research and development should be supported, and collaboration between businesses, higher education institutions and other relevant research and innovation organisations should be encouraged.</p> <p>E London's higher and further education institutions and their development across all parts of London should be promoted. Their integration into regeneration and development opportunities to support social mobility and the</p>

	<p>growth of emerging sectors should be encouraged.</p> <p>F Clusters such as Tech City and MedCity should be promoted and the development of new clusters should be supported where opportunities exist, such as CleanTech innovation clusters, Creative Enterprise Zones, film, fashion and design clusters, and green enterprise districts such as in the Thames Gateway.</p> <p>G In collaboration with the Mayor, boroughs are encouraged to identify and promote the development of Strategic Outer London Development Centres (SOLDC) that have one or more specialist economic functions of greater than sub-regional importance. SOLDCs should be supported by:</p> <ol style="list-style-type: none"> 1) encouraging local innovation to identify and enhance distinct economic strengths 2) co-ordinating infrastructure investment 3) creating a distinct and attractive business offer and public realm 4) ensuring that development complements the growth of town centres and other business locations, and supports the environmental and transport objectives of this Plan 5) bringing forward development capacity 6) improving Londoners' access to employment opportunities.
E11	<p>A The Mayor will work with strategic partners to address low pay and, supported by his Skills for Londoners Taskforce, co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners.</p> <p>B Development proposals should seek to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Boroughs should ensure these are implemented in ways that (a) enable trainees to complete their training and apprenticeships, (b) ensure the greatest level of take-up possible by Londoners of the training, apprenticeship and employment opportunities created and (c) increase the proportion of under-represented groups within the construction industry workforce. In partnership with the Mayor, boroughs are encouraged to consider cross-borough working to open up opportunities, including those created via Section 106 obligations, on a reciprocal basis, to residents from adjacent boroughs and across London.</p>

Supplementary Planning Guidance (SPG)

Town Centres SPG

Policy / paragraph reference	Policy and paragraph text
SPG Implementation 1.2	<p>Boroughs and town centre partners are encouraged to:</p> <ol style="list-style-type: none"> c) support the development of London's creative industries in town centres g) promote an attractive business environment as part of a broader mix of uses, with a sensitive approach to car parking
SPG Implementation 1.3	<p>Boroughs and town centre partners are encouraged to:</p> <ol style="list-style-type: none"> b) adopt a proactive approach to office development where increased economic potential can be clearly identified, focusing demand on the most viable and competitive business locations, having regard to authoritative, strategic and local evidence of sustained demand for office-based activities, viability, local transport capacity and townscape considerations

Land for industry and transport SPG (2012)

Policy paragraph reference	Policy and paragraph text
SPG 3	<p>In implementing London Plan Policies 2.17 and 4.4, the Mayor will and TfL, boroughs and other partners should:</p> <ul style="list-style-type: none"> (i) adopt a positive ‘plan-monitor-manage’ approach to planning for industrial land in London to bring demand and supply into closer harmony; (ii) undertake regular integrated strategic and local assessments of the quantitative and qualitative supply and demand for industrial land having regard to the range of industrial type activities indicated in paragraph 2.1 of this SPG to inform the retention of industrial land in DPDs and the release of surplus capacity to other uses. These assessments should be integrated with assessments of housing capacity and need for new waste facilities, utilities and land for transport; (iii) take into account the broad phasing and sub-regional distribution of the London-wide monitoring benchmark for industrial land release set out in Table 3.1; (iv) take account, when developing borough benchmarks, site specific allocations and policies in DPDs, of the qualitative borough categorisations for Restricted, Limited and Managed transfer of industrial land to other uses in Table 3.2 and Figure 3.2, and the indicative monitoring release benchmarks outlined for boroughs in Annex 1; (v) take a proactive, plan-led approach having regard to the monitoring release benchmarks, to retain the best quality industrial sites and to manage the transfer of the poorest quality sites that are surplus to requirements through DPD site re-allocations whilst maintaining an allowance for some further transfers to take place during the plan period through the development management process; (vi) test the cumulative impact of transfers against the borough benchmarks, including planned transfers of designated sites in DPDs and transfers of non-designated industrial land through the development management process including those agreed in principle in pre-application discussions; (vii) consider in light of strategic and local assessments the potential to consolidate and intensify industrial uses in appropriate locations and establish effective re-location arrangements in the context of national and regional policy. The GLA group will work with boroughs and other stakeholders to coordinate this process as it affects SILs; (viii) coordinate changes to the SILs so that these can be considered in a future review of the London Plan and where appropriate, develop frameworks including OAPFs to manage the release of land and inform detailed reviews of SIL boundaries through the DPD process; (ix) ensure that sites released from industrial use meet strategic as well as local needs. The priority should be to meet the need for housing, including affordable housing, and appropriate mixed development. Increasing capacity for social infrastructure and town centre related development will also be important in appropriate locations; (x) monitor industrial land and policy development benchmarks having regard to those indicators set out in paragraph 3.33 of this SPG and coordinate this on a London-wide and sub-regional basis. <p>The spatial expression of this guidance is that:</p>

	<p>(xii) industrial land in Strategic Industrial Locations and strategically recognised Locally Significant Industrial Sites should in general be protected, subject to guidance elsewhere in this SPG. In parts of the East and North sub-regions there is particular scope for structured release of some SILs. In line with the London Plan these should be planned and coordinated in collaboration with boroughs and other partners through the London Plan, Opportunity Area Planning Frameworks where appropriate, and detailed boundaries identified in DPDs;</p> <p>(xiii) release of industrial land through development management should generally be focussed on smaller sites outside the SIL framework;</p> <p>(xiv) in outer London, boroughs should manage and improve the stock of industrial capacity to meet both strategic and local needs, including those of small and medium sized enterprises (SMEs), start-ups and businesses requiring more affordable workspace;</p> <p>(xv) boroughs are urged to work with the GLA and other stakeholders to develop and implement policies, planning frameworks and other investment tools to realise the full potential of the Strategic Outer London Development Centres (SOLDCs) with economic functions of greater than sub-regional importance in logistics, industry and green enterprise;</p> <p>(xvi) there is need for partnership working to see that adequate provision in inner London is sustained, and where necessary enhanced, to meet the distinct demands of the Central Activities Zone for locally accessible, industrial type activities.</p>
SPG 4	<p>Strategic Industrial Locations: In implementing London Plan Policies 2.17 and 4.4, the Mayor will and TfL, boroughs and others partners should:</p> <p>(i) promote the SILs as the main strategic reservoir for industrial and related activity in London;</p> <p>(ii) assess the quality of industrial land within SILs in Employment Land Reviews taking into account strategic and local factors (see paragraphs 4.14 to 4.16 of this SPG) to inform strategies for planning, investment, improvement and development;</p> <p>(iii) define the detailed boundaries of London Plan SILs in DPDs and associated Proposals Maps taking into account strategic and local assessments, Employment Land Reviews and relevant Opportunity Area Planning Frameworks;</p> <p>(iv) identify the components of the SIL framework (namely the Preferred Industrial Locations and Industrial Business Parks) in strategies, DPDs and other plans;</p> <p>(v) manage the differing offers of PILs and IBPs through coordinated investment, regeneration initiatives, transport and environmental improvements and the use of planning agreements, and provide local planning guidelines to meet the needs of different types of industry appropriate to each having regard to paragraph 4.5;</p>
SPG 5	<p>In implementing London Plan policies the Mayor will and boroughs, the LDA, TfL and other partners should:</p> <p>(i) take particular account of the need for logistics provision in the market areas outlined in paragraph 5.13 and especially in outer East, North and West London;</p> <p>(ii) encourage logistics and distribution facilities which will promote the movement of goods including waste and aggregates by water or rail;</p> <p>(iii) ensure that provision is made for large scale distribution activities and urban consolidation centres in the light of local and strategic assessments of demand, particularly in environmentally acceptable Preferred Industrial Locations with good access to the strategic road network, existing and</p>

	<p>potential inter-modal rail freight (see Section 13), river and/or canal related facilities including wharves (see Section 22);</p> <p>(iv) accommodate smaller scale logistics, warehouse and storage facilities within SILs and LSIS in line with strategic road capacity. Provision on industrial sites outside the SILs should not compromise the local environment, access or road capacity or broader concerns to secure intensification at appropriate locations;</p> <p>(v) in accordance with London Plan policy 6.14, developments that are likely to generate high numbers of freight movements should be located close to major transport routes and make use of rail and water freight opportunities wherever possible. Appropriate loading and unloading facilities should be provided to reduce impacts on the highway;</p> <p>(vii) consider whether all or parts of SILs and LSIS, where there are existing or potential opportunities for sustainable modes of distribution, should be formally promoted as Logistics Parks.</p>
SPG 9	<p>In implementing London Plan Policies 2.17 and 4.4 the Mayor will and TfL, boroughs and others partners should:</p> <p>(i) consider through strategic and local demand and supply assessments and DPDs whether industrial areas that have, or will have, good public transport accessibility, especially those within or on the edge of town centres, would be appropriate for higher density, mixed-use redevelopment. This redevelopment should be consistent with London Plan policy 4.4Aa and must not compromise the offer of wider areas as competitive locations for industry, logistics, transport, utilities or waste management;</p> <p>(ii) where this affects SILs this consolidation should be managed sensitively using the process set out in London Plan Policy 2.17 and SPG3. Consolidation through this process should be focused on the periphery of SILs near to public transport nodes or town centres, especially where there is a barrier separating the area from the rest of the SIL and enable consolidation of more environmentally sensitive, existing PIL tenants while maintaining the integrity of a local business cluster;</p> <p>(iii) establish robust and sensitive industrial relocation arrangements to support redevelopment where necessary.</p>
SPG 10	<p>In implementing London Plan policies, the Mayor will and boroughs, TfL and other partners should:</p> <p>(i) ensure that development of land in, and provision and refurbishing of premises for, industrial and related uses contribute to strategic climate change mitigation and adaptation objectives (see Sustainable Design and Construction SPG);</p> <p>(ii) encourage the redevelopment of London's industrial areas to enhance their offer as competitive locations attractive to modern industry;</p> <p>(iv) seek imaginative, sensitive design and investment solutions which do not entail a net loss of industrial capacity, which make more efficient use of space and enhance the environment within and around industrial areas;</p> <p>(v) take into account the industrial design guidance set out in paragraphs 10.13 to 10.22;</p> <p>(vi) provide on site provision for the particular operational requirements of heavy goods vehicles, including sufficient turning space, capacity to accommodate more goods vehicles than generally anticipated, 'parking up' space, rest space facilities, work force parking, improved linkages between local and strategic roads and the particular issues facing older industrial areas;</p> <p>(vii) consider how planning agreements might be used in light of local circumstances to secure London Plan objectives, including premises for</p>

	<p>different types of industrial occupier, transport, training, e-related and other infrastructure, contributions towards site assembly and decontamination and meeting the needs of specialist industries;</p> <p>(viii) make provision for demand for 'bad neighbour' industrial uses in environmentally acceptable locations, normally within PILs, and through good design ensure that they do not compromise the viability of other activities or the regeneration potential of the wider area;</p> <p>(ix) promote access to employment and target skills investment taking into account the London Employment Action Plan and the London Skills and Employment Board (LSEB) Strategy.</p>
SPG 11	<p>In implementing London Plan policies, the Mayor will and boroughs, TfL and other partners should:</p> <p>(i) manage the stock of industrial premises so that it provides a competitive offer for different types of occupier including logistics, utilities, waste management, transport functions and other related industrial activities. This will entail both improving the quality of provision to meet users' different needs, including those of SMEs and clusters of related activities, and maintaining lower cost capacity or making provision for those requiring affordable business premises to meet local needs;</p> <p>(ii) protect industrial sites and premises which meet demonstrable demand for lower cost industrial accommodation;</p> <p>(iii) promote the provision of small industrial units and managed workspaces suitable for small and medium sized enterprises (SMEs) and start-up companies;</p>

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Objective 1	<p>CREATE: To create a successful and inclusive new urban quarter, supporting delivery of 24,000 new homes in Old Oak and 1,500 new homes in non-industrial locations in Park Royal. This will include a mix of affordable and market tenures and typologies that meet the needs of new and existing residents. Development of new homes should achieve best practice standards of architecture and urban design, along with the delivery of appropriate levels of new social, physical and green infrastructure to support the future population. This will help create a vibrant and distinctive places / neighbourhoods, and contribute to an integrated, healthy and sustainable place.</p>
Objective 3	<p>COMMUNITY: To promote economic growth that helps address deprivation and reduces inequality for local communities and Londoners. To promote community development by providing jobs, homes and social infrastructure that is designed to enhance existing and develop new communities who live, work, commute or access the area. There is an opportunity to coordinate the development and stewardship of public sector land and assets to support the creation of 55,000 new jobs at Old Oak and a further 10,000 new jobs at Park Royal, and work to identify and secure funding streams. There will be a need to deliver training and employment initiatives to support Londoners into employment. This will require close working with the boroughs, key stakeholders, businesses and local communities to ensure local accountability and their involvement.</p>

Objective 4	<p>CONSOLIDATE: To protect and enhance Park Royal as a Strategic Industrial Location. To attract investment that will improve existing operations and maximise the area’s industrial potential. There is a need to support the smooth transition of business and industrial relocations. There will also be a need to protect and/or enhance nearby heritage and amenity assets including Wormwood Scrubs and the Grand Union Canal.</p>
Principle 1	<p>The core development area is focussed at Old Oak (see figure 17). This area should be redeveloped as a sustainable and healthy mixed-use part of west London. In conformity with the London Plan this new urban quarter should be comprehensively redeveloped to accommodate a minimum of 24,000 new homes, and 55,000 jobs. To achieve this, there will be a requirement for significant new transport, utility and social infrastructure provision to meet the requirements of the future population. OPDC will, through it’s Local Plan, carry out work to further consider the deliverable quantum of development.</p> <p>In accordance with Policy 2.17Bb of the London Plan, it is proposed that SIL is consolidated into the Park Royal as shown in figure 17. The official de-designation process for SIL in Old Oak would be dealt with through OPDC’s Local Plan. Requirements for replacement of any resultant loss of SIL should be considered at a strategic level.</p>

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
Para 3.15	No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
<p>Homes and jobs targets: Question the homes and jobs targets in the Local Plan. Some consultees consider that the figures should be higher, whereas others suggest that the figures should be lower. Request that further work should be undertaken to assess whether the London Plan targets are appropriate and provide justification for why the densities proposed within the Development Capacity Study are appropriate</p>	<p>Hammersmith and Fulham Council, Ealing Council, TITRA, Diocese of London, Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, the Hammersmith Society, Wells House Road Resident's Association, London Sustainable Development Commission, MP for Hammersmith, 4 local residents</p>	<p>No change proposed. The OPDC Local Plan is required to be general conformity with the London Plan and the minimum housing targets for Old Oak and Park Royal. Further work has been undertaken as part of OPDC's Development Capacity Study to test the appropriateness of housing targets in the Local Plan. The Development Capacity Study has been undertaken in accordance with national policy guidance. The Development Capacity Study work has informed the revised targets in the Regulation 19 draft Local Plan. The acceptability of any specific development proposal would be judged against the policies in the Local Plan, which includes policies which ensure that design is of a high quality and is in accordance with the principles of sustainable development.</p>
<p>Homes vs Jobs: Too many jobs are proposed and not enough homes</p>	<p>3 local residents</p>	<p>No change proposed. There is a need for the OPDC Local Plan to be in general conformity with the London Plan, which identifies the need to deliver a minimum 25,500 homes and 65,000 jobs in the OPDC area. OPDC considers that the homes and jobs figures to strike the right balance between the need for homes and jobs in the area. The level of transport access and the sites' location make Old Oak and Park Royal an excellent future employment location. This will help London's global competitiveness. This mix of employment and homes will also help create a mixed community. Employment provision is being further tested through OPDC's Future Growth Sectors Study, which will inform the next draft Local Plan.</p>

<p>Release more industrial land: Stakeholders suggested that OPDC should look to release more strategic industrial land in Park Royal (particularly on the HS2 work sites and at Willesden bus garage) for housing in order to allow for lower densities in Old Oak and to ensure that industrial uses' impacts on existing residential areas are minimised. Stakeholders also suggested that OPDC should take a less fixed, more blurred approach to land use zonings, allowing residential uses in industrial areas and vice versa</p>	<p>Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA, Wells House Road Resident's Association, 6 local residents</p>	<p>No change proposed. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities this provides for high density mixed use development. 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, a pan London need for SIL 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.</p> <p>Officers consider that taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. Officers support the potential for a mix of land uses in Old Oak and this is already reflected within the draft Local Plan's strategic policies.</p>
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Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
<p>Not clear how jobs figures have been calculated and need to do further work to understand what jobs are likely to be attracted to what sectors and how this will benefit local employment</p>	<p>Michael Hangyal</p>	<p>No change proposed. The Local Plan is supported by a Development Capacity Study which sets out how the jobs figures have been calculated. The Future Employment Growth Sectors Study also accompanied the Plan and this identified the sectors likely to grow in the Old Oak and Park Royal area. It would not be appropriate for the Plan to identify how many jobs will be delivered in each economic sector as this would be inflexible to changing economic cycles and trends. Policy E5 requires relevant developments to help</p>

		local people benefit from employment opportunities.
The Plan should identify where the intensification of industrial land should occur and should be less about protection and more about a proactive strategy for delivery of growth. This should also consider decant arrangements.	Ealing Council, Segro	Change proposed. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification. OPDC's Intensification Study identifies sites likely to be suitable and viable for intensification. Where sites meet the threshold, they have been identified as new industrial site allocations. OPDC acknowledge that other sites identified in the Study or windfall sites could also contribute towards intensification and policy E1 would support this.
The plan should have a fall back position in case of slower economic growth, with lower jobs targets	Hammersmith Society	No change proposed. The Local Plan covers 20 years over which there will be economic peaks and troughs. It is not considered appropriate to assume a significant economic downturn from the outset of the Local Plan. The Local Plan is accompanied by a set of Key Performance Indicators (KPIs). If Plan targets are not being achieved, this would be identified through these KPIs and this may trigger a review of the Plan's policies to either ensure the jobs targets are met or to revise them down accordingly.
In the right location and with the right design and planning controls, SIL uses can be located next to non SIL Uses	A40 Data Centre B.V	No change proposed. The Mayor's London Plan sets out the strategic approach to promoting and managing industrial land, including defining which uses are appropriate within Strategic Industrial Locations (SIL). In line with the Industrial Land Review, OPDC's key priorities for SIL are to protect, strengthen and intensify industrial activities. To ensure these objectives are met, development will only be permitted if it does not materially affect the ongoing functioning of employment uses in line with policy D6.
Object to London Living Wage being referenced in the policy. It is not the role of the planning system to control workers' pay and conditions	DP9 (on behalf of Old Oak Park Limited)	No change proposed. The policy 'strongly encourages' contractors and building occupiers to sign up to the London Living Wage. The London Living Wage is recognised as a key method of addressing in-work poverty and is therefore a key facet of ensuring economic resilience. Wording has been inserted to reference that this requirement would be secured through an informative on planning decisions.

Latest version of the Local Plan (Fig 3.4) correctly indicates a site which is in residential use, which was erroneous in the Reg 18 Local Plan	Boyer Planning (on behalf of Raban Goodhall Ltd)	Noted.
Site currently designated as SIL should be identified for development	Boyer Planning (on behalf of Raban Goodhall Ltd)	Change proposed. The Industrial Land Review and Addendum have undertaken a review of additional sites within SIL to assess to determine whether additional changes to the SIL boundary are appropriate. The Goodhall Street sites are proposed to be released from SIL for mixed use development.
More flexibility is required in the SIL area to allow for mixed use development in SIL around residential areas (i.e. railway cottages and Midland Terrace) on Old Oak side of the development zone.	Nicky Guymmer; Bruce Stevenson; Oonagh Heron; Mark Walker; Dave Turner; TITRA; Midland Terrace Residents; Nye Jones; DP9 (on behalf of A40 Data Centre BV); Joanna Betts; Nadia Samara; Nicholas Kasic; Francis, Marc and Caroline Sauzier; Patrick Munroe; Lily Gray; Ralph Scully; Catherine Sookha; Lynette Hollender; Jeremy Aspinall; Thomas Dyton	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 ongoing demand for industrial space. The proliferation of non SIL uses within SIL would undermine the functioning of existing and future industrial uses. Detailed changes to the SIL boundary have been assessed in the Industrial Land Review Addendum.
Policies are over restrictive in terms of their protection of SIL, more flexibility is required across SIL (Park Royal West and Old Park Royal)	Old Oak Neighbourhood Interim Forum; TITRA, Midland Terrace Residents; 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 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 ongoing demand for industrial space. The proliferation of non SIL uses within SIL would undermine the functioning of existing and future industrial uses. The London Plan provides strategic protection to SIL and defines which uses are appropriate in these areas. A more flexible approach in designated SIL would not be in general conformity with these policies.
Support protection, intensification and strengthening of Park Royal SIL.	CBRE (on behalf of SEGRO); GLA	Noted.
Support the creation of new jobs, including fairer economy,	LBHF; Hammersmith Society; Harlesden Lets, Wells House Road	Noted.

optimising employment opportunities for local residents and working with training and educational institutions.	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	
Support for creative sector and the provision of new workspaces, including creative low cost workspaces.	ArtWest; ACAVA; Joanna Betts; Nadia Samara; Nicholas Kasic; Francis, Marc and Caroline Sauzier; Patrick Munroe; Lily Gray; Hammersmith Society; Wells House Road Residents Association; Ralph Scully; Catherine Sookha; Lynette Hollender; Grand Union Alliance; Jeremy Aspinall; Thomas Dyton;	Noted.
Policy should reference all of the relevant evidence base. Failure to reference relevant evidence base calls into question the transparency of the consultation process.	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	Change proposed. Additional supporting text has been added to policy E1, drawing on information from the Industrial Land Review, referring to the area of existing industrial land affected.
The delivery of small workspaces and flexible workspaces will be hampered by plans to protect, strengthen and intensify the Strategic Industrial Location (SIL) in Park Royal.	Old Oak Neighbourhood Interim Forum; TITRA; Midland Terrace Residents, 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. It is considered that protecting, intensifying and strengthening Park Royal will not compromise the implementation of policy E3. Protecting and intensifying SIL will ensure that industrial floorspace is available to help meet demand. This floorspace can be used to accommodate small businesses and a range of broad industrial type activities.
Support encouragement of London Living Wage, but also need to think about need to provide housing for those on the London Living Wage	Harlesden Lets	Noted. Delivering affordable housing in a range of tenures, types and sizes is a key objective of the Local Plan as set out in Policies SP4 and H2.

<p>More detail is needed on how Industrial intensification will be delivered.</p>	<p>London Borough of Ealing</p>	<p>Change proposed. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification. OPDC's Intensification Study identifies sites likely to be suitable and viable for intensification. Where sites meet the threshold, they have been identified as new industrial site allocations. OPDC acknowledge that other sites identified in the Study or windfall sites could also contribute towards intensification and policy E1 would support this.</p>
<p>Question whether industrial intensification is achievable.</p>	<p>DP9 (on behalf of A40 Data Centre BV); Joanna Betts; Nadia Samara; Nicholas Kasic; Francis, Marc and Caroline Sauzier; Patrick Munroe; Lily Gray; Hammersmith Society; Wells House Road Residents Association; Ralph Scully; Catherine Sookha; Lynette Hollender; Jeremy Aspinall; Thomas Dyton; Grand Union Alliance; Old Oak Interim Forum</p>	<p>Change proposed. The Park Royal Intensification Study explores opportunities as well as deliverable and commercially viable strategies to intensify industrial land. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification. OPDC's Intensification Study identifies sites likely to be suitable and viable for intensification. Where sites meet the threshold, they have been identified as new industrial site allocations. OPDC acknowledge that other sites identified in the Study or windfall sites could also contribute towards intensification and policy E1 would support this.</p>
<p>Not convinced that that sites identified in the intensification study are sufficient to meet demand for industrial space.</p>	<p>Park Royal Business Group</p>	<p>Change proposed. The new draft London Plan (2017) requires no net loss of industrial floorspace capacity within designated SIL. The Industrial Land Review Addendum demonstrates how this objective will be achieved through OPDC's Local Plan. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification and co-location of industrial floorspace.</p>
<p>Industrial land is important to London's economy and productivity, but it is facing structural changes and challenges. Urban logistics is a key element of London's industrial sector and is critical to its</p>	<p>CBRE (on behalf of SEGRO)</p>	<p>Noted.</p>

productivity and economic success.		
Support intensification but challenges linked to intensification need to be addressed and it needs be grounded in the needs of the market and subject to viability.	Park Royal Business Group; CBRE (on behalf of SEGRO)	Change proposed. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification. OPDC's Intensification Study identifies sites likely to be suitable and viable for intensification. Where sites meet the threshold, they have been identified as site allocations. The Place Policies and Transport policies also seek to address some of the key challenges linked to intensification including improvements to the movement network.
The Plan should be clearer in setting out how SIL intensification will be delivered, including identifying site allocations for industrial intensification.	Mayor of London	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 and the ongoing demand for industrial space. A mix of uses within SIL would undermine its core function as a reservoir or land for industrial uses. Transport policies seek to limit car parking and would require travel plans and transport assessments.
Recognise that more efficient use of land through intensification is required and broadly support recommendations for this.	Park Royal Business Group	Noted.
A bold shift in policy and approach is needed to actively promote and facilitate new industrial development under a clearly defined spatial vision.	CBRE	Noted. OPDC considers that the policies in the Local Plan seeks to achieve this.
Site currently designated as SIL should be identified for development	Boyer Planning (on behalf of Raban Goodhall Ltd)	Change proposed. The Industrial Land Review and Addendum have undertaken a review of additional sites within SIL to assess to determine whether additional changes to the SIL boundary are appropriate. The Goodhall Street sites are proposed to be released from SIL for mixed use development.
Question the	Hammersmith Society;	No change proposed. The jobs

deliverability/accuracy of jobs targets as the figures do not take into account the closure and relocation of businesses/jobs.	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	capacity figure is based on a robust assessment of the development potential of suitable sites and broad locations over the plan period. Detailed information on the assessment is set out in the Development Capacity Study and the Park Royal Intensification Study. However, the text has been amended to clarify that the targets refer to new jobs.
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Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Jobs and homes should be distributed across the OPDC area.	Grand Union Alliance	Noted. Policies SP5 and SP6 and Place Policies provide spatial guidance for distributing land uses.
Plans should respect local people and respond to local context. The Local Plan is not achievable and will harm the local area with an isolated station complex and tower blocks. A greater spread of land uses should be provided to deliver a high quality of life.	Grand Union Alliance	No change proposed. The Spatial Vision and the Going Local Narratives set out aspirations to benefit local people's quality of life and ensure development complements and is connected with surrounding neighbourhoods. These aspirations are embedded in the policies of the Local Plan. Particularly, Policy SP2 provides guidance to deliver Good Growth and sustainable development, Policy SP3 provides guidance to improve health and reduce health inequalities, Policies SP4 and SP5 provide guidance for the delivery and distribution of a wide range of homes and jobs, Policy SP6 provides guidance to celebrate local context, Policy SP7 provides guidance to ensure new streets and routes connect to existing neighbourhoods, Policy SP9 provides guidance to ensure development is high density, high quality and positively responds to local context, character and heritage.
Local jobs are needed	West Acton Residents Association	Noted. Policies SP5 and E5 provide guidance to secure local access to training, employment and economic opportunities.
Support proposed delivery of new jobs and a major new commercial centre.	Imperial College	Noted.

Development on, or over Old Oak Common station remains outside the scope of HS2's work.	HS2 Ltd.	Noted. This is reflected in Policy P1C1.
There is a need for training programmes and opportunities for local people to work on both the area development and in new businesses created by the development. There should be equal opportunities for people and investment in digital/IT skills and equipment.	Thomas Dyton; Wells House Road Residents Association	Noted. Policy E5 requires a Local Labour Skills and Employment Strategy and Management Plan (LLSESMP) to be provided for major development proposals. A LLSESMP would include detailed information on jobs, skills, supply chain and mitigation. New, on site skills training centres could be delivered as part of implementing a LLSESMP, if that was considered appropriate.
New jobs target is potentially unsound as it is not clear that it is informed by a robust evidence base. Development Capacity is based on assessment of Park Royal SIL designation as a single, broad location. Further work is required that considers individual sites within the Park Royal.	Aberdeen Standard Investments	No change proposed. Development capacity has been identified using National Planning Practice Guidance Housing and Economic Land Availability Assessment guidance. For Park Royal, this has been informed by evidence in the Park Royal Intensification Study, which considered a range of case study sites and other potential intensification sites. The Park Royal Intensification Study demonstrates that the intensification of SIL is deliverable and viable. The jobs figures are not maximum targets but they do provide an indication of the number of jobs that could be delivered over the plan period. Policies SP5 and E1 are clear that development within SIL should help contribute towards meeting the strategic target of 40,400 new jobs. SP1 and E1 set clear priorities for SIL in seeking to protect, strengthen and intensify it in order to ensure the delivery of additional floorspace as well as new jobs.
Welcomes the OPDC and the Local Plan's support for surrounding areas – (specifically Harlesden).	Harlesden Neighbourhood Forum	Noted.
Request that the Major Town	Transport for London	No change proposed. The supporting text to Policy P1 supports early delivery

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.		of the Elizabeth Line Depot. OPDC considers it appropriate to provide guidance for the depot should this be achieved.
Support the identification of a new Major Town Centre in Old Oak North as illustrated on Figure 3.7. The early development of the EMR site can make a major contribution to this Centre	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	<ul style="list-style-type: none"> Approximately 40,400 new jobs can be delivered during the 20 year plan period.
Future Employment Growth Sectors Study	<p>There are a number of growth sectors which could be supported in Old Oak and Park Royal including:</p> <ul style="list-style-type: none"> Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. There are opportunities to retain, strengthen and diversify these sectors. Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. <p>Key ways to support these fit into 4 broad themes:</p> <ul style="list-style-type: none"> Sector Development Workspace, Infrastructure and Placemaking Skills and Social Inclusion Evidence and Strategy <p>Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support;</p>

	<p>supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area.</p> <ul style="list-style-type: none"> • Some sectors are better suited to particular locations within OPDC’s boundary so the spatial recommendations also show potential suitable locations.
Industrial Land Review	<p>Protect</p> <ul style="list-style-type: none"> • Protect industrial uses in Park Royal SIL • Reduce non-conforming uses in Park Royal SIL • Return Park Royal HS2 construction sites to SIL • Development adjacent to Park Royal SIL <p>Intensify</p> <ul style="list-style-type: none"> • Efficient use of industrial land • Reduce road congestion • Intensification pilot projects <p>Expand</p> <ul style="list-style-type: none"> • Adjust Park Royal SIL boundary • Light industrial floor space in Old Oak • Manage industrial floorspace within the region • Industrial space design and planning guidance <p>Support</p> <ul style="list-style-type: none"> • Business relocation • Low carbon transition • Local procurement • Business listing and online forum
Infrastructure Delivery Plan	<ul style="list-style-type: none"> • Identifies a significant number of infrastructure requirements to support the regeneration of the area. • The majority of infrastructure identified relates to the core development area in Old Oak, but the IDP also identifies important infrastructure requirements for Park Royal • The study identifies those pieces of infrastructure which OPDC would look to secure through developer contributions (Section 106, Section 278 or Community Infrastructure Levy). • Maps are provided for those pieces of infrastructure that relate to particular locations of the area. <p>The IDP will be kept as a ‘live’ document and regularly updated to respond to any changes in infrastructure requirements.</p>
Integrated Impact Assessment and Habitats Regulation Assessment	<ul style="list-style-type: none"> • Ensure the contents of the draft Local Plan consider, support and enhance: <ul style="list-style-type: none"> ○ the component environmental, social and economic elements of sustainability; ○ equality for all; and ○ physical, mental and emotional health and well-being. <p>Ensure the contents of the draft Local Plan are screened for any impact on Natura 2000 sites.</p>
Park Royal Atlas	<p>There are a diverse range of businesses in the area</p> <ul style="list-style-type: none"> • At the time of the survey, 19,934 active workspaces were identified. • A broad range of business sectors were identified, including breweries, bakeries, metal workshops, storage, contractors, joiners,

	<p>hospitals, schools, publishers, film studios, software developers, garages, car sales, pubs, hotels, jewellers, cobblers, lawyers, accountants, spice merchants, medical suppliers, churches and artist studios.</p> <ul style="list-style-type: none"> • 30% of workplaces are small office type spaces, though workplaces in large warehouses make up 63% of the total floor area. • The central areas of Park Royal stand out for having the greatest diversity of buildings and space types. Many of these are used by micro businesses which count for 75% of workplaces
Park Royal Intensification Study	<p>There are a number of sites and locations across Park Royal where there may be opportunities for intensification, including through:</p> <ul style="list-style-type: none"> • Vertical extension • Horizontal extension • Infill • Internal subdivision • New provision on vacant land • Comprehensive redevelopment
Industrial Estate Study	<p>Recommendations for how Park Royal can improve its competitive position, including:</p> <ul style="list-style-type: none"> • protecting industrial land; • ensuring a greater diversity of unit sizes; • addressing infrastructure issues; and • improving access to amenities.
Park Royal Workforce Skills Analysis	<p>The Park Royal Workforce Skills Analysis identifies that there are some slightly larger firms employing 10-49 people which are experiencing employee training/skills problems. For them it seems to be low and intermediate skills that are the issue rather than (as might have been expected) high-level skills. There are some reasons for thinking this may get worse in the years to come. These range from a rapidly rising minimum wage to the increasing buoyancy of the London jobs market, and even rising house prices making it harder for lower-skilled people to live in the boroughs around Park Royal.</p> <p>There are also concerns about a lack of suitable people applying for apprenticeships, and low demand from young people for these and other employment opportunities offered by employers at the site. Given that more survey respondents were thinking about employing apprentices in the future than currently employ them, this too may become a more pressing issue in future years.</p> <p>The findings suggest there are inefficiencies in the labour market which could perhaps be addressed. Anecdotal evidence from the consultations (as well as the survey responses) indicated that those firms that were experiencing recruitment difficulties were looking to connect with colleges and schools but had little idea of the best way of going about it, and were falling back on pre-existing relationships with independent training providers of industry- and job-specific training. Meanwhile the colleges were struggling to engage small businesses with disparate technical skills development needs and difficulties attracting young people to entry-level and apprenticeship opportunities. This suggests there may be opportunities for colleges and/or external providers to discuss training needs with employers, perhaps through some kind of brokering service.</p>
Precedents Study	<ul style="list-style-type: none"> • A series of lessons are identified for each precedent within the

	<p>study which act as recommendations for future similar schemes within the OPDC area.</p> <ul style="list-style-type: none"> It is advised that further work is undertaken to assess a number of the schemes in further detail to inform the master planning process at Old Oak, or specific future schemes within the area.
Socio-Economic Baseline	The report does not make recommendation as it is a baseline assessment of current socio-economic conditions. The indicators outlined in the study are intended to be measured on an ongoing basis to measure improvements in socio-economic conditions.
Whole Plan Viability Study	In the round, the policies contained in the Local Plan would be viable.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Industrial Land Review	<ul style="list-style-type: none"> Adjust Park Royal SIL boundary around Park Royal Centre 	OPDC commissioned a Park Royal Development Framework Principles supporting study in February 2018. This has sought to reconcile issues or recommendations related to Park Royal Centre that are currently spread across a number of the Local Plan supporting studies, including the Industrial Land Review and Retail and Leisure Needs Study. The outputs from this work include an assessment of suitable sites for expansion of the town centre and, as a result, a revised town centre/SIL boundary.

Other documents

Draft Economic Development Strategy for London (2017)

Policy / paragraph reference	Policy and paragraph text
Page 58	<p>The Mayor will:</p> <ol style="list-style-type: none"> Pilot the Healthy Early Years London programme and deliver the Early Years Hubs to tackle the cost of childcare, improve the health, wellbeing and school readiness of children under five, and upskill early years workers – helping to increase the takeup and quality of early years education. Work with London schools, colleges, providers, businesses, universities and London boroughs to develop a coherent and accessible all-age careers information, advice and guidance offer. Work with schools, colleges, universities and industry to break down gender stereotypes and address other inequalities, for example in BAME communities, especially in STEM subjects. As part of this, the Mayor will fund up to 5,000 pupils who are underrepresented in the science, technology, engineering and maths (STEM) sector to enter their projects for a national CREST Award – the top science award scheme for school children in the country.

	<p>4. Continue to lobby for London early years, schools and colleges to have sufficient funding to continue to improve outcomes for all pupils.</p> <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government supports the London school and college system to work together to increase teacher numbers by improving both recruitment and retention. • Government provides adequate funding for London schools to cover actual costs, including for special educational and disability needs, and increases in teacher pay and National Insurance costs. • Government makes available school improvement funds in London to sustain and enhance London's educational attainment to improve outcomes in maths and English and take action to continue to progress outcomes for disadvantaged pupils. • Businesses offer more STEM work experience to pupils using the London Ambitions portal and/or working with STEM Learning. • London's universities support student entrepreneurship across the education system.
Page 63	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Work with London's further education providers and other key stakeholders (including higher education) to promote the benefits of further learning, and promote Continuing Professional Development (CPD) and succession planning. 2. Address the perceived costs by promoting Advanced Learner Loans, which provide financial support to those aged 19 and over undertaking qualifications at Level 3 and above. 3. Support the devolved Work and Health programme in London to help long-term unemployed people to (re)-enter work, working in collaboration with London's boroughs and sub-regional partnerships. 4. Promote training provision that meets the needs of disabled people, in line with the Special Educational Needs and Disability review. 5. Help make ESOL courses more accessible so they meet the needs of different groups of learners in the capital, especially the unemployed. 6. Set out priorities and outcomes for adult education in London through an annual skills statement for the devolved Adult Education Budget (AEB) from 2019/20. 7. Develop a Digital Inclusion Strategy to help increase the number of Londoners benefiting from digital technology. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government ensures London's funding settlement for the Adult Education Budget (AEB) in 2019/20 and future years is at the very least no lower than current levels. • Government further devolves funding, powers and responsibilities to the Mayor to achieve a coherent and integrated skills and adult education offer for London including 16-18 provision, higher level learning and careers services, with apprenticeship levy funds and EU replacement funds devolved. • Colleges, skills providers, boroughs and employers to work with City Hall to promote the economic benefits of individuals investing in their learning, including through Advanced Learner Loans. • Businesses and schools work together to offer more young people opportunities to engage with employers before they leave school.
Page 69	The Mayor will:

	<ol style="list-style-type: none"> 1. Help to increase the supply of housing including affordable homes and help make private renting more affordable. 2. Improve the accessibility and affordability of the cost of transport, and provide a better experience for disabled and older people. 3. Help to support access to more affordable and accessible childcare. 4. Work with partners to address some of the key causes of financial exclusion and increase financial literacy among young people. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government provides comprehensive and urgent devolution of additional funding and powers that recognise the scale of London's housing challenges. • Developers, housing associations and local authorities plan for and build the new and genuinely affordable homes that Londoners need. • Local authorities provide and coordinate help and support for Londoners affected by the housing crisis. • Government increases funding for childcare to reduce the costs for parents and enable more women to sustain employment.
Page 73	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Recognise and celebrate businesses that promote high standards in employment and procurement through the new Good Work Standard for London. 2. Promote fair pay and good employment practices through the Good Work Standard and help to establish London as a Living Wage city. 3. Provide guidance on being a good employer of disabled people to support more disabled people to find and progress in work, and keep older workers (50+) engaged with the workforce. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government implements the recommendations of the Mathew Taylor review to improve the rights of agency workers, zero hour contractors, and those employed within the gig economy. • Government should broaden the powers of HMRC, and the Employment Agency Standards Inspectorate, and implement a much more activist enforcement regime to root out illegal employment practices. • Businesses, business groups and local councils work with him to promote the principles of the Good Work Standard, and encourage engagement from employers across the capital. • Local authorities extend business rate discount schemes for Living Wage accredited employers across London.
Page 76	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Work with partners to devise and implement solutions to food insecurity in London. 2. Improve access to healthy and affordable food and promote the benefits of eating healthily. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Local authorities work to promote healthy and sustainable food, including the development of food poverty action plans and healthy food retail plans. • Businesses, particularly those within traditionally low paid sectors, sign up to the London Healthy Workplace Charter, so that they can develop and maintain healthier workplaces.

Page 81	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Promote the importance of well designed, inclusive and high quality public spaces, buildings and housing. 2. Work with local authorities, the community and voluntary sectors to enable the creation of more socially integrated communities. 3. Maximise community participation, active citizenship and volunteering in the process of growth. 4. Work with the Met Police and partners to make London a safer, more secure city confronting violence, extremism and terrorism and improving cyber security. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • The voluntary sector and civil society groups work with him to ensure London's communities have a voice in policy development and delivery, with an emphasis on groups that are less engaged. • Businesses of all sizes enable their employees to volunteer their time and skills to support the community. • Government provides our police and security services with a fair funding deal for London to help keep the city safe.
Page 95	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Help to protect London's role as a global hub for business, ensuring there is sufficient supply of office accommodation and investment in transport and infrastructure. 2. Work with communities to create vibrant local economies outside central London, including successful town centres, high streets and industrial areas. 3. Help to ensure that London retains sufficient industrial land to keep the economy working efficiently. 4. Support the retention of low cost and affordable workspace using planning policy and enable the creation of new space through the Good Growth Fund. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government reviews permitted development rights that affect offices, light industrial premises and other employment uses, to ensure that they do not undermine the availability of viable low cost workspace. • Operators and developers of industrial and distribution premises work closely with the Mayor to explore innovative solutions to workplace demand, such as multistorey development and co-location with residential uses. • Workspace providers develop a system of accreditation, which encourages more consistent monitoring of economic and social value to demonstrate the contribution that these workspaces make to London. • Government formalises a way for small businesses who use large open plan environments (such as co-working spaces) to benefit from the small business rate relief they would be eligible for if they worked in a small self-contained unit.
Page 105	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Implement the Healthy Streets Approach to create a healthy street environment, where people choose to walk, cycle and use public transport. 2. Help to make more efficient use of London's streets by reducing car dependency and tackling congestion. 3. Invest in London's public transport capacity with TfL and make the case to government for the transport investment needed to enable economic growth, such as Crossrail 2.

	<p>4. Use new transport schemes to unlock homes and jobs across London, with developments planned around walking and cycling for local trips and public transport use for longer journeys.</p> <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government works with the Mayor and Transport for London to secure the necessary powers to deliver Crossrail 2, opening the scheme in 2033. • Government ensures further rail franchises across the South East are devolved to the Mayor to provide improved service and better accountability. Government develops aviation capacity in the South East without severe environmental impacts, notably through a second runway at Gatwick.
<p>Pages 114-115</p>	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Establish an Infrastructure High Level Group, with the aim of improving the planning, coordination and delivery of infrastructure in the capital. 2. Tackle the barriers to provision of fast, reliable digital connectivity through a comprehensive programme including: appointing a dedicated team in City Hall, promoting best practice and innovation, developing guidance, advocating the use of public sector assets for digital connectivity and championing the use of standardised agreements. 3. Promote an integrated approach to water management - reducing demand, supporting appropriate water resource development, and managing rainwater close to where it falls, to reduce the risk of flooding. 4. Help to retrofit London's building stock and energy systems to help deliver zero carbon heat and power by 2050. 5. Protect and enhance London's Natural Capital - its green spaces, air, water and other natural resources to ensure London is a healthy, green and liveable city. 6. Promote the concept of green infrastructure and natural capital accounting. 7. Promote the circular economy approach to resource and material management. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government devolves stronger fiscal powers from Whitehall to help address the UK's underinvestment in infrastructure and incentivise economic growth. • Government and the regulators consider the wider public good implications of utility providers' capital investment programmes, going beyond the current focus on how they impact on consumer bills. • Government collaborates with the Mayor in helping to address knowledge gaps amongst consumers, developers, local authorities and other key stakeholders by sharing their experience, guidance and good practice. • Government works to encourage planning, coordination and funding in digital connectivity in London by enabling the GLA to have regional strategic responsibility as a gatekeeper to funding and resources for the improvement of digital infrastructure. • Digital infrastructure providers communicate effectively with the GLA and London boroughs of their infrastructure plans and work with them to identify and address current and future underserved areas. • Government actively supports London's work to develop a 'Natural Capital Accounting System' that allows the full value of green

	<p>infrastructure to be quantified and investigate how it could ultimately be incorporated into formal accounting practices in a future low carbon circular economy.</p> <ul style="list-style-type: none"> • Government introduces a long-term regulatory and financial framework to speed up the rate of energy efficiency in buildings to help reduce energy costs. • Businesses look at how they can support the delivery of green infrastructure across London and help to reduce flood risk - developers and landowners should provide sustainable drainage systems in new and existing developments. • Businesses consider how they can adopt a 'circular approach' to their use of resources, ensuring that materials stay in use as long as possible, reducing the amount of virgin materials required and maximising recycling.
<p>Pages 120-121</p>	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Promote the strengths of London's research base to businesses, investors and global partners. 2. Use the Adult Education Budget, once devolved, to tailor skills provision to meet the needs of businesses and learners, and to support progression into and within work. 3. Promote the provision and takeup of high quality (including higher level) apprenticeships by employers and providers, and investment in workforce progression. 4. Use the Skills for Londoners Capital Fund to improve the quality of facilities for learning. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government commits the UK to participation in European research networks, beyond the current Horizon 2020 programme, including the prestigious European Research Council (ERC) grants. If unsuccessful, the Government must ensure equivalent research funding opportunities for our higher education institutions. • Government prioritises a flexible immigration system – one that strengthens London's international competitiveness, and which includes: ⁰⁰A clear post-study work offer to international students, one that can support start-up and SME innovation and growth. ⁰⁰Removal of international students from the annual net migration target. ⁰⁰Wider opportunities for freelance talent, in particular in tech and creative industries, to work as self-employed. ⁰⁰Adoption of a pro-active approach to bringing global talent to the UK by reforming the current non-EU visa system. • Government devolves the Apprenticeship Levy to the Mayor to fund skills and employment initiatives in the capital. In the longer term, it should be for London's government to decide whether or not to retain such a levy, at what rate, and how it should be spent, in consultation with business. • Businesses engage with providers to help inform the planning of future education provision and increase investment in workforce development.

<p>Pages 128-129</p>	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Work with London & Partners to attract and retain investment in London and support foreignowned firms to expand through the Business Growth Programme. 2. Support start-ups and business growth across London through the Growth Hub and other initiatives. 3. Build on the successful London Co-investment Fund model by launching another early stage venture fund that targets high growth enterprises and addresses the funding gap facing high growth firms. 4. Support more businesses to export through the International Business Programme delivered by London & Partners and their private sector partners. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government works with the GLA and London & Partners to develop a joint export strategy to support London’s current exporters to succeed in overseas markets and develop the appetite and capacity of more businesses to export. • Government maintains a flexible approach to migration, prioritising remaining in the Single Market with qualified freedom of movement and reform of the UK’s non-EEA visa system, including the Tier 1 Entrepreneur route. • Government provides additional, multi-year funding to support the further development of London’s Growth Hub to deliver face-toface triage and advice to London’s entrepreneurs and growing businesses. • Business support providers work with the London Growth Hub to help coordinate London’s business support offer to ensure an easyto-access offer is available for businesses in the capital. • Government increases the British Business Bank’s role in London and in particular, commits to replace the lost European Investment Fund (EIF) guarantees lost as a result of the UK’s departure from the EU. • Government ensures that current European Structural Funds dedicated to supporting business growth are continued to at least the same level and devolved to the Mayor. • Government reviews the business rates system – to raise the rateable value at which small businesses pay no rates, offer exemptions for certain industries such as nurseries and childcare providers; and legislates to hold more frequent business rates revaluations.
<p>Page 134</p>	<p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government devolves a proportion of its innovation funds directly to London, and other UK cities, to enable cities to respond in a more agile way to emerging economic opportunities, to more proactively support business growth needs, and maximise collaboration within and between different sectors and regions 143.

<p>Page 141</p>	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Identify key social, economic and environmental challenges and call on London's entrepreneurs to innovate with data and technology to help solve them. 2. Support investment in urban demonstrators to showcase digital technologies across the city, and work with London boroughs and investors to bring these to market for the benefit of Londoners. 3. Establish new digital leadership with the Smart London Board and publish a new Smart London Plan to make London the smartest city in the world. <p>This will include:</p> <ul style="list-style-type: none"> • Using the London Plan to enable smart technology to be incorporated into new developments and infrastructure. • Enabling common standards and open approaches to data and procurement for digital services enabling products and services to scale. • Making data safer and able to be used more effectively by better data sharing, and personal- or cyber- security. <ol style="list-style-type: none"> 4. Support the creation of GovTech incubators to bring the best ideas to market in digital public services, helping London's residents and businesses to access and use public services and information more easily. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government departments, including the Government Digital Service and GovTech Catalyst, collaborate with the Mayor and the Boroughs to improve digital public services and smart city technologies. • Local Authorities develop data sharing agreements and common data standards so businesses can more easily develop and scale digital public services. • Businesses engage with the public sector to understand the challenges London is facing and innovate with data to identify solutions.
<p>Page 151</p>	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Work to secure investment in the development of the Thames Estuary Production Corridor and prepare a blueprint for technical education. 2. Publish a Cultural Infrastructure Plan to identify what London needs to retain its world leading status as a creative capital and ensure Londoners have access to culture. 3. Promote and support the sector through agencies and trade bodies like the British Fashion Council, Film London, London Design Festival, Games London and London & Partners. 4. Protect London's heritage and culture through a pro-culture London Plan. 5. Support the provision of affordable creative workspace exploring options for a Creative Land Trust and piloting Creative Enterprise Zones. 6. Help more Londoners to engage in culture through the London Borough of Culture competition, Love London campaign and the promotion of culture in education. 7. Continue to back major cultural festivals to celebrate London's diverse population. 8. Promote the night time economy in line with the vision for London as a 24-hour city. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government recognises London's global position as a creative capital and invests in its world leading creative and cultural industries, reflecting London's role as a gateway to the rest of the UK.

	<ul style="list-style-type: none"> • Government creates an immigration system that supports and safeguards the future success of the creative industries, including enabling wider opportunities for non-EEA creative freelance talent to work as self-employed. • The Valuation Office Agency reviews its valuation policy for businesses linked to London's night time economy including pubs, restaurants, clubs, live music venues and other licensed premises.
Page 156	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Lobby on behalf of the sector for a Brexit deal which sustains mutual market access for UK and EU financial services companies. 2. Help to ensure London has sufficient office space in the right locations to support the growth of the sector. 3. Work with London & Partners, the City of London Corporation, TheCityUK, London First, the London Stock Exchange and other business leaders and stakeholders to showcase London's global strengths and support growth, including in FinTech and carbon finance. 4. Explore opportunities to build on the London Co-investment Fund and continue to leverage in venture capital for promising start-ups. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government recognises and reflects the importance of the financial services sector to London and the UK in Brexit negotiations. • The financial services sector works with FinTech firms to continue to innovate with new products and services to ensure London remains the financial services capital of the world. • The financial services industry, including pension funds, corporate and private wealth managers take a bolder and more patient approach to deploying capital to take advantage of London's emerging expertise in new industries, supporting firms to scale up and grow.
Page 163	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Promote London and the wider south-east as a pioneer of life science innovation internationally. 2. Work with partners to explore options for the safe use of NHS data for research. 3. Continue to support collaboration across different sectors (such as digital health and MedTech) to meet healthcare challenges. 4. Help to increase the availability of long term 'patient' capital available to the sector. 5. Work with London boroughs, universities and research institutions, the NHS and other stakeholders to support the growth of new life sciences developments - from directly funding new innovation and workspace provision, to making the best use of publicly owned land, and using the Mayor's planning policy levers to facilitate future development. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government supports industry to thrive post-Brexit through ensuring access to talent, close regulatory alignment with the EU and supporting firms to reach new international markets. • Government supports MedCity to promote the sector internationally, as part of the national clusters approach, to lever the inward investment that will support UK wide growth. • The NHS works with firms to identify innovative data-driven solutions to help solve London's health challenges.

	<ul style="list-style-type: none"> Investors, including pension funds, corporate and private wealth managers take a more patient approach to deploying capital in the life sciences sector, where drug development for example can take over 10 years.
Page 169	<p>The Mayor will:</p> <ol style="list-style-type: none"> Set clear environmental ambitions for London and a roadmap for delivering them. Support businesses and households to become more resource efficient. Help to accelerate innovation in the CleanTech sector by assisting start-ups to test, prototype and commercialise their innovation in London. Establish a Centre for CleanTech Innovation in West London – to provide workspace, collaboration space and business support. Scope out the potential to establish ‘a proving factory’ - an early stage manufacturing facility to enable firms with growth potential to prototype their innovations. Promote London’s CleanTech proposition internationally with London & Partners to attract new anchor businesses and investment. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> Government works with cities to create a policy and regulatory framework that supports innovative firms to provide creative solutions to the environmental challenges cities face. Investors back London’s CleanTech innovation, supporting start-up growth and helping to make the capital more liveable. Businesses engage in London’s environmental challenges and provide innovative solutions.
Pages 175-176	<p>The Mayor will:</p> <ol style="list-style-type: none"> Set out the challenges facing London and Londoners and work with technology innovators to find solutions. Engage with industry and academia to develop London’s strengths in areas such as artificial intelligence, virtual reality and augmented reality, exploring how businesses across different industries can take advantage of the opportunities in digital technology. Maximise investment opportunities through the Mayor’s ‘Investment Showcase’, attracting finance and helping innovative businesses to scale up. Help to ensure London has access to tech talent through the Mayor’s ‘Digital Talent’ programme and through championing a flexible immigration system. Support tech firms and companies adopting digital business models, to access best practice in cybersecurity and data protection. Work with partners to improve London’s digital infrastructure, helping to provide affordable access to high bandwidth digital connectivity. Work with London & Partners to champion London’s technology sector at home and abroad and attract inward investment. Lobby government on behalf of the sector for continued UK influence over the shape the future Digital Single Market takes, and a Brexit deal that guarantees British companies will have access to it. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> All businesses engage in the opportunities new advances in digital technology bring, such as artificial intelligence and machine learning, and draw on the strengths of London’s R&D base. Investors back London tech firms at all stages of growth and development to ensure London continues to be a world leader in

	<p>technology innovation.</p> <ul style="list-style-type: none"> • Businesses fully understand the risks posed by cyber crime, are aware of the changes made in data protection regulation, and invest in appropriate cyber security to ensure they operate in a secure digital environment. • Government influences the future shape of the Digital Single Market, and ensures a Brexit deal that guarantees British companies will have access to it; as well as access to the global talent they need to innovate and grow.
Page 181	<p>The Mayor will:</p> <ol style="list-style-type: none"> 1. Support London & Partners to raise awareness of the Tourism Vision to those with a stake in London's international promotion. 2. Work with London & Partners to implement the Tourism Vision focusing on: <ul style="list-style-type: none"> • Convincing more visitors to choose London by showcasing the range and depth of London's cultural offer, attracting more first time visitors and boosting off-peak travel. • Improving the visitor experience and access to information. • Ensuring London has the infrastructure and amenities to sustain and accommodate growing numbers of visitors. • Working with industry to develop the infrastructure to support increasing numbers of business visits and events. <p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Government guarantees continued visa free travel to the UK for European citizens and adopts a flexible approach to migration to help address the skills shortages in the sector. • Government favours a Brexit deal that enables the UK's continued membership of the European Common Aviation Area. • Businesses raise the profile of the sector to attract and retain talent. • Businesses work collectively with London and national government to bid for and host major sporting, cultural and business events that build London's reputation globally.
Page 187	<p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Everyone with a stake in London's economy – UK cities, businesses and institutions, communities, voluntary organisations and others – all work with him to shape and deliver the ambitions of the Economic Development Strategy.
Page 189	<p>The Mayor asks that:</p> <ul style="list-style-type: none"> • Public and private sector organisations across London use their buying power to drive improvements to the economic, social and environmental wellbeing of Londoners.

Policy SP6: Places and Destinations

Legislation, Policy and Guidance Context

National Planning Policy Framework (NPPF)

Paragraph Reference	Paragraph
17	Planning should take account of the different roles and character of different areas, promoting the vitality of our main urban areas.
23	Local planning authorities should define a network and hierarchy of centres that is resilient to anticipated future economic changes.
37	Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
58	Planning policies and decisions should aim to ensure that developments establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver <ul style="list-style-type: none"> • the provision of retail, leisure and other commercial development • the provision of health, security, community and cultural infrastructure and other local facilities

National Planning Practice Guidance (NPPG)

Design

Paragraph Reference	Paragraph
020	<p>Distinctiveness is what often makes a place special and valued. It relies on physical aspects such as:</p> <ul style="list-style-type: none"> • the local pattern of street blocks and plots; • building forms; • details and materials; • style and vernacular; • landform and gardens, parks, trees and plants; and • wildlife habitats and micro-climates.

	Distinctiveness is not solely about the built environment – it also reflects an area’s function, history, culture and its potential need for change.
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Ensuring the vitality of town centres

Paragraph Reference	Paragraph
001	Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work.

London Plan (2016) Policies

Policy and paragraph reference	Policy and paragraph text
2.15	<p>B Changes to the network including designation of new centres or extension of existing ones where appropriate, should be co-ordinated strategically with relevant planning authorities including those outside London. Identified deficiencies in the network of town centres can be addressed by promoting centres to function at a higher level in the hierarchy or by designating new centres where necessary, giving particular priority to areas with particular needs for regeneration (see Policy 2.14) and better access to services, facilities and employment. Centres with persistent problems of decline may be reclassified at a lower level.</p> <p>D Boroughs should:</p> <p>a2) in light of local and strategic capacity requirements (Policy 4.7), identify town centre boundaries, primary shopping areas, primary and secondary frontages in LDF proposals maps and set out policies for each type of area in the context of Map 2.6 and Annex 2</p> <p>b) in co-ordination with neighbouring authorities and the Mayor, relate the existing and planned roles of individual centres to the network as a whole to achieve its broader objectives</p>
4.6	<p>C In preparing LDFs, boroughs should:</p> <p>c) designate and develop cultural quarters to accommodate new arts, cultural and leisure activities, enabling them to contribute more effectively to regeneration</p>
4.7	<p>C In preparing LDFs, boroughs should:</p> <p>c) take a proactive partnership approach to identify capacity and bring forward development within or, where appropriate, on the edge of town centres</p>

7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change.
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Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
GG2	<p>Making the best use of land To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:</p> <p>A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.</p> <p>B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach.</p> <p>C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.</p> <p>D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.</p> <p>E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.</p> <p>F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance</p>
SD6	<p>Town centres</p> <p>A London's varied town centres and their vitality and viability should be promoted and enhanced as:</p> <ol style="list-style-type: none"> 1) strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development 2) locations for mixed-use or housing-led intensification and higher-density renewal, securing a high-quality environment and complementing local character and heritage assets 3) the structure for delivering sustainable access by walking, cycling and public transport to a competitive range of services and activities 4) the main focus for Londoners' sense of place and local identity in the capital 5) the primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy 6) a key mechanism for building sustainable, healthy, walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management.

B The adaptation and restructuring of town centres should be supported in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries.

C The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Residential-only schemes in town centres may be appropriate outside of primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.

D The particular suitability of town centres for smaller households, Build to Rent, older people's housing and student accommodation should be considered and encouraged.

E The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights (see Policy E1 Offices) and the need for affordable business space (Policy E3 Affordable workspace).

F The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, having regard to the role of individual centres in the night-time economy (see Figure 7.7 and Table A1.1) and supporting the development of cultural uses and activity.

G Tourist infrastructure, attractions and hotels in town centre locations, especially in outer London, should be enhanced and promoted (see Policy E10 Visitor infrastructure).

H The delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners, including disabled and older Londoners and families with young children, should be provided. This may include Shopmobility schemes, the provision of suitably designed crossing points, dropped kerbs and tactile paving, seating and public toilets.

I The provision of social infrastructure should be enhanced, and facilities should be located in places that maximise footfall to surrounding town centre uses.

J Safety and security should be improved, and active street frontages should be secured in new development, including where there are ground floor residential frontages.

C The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Residential-only schemes in town centres may be appropriate outside of primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.

D The particular suitability of town centres for smaller households, Build to Rent, older people's housing and student accommodation should be considered and encouraged.

E The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights (see Policy E1 Offices) and the need for

	<p>affordable business space (Policy E3 Affordable workspace).</p> <p>F The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, having regard to the role of individual centres in the night-time economy (see Figure 7.7 and Table A1.1) and supporting the development of cultural uses and activity.</p> <p>G Tourist infrastructure, attractions and hotels in town centre locations, especially in outer London, should be enhanced and promoted (see Policy E10 Visitor infrastructure).</p> <p>H The delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners, including disabled and older Londoners and families with young children, should be provided. This may include Shopmobility schemes, the provision of suitably designed crossing points, dropped kerbs and tactile paving, seating and public toilets.</p> <p>I The provision of social infrastructure should be enhanced, and facilities should be located in places that maximise footfall to surrounding town centre uses.</p> <p>J Safety and security should be improved, and active street frontages should be secured in new development, including where there are ground floor residential frontages.</p>
SD7	<p>Town centre network</p> <p>A The changing roles of town centres should be proactively managed in relation to the town centre network as a whole (see Figure 2.17 and Annex 1). This process should support sustainable economic growth across the Greater London boundary to enhance the vitality and viability of London's centres and complement those in the Wider South East.</p> <p>B Identified deficiencies in the London town centre network can be addressed by promoting centres to function at a higher level in the network, designating new centres (see Annex 1) or reassessing town centre boundaries (see Policy SD8 Town centres: development principles and Development Plan Documents). Centres with current or projected declining demand for commercial, particularly retail, floorspace may be reclassified at a lower level in the hierarchy.</p> <p>C The classification of International, Metropolitan and Major town centres (see Annex 1) can only be changed through the London Plan. Potential future changes to the strategic town centre network are set out in Figure A1.1 in Annex 1. Changes to District, Local and Neighbourhood centres can be brought forward through Local Plans where supported by evidence in development capacity assessments and town centre health checks and subject to assessments of retail impact where appropriate (see Policy SD8 Town centres: development principles and Development Plan Documents).</p> <p>D International, Metropolitan and Major town centres should be the focus for the majority of higher order comparison goods retailing, whilst securing opportunities for higher density employment, leisure and residential development in a high quality environment.</p> <p>E District centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment.</p> <p>F Local and neighbourhood centres should focus on providing convenient and attractive access by walking and cycling to local goods and services</p>

	<p>needed on a day-to-day basis.</p> <p>G Boroughs and other stakeholders should have regard to the broad policy guidelines for individual town centres in Annex 1 including:</p> <ol style="list-style-type: none"> 1) indicative growth potential (commercial and residential) 2) centres associated with the Areas for Regeneration (see Policy SD10 Strategic and local regeneration) 3) night-time economy roles (see Policy HC6 Supporting the night-time economy) 4) viable office locations including those with strategic office development potential and/or need to retain existing office functions in light of office to residential permitted development rights (see Policy E1 Offices).
D1	<p>London's form and characteristics</p> <p>Development Plans, area-based strategies and development proposals should address the following:</p> <p>A The form and layout of a place should:</p> <ol style="list-style-type: none"> 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. <p>B Development design should:</p> <ol style="list-style-type: none"> 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.

HC6	<p>Supporting the night-time economy</p> <p>A Boroughs should develop a vision for the night-time economy, supporting its growth and diversification, in particular within strategic areas of nighttime activity (see Table A1.1 and Figure 7.7), building on the Mayor’s Vision for London as a 24-Hour City.</p> <p>B In Development Plans, town centre strategies and planning decisions, boroughs should:</p> <ol style="list-style-type: none"> 1) promote the night-time economy, where appropriate, particularly in the Central Activities Zone, strategic areas of night-time activity, town centres, and where public transport such as the Night Tube and Night Buses are available 2) improve inclusive access and safety, and make the public realm welcoming for all night-time economy users and workers 3) diversify the range of night-time activities, including extending the opening hours of existing daytime facilities such as shops, cafés, libraries, galleries and museums 4) address the cumulative impact of high concentrations of licensed premises and their impact on anti-social behaviour, noise pollution, health and wellbeing and other impacts for residents, and seek ways to diversify and manage these areas 5) ensure night-time economy venues are well-served with safe and convenient night-time transport 6) protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas, music and other arts venues. <p>C Promoting management of the night-time economy through an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, and environmental and cleansing services should be supported. Boroughs should work closely with stakeholders such as the police, local businesses, patrons, workers and residents.</p>
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Supplementary Planning Guidance (SPG)

Policy and paragraph reference	Policy and paragraph text
<p>Town Centres SPG (2014)</p> <p>SPG implementation 1.2</p>	<p>Boroughs and town centre partners are encouraged to:</p> <ol style="list-style-type: none"> a) encourage the integration of culture, creativity and good design into the built environment, having regard to those areas deficient in cultural provision and drawing on best practice across the capital d) develop and promote clusters of cultural activities and related uses as cultural quarters, particularly to support regeneration
<p>SPG Implementation 6.4</p>	<p>Boroughs and town centre partners are encouraged to:</p> <ol style="list-style-type: none"> a) ensure development complements other parts of the town centre network including coordination with the wider city region b) develop integrated policies across the London boundary to promote spatially balanced and sustainable economic growth to support the vitality and viability of London’s centres and those in the wider south east c) ensure that London’s town centres play an important role in the development and regeneration of the London Plan Growth Areas and Coordination corridors.

Culture and Night-Time Economy (November 2017)	<p>Sets out information to:</p> <ul style="list-style-type: none"> to provide guidance on using London Plan polices to protect and enhance cultural venues a focus on how to offer more protection for pubs and explaining the 'Agent of Change' principle promoting the night-time economy and night-time cultural offer whilst achieving a balance with the needs of local residents making culture and the night-time economy more inclusive and accessible looking at ways to manage the impacts of the night-time economy
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Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Objective 1	<p>CREATE: To create a successful and inclusive new urban quarter, supporting delivery of 24,000 new homes in Old Oak and 1,500 new homes in non-industrial locations in Park Royal. This will include a mix of affordable and market tenures and typologies that meet the needs of new and existing residents. Development of new homes should achieve best practice standards of architecture and urban design, along with the delivery of appropriate levels of new social, physical and green infrastructure to support the future population. This will help create a vibrant and distinctive places / neighbourhoods, and contribute to an integrated, healthy and sustainable place.</p>
Principle D5	<p>Proposals should accord with the guidance set out in Principle D3 and Principle OO4 of this framework and London Plan policy 7.7 to contribute to the creation and improvement of locally distinct neighbourhoods / places within three character areas of Old Oak, Park Royal and Wormwood Scrubs, that meet the principles of Lifetime Neighbourhoods, within the three overarching character areas: Area Place Old Oak Old Oak North Old Oak Common Station Old Oak South Old Oak High Street North Acton Old Oak Lane Scrubs Lane Grand Union Canal Park Royal Park Royal* Heart of Park Royal Wormwood Scrubs Wormwood Scrubs.</p>

Local Plan Regulation 18 Draft Policy Options

Policy	Paragraph
TC2	<p>1. Identify Old Oak High Street as a Metropolitan Centre.</p> <p>9.21 This option would provide the opportunity to increase the scale of town centre uses in the Old Oak area. This option would have benefits in terms of making Old Oak an attractive destination and could have benefits for placemaking by attracting higher footfall. However, this option could impact on the vitality and viability of the surrounding town centre hierarchy. It may also dilute investment in other centres and could also impact on a wider catchment and a greater number of town centres in west London. The greater quantum of retail on Old Oak High Street could also make it more difficult to let space.</p> <p>9.22 Examples of other 'metropolitan' town centres in London are Ealing, Shepherd's Bush and Kingston.</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.

9.23 This option would limit the quantum of town centre uses to look to minimise impacts on nearby town centres such as Harlesden, Ealing and Shepherd's Bush. However, this approach would not provide sufficient floorspace to cater for the needs arising from development. The London Plan explains that typically District Centres contain 10,000-50,000sqm retail, leisure and service floorspace and that Neighbourhood Centres, would by virtue, be at either the lower end of this range or below 10,000sqm. The Retail and Leisure Needs Study identifies a quantitative need for 52,500sqm of A-class floorspace alone in Old Oak during the plan period and consequently, designating a District Centre and Neighbourhood Centre would be likely to only provide sufficient floorspace to provide for retail needs and would not allow for the provision of a significant quantum of culture, sports or leisure uses within these centres. The approach of designating a Neighbourhood Centre around the Old

Oak Common Station would also fail to capture the catalytic impact that the station could have on the immediate area and wider hinterland. The Old Oak Common Station is estimated to have approximately 250,000 passengers a day interchanging (embarking or disembarking). There is a significant opportunity for the land uses around the Old Oak Common Station to attract these passengers who are interchanging into the surrounding hinterland and to help activate the place and capture economic benefits for the area and its hinterland and this opportunity would be limited through the designation of a Neighbourhood Centre here, rather than a Major Centre.

9.24 Examples of other District Centres in the area are Harlesden, Hanwell and Portobello Road and examples of other 'neighbourhood' centres in the area are East Acton, Kensal Rise and Perivale.

3. Two centres are designated in Old Oak - a District Centre to the south of the canal around Old Oak Common Station and a Neighbourhood Centre to the north of the canal.

9.25 As with option 2 above, this option would seek to limit the quantum of town centre uses to minimise impacts on nearby town centres. As above, it is unlikely that a district and neighbourhood centre would provide sufficient floorspace to cater for the needs of development and certainly would not provide a policy framework for the establishment of strategic culture, sports and leisure uses in the area.

9.26 The designation of a district centre to the south of the Grand Union Canal would better capture the scale of need for town centre uses arising from the population living, working and visiting the area than in option 2. However, to the north of the canal, the designation of a Neighbourhood Centre would not be capable of providing sufficient town centre uses to meet the areas need. This could be met to a certain degree by the District Centre at Old Oak Common Station and the District Centre at Harlesden, but there would also be a risk that premises in this area would struggle and the limited quantum of town centre uses may impact on placemaking.

4. Park Royal is not identified as a Neighbourhood Centre and a different approach is taken to town centre uses in the area.

9.27 The town centre uses in the centre of Park Royal, in particular the ASDA supermarket, generate significant volumes of traffic which have an impact on the ability of Park Royal to function as an industrial estate. An approach to minimise this impact might be to dedesignate the centre and allow for its gradual erosion to other uses such as employment and residential including local 'walk to' services. However, this approach could also result in worse impacts on the highway network if the town centre uses are dispersed requiring employees and residents to travel further for their services. It would

also see the loss of well used existing local services over time.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
<p>New Places: Suggestions for the Local Plan to include new places including:</p> <ul style="list-style-type: none"> - A separate place for Willesden Junction station; - A separate place for Victoria Road/Old Oak Lane - Splitting Park Royal into two places - Identifying Harlesden Town Centre as a separate place - A separate place for Old Oak Common station <p>A separate place for the IEP depot</p>	<p>Diocese of London, Old Oak Park (DP9), The Hammersmith Society, TITRA, Wells House Road Resident's Association, Midland Terrace Resident's Group, Old Oak Interim Forum, 9 local residents</p>	<p>Change proposed. OPDC recognises the need to have a more nuanced approach to Places.</p> <p>OPDC agrees with the suggestion to have a separate place for Willesden Junction. This has been included in the Regulation 19 draft (P11)</p> <p>OPDC agrees with the rationale to have a separate place drawing together the communities along Old Oak Lane, Old Oak Common Lane and part of Victoria Road. This has been identified as a separate place in the Regulation 19 draft (P8)</p> <p>OPDC recognises the diversity within Park Royal industrial area and officers have undertaken further evidence work, which is considering the spatial characteristics of this area. OPDC has produced a Heritage Strategy, which identifies heritage assets and ways in which these can help shape the future of Old Oak and Park Royal. OPDC has also produced a Future Growth Sectors Study to gather further information on the nature of the local economy and future opportunities. This has resulted in a more nuanced approach in Park Royal,</p>

		<p>which has now been split into two places – Park Royal West (P4) for the newer more logistics/storage orientated part of the estate, and Old Park Royal (P5) for the older part of the estate where industrial uses are finer grain and more mixed.</p> <p>Harlesden Town Centre is not within the OPDC area, so OPDC is unable to set a place policy for it; however, OPDC is working closely with Brent Council and the Harlesden Neighbourhood Forum to consider how development at Old Oak and Harlesden can complement each other.</p> <p>OPDC recognises the need for more detailed policy guidance for Old Oak Common station and to address this, the station has been identified as a ‘cluster’.</p> <p>OPDC does not propose to include a separate place for the IEP depot. Whilst the future redevelopment of the IEP depot site for a mixed use development may be supported in land use policy terms, given the nature of the existing use as the depot, it is not identified as a phase likely to come forward within the timescales of the Local Plan.</p>
<p>Meanwhile Uses: There was support for requiring developers to submit a meanwhile strategy, but that the Local Plan should set a threshold for the size of schemes required to submit one</p>	<p>Brent Council, Old Oak Park (DP9), Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, Diocese of London, Old Oak Park (DP9), TITRA, London Sustainable Development Commission, 2 local residents</p>	<p>Change proposed. The revised Local Plan (policy TCC9) requires a meanwhile feasibility studies to be submitted by major development proposals (10 or more residential units or 1000sqm+ of non-residential floorspace). If meanwhile uses are feasible, then the policy requires the submission of a meanwhile strategy.</p>

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support SP6 and recognition of the role catalyst uses can play	Imperial College	Noted.
Support Policy SP6	T.A.S.B. Investments Ltd, Association for Consultancy and Engineering (ACE), Hammersmith and Fulham Council, Friary Park Preservation Group	Noted.
Para 3.53 erroneously refers to 'Atlas Junction stations' rather than 'Atlas Junction centres'	Transport for London	Change proposed. The text has been amended to 'centres'.
The supporting text to SP6 should refer to the role the Oaklands development will play in early delivery and integrating existing and new communities at Atlas Junction.	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	No change proposed. It is not felt appropriate in this strategic policy to draw out and identify one particular scheme. Reference is made to the Oaklands scheme supporting the knitting together the area in the supporting text to the Atlas Junction cluster (Policy P8C1).
Support the delivery of Old Oak High Street as a major town centre	Mayor of London	Noted.
Support the introduction of a separate place for Willesden Junction	Old Oak Park Ltd	Noted.
Para 3.51 refers to setting the trajectory of the centre. The trajectory should not be set now as there will be many influences and considerations that warrant a more flexible approach	Old Oak Park Ltd	No change proposed. OPDC considers it important to set the trajectory now so that individual schemes that come forward can be assessed against the understanding of the likely emergence of the wider centre. The rationale for this is set out in OPDC's Retail and Leisure Needs Study and this approach has been supported by the Mayor of London.
Should include requirement for 'high quality' in the policy and recognise role of local heritage in place-making.	Hammersmith and Fulham Council	Change proposed. Wording has been added to part a)i) of the policy to reference 'high quality' and it is

		considered that the inclusion of high quality within this policy line also binds the other requirements in the policy to contribute towards the creation of high quality places. Reference to heritage informing the creation of distinctive places is already made in the supporting text to Policy SP6.
Policy SP6 is not sound (no reason given)	Sarah Abrahamart	No change proposed. Without a reason being given for why the policy is not sound, OPDC is unable to address this issue.
Support creation of a cultural quarter.	Mayor of London, ArtWest, 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	Noted.
Policy should set out that each centre should be appropriate to its function and should establish its own identity	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 policy defines the function of each of the centres and requires proposals to support their delivery. The policy also requires development to support the delivery of a series of distinctive places. OPDC considers that the policy therefore addresses this matter.
Question the concept of clusters which the text states are characterised as locations which are likely to attract higher footfall and/or have a particular use and as such warrant more detailed policy	Old Oak Interim 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. Cluster policies are considered necessary to provide extra policy detail at the points in the area where most activity is likely to occur. Responses to the Regulation 18 Local Plan identified and supported the need within certain locations for a greater degree of policy detail.
The word 'celebrate' does not mean anything in spatial planning terms.	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. The word celebrate is only ever used in supporting text rather than in policy. The Oxford Dictionary defines that

	Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	'celebrate' can be to 'honour or praise publicly' and in the instances it is used in the Local Plan, the word relates to the aspiration for development to create a feature of a particular asset.
SP6a)ii) is not justified	Old Oak Interim 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. No reason has been provided as to why the policy is not justified. More detailed policies are included in the Local Plan relating to meanwhile and catalyst uses (TCC8 and TCC9) which will be used to assess the acceptability of any proposals.
SP6 should specifically include – delivery of positive physical and community connections between existing places within and adjacent to the OPDC area, specifically avoiding detrimental impact and segregation.	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. Physical connections are dealt with in SP7 (connecting people and places) and in the relevant place policies and therefore do not need to be included in SP6. Community connections are dealt with in a general sense in SP4 (thriving communities) and therefore do not need to be included in SP6.
SP6 should provide policy that ensures a cultural quarter and catalyst use achieves positive regeneration within an existing relatively deprived area. Proposals should be drawn up in collaboration with local community members and be widely consulted.	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 strategic policy is strategic in nature. Policy TCC5 requires that facilities for cultural space meet needs. Likewise, Policy TCC8 requires proposals to perform positively against the criteria within Table 10.2, which includes that it should complement London and West London's needs and growth aspirations and complement the local characteristics and meet the needs of and provide benefits for the local population.
The policy should also actively support proposals for community empowerment and ownership – across boundaries of the OPDC area and neighbouring areas	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	No change proposed. Community ownership is dealt with under Policy DI3. Community empowerment is dealt with under the lifetime neighbourhoods principles,

	Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	which are extolled through Policy SP2. OPDC cannot set planning policies to address the delivery of development outside of its boundary.
Old Oak should be promoted as a cultural destination with a facility that will attract people from across the country	Jamie Glazebrook	Noted. This is included within SP6.
Support provision of a mix of culture and leisure uses in the development	David Craine	Noted.
Development needs to complement Harlesden Town Centre, rather than compete and overwhelm it.	Harlesden Lets	Noted. The requirement to complement neighbouring centres is set out in Policy SP6. OPDC also requires schemes over a certain scale to measures that will support the continuing vitality and viability of Harlesden District Centre. Details for this strategy are set out in Policy TCC1.
Support designation of Old Oak High Street as a major town centre	Royal Borough of Kensington and Chelsea	Noted.
The cultural quarter should include an arts centre and studio space for the local community.	Chloe Freemantle	Noted. The provision of a cultural quarter would enable the potential provision of an arts centre and studio space.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Welcome clarification in relation to meanwhile uses.	Old Oak Park Limited	Noted.
Support plans for a new Cultural Quarter at Old Oak, but the ambition for this has been watered down compared to earlier iterations of the plan. OPDC should proactively seek to bring a major cultural catalyst to the area.	The Hammersmith Society; Alan Goodearl, Thomas Dyton, Wells House Road Residents Association	No change proposed. The wording in Policy SP8 citing the delivery of a new Cultural Quarter at Old Oak has not changed from first revised draft version of the Local Plan. The policy is also clear that OPDC will support the delivery of appropriate catalyst uses. Policy TCC8 sets out the four broad categories of potential catalyst uses, and it is not

		considered appropriate to prioritise one particular category. However, through Policy TCC5 (Culture and Art) and the place policies for Old Oak North and Old Oak South, the Local Plan requires development to support delivery of a new cultural quarter in Old Oak. Proposals for catalysts uses which support delivery of this would be viewed positively.
Policy and supporting text should be amended to refer to the protection of valuable heritage and environmental assets through place in placemaking.	Wormwood Scrubs Charitable Trust	No change proposed. The protection of heritage assets is addressed through Policy SP9 (Build Environment) and Policy D8 (Heritage). The protection of environmental assets is addressed through Strategic Policy SP8 (Green Infrastructure and Open Space) and the policies EU1 (Open Space) and EU2 (Urban Greening and Biodiversity). The protection of heritage and environmental assets is also addressed throughout places polices of chapter 4.
Figure 3.8 shows Wormwood Scrubs Street within Wormwood Scrubs, which is inconsistent with other figures in the document.	Wormwood Scrubs Charitable Trust	Change proposed. Figure 3.8 has been amended to more accurately reflect the boundary of Wormwood Scrubs Place and the location of Wormwood Scrubs Street.
The supporting text to SP6 should refer to the role the Oaklands development will play in early delivery and integrating existing and new communities at Atlas Junction.	Queens Park Rangers Football Club and Stadium Capital Developments	Noted. See response to comment SP6/4 from the first regulation 19 draft Local Plan
The place policies of chapter 4 are wrongly considered strategic policies as they meet the criteria for non-strategic policies as set out in NPPF paras 075 and 076. As a result, this element of the plan is unsound.	Old Oak Neighbourhood Forum	No change proposed. OPDC does consider the place policies to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and

		jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
Welcome clarification in relation to meanwhile uses.	Old Oak Park Limited	Noted.
Support plans for a new Cultural Quarter at Old Oak, but the ambition for this has been watered down compared to earlier iterations of the plan. OPDC should proactively seek to bring a major cultural catalyst to the area.	The Hammersmith Society; Alan Goodearl	<p>No change proposed. The wording in Policy SP8 citing the delivery of a new Cultural Quarter at Old Oak has not changed from first revised draft version of the Local Plan. The policy is also clear that OPDC will support the delivery of appropriate catalyst uses.</p> <p>Policy TCC8 sets out the four broad categories of potential catalyst uses, and it is not considered appropriate to prioritise one particular category. However, through Policy TCC5 (Culture and Art) and the place policies for Old Oak North and Old Oak South, the Local Plan requires development to support delivery of a new cultural quarter in Old Oak. Proposals for catalysts uses which support delivery of this would be viewed positively.</p>
Policy and supporting text should be amended to refer to the protection of valuable heritage and environmental assets through place in placemaking.	Wormwood Scrubs Charitable Trust	<p>No change proposed. The protection of heritage assets is addressed through Policy SP9 (Build Environment) and Policy D8 (Heritage). The protection of environmental assets is addressed through Strategic Policy SP8 (Green Infrastructure and Open Space) and the policies EU1 (Open Space) and EU2 (Urban Greening and Biodiversity). The protection of heritage and</p>

		environmental assets is also addressed throughout places polices of chapter 4.
Figure 3.8 shows Wormwood Scrubs Street within Wormwood Scrubs, which is inconsistent with other figures in the document.	Wormwood Scrubs Charitable Trust	Change proposed. Figure 3.8 has been amended to more accurately reflect the boundary of Wormwood Scrubs Place and the location of Wormwood Scrubs Street.
The supporting text to SP6 should refer to the role the Oaklands development will play in early delivery and integrating existing and new communities at Atlas Junction.	Queens Park Rangers Football Club and Stadium Capital Developments	Noted. See response to comment SP6/4 from the first regulation 19 draft Local Plan
The place policies of chapter 4 are wrongly considered strategic policies as they meet the criteria for non-strategic policies as set out in NPPF paras 075 and 076. As a result, this element of the plan is unsound.	Old Oak Neighbourhood Forum	No change proposed. OPDC does consider the place policies to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.

<p>SP6 should make direct reference to Kensal Canalside Opportunity Area' to fulfil the Duty to Cooperate. It is suggested that "Our proposed outcome" should insert "...and complements existing and emerging surrounding town centres."</p>	<p>Royal Borough of Kensington and Chelsea</p>	<p>No change proposed. The supporting text to Policy SP1 makes clear reference a list of areas where joint working will be required to ensure that the benefits of regeneration can be fully captured, this includes Kensal Canalside Opportunity Area. Additional references are also included in supporting text to P10, T1 and T3. It is not considered necessary to replicate text on the significance of the Kensal Canalside Opportunity Area already included in SP1. Furthermore, it is not considered appropriate for the Policy to reference the Kensal Canalside Opportunity Areas in isolation as other areas listed in SP1 are also key areas.</p>
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Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Relevant recommendations
<p>Retail and Leisure Needs Study (and Addendums)</p>	<ul style="list-style-type: none"> • There is a deficiency of cultural space in West London and the OPDC area could help address this through the delivery of a new cultural quarter (paras 7.2.4 and 7.2.8) • There is a quantitative need for approximately 68,500sqm of A-class uses in the OPDC area in the Local Plan period (the next 20 years). • A new town centre hierarchy is identified: <ul style="list-style-type: none"> - A new major town centre at Old Oak High Street; - A new neighbourhood town centre at North Acton; - A new neighbourhood town centre at Atlas Junction; and - Consolidating and expanding the existing neighbourhood town centre at Park Royal Centre. • Within the plan period, 57,250sqm of A-class uses should be provided in the new Old Oak High Street Major Town Centre, with 4,750sqm in North Acton, 3,500sqm in Atlas Junction and 3,000sqm in Park Royal Centre • A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for

		independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses.
Catalyst Study	Uses	<ul style="list-style-type: none"> • Catalyst uses could be small or large, but OPDC should look to set a threshold for the application of planning policy criteria of either in excess of 10,000sqm and/or 0.25 hectares of land • The review of case studies identifies both positives and negatives for catalyst uses. The study identifies that rather than one catalyst, a series of multiple, complementary catalysts are likely to best support the wider regeneration aspirations of the area. • The study identifies a series of planning criteria against which applications should be assessed. These are structured around five overarching objectives for any catalyst: <ul style="list-style-type: none"> - To be part of a holistic offer; - To be financially sustainable; - To complement the wider environment; - To help generate momentum; and • To leverage HS2 and Crossrail.
	Cultural principles	<ul style="list-style-type: none"> • Ensure the Local Plan highlights the importance of culture to the area. • Ensure that character, heritage and culture sit at the heart of placemaking. • Develop a Cultural Strategy to further consider opportunities for culture in the OPDC area. • Ensure that consultation is meaningful, that it reaches as many people and communities as possible, and that it includes young people and families. • Encourage 'anchor' tenants and cultural institutions to locate in the area, and explore options for attracting and retaining creative businesses and affordable workspace

Rationale for any non-implemented recommendations

Evidence base	Recommendation	Rationale for not including
Retail and Leisure Needs Study	Potential designation of a district centre and neighbourhood centre in Old Oak, instead of a major town centre	<p>The rationale for proposing a major town centre is outlined in para 7.6.11 in the Retail and Leisure Needs Study.</p> <p>Officers propose to continue to identify Old Oak High Street as a potential major town centre. The draft Retail and Leisure Needs Study identifies the need in the centre to provide over 50,000sqm of A-class uses alone, which puts it within the Major Town Centre bracket in Annex 2 of the London Plan. This does not account for the floorspace requirements for culture, sports, leisure and community uses falling within use class D1 and D2.</p> <p>The Retail and Leisure Needs Study (para 7.6.11) also identifies that the designation of a major town centre will also:</p> <ul style="list-style-type: none"> - Meet a gap in major centre provision in the area and provide a distinct offer from other centres in the hierarchy - Ensure that appropriate investment and occupiers for major centres are directed to the planned new centre rather than potentially incrementally throughout the remainder of the OPDC area, helping

		<p>with place making objectives and creating a sense of place for a new community</p> <ul style="list-style-type: none"> - provide a clear policy message on how the retail floorspace will meet the needs of the development in a sustainable manner. <p>The Local Plan puts in place appropriate safeguards to ensure that impacts on neighbouring centres are minimised. Impact Assessments are required for schemes providing over 5,000sqm in Old Oak (see policy TCC3) and proposals are required to submit a town centre enhancement strategy (see policies P1, P2 and P11, chapter 4), where proposals are likely to have adverse impacts. However, officers agree with the need for close working with Brent Council and local community groups to ensure that Harlesden remains a successful town centre.</p> <p>Policy SP6 requires that the new town centre hierarchy complements the surrounding town centre network, including centres like Harlesden, Shepherd's Bush, Acton and Ealing.</p>
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Other evidence base

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

Policy SP7: Connecting People and Places

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Paragraph Reference	Paragraph
17	Planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.
29	Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.
30	Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.
31	Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development.
35	Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to <ul style="list-style-type: none"> ● accommodate the efficient delivery of goods and supplies; ● give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; ● create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
37	Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
41	Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.

156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver the provision of infrastructure for transport
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National Planning Practice Guidance (NPPG)

Design

Paragraph Reference	Paragraph
008	<p>Planning policies and decisions should look to create streets that support the character and use of the area. This means considering both their role as transport routes and their importance as local public spaces to accommodate non travel activities.</p> <p>Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through. Attractive and well-connected permeable street networks encourage more people to walk and cycle to local destinations.</p> <p>For this reason streets should be designed to be functional and accessible for all, to be safe and attractive public spaces and not just respond to engineering considerations. They should reflect urban design qualities as well as traffic management considerations and should be designed to accommodate and balance a locally appropriate mix of movement and place based activities.</p> <p>The transport user hierarchy should be applied within all aspects of street design – consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles.</p>

London Plan (2016) Policies

Policy and paragraph reference	Policy and paragraph text
6.1	<p>A The Mayor will work with all relevant partners to encourage the closer integration of transport and development through the schemes and proposals shown in Table 6.1 and by:</p> <ul style="list-style-type: none"> a encouraging patterns and nodes of development that reduce the need to travel, especially by car b seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand c supporting development that generates high levels of trips at locations with high levels of public transport accessibility and/or capacity, either currently or via committed, funded improvements including, where appropriate, those provided by developers through the use of planning obligations d improving interchange between different forms of transport, particularly around major rail and Underground stations, especially where this will enhance connectivity in outer London

6.2	<p>e seeking to increase the use of the Blue Ribbon Network, especially the Thames, for passenger and freight use</p> <p>f facilitating the efficient distribution of freight whilst minimising its impacts on the transport network</p> <p>g supporting measures that encourage shifts to more sustainable modes and appropriate demand management</p> <p>h promoting greater use of low carbon technology so that carbon dioxide and other contributors to global warming are reduced</p> <p>i promoting walking by ensuring an improved urban realm</p> <p>B The Mayor will, and boroughs should, take an approach to the management of streetspace that takes account of the different roles of roads for neighbourhoods and road users in ways that support the policies in this Plan promoting public transport and other sustainable means of transport (including policies 6.2, 6.7, 6.9 and 6.10) and a high quality public realm. Where appropriate, a corridor-based approach should be taken to ensure the needs of street users and improvements to the public realm are co-ordinated.</p> <p>C Boroughs and any other relevant partners must ensure the provision of sufficient land, suitably located, for the development of an expanded transport system to serve London's needs by:</p> <p style="padding-left: 40px;">a safeguarding in DPDs existing land used for transport or support functions unless alternative facilities are provided that enables existing transport operations to be maintained</p> <p style="padding-left: 40px;">b identifying and safeguarding in DPDs sites, land and route alignments to implement transport proposals that have a reasonable prospect of provision, including those identified in Table 6.1.</p>
6.3	<p>D Boroughs should take the lead in exploiting opportunities for development in areas where appropriate transport accessibility and capacity exist or is being introduced. Boroughs should facilitate opportunities to integrate major transport proposals with development in a way that supports London Plan priorities.</p>
6.11	<p>B DPDs should develop an integrated package of measures drawn from the following:</p> <p>a promoting local services and e-services to reduce the need to travel</p> <p>b improving the extent and quality of pedestrian and cycling routes</p> <p>c making greater use of the Blue Ribbon Network</p> <p>d improving the extent and quality of public transport</p> <p>e developing intelligent transport systems to convey information to transport users</p> <p>i applying the London street-types framework to ensure that the needs of street users and improvements to the public realm are dealt with in a co-ordinated way</p> <p>j promoting efficient and sustainable arrangements for the transportation and delivery of freight.</p>

6.12	<p>B In assessing proposals for increasing road capacity, including new roads, the following criteria should be taken into account:</p> <ul style="list-style-type: none"> a the contribution to London's sustainable development and regeneration including improved connectivity b the extent of any additional traffic and any effects it may have on the locality, and the extent to which congestion is reduced c how net benefit to London's environment can be provided d how conditions for pedestrians, cyclists, public transport users, freight and local residents can be improved e how safety for all is improved. <p>C Proposals should show, overall, a net benefit across these criteria when taken as a whole. All proposals must show how any dis-benefits will be mitigated.</p>
6.14	<p>B Development proposals that:</p> <ul style="list-style-type: none"> c increase the use of the Blue Ribbon Network for freight transport will be encouraged.
7.1	<p>B Development should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure</p>
7.27	<p>A Development proposals should enhance the use of the Blue Ribbon Network, in particular proposals:</p> <ul style="list-style-type: none"> b should protect and improve existing access points to (including from land into water such as slipways and steps) or alongside the Blue Ribbon Network (including paths). New access infrastructure into and alongside the Blue Ribbon Network will be sought.
7.30	<p>C Within LDFs boroughs should identify any local opportunities for increasing the local distinctiveness and use of their parts of the Blue Ribbon Network</p>

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
T1	<p>Strategic approach to transport</p> <p>A Development Plans and development proposals should support:</p> <ul style="list-style-type: none"> 1) the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041 2) the proposed transport schemes set out in Table 10.1. <p>B All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.</p>
T2	<p>Healthy Streets</p> <p>A Development proposals and Development Plans should deliver patterns</p>

	<p>of land use that facilitate residents making shorter, regular trips by walking or cycling.</p> <p>B Development Plans should:</p> <ol style="list-style-type: none"> 1) promote and demonstrate the application of the Mayor's Healthy Streets Approach to: improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities. 2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant. <p>C In Opportunity Areas and other growth areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active and public transport travel. Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators.</p> <p>D Development proposals should:</p> <ol style="list-style-type: none"> 1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. 2) reduce the dominance of vehicles on London's streets whether stationary or moving. 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.
T3	<p>Transport capacity, connectivity and safeguarding</p> <p>A Development Plans should develop effective transport policies and projects to support the sustainable development of London and the Wider South East as well as to support better national and international public transport connections.</p> <p>B Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs, including by:</p> <ol style="list-style-type: none"> 1) safeguarding existing land and buildings used for transport or support functions (unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary) 2) identifying and safeguarding new sites and route alignments, as well as supporting infrastructure, in order to provide transport functions and planned changes to capacity, including proposals identified in Table 10.1 3) safeguarding the Walk London Network, protecting access to and improving the Thames Path and, where relevant, improving its alignment with the Thames. <p>C Development proposals that do not provide adequate protection for the schemes outlined in Table 10.1 or which otherwise seek to remove vital transport functions or prevent necessary expansion of these, without suitable alternative provision being made to the satisfaction of transport authorities and service providers, should be refused.</p> <p>D In Development Plans and development decisions, priority should be given to delivering upgrades to Underground lines, securing Crossrail 2, the</p>

	<p>Bakerloo Line Extension, river crossings and an eastwards extension of the Elizabeth Line.</p> <p>E Development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.</p>
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Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Objective 2	<p>CONNECT: To use the catalyst of the new High Speed 2 (HS2)/ Crossrail and National Rail interchange, along with improved local transport connections to regenerate and promote this area as one of London’s best connected locations. Old Oak and Park Royal can make a significant contribution to London’s competitiveness, in a way that is sustainable, attracts long term investment, meets local needs, and supports the strategic long-term priorities in the Mayor’s London Plan (2015). It is also critically important that this area is fully integrated with its surroundings to ensure the free and easy movement of people to, from and within the area.</p>
Principle D1	<p>Proposals should improve existing street environments and create a new network of streets that will help overcome severance and connect existing and future communities by:</p> <ul style="list-style-type: none"> a. delivering a defined and permeable urban grain and a legible urban block pattern; b. creating new and improving existing streets to be safe, comfortable and attractive for walking and cycling, with links to off-highway routes such as towpaths, and support elements of play; c. delivering active frontages and/or residential uses at ground level in most locations where feasible; d. strengthening the identity and legibility of stations (according with guidance such as TfL Station Public Realm Design Guidance) and town centres; and e. delivering a high quality, robust public realm with a clear management and maintenance strategy.

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	<p>No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.</p>

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
<p>Connecting communities: The policy should define how existing communities will be connected to each other and to open spaces.</p>	<p>Queen's Park Rangers FC, Greater London Authority, Brent Council, London Sustainable Development Commission, 3 local residents.</p>	<p>Change proposed. OPDC has developed a Public Realm, Walking and Cycling Strategy which is informing the Regulation 19 Local Plan and which shows how the OPDC area should be connected into its surroundings. The Local Plan is also supported by an Environmental Standards Study, which sets OPDC's standards for open space, which have been incorporated into Policy SP8 (Green Infrastructure and Open Space), the place policies (chapter 4), Policy EU1 (open space) and EU2 (Urban Greening and Biodiversity). Policy SP8 requires that delivers and/or contribute towards a varied, well-designed, integrated and high quality green infrastructure and open space networks which successfully integrate with the wider green infrastructure and open space networks, including the Grand Union Canal, Wormwood Scrubs and All London Green Grid</p>

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
<p>Wormwood Scrubs Street should not be open to traffic. Its role should be clarified.</p>	<p>Old Oak Interim Neighbourhood Forum, TITRA; Midland Terrace Residents, 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</p>	<p>No change proposed. The intention is that Wormwood Scrubs Street is for pedestrians, cyclist and access only vehicles to reduce demand along this east-west route.</p>

	Aspinall, Thomas Dyton	
The proposed Old Oak High Street is not deliverable and would have a negative impact on the Birchwood Nature Reserve and Canal. Park Road should be main north south route in the development area. Early delivery of the High Street will not be possible. The High Street will be series of disconnected streets.	The Inland Waterways Association-Middlesex Branch	Change proposed. The alignment of Old Oak High Street, now named Old Oak Street, has been revised, in recognition of the longer-term deliverability of the Elizabeth Line depots but there is a still a longer term aspiration to deliver a connection over the canal in this location. The Birchwood Nature Reserve and Canal will be protected.
The number of bridge crossings over the canal should be minimised. This number of crossings in a short distance will compromise the proposed linear park.	The Inland Waterways Association-Middlesex Branch	Change proposed. Policy SP8 along with policy EU1 and EU2 all promote the requirements for open space and urban greening. OPDC believe that additional bridges will ensure that better connections are made to the linear park, promoting its use for more vulnerable road users. One bridge connection has been removed due to work showing the feasibility of a hybrid bridge solution for an eastern connection over the Grand Union Canal.
Welcome text supporting water borne movement, including freight, on the canal.	The Inland Waterways Association-Middlesex Branch	Noted. No change proposed.
Public transport should be provided with the same level of priority as pedestrians and cyclists in transport hierarchy.	TfL	No change proposed. OPDC see clear merit in producing a robust hierarchy to influence user behaviour and identify the core principles for healthy streets. This starts with identifying the most vulnerable road uses and ensuring that infrastructure and options are available to encourage sustainable travel behaviour across the site.
Policy T4 on mode shift and parking should be included in SP7	TfL	No Change proposed. SP7 already covers the

<p>as they are strategic policy matters.</p>		<p>need to minimise journeys by private car and to encourage walking, cycling and public transport use which will lead to modal shift. Specific car parking standards are considered a development management issue and not appropriate for inclusion in a strategic policy.</p>
<p>TfL recommends that Policy b) part iv could be strengthened; beyond minimising the need for use of private vehicles, OPDC should actively discourage their use including through the respective Borough traffic reduction strategies, consistent with the draft MTS.</p>	<p>TfL</p>	<p>Change proposed. OPDC has strengthened the policy</p>
<p>The need to improve safety, accessibility, connectivity and permeability should be included in SP7 as they are key mayoral transport policies.</p>	<p>TfL</p>	<p>Change proposed. Text has been amended to add this requirement.</p>
<p>Reference to Crossrail on map should be amended to Elizabeth Line.</p>	<p>TfL</p>	<p>Change Proposed. The map has been amended to say the Elizabeth Line.</p>
<p>Consistent colours and terminology should be used on all maps.</p>	<p>TfL</p>	<p>Change proposed. Figures have been updated and consistent colours and terminology have been used.</p>
<p>The form and function of Park Road needs to be clarified because currently it is not clear from the policy and work has been undertaken on this which is at odds.</p>	<p>TfL and Old Oak Park Ltd</p>	<p>Change proposed. The text for the form and function of Park Road has been amended to reflect recent transport and masterplanning work undertaken for the Old Oak North Development Framework Principles. This detail will be clarified in SP7 and further provided in P2.</p>
<p>Policy should mention the role of facilitating and managing efficient servicing and delivery activities.</p>	<p>TfL</p>	<p>No change proposed. The policy references the need for efficient servicing of land uses and servicing and delivery activities are outlined in detail in Policy T7.</p>

Supporting text should acknowledge potential for early delivery of a new bridge link from EMR to an improved Willesden Junction Station.	HGH Planning on behalf of Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. This link forms part of Old Oak Street in the local plan. Within P2 the supporting text discusses the aspiration for the early delivery of this link.
Acknowledge that early delivery can happen due to construction of first part of Park Road at Oaklands South	HGH Planning on behalf of Genesis	No change proposed. The timing of Park Road is provided in the IDP and the site allocation information is provided within SP10. This is sufficient information for the Local Plan.
Figure 3.8 and 4.12 indicate different forms of vehicular links from Scrubs Lane. This needs to be amended in line with the transport and masterplan work that has been undertaken	Old Oak Park Limited	Change Proposed. OPDC has amended the figures to ensure they are accurate and consistent.
Support for connectivity	NHS London Healthy Urban Development Unit	Noted. No change proposed.
Support Scrubs Lane as an important location for early development	DP9 on behalf of Fruition properties	Noted. No change proposed.
The Council welcomes working with the OPDC to improve the connections between the OPDC area and the adjoining Kensal Canalside Opportunity Area. Needs to be in text for SP7.	RB Kensington and Chelsea	No change proposed. Reference to connections to Kensal Canalside are made in the supporting text to SP1.
Support policy. The need to work with a number of stakeholders in order to deliver infrastructure should be reflected in the policy and the policy wording should be ambitious- i.e. 'sufficient' infrastructure isn't ambitious enough.	LB Hammersmith and Fulham	No change proposed. The need to work with a number of stakeholders is captured as a policy in DI2.
Paragraph deals with the need for transport infrastructure to seamlessly integrate into the development.	LB Hammersmith and Fulham	Noted. No change proposed.
LBHF is keen to continue to work with OPDC to understand and mitigate the impact of development upon LBHF residents and the local road network.	LB Hammersmith and Fulham	Noted. No change proposed.
3.76 should also reflect the sensitive nature of the Grand Union Canal as a nature and conservation site that will be a key	LB Hammersmith and Fulham	No change proposed- SP8 outlines this as a key point and expands on the subject.

feature for the future of this development.		
Policy is sound	Friary Park Preservation Group	Noted. No change proposed.
Support the Sustainable Transport Hierarchy	Brent Cyclists	Noted. No change proposed.
There is a risk that new routes within the development will affect safety on roads outside of the development must be mitigated against. Roads through the development should have no through route for traffic.	Brent Cyclists	No change proposed. SP7 and the relevant place policies indicate the need for roads within the development to be designed to not encourage through traffic and the importance of new and existing roads being designed according to the Healthy Streets approach.
Health Streets principles must be delivered on all new streets.	Brent Cyclists	Noted. Policy SP7 and T1 promote this. No change proposed.
Concern that the High Street will be built to narrowest allowable width within guidelines.	Brent Cyclists	Noted. OPDC intend for Old Oak Street to have a generous width to cater for all users and be resilient to future transport changes. No change proposed.
Development should mitigate turbulence for road users where it occurs.	Brent Cyclists	Noted. No change proposed.
Support aim to prevent through road for private vehicles.	Brent Cyclists	Noted. No change proposed.
Aim for "specific character and function" must not impact on walking and cycling safety.	Brent Cyclists	Noted. In line with the sustainable transport hierarchy, walking and cycling will be at the forefront of the design of streets. No change proposed.
Canal freight transport must not impact pedestrian and cycle movements along canal.	Brent Cyclists	Noted. If moorings on the canal are introduced, they will be designed to ensure they do not impede walking and cycling movements to adhere to the sustainable transport hierarchy. No change proposed.
Policy will help mitigate risk of traffic congestion.	David Craine	Noted. No change proposed.
Important to develop walkable neighbourhoods and a sustainable movement network within the Opportunity Area and connecting neighbouring communities	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Noted. In line with the sustainable transport hierarchy, walking and cycling will be at the forefront of the design of

	Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	streets. No change proposed.
The plan does not adequately address how rail and bus connections will be delivered to serve the area	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 rail figure with Policy T5 indicates the rail connections and stations that will be available to serve the development area. The bus figure within Policy T6 shows the bus network which will serve the area. Infrastructure requirements are also set out in OPDC's Infrastructure Delivery Plan.
Support delivery of Old Oak High Street	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	Noted.
There is not a proposal to provide a transport link between each of the 'Places'. This will be particularly important to interconnect key residential areas with the major elements of Social Infrastructure, if in the case of medical and educational facilities, these are to be centralised. A unified transport system covering each of main streets shown on Figure 3.8 – Proposed Connections, would be a good starting point.	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 transport networks are shown in the figures associated with policies T2, T3, T5 and T6 and in the Infrastructure Delivery Plan have been developed to ensure there are connections between all of the "Places".
Need to recognise that the area is not flat	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,	No change proposed. OPDC recognises that there are significant level challenges across the site. All walking and cycling networks will have a minimum of 1 in 20 gradient to ensure the site is accessible.

	Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
The plan should not be considered positively prepared unless it includes a plan for an internal transit system.	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. SP7 and the transport policies indicate the proposals for the transport network across Old Oak and Park Royal, which provides for a variety of means of travel across the area.
Policy is not positively prepared as it does not adequately promote modal shift from car use, and text should be added to require the active marketing of public transport in new development to rectify this.	John Cox	No change proposed. The Local Plan promotes modal shift from car use by ensuring the healthy streets approach is the overarching policy for all transport proposals. T4 promotes low and car free development. SP7, T 1, T2, T2, T5 and T6 promote walking, cycling and public transport use.
Policy SP7 is too detailed and it is questionable whether it should be a strategic policy.	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. Policy SP7 outlines the wider plans across the area to connect people and places. It is appropriate as a Strategic Policy as it deals with the overarching aims to ensure good connectivity across the area. The Places and transport policies then provide more detail.
Support minimising need to travel but this cannot be achieved by resisting mixed use on strategic industrial location.	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. 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 and the ongoing demand for industrial space. A mix of uses within SIL would undermine its core function as a reservoir or

		land for industrial uses. Transport policies seek to limit car parking and would require travel plans and transport assessments.
Need to recognise that passage along new streets may not be straightforward	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 aims to deliver high quality, legible streets to ease navigation.
Walking distances between the stations are excessive compared to most transport interchanges.	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. The Local Plan shows the connections between stations which will be as direct as possible. A range of modes will be available for people to have choice with regards to the way they interchange between stations.
Allowing mixed use development in SIL would have a positive impact on travel patterns.	TITRA; Midland Terrace, 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 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 and the ongoing demand for industrial space. A mix of uses within SIL would undermine its core function as a reservoir or land for industrial uses. Transport policies seek to limit car parking and would require travel plans and transport assessments.
Plan for categories of users with different needs and travel objectives	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. The Sustainable Transport Hierachy and Healthy Streets policies in SP7

	Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	and T1 promote sustainable travel and includes choice for travellers with different needs.
Transport improvements should be part of a clear masterplanned approach	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	Noted.
Old Oak Common Station must have east west access	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. OPDC is promoting east-west access at Old Oak Common station as indicated in the network figures in SP7 and the transport chapter. OPDC is promoting this and working with HS2 Ltd to deliver this.
Scale and the proposals for the A40 and A406 need outlining.	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. Both the A40 and A406 are strategic roads and under TfL's jurisdiction. The A40 study is provided as a supporting study to the local plan which outlines the proposals that were investigated by TfL.
Park Royal transport improvements are required and provision of grade separation is not the answer.	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. Grade separation is not a proposal being investigated by OPDC for Park Royal. The Park Royal Transport Strategy is provided as a supporting study and outlines the transport proposals that have been investigated. Required improvements are referenced in OPDC's Local Plan and in the

		Infrastructure Delivery Plan.
Deliverability of Old Oak High Street if Elizabeth Line Depot is retained during plan period	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	Change proposed. The Local Plan no longer shows the Elizabeth Line depot as being a development site within the plan period but OPDC will work with Crossrail to investigate future connections across the Elizabeth Line depot.
Lack of precedents for similar scale car free developments.	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. OPDC is encouraging car-free development to ensure people travel sustainably. There are a number of precedents for car free developments in King's Cross, Vauxhall and Stratford.
Innovative scenarios should be considered and made publicly available.	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. A key policy in SP7 and T1 is to ensure streets are future-proofed for changes in the surrounding context, life-style and technological changes. Innovative transport interventions like automated vehicles and drones will be investigated for Old Oak and Park Royal when more information is known about them.
Align transport policies with those of boroughs, Transport for London and other transport operators to reduce existing congestion in the surrounding road network.	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. OPDC worked collaboratively with TfL, Network Rail, HS2 Ltd and the local boroughs to ensure the transport policies were aligned.
Coordination of proposals and discussions with communities for walking and cycling improvements should be carried out.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Noted. Consultation has been undertaken as part of the Local Plan and engagement will be undertaken as part of

	Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	future planning applications.
Refer to HS2-WLL link and raft	West London Line Group	No change proposed. These proposals are not being carried forward by DfT and therefore OPDC is not in a position to include these proposals in the Local Plan
Refer to conference/exhibition/performance facility above the raft	West London Line Group	No change proposed. These proposals are not being carried forward by DfT and therefore OPDC is not in a position to include these proposals in the Local Plan. However, the Local Plan supports the potential for catalyst uses, which could include a convention facility, subject to the proposal according with other relevant planning policy.
Seamless interchange will not be delivered and OPDC must meet the ever growing demand for rail in general and especially between these three facilities (Clapham Junction, Heathrow and OOC).	West London Line Group	Noted. OPDC is working with Network Rail, TfL, DfT and HS2 Ltd to create a high quality interchange between all stations in Old Oak and Park Royal.
Support the principle of healthy streets however connection to overground stations will be windy	West London Line Group	Noted. Policy D6 requires consideration to be given to amenity, which includes wind.
Objections to the Old Oak Common Lane station bridge	Old Oak Interim Forum and TITRA and Midland Terrace, 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 Local Plan shows an east-west connection between North Acton and the OOC station via the Overground station. Technical work undertaken by TfL indicated this connection should be a bridge. The connection is currently unfunded and further work is required to understand the form of it that will be delivered.
Concern regarding the position of Old Oak High Street and it not adequately serving Harlesden	London Borough of Brent	No change proposed. There are two links to Willesden Junction station

<p>Town Centre/ removing activity on Station Road and to the west of Willesden Junction station routing up to Harlesden.</p>		<p>proposed to route north to Harlesden Town Centre in the Local Plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre</p>
<p>Request for early delivery of enhancements to Willesden Junction station and connections</p>	<p>LBB, LBHF, HGH Planning on behalf of Queens Park Rangers Football Association and Stadium capital</p>	<p>No change proposed. OPDC shares the aspiration to enhance Willesden Junction station and deliver connections at the earliest opportunity. This will require collaborative working with landowners, TfL and Network Rail</p>
<p>Support the emphasis on the sustainable transport hierarchy and requirement for use of consolidation centres where appropriate. Would encourage OPDC to identify how consolidation centres may be phased across the area.</p>	<p>LWARB</p>	<p>No Change Proposed. OPDC does not consider it appropriate to allocate a site as a consolidation centre at this point in time. OPDC requests developers to explore the opportunity to use existing consolidation centres as part of their construction logistics plan.</p>
<p>Improvements in public transport and improved cycle and walking infrastructure is required to encourage modal shift.</p>	<p>Park Royal Business Group</p>	<p>Noted. This is supported in OPDC's sustainable transport hierarchy and the Local Plan sets out the infrastructure enhancements required to help support this modal shift.</p>
<p>Welcome acceptance that better transport solutions are required to support Park Royal.</p>	<p>Park Royal Business Group</p>	<p>Noted.</p>
<p>Accessible, efficient and affordable public transport spreading out from transport hubs should be a priority to minimise traffic congestion and to promote OPDC's policy of 'no cars'.</p>	<p>West Twyford Residents Association</p>	<p>Noted. It is agreed that public transport should be prioritised over private vehicular movements along with the promotion of active transport including walking and cycling.</p>
<p>The Local Plan does not give recognition of the fact that the new homes and jobs are being</p>	<p>Old Oak Interim Neighbourhood Forum, Wells House Road</p>	<p>No change proposed. Both SP7 and the transport chapter indicate the need</p>

implanted in an area of London where the road and public transport networks are under pressure	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	for enhanced infrastructure and to alleviate congestion in order to cater for the transport demands generated by the development.
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Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
New routes into and through Wormwood Scrubs should be identified.	John Cox	No change proposed. Policy P12 identifies the locations of new and improved access points into Wormwood Scrubs.
Management/enforcement of private vehicle access-only into Old Oak North should be clearer	John Cox, Transport for London	No change proposed. OPDC considers the existing wording to be appropriately clear.
Welcome clarification regarding restricting private vehicle access to access-only.	Transport for London	Noted.
Old Oak Street connection to Victoria Road should be sub-surface	Thomas Dyton, Wells House Road Residents Association	No change proposed. Whilst Park Road is proposed to connect onto Old Oak Common Lane, Old Oak Street is shown as a through connection to Victoria Road. The Local Plan does not specify whether this is above or below ground. Further work will be required to define the design of this route.
Summary of objectives of policy SP7	The Inland Waterways Association	Noted.
Dotted connection to Kensal Canalside Opportunity Area should be amended to have same status as other links in the Local Plan	Royal Borough of Kensington and Chelsea	No change proposed. Wormwood Scrubs Street is currently identified to be delivered after the plan period. Figure 3.10 shows the key route of Wormwood Scrubs Street towards Kensal Canalside as a potential connection reflecting the level of work undertaken in defining its delivery. Following the

		<p>completion of any future work demonstrating this connection, future versions of the Local Plan will reflect this accordingly.</p>
<p>Prefer emphasis for pedestrians, cyclists and buses to be set out in the policy and figure 3.9 to ensure consistency with the Mayor's Transport Strategy. Recognise the need to support active modes is a key priority but the policy needs to acknowledge that use of public transport is needed for longer trips.</p>	<p>Transport for London</p>	<p>Change proposed. OPDC's Sustainable Transport Hierarchy is informed by recommendations of the Public Realm, Walking and Cycling Strategy, Old Oak Strategic Transport Study, Park Royal Transport Strategy, Old Oak North Development Framework Principles, Scrubs Lane Development Framework Principles and the Victoria Road and Old Oak Lane Development Framework Principles. The hierarchy considers the recommendations of these documents that are specific to the OPDC area to deliver Healthy Streets, minimise the need to travel and create a high density and highly compact, layered city form that puts local services within easy reach. To deliver these aspirations for the OPDC area, and reflect the needs to minimise the need to travel and support active travel, OPDC considers that it is appropriate to continue to separate public transport from pedestrians and cyclists given the direct health benefits demonstrated by walking and cycling. To further align with the Mayor's Transport Strategy, figure 3.9 will be amended to combine pedestrians and cyclists into a single item but will continue to show public transport separately. However, OPDC recognises the importance of delivering new and enhanced public transport services for longer journeys and to optimise development capacities. Supporting text to</p>

		Policy SP7 will be amended to clarify that the sustainable transport hierarchy should not be viewed as a mechanism to restrict the essential delivery of new and enhanced public transport infrastructure given the significant investment required to deliver these services and the resultant benefits.
TfL is pleased that the Mayor's Transport Strategy policies for mode shift away from the car (including the target for an 80% non-car mode share) and a restraint based approach to car parking for new development are now incorporated in Policy SP7	Transport for London	Noted.
TfL is pleased that part b (iv) has been strengthened and clarified for consistency with policy T4.	Transport for London	Noted.
TfL is pleased that additional references to safety, and accessibility have been included in part c as these are key Mayoral priorities	Transport for London	Noted.
Identify potential difficulty to achieve a minimum of 6b within the Old Oak area away from stations. Suggest re-wording text in P2 to 'achieve up to a PTAL of 6b'.	Transport for London	Change proposed. To reflect some locations away from public transport services in Old Oak North and South currently being shown as having Public Transport Accessibility Levels 6a, supporting text to P2 will be amended to seek to achieve a PTAL of 6b.
As well as Healthy Streets, Sport England's Active Design Principles should be embedded within the Local Plan	Sport England	No change proposed. OPDC considers that the 10 principles of Active Design are appropriately reflected within Local Plan policies.
There is conflict between providing access through Wormwood Scrubs and keeping the Scrubs as an untamed place	Wormwood Scrubs Charitable Trust	No change proposed. Policy P12 provides guidance to ensure the biodiversity value of Wormwood Scrubs is preserved and enhanced. The supporting text also recognises that Wormwood Scrubs' character as a

		publicly accessible open space that is more wild than tamed, will inform how the regeneration of Old Oak relates to Wormwood Scrubs.
Should be connection 'to' the Scrubs, not 'into'.	Wormwood Scrubs Charitable Trust	Change proposed. To align with Policy P12, SP7 will be amended to state 'to Wormwood Scrubs'.
Welcomes connections from Old Oak Common Station and Old Oak South now exiting onto Wormwood Scrubs Street instead of Wormwood Scrubs.	Wormwood Scrubs Charitable Trust	Noted.
Amend supporting text to SP7 to rename Wormwood Scrubs Street to Wormwood Scrubs Lane and identify this is for walking and cycling only.	Wormwood Scrubs Charitable Trust	No change proposed. Although Wormwood Scrubs Street will be delivered after the plan period, OPDC considers the existing title to be appropriate. In recognition of the long-term delivery of this street, identifying it for walking and cycling only at this point in time is not considered to be appropriate.
Delivery of Hythe Road London Overground Station is not confirmed. Therefore, the increase in PTAL generated by the station cannot be used to justify high densities (and resultant building heights) in Old Oak North	Midland Terrace Residents Association, St Quintin and Woodlands Neighbourhood Forum	No change proposed. Development capacities and densities for Old Oak North are informed by a range of elements including existing and planned transport capacity. This includes improvements to existing stations and proposed new stations such as Old Oak Common Station and Hythe Road Station. The Public Transport Accessibility Levels generated by Old Oak Common Station, improvements to Willesden Junction Station and existing/planned bus routes supports the development capacity identified for Old Oak North without solely relying on improved public transport access generated by Hythe Road Station. The policy supports the delivery of the highest public transport levels to support

		density of development.
Direct walking, cycling and bus links to Harlesden should be provided.	Alan Goodearl, King Wei Ling, Grand Union Alliance, John Cox	No change proposed. The Local Plan recognises the importance of connecting with surrounding areas, including Harlesden. Policies SP7, T6 and Place Policies P2, P8, P10 and P10 set out guidance to connect Harlesden through bus services, walking and cycling to Old Oak.
Policy should acknowledge importance of delivering a link between Willesden Junction and Old Oak North.	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. Policy P2 acknowledges the importance of delivering timely access to Willesden Junction to support access to public transport and support increased PTAL levels.
Paragraph should reference how the canal has evolved as an important nature and biodiversity corridor	London Borough of Hammersmith and Fulham	No change proposed. The roles of the Grand Union Canal are set out in Policy P3.
Supporting Mayor's Transport Strategy 80% target is incompatible with SIL of Park Royal	Aberdeen Standard Investments	No change proposed. OPDC considers that achieving the Mayor's aspirations is deliverable while supporting the functions of Park Royal. Transport policies within the Local Plan set out Park Royal specific guidance.
Island approach to stations will not stimulate local economy.	Grand Union Alliance	No change proposed. Policy T5 provides guidance to ensure that they contribute to the creation of destinations, thereby helping to stimulate the local economy.
Large railway depots and other barriers should be relocated at the earliest opportunity	Grand Union Alliance	Noted. Policies SP10, P2 and P11 support the early delivery of development of depots subject to the continued delivery of transport functions.
Unique local transit system needed within the OPDC area.	Grand Union Alliance	No change proposed. The Old Oak Strategy Transport Strategy recommends the delivery of published transport networks. The use of potential future modes of transport are supported by SP7.
Better subsurface road infrastructure is needed.	West Acton Residents Association	No change proposed. OPDC considers that building subsurface road

		infrastructure is not an option due to the cost, the adverse impact upon the local and wider highway networks and need to support sustainable and active travel.
There has been no impact assessment for utilities and transport information for North Acton.	West Acton Residents Association	No change proposed. The Old Oak Strategy Transport Strategy undertook an impact assessment on the transport network of the OPDC and surrounding areas. OPDC's Utilities Strategy sets out the strategy for supporting development with required utilities infrastructure.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Bus Strategy	<ul style="list-style-type: none"> • Provision of additional routes and capacity enhancements • Changes to routes to enhance journey time efficiency • Phased approach to provide capacity enhancements generated by the completion of key developments
Car Parking Study	<ul style="list-style-type: none"> • Recommends that the residential parking policy is appropriate, and that further consideration is required for the non-residential parking policy.
Environmental Standards Study	<ul style="list-style-type: none"> • A minimum of 30% of the area should be set aside for high quality and multi-functional public open space including ensuring there are sufficient local parks and green spaces for play.
Infrastructure Delivery Plan	<ul style="list-style-type: none"> • Identifies a significant number of infrastructure requirements to support the regeneration of the area. • The majority of infrastructure identified relates to the core development area in Old Oak, but the IDP also identifies important infrastructure requirements for Park Royal • The study identifies those pieces of infrastructure which OPDC would look to secure through developer contributions (Section 106, Section 278 or Community Infrastructure Levy).
Old Oak Strategic Transport Study	<ul style="list-style-type: none"> • New London Overground Stations at Hythe Road and Old Oak Common Lane • Willesden Junction station improvements and bridge over WCML • Potential Crossrail 1 to WCML link • Improved frequencies on London Overground • Increased bus frequencies and new routes • New highway connections • A package of highway 'quick wins' • A package of measures to improve conditions for walking and cycling

	<ul style="list-style-type: none"> • A package of demand management measures to ensure a reduced car mode share
Park Royal Transport Strategy	<ul style="list-style-type: none"> • Providing transport networks that enhance the communities they serve and help local business to operate and grow sustainably, both now and in the future.
Public Realm, Walking and Cycling Strategy	<ul style="list-style-type: none"> • The new street network at Old Oak is comprised of four key routes. These are: Old Oak High Street, Grand Union Street, Park Road and Wormwood Scrubs Street.
Old Oak North Development Framework Principles	<ul style="list-style-type: none"> • Deliver a viaduct for the West London Line to generate wider benefits. • Provide connections to Scrubs Lane that should be located at Park Road and Hythe Road. • Provide connections to Old Oak South via Park Road and Old Oak Street. • Delivery of a two-way cycle lane to the west of Scrubs Lane is no longer likely to be deliverable. • Within the place of Willesden Junction, Old Oak Street will continue as a walking and cycling route connecting to Station Approach in the west. To the east a new walking and cycling link will also be delivered to Harrow Road.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Public Realm, Walking and Cycling Strategy	<ul style="list-style-type: none"> • The new street network at Old Oak is comprised of four key routes. These are: Old Oak High Street, Grand Union Street, Park Road and Wormwood Scrubs Street. 	<ul style="list-style-type: none"> • Key route network within Old Oak has been superseded by proposals set out in the Old Oak North Development Framework Principles

Other evidence base

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

SP8: Green Infrastructure and Open Space

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	<p>Planning should contribute to conserving and enhancing the natural environment.</p> <p>Planning should recognise that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production).</p>
73	<p>Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.</p>
74	<p>Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> • an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or • the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or • the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.
99	<p>Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.</p>
109	<p>The planning system should contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> • recognising the wider benefits of ecosystem services; • minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent

	<p>ecological networks that are more resilient to current and future pressures;</p> <ul style="list-style-type: none"> preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.
114	Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.
117	<p>To minimise impacts on biodiversity and geodiversity, planning policies should:</p> <ul style="list-style-type: none"> plan for biodiversity at a landscape-scale across local authority boundaries; identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation; promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan; aim to prevent harm to geological conservation interests; and <p>where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas.</p>
157	Crucially Local Plans should contain a clear strategy for enhancing the natural, built and historic environment.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Air Quality	
<p>Title: How can an impact on air quality be mitigated?</p> <p>Paragraph: 008</p> <p>Reference ID: 32-008-20140306</p> <p>Revision Date: 06.03.2014</p>	<p>Mitigation options where necessary will be locationally specific, will depend on the proposed development and should be proportionate to the likely impact. It is important therefore that local planning authorities work with applicants to consider appropriate mitigation so as to ensure the new development is appropriate for its location and unacceptable risks are prevented. Planning conditions and obligations can be used to secure mitigation where the relevant tests are met.</p> <p>Examples of mitigation include: Using green infrastructure, in particular trees, to absorb dust and other pollutants</p>
Climate Change	
<p>Title: How can adaption and mitigation approaches be integrated?</p> <p>Paragraph: 004</p>	<p>When preparing Local Plans and taking planning decisions local planning authorities should pay particular attention to integrating adaptation and mitigation approaches and looking for 'win-win' solutions that will support sustainable development. This could be achieved in a variety of ways, for example through the provision of multi-functional green infrastructure, which can reduce urban heat islands, manage flooding and help species</p>

<p>Reference ID: 6-004-20140612</p> <p>Revision Date: 12.06.2014</p>	<p>adapt to climate change – as well as contributing to a pleasant environment which encourages people to walk and cycle.</p>
<p>Design</p>	
<p>Title: Planning should promote a network of greenspaces (including parks) and public places</p> <p>Paragraph: 009</p> <p>Reference ID: 26-009-20140306</p> <p>Revision Date: 06.03.2014</p>	<p>Development should promote public spaces and routes that are attractive, accessible, safe, uncluttered and work effectively for all users – including families, disabled people and elderly people. A system of open and green spaces that respect natural features and are easily accessible can be a valuable local resource and helps create successful places. A high quality landscape, including trees and semi-natural habitats where appropriate, makes an important contribution to the quality of an area.</p> <p>The benefit of greenspaces will be enhanced if they are integrated into a <u>wider green network</u> of walkways, cycleways, open spaces and natural and river corridors.</p>
<p>Health and Wellbeing</p>	
<p>Title: Health and Wellbeing</p> <p>Paragraph: 005</p> <p>Reference ID: 53-005-20140306</p> <p>Revision Date: 06.03.2014</p>	<p>A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage:</p> <ul style="list-style-type: none"> • Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; <u>green open space and safe places for active play and food growing</u>, and is accessible by walking and cycling and public transport.
<p>Natural Environment</p>	
<p>Title Is there a statutory basis for planning to seek to minimise impacts on biodiversity and provide net gains in biodiversity where possible?</p> <p>Paragraph 007</p> <p>Reference ID: 8-007-20140306</p> <p>Revision Date: 06 03 2014</p>	<p>Yes. Section 40 of the Natural Environment and Rural Communities Act 2006, which places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. A key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision making throughout the public sector, which should be seeking to make a significant contribution to the achievement of the commitments made by government in its Biodiversity 2020 strategy.</p> <p>Guidance on statutory obligations concerning designated sites and protected species is published separately because its application is wider than planning and links are provided to external guidance. Local planning authorities should take a pragmatic approach – the aim should be to fulfil statutory obligations in a way that minimises delays and burdens.</p> <p>The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core</p>

	principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution.
<p>Title: How can development not only protect but also enhance biodiversity?</p> <p>Paragraph: 017</p> <p>Reference ID: 8-017-20140306</p> <p>Revision Date: 06 03 2014</p>	<p>Biodiversity maintenance and enhancements through the planning system have the potential to make a significant contribution to the achievement of <u>Biodiversity 2020 targets</u>.</p> <p>Biodiversity enhancement in and around development should be led by a local understanding of ecological networks, and should seek to include:</p> <ul style="list-style-type: none"> • habitat restoration, re-creation and expansion; • improved links between existing sites; • buffering of existing important sites; • new biodiversity features within development; and • securing management for long term enhancement.
<p>Title: Why is green infrastructure important to delivering sustainable development?</p> <p>Paragraph: 028</p> <p>Reference ID: 8-028-20160211</p> <p>Revision Date: 11 02 2016</p>	<p>Green infrastructure is important to the delivery of high quality sustainable development, alongside other forms of infrastructure such as transport, energy, waste and water. Green infrastructure provides multiple benefits, notably ecosystem services, at a range of scales, derived from natural systems and processes, for the individual, for society, the economy and the environment. To ensure that these benefits are delivered, green infrastructure must be well planned, designed and maintained. Green infrastructure should, therefore, be a key consideration in both local plans and planning decisions where relevant.</p>
<p>Title: What is a strategic approach to green infrastructure?</p> <p>Paragraph: 029</p> <p>Reference ID: 8-029-20160211</p> <p>Revision Date: 11 02 2016</p>	<p>To assist in planning positively for green infrastructure local planning authorities may wish to prepare an authority-wide green infrastructure framework or strategy. This should be evidence-based by, for example, including an assessment of current green infrastructure provision that identifies gaps in the network and the components and opportunities for improvement. The assessment can inform the role of green infrastructure in local and neighbourhood plans, infrastructure delivery plans and Community Infrastructure Levy (CIL) schedules.</p> <p>Local Plans should identify the strategic location of existing and proposed green infrastructure networks. Where appropriate, supplementary planning documents can set out how the planning, design and management components of the green infrastructure strategy for the area will be delivered.</p> <p>This strategic approach to green infrastructure may cross administrative boundaries. Therefore neighbouring authorities, working collaboratively with other stakeholders including Local Nature Partnerships (LNPs) and Local Enterprise Partnerships (LEPs), may wish to consider how wider strategies for their</p>

	<p>areas can help address cross-boundary issues and help meet the Duty to Cooperate.</p>
<p>Title: How can green infrastructure help to deliver wider planning policy?</p> <p>Paragraph: 030</p> <p>Reference ID: 8-030-20160211</p> <p>Revision Date: 11 02 2016</p>	<p>Green infrastructure can help to deliver a variety of planning policies including:</p> <p>Building a strong, competitive economy: Green infrastructure can drive economic growth and regeneration, helping to create high quality environments which are attractive to businesses and investors.</p> <p>Delivering a wide choice of high quality homes: Green infrastructure can help deliver quality of life and provide opportunities for recreation, social interaction and play in new and existing neighbourhoods. More broadly, green infrastructure exists within a wider landscape context and can reinforce and enhance local landscape character, contributing to a sense of place. Green infrastructure is also an important approach to delivering ecosystem services and ecological networks.</p> <p>Requiring good design: Well-designed green infrastructure helps create a sense of place by responding to, and enhancing, local landscape character. Green infrastructure can also help create safe and accessible environments in new development and the regeneration of brownfield sites in existing built up areas.</p> <p>Promoting healthy communities: Green infrastructure can improve public health and community wellbeing by improving environmental quality, providing opportunities for recreation and exercise and delivering mental and physical health benefits. Green infrastructure also helps reduce air pollution, noise and the impacts of extreme heat and extreme rainfall events.</p> <p>Meeting the challenge of climate change, flooding and coastal change: Green infrastructure can help urban, rural and coastal communities mitigate the risks associated with climate change and adapt to its impacts by storing carbon; improving drainage (including the use of sustainable drainage systems) and managing flooding and water resources; improving water quality; reducing the urban heat-island effect and; where appropriate, supporting adaptive management in coastal areas. Green infrastructure networks also help species adapt to climate change by providing opportunities for movement.</p> <p>Conserving and enhancing the natural environment: The components of green infrastructure exist within the wider landscape context and should enhance local landscape character and contribute to place-making. High quality networks of multifunctional green infrastructure provide a range of ecosystem services and can make a significant contribution to halting the decline in biodiversity.</p>
<p>Title:</p>	<p>As with other forms of infrastructure, green infrastructure requires sustainable management and maintenance</p>

<p>How should green infrastructure be planned for in the long term?</p> <p>Paragraph: 031</p> <p>Reference ID: 8-030-20160211</p> <p>Revision Date: 11 02 2016</p>	<p>arrangements to be in place if it is to provide benefits and services in the long term. Arrangements for managing green infrastructure, and for funding its management over the long-term, should be identified as early as possible when planning green infrastructure and factored into the way that it is designed and implemented.</p>
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Open Space, Sports and Recreation Facilities

<p>Title: How should open space be taken into account in planning?</p> <p>Paragraph: 001</p> <p>Reference ID: 37-001-20140306</p> <p>Revision Date: 06.03.2014</p>	<p>Open space should be taken into account in planning for new development and considering proposals that may affect existing open space. Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure, as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development.</p> <p>It is for local planning authorities to assess the need for open space and opportunities for new provision in their areas. In carrying out this work, they should have regard to the duty to cooperate where open space serves a wider area. See guidance on Local Green Space designation, which may form part of the overall open space network within an area.</p>
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Any other relevant national guidance/policy

Policy / paragraph reference	Policy and paragraph text
N/A	N/A

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
Chapter 1:	
Policy 1.1 Delivering the Strategic Vision	B Growth will be supported and managed across all parts of London to ensure it takes place within the current boundaries of Greater London without:

and Objectives for London	a encroaching on the Green Belt, or on London's protected open spaces
Chapter 2: London's Places	
Policy 2.18 Green Infrastructure: the multi functional network of green and open spaces	<p>Boroughs should:</p> <p>a set out a strategic approach to planning positively for the creation, protection, enhancement and management of networks of green infrastructure by producing green infrastructure strategies that cover all forms of green and open space and the interrelationship between these spaces. These should identify priorities for addressing deficiencies and should set out positive measures for the design and management of all forms of green and open space; Delivery of local biodiversity action plans should be linked to these strategies.</p> <p>b ensure that in and through DPD policies, green infrastructure needs are planned and managed to realise the current and potential value of these to communities and to support delivery of the widest range of linked environmental and social benefits;</p> <p>c in London's urban fringe support, through appropriate initiatives, the vision of creating and protecting an extensive and valued recreational landscape of well-connected and accessible countryside around London for both people and wildlife.</p>
Chapter 5: London's Response to Climate Change	
Policy 5.3 Sustainable Design and Construction	<p>C Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:</p> <p>i promoting and protecting biodiversity and green infrastructure.</p>
Policy 5.10 Urban Greening	<p>A The Mayor will promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.</p> <p>C Development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping.</p>
Chapter 7: London's Living Spaces and Places	
Policy 7.17 Metropolitan Open Land	<p>Any alterations to the boundary of MOL should be undertaken by Boroughs through the LDF process, in consultation with the Mayor and adjoining authorities.</p> <p>To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria:</p> <ul style="list-style-type: none"> • it contributes to the physical structure of London by being clearly distinguishable from the built up area • it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London • it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value

	it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.
Policy 7.18 Protecting Open Space and Addressing Deficiency	<p>The Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency.</p> <p>Planning decisions</p> <p>The loss of protected open spaces must be resisted unless equivalent or better-quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.</p> <p>LDF preparation</p> <p>When assessing local open space needs LDFs should:</p> <ul style="list-style-type: none"> • include appropriate designations and policies for the protection open space to address deficiencies • identify areas of open space deficiency, using the open space categorisation set out in Table 7.2 as a benchmark for all the different types of open space identified therein • ensure that future publically accessible open space needs are planned for in areas with the potential for substantial change such as opportunity areas, regeneration areas, intensification areas and other local areas. • ensure that open space needs are planned in accordance with green infrastructure strategies to deliver multiple benefits. <p>Boroughs should undertake audits of all forms of open space and assessments of need¹. These should be both qualitative and quantitative, and have regard to the cross-borough nature and use of many of these open spaces.</p>
Policy 7.19 Biodiversity and access to nature	<p>F In their LDFs, Boroughs should:</p> <p>b identify areas deficient in accessible wildlife sites and seek opportunities to address them</p> <p>e identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites</p>

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
Chapter 1 Planning	London's Future
Policy GG2 Making the best use of land	<p>To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:</p> <p>D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.</p>
Chapter 3 Design	
Policy D1 London's form and characteristics	<p>Development Plans, area-based strategies and development proposals should address the following:</p> <p>A The form and layout of a place should:</p> <ul style="list-style-type: none"> • 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity

	<p>B Development design should:</p> <ul style="list-style-type: none"> • 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water
Policy D7 Public realm	<p>Development Plans and development proposals should:</p> <p>H Incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity.</p>
Chapter 5 Social Infrastructure	
Policy S5 Sports and recreation facilities	<p>C Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space (Policy G3 Metropolitan Open Land) and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.</p>
Chapter 8 Green infrastructure and Natural Environment	
Policy G1 Green infrastructure	<p>A London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure</p> <p>B Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.</p> <p>C Development Plans and Opportunity Area Planning Frameworks should:</p> <ul style="list-style-type: none"> • identify key green infrastructure assets, their function and their potential function 2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
Policy G3 Metropolitan Open Land	<p>A Metropolitan Open Land (MOL) should be protected from inappropriate development:</p> <ul style="list-style-type: none"> • 1) development proposals that would harm MOL should be refused • 2) boroughs should work with partners to enhance the quality and range of uses of MOL. <p>B The extension of MOL designations should be supported where appropriate.</p> <p>C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.</p> <p>D Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:</p> <ul style="list-style-type: none"> • 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area • 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London • 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value

	4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.
Policy G4 Local green and open space	<p>A Local green and open spaces should be protected.</p> <p>B The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.</p> <p>C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required¹⁰⁵.</p> <p>D The loss of green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.</p> <p>E Development Plans and Opportunity Area Frameworks should:</p> <ol style="list-style-type: none"> 1) include appropriate designations and policies for the protection of green and open space to address deficiencies 2) ensure that future green and open space needs are planned for in areas with the potential for substantial change 3) ensure that green and open space needs are planned in line with objectives in green infrastructure strategies in order to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure.
Policy G5 Urban greening	<p>A Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.</p> <p>B Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.</p>
Policy G6 Biodiversity and access to nature	<p>A Sites of Importance for Nature Conservation (SINCs) should be protected. The greatest protection should be given to the most significant sites.</p> <p>B In developing Development Plan policies, boroughs should:</p> <ol style="list-style-type: none"> 1) use the relevant procedures to identify SINCs and green corridors. When undertaking comprehensive reviews of SINCs across a borough or when identifying or amending Sites of Metropolitan Importance boroughs should consult the London Wildlife Sites Board 2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them

	<p>3) seek opportunities to create habitats that are of particular relevance and benefit in an urban context</p> <p>4) include policies and proposals for the protection and conservation of priority species and habitats and opportunities for increasing species populations</p> <p>5) ensure sites of European or national nature conservation importance are clearly identified and appropriately assessed.</p> <p>C Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach should be applied to minimise development impacts:</p> <p>1) avoid adverse impact to the special biodiversity interest of the site</p> <p>2) minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site</p> <p>3) seek appropriate off-site compensation only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.</p> <p>D Biodiversity enhancement should be considered from the start of the development process.</p> <p>E Proposals which create new or improved habitats that result in positive gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites.</p>
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Mayor's Sustainable Design and Construction SPG (2014)

Policy / paragraph reference	Policy and paragraph text
2.2.3	Through careful design, developers should ensure their schemes optimise density. The design should enable the development to sit comfortably within the local context and provide a high quality living or working environment, including the provision of amenity and open space. The delivery of sufficient housing, employment space and supporting infrastructure on existing sites will result in less pressure to development open spaces and other green or public spaces.
2.2.32 2.2.33	<p>2.2.32 Where boroughs are aware of a demand for food growing space they can secure landscape designs within developments that provide flexible open spaces which may be adapted for food growing to be undertaken in the future, should there be demand from the local community. Consideration at the design stage will include:</p> <ul style="list-style-type: none"> • safeguarding south facing spaces • the availability of water, incorporating rain water harvesting • the loading capacity of green roofs and balconies; • planting walls with espaliers or climbing plants; • integrating edible plants with ornamental plants; • proving planters that can be easily converted for food growing; and • management. <p>2.2.33 Where provided, it may be appropriate to secure (through condition or s106 agreement) the identified space for food growing, as opposed to wider open space uses.</p>

<p>2.8 Nature Conservation and Biodiversity</p>	<p>2.8.2 Developments should be sensitively designed so that there is no net loss in the quality and quantity of habitat across a development site and to enhance biodiversity and increase connectivity between patches of urban habitat.</p> <p>Protected species</p> <p>2.8.3 Certain species are protected under UK and European legislation. Natural England provides a list of protected species as well as guidance relating to these protected species.</p> <p>2.8.4 Certain development activities within the vicinity of protected species and their habitats require a licence from Natural England. It is the developer's responsibility establish the likelihood of the presence of any protected and priority species on their site, or within the vicinity of their site. Initial information can be identified from a local or the London wide54 records centre or a survey by a competent person may be required. The detail and length of the survey period will depend on the suspected likelihood of the presence of protected species and what the species is. The site may only be used for part of the year by a protected species. It is also the developer's responsibility to ensure that they have complied with all legislation with regards to protected species when developing their site. The protected species most likely to be encountered on development sites in London are bats, badgers, water vole, great crested newt and reptiles (grass snake, common lizard and slow-worm). Specialist advice on how to manage and protect specific species can be found on Natural England's website and from the London Wildlife Trust or from specialist conservation bodies for individual species such as the Royal Society for the Protect of Birds (RSPB), Buglife and the Bat Conservation Trust.</p> <p>Protected sites</p> <p>2.8.5 Certain sites are protected by UK and European legislation. Sites include those designated as:</p> <ul style="list-style-type: none"> • International55 - special areas of conservation (SACs), special protected areas (SPAs) and Rasmar sites; and • National - Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs). <p>Other sites protected by land-use planning policy</p> <ul style="list-style-type: none"> • London wide - sites of metropolitan importance for nature conservation; and • Local - sites of borough and local importance for nature conservation. <p>2.8.6 Where proposals are in the vicinity of these sites developers will have to carry out an assessment of the potential impacts the scheme could have on these sites, including the connectivity of this site with other nature conservation sites. The assessment should be commensurate to the scale of the development and the statutory or non-statutory protection afforded to the site . The assessment needs to have informed the design of the development, which should minimise impacts, including on the connectivity of green corridors. Where it is assessed there will be adverse impacts on biodiversity or the connectivity of ecological sites sufficient mitigation measures are to be incorporated into the construction and occupation stages. The assessment needs to be submitted alongside the planning application.</p>
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2.8.7 The development of land use policy documents and some large development proposals or projects will need to be informed by Appropriate Assessments under the European Union Habitats Directives if they are likely to have an impact on European sites (SACS and SPAs). This assessment is the responsibility of the determining authority .

Biodiversity Action Plans

2.8.8 Developers and local planning authorities should have regard to additional species and habitats that are identified at the national, London or local level as priorities for protection and enhancement. This includes species which are of a particular conservation priority in London such as, for example swifts and stag beetles .

Development proposals

2.8.9 In accordance with London Plan Policy 7.19 developers should adhere to the following hierarchy when considering biodiversity on their development site:

1. avoid adverse impact to the biodiversity interest by:

- identifying the biodiversity interest within the site
- considering the particular structure of landscape or vegetation required by any important plant or animal species;
- carefully considering the location, design, form and foundation requirements for the development to protect existing biodiversity as well as the length and timing of the construction phase and the specific processes involved ; and
- considering the implications of the development on changes to the local natural environment over time, for example space required for maturing trees, the impact of additional lighting and noise.

2. minimise impact and seek mitigation, biodiversity impacts should be reduced as far as reasonably possible. This can be achieved by undertaking appropriate ecological surveys in advance of any planning application to guide and inform the design of the development (as set out in paragraph 2.8.4. These steps should be followed and an explanation provided with planning applications:

- give priority to retaining any existing valuable habitat, vegetation, species populations or ecological features;
- provide connectivity to existing green and nature conservation spaces by contributing to 'buffer habitat', 'stepping stones' and 'corridors; and
- provide new habitat within the development of equal or greater biodiversity value. See paragraph 2.8.11 for examples of habitat creation.

3. only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation which could include:

- provision of off-site replacement habitat; and
- provision of a financial contribution or other resources to enable adjacent land managers to improve the quality of their ecological resource.

2.8.10 Where required, an assessment needs to be submitted alongside a planning application. It should be noted that for important species or habitat, knowledge of seasonal fluctuations and dependencies may be necessary, requiring surveying effort that adequately captures a full annual cycle. Also

	<p>any mitigation or compensation measures need to be identified at planning application stage and secured by condition or s106 agreement. All compensation habitat must be maintained to ensure its establishment and long term survival. Details of management and maintenance measures to be put in place are to be set out in a management plan. All biodiversity assessments and proposal for protection, mitigation and replacement should be prepared by a suitably qualified person. Developers are encouraged to provide this data to the Greenspace Information for Greater London (GIGL). Promoting the creation of additional Habitat</p> <p>2.8.11 In addition to following the hierarchy described above new habitat provision should be provided as part of a development’s urban greening measures. This can include ecologically sensitive landscaping, including water features or new habitat provided on buildings, such as in the form of green roofs and walls and roof gardens, ponds and wetlands potentially incorporated with SuDs and bird and bat boxes and insect habitats. Habitat provided on a building can benefit some species but cannot fully replace habitat lost at ground level. There are numerous web-sites that provide information on how to include and enhance biodiversity on development sites. See the Signpost adjacent for a few of these resources.</p> <p>2.8.12 The potential to increase biodiversity in public realm improvements should be maximised. The ecological enhancement of urban greening measures in the public realm can in particular increase the connectivity between existing areas of urban habitat. The Mayor’s All London Green Grid SPG identifies opportunities for improving the connectivity of green infrastructure, including the creation of corridors for nature conservation, across London .</p>
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All London Green Grid 2012 (SPG)

Policy/ paragraph reference	Policy and paragraph text
Implementation Point 4 (b)	Development and regeneration proposals should plan, locate and design new and improved green infrastructure and manage the ALGG as an interdependent, integrated and multifunctional open and green space network
Implementation Point 7	The Mayor, boroughs and other stakeholders should work in partnership to address all opportunities to achieve the appropriate range of diverse functions and benefits from the network of green infrastructure both within and around London

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Principle D2	Proposals should: Deliver a grid of amenity spaces (public, private, communal) that contributes to the creation of healthy Lifetime Neighbourhoods as depicted in figure 14 and that:

	<p>a. contributes to the delivery of the Mayor’s All London Green Grid SPG;</p> <p>b. caters for the needs of new and existing communities;</p> <p>c. are laid out as a well-connected legible grid;</p> <p>d. are well-designed and with clear management and maintenance plans;</p> <p>e. facilitates clear connections between stations;</p> <p>f. protects, improves and connects into existing open spaces;</p> <p>g. includes coordinated urban greening along streets, in public open spaces and along the Grand Union Canal;</p> <p>h. connects biodiversity assets to support habitat resilience; and</p> <p>i. mitigates flood risk through the delivery of sustainable urban drainage measures.</p>
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Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
3.22	No reasonable alternative policy options have been identified. The creation of connected places served by open spaces that meet need is underpinned by national and regional policy.
12.6	12.6 No alternative policy options have been identified, as alternatives would not be consistent with the NPPF or in general conformity with the London Plan.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Delivering open space: The policy should provide a stronger commitment to delivering open space.	Brent Council	Change proposed. The revised Local Plan is supported by an Environmental Standards Study. This is informing more detailed requirements for open space in Local Plan, which are set out in Policy SP8 (Green Infrastructure and Open Space), the place policies (chapter 4), Policy EU1 (open space) and EU2 (Urban Greening and Biodiversity). This includes the requirement to deliver 30% public open space as part of development proposals outside of SIL and the delivery of 3 new local parks (2ha+) in Old Oak

<p>Open space: Some stakeholders supported the open space provision in Old Oak North being provided as one large space, stating that it would allow for a wider range of recreational and sporting activities</p> <p>Other stakeholders supported the provision of a series of linked smaller spaces, as this would enable more doorstep access to open space, whilst still providing for a wide variety of functions</p> <p>One consultee felt it best to maintain flexibility and allow proposals to either provide the open space as one large space or a series of linked spaces</p>	<p>Brent Council, Hammersmith and Fulham Council, Hammersmith and Fulham Historic Buildings Group, 3 local residents</p> <p>Midland Terrace Resident's Group, Old Oak Interim Forum, 2 local residents</p> <p>Old Oak Park (DP9)</p>	<p>Change proposed. The Old Oak North place policy (P2) requires the delivery of a new minimum 2 ha local park in Old Oak North, to provide for a variety of leisure and recreation functions. The need for this space is evidenced in OPDC's Environmental Standards Study.</p> <p>The policy for Old Oak North also requires development in Old Oak North to contribute to the delivery of the Grand Union Canal local park, also of a minimum of 2ha, with the remainder of the park being provided by development coming forward in Old Oak South.</p> <p>Policy SP8 (Green Infrastructure and Open Space) and EU1 (open space) require that development delivers 30% of the developable area as public open space and that in addition to local parks, provision should be made of smaller open spaces and green streets.</p>
<p>Green space: There is a need for more green space in North Acton. It is not clear in the Plan whether existing open space will be protected and what the approach is towards greenspace, landscaping/tree planting.</p>	<p>Grand Union Alliance, 3 local residents</p>	<p>Change proposed. The Local Plan policy EU1 looks to protect existing open spaces, unless it is re-provided with at least an equivalent quantum and quality. Policy SP8 and EU1 also requires the provision of new open space, including requiring 30% of the developable area outside of SIL being provided as public open space. Policy EU2 supports high quality urban greening and the delivery of a diverse range of ecology.</p>
<p>Management of open space: Policies D2 and D3 should set out how it is considering the long term management of open spaces</p>	<p>Brent Council, The Hammersmith Society, 1 local resident.</p>	<p>Noted. Policy SP8, EU1 and EU2 set out the importance of securing appropriate management and maintenance arrangements for open space. The Local</p>

<p>and public realm in light of local council resources.</p>		<p>Plan does not specify the exact arrangements as there would need to be detailed consideration of the most appropriate management arrangements on a case by case basis.</p>
<p>Amount and types of open space: Policy D3 should specify quantum and range of open space needed to meet the needs of the new community. Open spaces should provide a range of roles including for attractions, social gatherings, biodiversity/nature, community events, street markets and quiet places.</p>	<p>Brent Council, Diocese of London, Grand Union Alliance, The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group, 4 local residents</p>	<p>Change proposed. Policy EU1 (which supersedes D3) identifies that outside of Strategic Industrial Location (SIL), development should look to deliver a minimum 30% of the area as publicly accessible open space. The policy sets out that this should be delivered through local parks in locations identified in the places chapter, smaller open spaces, green streets and where it is not possible or desirable to deliver 30%, a contribution in lieu would be sought.</p>
<p>Nature Reserve: Support for keeping the nature reserve in its current location. Some suggested it could be relocated but the Plan would need to ensure that areas of biodiversity and wilderness and maintained in Old Oak South.</p>	<p>Diocese of London, Midland Terrace Resident's Group, Old Oak Interim forum, Hammersmith and Fulham Historic Buildings Group, TITRA, 2 local residents, 2 local residents.</p>	<p>Noted. The starting point for the nature reserve would be to seek to retain and upgrade it as a key amenity and biodiversity space. However, it is recognised that there are essential and large infrastructure requirements in and around the nature reserve. As their detailed design is progressed, it may be more appropriate to relocate the space elsewhere within the scheme. Any relocation of the open space would need to be undertaken in accordance with Policies EU1 (open space) and EU2 (urban greening and biodiversity).</p>
<p>Embankment: The embankment to the north-west should be retained as this is essential to delivering agreed ecological enhancements.</p>	<p>Friends of Wormwood Scrubs, 2 local residents</p>	<p>Noted. The Local Plan is not proposing the redevelopment of the IEP depot during the lifetime of the Plan. The Local Plan is not directly proposing the removal of the embankment; however, were ecology on the embankment to be affected by a proposal, OPDC would require</p>

		development to provide an equivalent or greater amount of biodiversity on-site or provide a financial contribution to facilitate off-site enhancements in lieu of provision, in accordance with Policy EU2.
<p>Ecological enhancements: Any ecological enhancements should be sensitive to the character of the Scrubs and should be decided by the Trust.</p> <p>A number of proposals are put forward for ecological enhancements/objectives and key locations where these could take place.</p>	Friends of Wormwood Scrubs	Change proposed. Policy P12 sets out OPDC's commitment to agree any proposals with the Wormwood Scrubs Charitable Trust. The ecological protections in Wormwood Scrubs are referenced in the supporting text. Proposals would need to accord with Policy EU2, which seeks to conserve and enhance biodiversity.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Welcome the positively planned approach to green infrastructure	Mayor of London	Noted
OPDC should refer to engaging closely with neighbouring London Boroughs, on the basis of a duty to co-operate, to ensure that the quality of the "wider environment", including green and open spaces, is not negatively impacted by any nearby developments.	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 Duty to Cooperate is a statutory duty during plan-making. OPDC has produced a Duty to Cooperate Statement as a supporting study to the Local Plan which sets out the how and when OPDC has engaged with proscribed bodies in the production of the Local Plan. Details on OPDC's approach to the Duty to Cooperate is also included in the supporting text to DI3 and in the annex to the Local Plan.
Diageo considers that the Lakeside Drive site could provide new open space and could be shown on figure 3.11. The diagram should also indicate the existing open space around the Diageo lake within the First Central development.	Diageo Plc	No change proposed. The Lakeside Drive site is located between a road and a logistics operation. It ranges in width from 19 metres to 22 metres and is considered to be of sufficient width to provide a range of development typologies and

		to be deliverable. OPDC does not consider it appropriate through the Local Plan to designate the site as an open space to offset the loss of public open space elsewhere. In accordance with Policy EU1, a proposal would need to come forward and propose any off-set and include measures to ensure that any replacement open space is of an equal or better quantum, quality and access and replaces the lost open space's function.
The diagram should also indicate the existing open space around the Diageo lake within the First Central development.	Friends of WWS, 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 existing open space in this location is not publicly accessible. The figure here only shows publicly accessible open space so it is not appropriate for this open space to be shown in the figure.
In reference to figure 3.11, suggest that the proposed GUC Linear Park should stretch along both the southern and northern boundary of the canal for its entire length	The Inland Waterways Association-Middlesex Branch	No change proposed. Securing linear space along the northern edge will be challenging within Park Royal SIL. The proposal is however to provide off-side public open space on Old Oak and in the Channel Gate place.
Welcome the 30% for open space. Suggest that the indicative areas of search for the new parks illustrated in Figure 3.11 are further refined and supported in Chapter 4. Requirements of the Water Framework Directive should be mentioned.	Environment Agency	Change proposed. At this stage it is too early to further refine the exact areas that will be allocated for parks and green spaces. However, further work has been undertaken in Old Oak North to refine the locations of public open spaces in this place. The supporting text to Policy EU3 reference to the Water Framework Directive. The place policies in chapter 4 appropriately reflect the need for the delivery of these local parks.
Broadly support the policy to provide 30% open space but want to ensure it is achieved.	LBHF, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Noted.

	Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
Policy is unsound because it doesn't address monitoring	Friary Park Preservation Group	No change proposed. OPDC has a set of key performance indicators which include for delivery of or loss of green infrastructure
Exclude WWS from Local Plan and provide more open space within OO.	Sarah Abrahamart	No change proposed. Wormwood Scrubs forms part of the OPDC area for planning purposes and therefore must appear in the Local Plan. OPDC is aware of the need to preserve Wormwood Scrubs and ensure its long-term role as an important area of MOL that is accessible and open to all the community. OPDC have carried out extensive work to understand how much open space is required to support the new development and is consulting on this provision. The proposal is to include a wide range of public open spaces to accommodate the different needs of the community including provision of 3 local parks and 30% public open space.
Support provision of 3 new local parks, but clarify funding, ownership and management in Local Plan.	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. Funding will be secured through a variety of sources in accordance with Policy DI1. OPDC recognises that securing funding for management and maintenance of green spaces is important. Funding mechanisms however will vary across the area and will be subject to negotiations and agreement with a number of parties. OPDC therefore do not consider that it is appropriate to include this in the Local Plan.

<p>Ensure developers contribute fully to the open space provision</p>	<p>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</p>	<p>No change proposed. These detailed requirements are covered in Policy EU1.</p>
<p>Canal forms an important part of the open space network - refer to comment in Places section</p>	<p>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</p>	<p>Noted. The Grand Union Canal is referenced in the policy.</p>
<p>Railway embankments should be recognised as part of the open space network</p>	<p>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</p>	<p>No change proposed. Noted. Figure 6.3 in policy EU2 identifies sites of importance for nature conservation including railway embankments. The policy recognises the importance of these area and protects them or requires adequate compensatory provision if they are removed.</p>
<p>Cemeteries should not be regarded as meeting developers open space requirements</p>	<p>Hammersmith Society (Mark Walker), 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</p>	<p>No change proposed. Noted. Policy EU1 sets out clear requirements for provision of open space. This policy does not support the use of cemeteries to offset their requirements. Policy EU2 protects existing areas of open space including cemeteries.</p>
<p>Support open space target but it may impact on densities and affordable housing provision</p>	<p>Old Oak Interim Neighbourhood Forum (Mark Walker), TITRA (Dave Turner), 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</p>	<p>No change proposed. The policy approach is supported by evidence in OPDC's Environmental Standards Study, which has benchmarked against other developments in London. The requirements for open space will need to be balanced against the requirements for affordable housing, in accordance with policy D11 and any scheme would be</p>

		assessed in terms of its impact on amenity and other environmental issues.
Ensure open space remains publicly accessible	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	Noted. This would be secured through legal agreements or condition.
Green Infrastructure and Open Space Strategy and Management Plan lacks detail particularly around Green Space Factor and Green Points system implementation	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	Change proposed. The name has been changed to the Urban Green Factor in line with the new policy in the draft London Plan (2017). The London Plan provides guidance on the application of the Urban Greening Factor and further SPG is proposed by the Mayor on guidance and its application.
Work with the boroughs to create additional green infrastructure beyond the OPDC area	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. Policy EU1 sets out clear requirements for provision of open space. OPDC will work with the host boroughs to support green space provision where feasible. However, OPDC is not the planning authority for the area outside of OPDC and therefore its role is more limited in terms of green infrastructure provision.
Lack of guidance for active play	Grand Union Alliance	Change proposed. Policy D9 provides guidance for multi-functional play. The supporting text has been strengthened to make reference to encouraging active lifestyles. Mayor policy also applies to the area. London Plan policy has not been repeated here and the Mayor's Play and Informal Recreation SPG also applies to the area.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Requirement for delivering 30% of developable land as publicly accessible open space and deliver development capacity will be challenging.	Old Oak Park Limited	No change proposed. See response to comment EU1/6 from the first regulation 19 draft Local Plan.
There is currently a lack of secure, appropriate green space and play space within reasonable distance of some existing communities like Wells House Road as the Western end of Wormwood Scrubs suffer from anti social behaviour.	Thomas Dyton, Wells House Road Residents Association	<p>Noted. Policies SP8 and EU1 require development to conserve and enhance existing open spaces, and support the delivery of 30% publicly accessible open space in the developable area outside of SIL.</p> <p>Policy P12 (Wormwood Scrubs) sets out OPDC will seek to deliver sensitive enhancements and improved access to Wormwood Scrubs.</p>
Support policy, in particular conservation and enhancements of existing green infrastructure, but it should clarify that improved connections for green spaces are for spaces other than Wormwood Scrubs.	Wormwood Scrubs Charitable Trust	<p>Noted. Improving access to existing green spaces is an important element to the overall approach to green infrastructure.</p> <p>No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the</p>

		<p>Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area.</p> <p>As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with the requirement within Policy P12 that any proposals are agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.</p>
<p>On figure 3.13, Green corridors should be shown to the southern boundary of the scrubs, as per the walking and cycle maps elsewhere in the plan.</p>	<p>Wormwood Scrubs Charitable Trust</p>	<p>No change proposed. The urban greening corridors identified in figure 3.13 reflect new and existing routes through urban spaces and the need to incorporate urban greening measures within them.</p>
<p>OPDC should take a natural capital accounting approach to development of the area, as promoted by the London Plan, London Environment Strategy and A Greener Future: The Governments 25 Environment Plan. This will to help capture the environmental challenges</p>	<p>Environment Agency</p>	<p>No change proposed. Policy SP8 requires development to ensure an overall net gain in biodiversity. Further guidance on how OPDC expects development to achieve net gain will be provided through a future SPD, where references to the natural capital</p>

posed by the proposed density and population increases.		accounting approach may be appropriate.
A cross reference to Policy EU3 (Water) should be included in the supporting text.	London Borough of Hammersmith and Fulham	No change proposed. The supporting text states that green infrastructure relates to both green spaces and water spaces, and blue infrastructure is included in the definition of green infrastructure in the glossary.
Wormwood Scrubs Park is a valuable London asset, but is isolated from much of the local population and is in a poor condition. A wider landscape plan is needed to improve the space and it's connections to surround areas and new development.	Grand Union Alliance	Noted. Policy P12 recognises that sensitive new walking and cycling connections to Wormwood Scrubs are required to improve access from surrounding communities, and ensure that it fulfils its function as a Metropolitan Park and it's requirements under the Act. The Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham are preparing a management plan for Wormwood Scrubs which will address deficiencies in access to the Scrubs, and inform a wider series of ecological and landscape enhancements.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Environmental Standards Study	<p>The development should support the delivery of the spatial vision by delivering and/or contributing towards a high quality, multi-functional green and blue infrastructure network, i.e. accessible for play and recreation, promotes walking or cycling safely, and supports wildlife, urban cooling and flood management.</p> <p>Proposals should:</p> <p>A. Provide a minimum of 30% of Old Oak's total area allocated to publicly accessible open space, which should consist of a network of well-managed, high quality, multi-functional green and civic open spaces and Green Streets, which are linked to the wider London Green Grid and Blue Ribbon Network;</p>

	<ul style="list-style-type: none"> • This equates to approximately 4.14sqm per resident and 1sqm per worker. This standard would also be appropriate for new build in Park Royal; • In addition to provision of at least 30% accessible open space, developers should contribute towards ensuring that these spaces provide a good mix of facilities, are fully accessible, well located and properly managed and maintained; • Wormwood Scrubs is excluded from the 30% but it would be required to fulfil the role of a district park, providing good quality access to outdoor sports facilities and open space. An open space strategy will review the capacity of this open space and its facilities to identify what facilities should be provided within the development site and where facilities and open space on Wormwood Scrubs could be enhanced through developer contributions; <p>B. Contribute towards and/or deliver 3 new local parks that are no less than 2ha in size and a range of small public open spaces and pocket parks;</p> <p>C. Provide a minimum 10sqm of dedicated play equipment per child;</p> <p>D. Incorporate a Grand Union Canal Linear Park;</p> <p>E. Limit overshadowing of open spaces. Public and private spaces should benefit from good light and microclimate, at least 2 hours of daylight on 21st March into 50% of space in line with BRE guidance;</p> <p>F. Aim to be biodiversity positive, in which biodiversity rich, multi-benefit, multifunctional green spaces and water bodies are highly interconnected and closely integrated with the wider green infrastructure network in a clear functional hierarchy;</p> <p>G. Make a positive contribution towards climate change. Green infrastructure should be maximised to provide summer shade and cooling, to the buildings and external environment, and appropriate provision for localised surface water attenuation, including sustainable drainage techniques;</p> <p>H. In order to ensure the long term quality and performance of green infrastructure is sustained, developments will be expected to contribute to its management and maintenance. Developers will be required to provide a detailed management plan which should set out the longer term revenue funding arrangements for open spaces and commitments around continual public access;</p>
<p>Infrastructure Delivery Plan</p>	<ul style="list-style-type: none"> • Identifies the infrastructure required to support the regeneration of the area, including social, transport, utility and green infrastructure. • 5.2. Open Space: In the creation of this new part of London the provision of open space and the ability of the population to access open space will be extremely important and contribute to the success of the area in a number of ways including social cohesion, health and wellbeing, as well as general environmental and biodiversity benefits. There are a range of open space projects identified in the Infrastructure Schedule. There are those that identify existing open space that would benefit from enhancement and the creation of new open spaces. Some spaces will be designed to perform more of a civic function while others are intended for green space.

Public Realm, Walking and Cycling Strategy	<ul style="list-style-type: none"> Open Spaces should be easily accessible from Old Oak High Street and visible to provide places to stop, relax for people of all ages and groups.
Precedent Study	<ul style="list-style-type: none"> Takes lessons from local and international schemes relevant to the type of development envisioned within the OPDC area on how to deliver quality open spaces.
Sites of Importance for Nature Conservation Statement	<ul style="list-style-type: none"> A summary of the evidence and approach used in designating Sites of Importance for Nature Conservation (SINC) as part of the OPDC Local Plan.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Environmental Standards Study	<ul style="list-style-type: none"> This standard (Old Oak open space) would also be appropriate for new build in Park Royal (SIL); 	<ul style="list-style-type: none"> Open space requirements for developments within the Park Royal SIL industrial area will be addressed through a Park Royal SPD
Environmental Standards Study	<ul style="list-style-type: none"> Greening of streets and public realm using 50% native species and 'right place, right tree' approach; Planting trees to provide cooling through shade and evapotranspiration 	<ul style="list-style-type: none"> Recommendations are considered to be too detailed for Local Plan policy, but will be used to inform future SPDs.

Other evidence base

Supporting Study	Recommendations
The Mayor's Green Infrastructure Taskforce Report	<ul style="list-style-type: none"> Green infrastructure in a future city should be informed by and deliver the following five objectives: <ul style="list-style-type: none"> Promoting Healthy Living Strengthening Resilient Living Encouraging Active Living Creating Living Landscapes Enhancing Living Space The economic value of green infrastructure needs to be measured based on the full range of benefits it provides. New mechanisms for the funding and management of green infrastructure us required.

SP9: Built Environment

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	<p>Planning should:</p> <ul style="list-style-type: none"> - always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. - take account of the different roles and character of different areas, promoting the vitality of our main urban areas - encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value - conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations
34	<p>Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.</p>
56	<p>The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.</p>
57	<p>It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.</p>
58	<p>Planning policies and decisions should aim to ensure that developments</p> <ul style="list-style-type: none"> • optimise the potential of the site to accommodate development • respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation • create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and • are visually attractive as a result of good architecture and appropriate landscaping.
61	<p>Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic</p>

69	environment. Planning policies and decisions, in turn, should aim to achieve places which promote safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion and safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas
126	Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. In developing this strategy, local planning authorities should take into account: <ul style="list-style-type: none"> • the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; • the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; • the desirability of new development making a positive contribution to local character and distinctiveness; and • opportunities to draw on the contribution made by the historic environment to the character of a place
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver conservation and enhancement of the natural and historic environment, including landscape.
157	Crucially Local Plans should contain a clear strategy for enhancing the natural, built and historic environment

National Planning Practice Guidance (NPPG)

Conserving and enhancing the historic environment

Policy / paragraph reference	Policy and paragraph text
004	In line with the National Planning Policy Framework, local authorities should set out their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. Such as a strategy should recognise that conservation is not a passive exercise. In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets. This could include, where appropriate, the delivery of development within their settings that will make a positive contribution to, or better reveal the significance of, the heritage asset.

Design

Policy / paragraph	Policy and paragraph text

reference	
003	Local planning authorities should secure design quality through the policies adopted in their local plans. Good design is indivisible from good planning, and should be at the heart of the plan making process.
006	<p>Design impacts on how people interact with places. Although design is only part of the planning process it can affect a range of economic, social and environmental objectives beyond the requirement for good design in its own right. Planning policies and decisions should seek to ensure the physical environment supports these objectives. The following issues should be considered:</p> <ul style="list-style-type: none"> • <u>local character (including landscape setting)</u> • <u>safe, connected and efficient streets</u> • <u>a network of greenspaces (including parks) and public places</u> • <u>crime prevention</u> • <u>security measures</u> • <u>access and inclusion</u> • <u>efficient use of natural resources</u> • <u>cohesive and vibrant neighbourhoods</u>
007	<p>Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation.</p> <p>The successful integration of all forms of new development with their surrounding context is an important design objective, irrespective of whether a site lies on the urban fringe or at the heart of a town centre.</p>
012	Good design can help to create buildings and places that are for everyone. Planning can help break down unnecessary physical barriers and exclusions caused by the poor design of buildings and places.
025	<p>Buildings can be formed in many ways, for example tall towers, individual stand-alone units, long and low blocks, terraces. They can all be successful, or unsuccessful, depending on where they are placed, how they relate to their surroundings, their use and their architectural and design quality.</p> <p>Some forms pose specific design challenges, for example how taller buildings meet the ground and how they affect local wind and sunlight patterns should be carefully considered. The length of some lower blocks can mean they disrupt local access and movement routes. Stand-alone buildings can create ill-defined spaces around them and terraces can appear monotonous and soulless if poorly designed.</p>
026	<p>This relates both to the overall size and mass of individual buildings and spaces in relation to their surroundings, and to the scale of their parts.</p> <p>Decisions on building size and mass, and the scale of open spaces around and between them, will influence the character, functioning and efficiency of an area. In general terms too much building mass compared with open space</p>

	<p>may feel overly cramped and oppressive, with access and amenity spaces being asked to do more than they feasibly can. Too little and neither land as a resource or monetary investment will be put to best use.</p> <p>The size of individual buildings and their elements should be carefully considered, as their design will affect the: overshadowing and overlooking of others; local character; skylines; and vistas and views. The scale of building elements should be both attractive and functional when viewed and used from neighbouring streets, gardens and parks.</p> <p>The massing of development should contribute to creating distinctive skylines in cities, towns and villages, or to respecting existing skylines. Consideration needs to be given to roof space design within the wider context, with any adverse visual impact of rooftop servicing minimised.</p> <p>Account should be taken of local climatic conditions, including daylight and sunlight, wind, temperature and frost pockets.</p>
079	<p>“Amenity” is not defined exhaustively in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. It includes aural and visual amenity (regulation 2(1)) and factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest (regulation 3(2)(a)).</p> <p>It is, however, a matter of interpretation by the local planning authority (and the Secretary of State) as it applies in any particular case. In practice, “amenity” is usually understood to mean the effect on visual and aural amenity in the immediate neighbourhood of an advertisement or site for the display of advertisements, where residents or passers-by will be aware of the advertisement.</p> <p>So, in assessing amenity, the local planning authority would always consider the local characteristics of the neighbourhood: for example, if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural features, the local planning authority would consider whether it is in scale and in keeping with these features.</p> <p>This might mean that a large poster-hoarding would be refused where it would dominate a group of listed buildings, but would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site.</p> <p>If the advertisement makes a noise, aural amenity would also be taken into account before express consent would be given.</p>

London Plan (2016)

Policy / paragraph reference	Policy and paragraph text
2.13	<p>B Development proposals within opportunity areas and intensification areas should:</p> <p>b) seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and,</p>

	<p>where appropriate, contain a mix of uses</p> <p>c) contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1, tested as appropriate through opportunity area planning frameworks and/or local development frameworks</p> <p>d) realise scope for intensification associated with existing or proposed improvements in public transport accessibility, such as Crossrail, making better use of existing infrastructure and promote inclusive access including cycling and walking</p>
2.16	<p>A The Mayor will, and boroughs and other stakeholders should, identify, develop and promote strategic development centres in outer London or adjacent parts of inner London with one or more strategic economic functions of greater than sub-regional importance (see para 2.77) by:</p> <p>b) bringing forward adequate development capacity</p>
3.4	<p>A Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Development proposals which compromise this policy should be resisted.</p>
6.1	<p>A The Mayor will work with all relevant partners to encourage the closer integration of transport and development through the schemes and proposals shown in Table 6.1 and by:</p> <p>j seeking to ensure that all parts of the public transport network can be used safely, easily and with dignity by all Londoners, including by securing step-free access where this is appropriate and practicable.</p>
6.4	<p>C DPDs should identify development opportunities related to locations which will benefit from increased public transport accessibility.</p>
7.1	<p>D The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood.</p>
7.2	<p>A The Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments:</p> <ul style="list-style-type: none"> a can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances b are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment c are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways d are realistic, offering more than one solution to help balance

	everyone's needs, recognising that one solution may not work for all.
7.3	A Boroughs and others should seek to create safe, secure and appropriately accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion.
7.4	<p>A Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.</p> <p>B Buildings, streets and open spaces should provide a high quality design response that:</p> <ul style="list-style-type: none"> a has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass b contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area c is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings d allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area e is informed by the surrounding historic environment.
7.5	A London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.
7.6	<p>A Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.</p> <p>B Buildings and structures should:</p> <ul style="list-style-type: none"> a be of the highest architectural quality b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm c comprise details and materials that complement, not necessarily replicate, the local architectural character d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings e incorporate best practice in resource management and climate change mitigation and adaptation f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces g be adaptable to different activities and land uses, particularly at ground level h meet the principles of inclusive design i optimise the potential of sites

7.7	<p>A Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings.</p> <p>E Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks. These areas should be consistent with the criteria above and the place shaping and heritage policies of this Plan.</p>
7.8	<p>F Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.</p> <p>G Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.</p>
7.9	<p>C Boroughs should support the principles of heritage-led regeneration in LDF policies</p>

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
GG2	<p>Making the best use of land</p> <p>To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:</p> <p>A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.</p> <p>B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach.</p> <p>C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.</p> <p>D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.</p> <p>E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.</p>

	F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance
D2	<p>Delivering good design</p> <p>Initial evaluation</p> <p>A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and areabased strategies, which covers the following elements:</p> <ol style="list-style-type: none"> 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. <p>Determining capacity for growth</p> <p>B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised.</p> <p>Design analysis and visualisation</p> <p>C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process.</p> <p>Design quality and development certainty</p> <p>D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.</p> <p>Design scrutiny</p> <p>E Design and access statements submitted with development proposals should provide relevant information to demonstrate the proposal meets the design requirements of the London Plan.</p> <p>F Boroughs and applicants should use design review to assess and inform design options early in the planning process. Design review should be in addition to the borough's planning and urban design officers' assessment and pre-application advice. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation, before a planning application is made, if they:</p>

	<p>1) are above the applicable density indicated in Part C of Policy D6 Optimising housing density; or</p> <p>2) propose a building defined as a tall building by the borough (see Policy D8 Tall buildings), or that is more than 30m in height where there is no local tall building definition.</p> <p>G The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:</p> <p>1) design reviews are carried out transparently by independent experts in relevant disciplines</p> <p>2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme</p> <p>3) where a scheme is reviewed more than once, subsequent design reviews reference and build on recommendations of previous design reviews</p> <p>4) design review recommendations are appropriately recorded and communicated to officers and decision makers</p> <p>5) schemes show how they have considered and addressed the design review recommendations</p> <p>6) planning decisions demonstrate how design review been addressed.</p> <p>Maintaining design quality</p> <p>H The design quality of development should be retained through to completion by:</p> <p>1) having a sufficient level of design information, including key construction details provided as part of the application to ensure the quality of design can be maintained if the permitted scheme is subject to subsequent minor amendments</p> <p>2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design</p> <p>3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter</p> <p>4) local planning authorities using architect retention clauses in legal agreements where appropriate.</p>
D6	<p>Optimising housing density</p> <p>A Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:</p> <p>1) the site context</p> <p>2) its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)</p> <p>3) the capacity of surrounding infrastructure.</p> <p>Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.</p> <p>B The capacity of existing and planned physical, environmental and social infrastructure to support new development should be assessed and, where necessary, improvements to infrastructure capacity should be planned to support growth.</p> <p>1) The density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels.</p> <p>2) The ability to support proposed densities through encouraging</p>

	<p>active travel should be taken into account.</p> <p>3) Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, in exceptional circumstances, that development is contingent on the provision of the necessary infrastructure and public transport services and that the development is phased accordingly.</p> <p>C The higher the density of a development, the greater the level of scrutiny that is required of its design, particularly the qualitative aspects of the development design described in Policy D4 Housing quality and standards, and the proposed ongoing management. Development proposals with a residential component that are referable to the Mayor must be subject to the particular design scrutiny requirements set out in part F of Policy D2 Delivering good design and submit a management plan if the proposed density is above:</p> <ol style="list-style-type: none"> 1) 110 units per hectare in areas of PTAL 0 to 1; or 2) 240 units per hectare in areas of PTAL 2 to 3; or 3) 405 units per hectare in areas of PTAL 4 to 6. <p>D The following measures of density should be provided for all planning applications that include new residential units:</p> <ol style="list-style-type: none"> 1) number of units per hectare 2) number of habitable rooms per hectare 3) number of bedrooms per hectare 4) number of bedspaces per hectare. <p>E The following additional measures should be provided for all major planning applications :</p> <ol style="list-style-type: none"> 1) the Floor Area Ratio (total Gross External Area of all floors / site area) 2) the Site Coverage Ratio (Gross External Area of ground floors /site area) 3) the maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level). <p>These built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.</p>
D7	<p>Public realm</p> <p>Development Plans and development proposals should:</p> <p>A Ensure the public realm is safe, accessible, inclusive, attractive, well connected, easy to understand and maintain, and that it relates to the local and historic context, and incorporates the highest quality design, landscaping, planting, street furniture and surfaces.</p> <p>B Maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people’s safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds.</p> <p>C Be based on an understanding of how the public realm in an area functions and creates a sense of place, during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists.</p>

	<p>D Ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings.</p> <p>E Ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm.</p> <p>F Ensure buildings are of a design that activates and defines the public realm, and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm.</p> <p>G Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter.</p> <p>H Incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity.</p> <p>I Ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate. This should be done in conjunction with the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Applications which seek to introduce unnecessary street furniture should normally be refused.</p> <p>J Explore opportunities for innovative approaches to improving the public realm such as open street events.</p> <p>K Create an engaging public realm for people of all ages, with opportunities for formal and informal play and social activities during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm.</p> <p>L Ensure that on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Pedestrian crossings should be regular, convenient and accessible.</p> <p>M Ensure the provision and future management of free drinking water at appropriate locations in new or redeveloped public realm.</p>
D8	<p>D8 Tall buildings</p> <p>Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. To ensure tall buildings are sustainably developed in appropriate locations, and are of the required design quality, Development Plans and development proposals must undertake the following:</p> <p>Definition</p> <p>A Based on local context, Development Plans should define what is considered a tall building, the height of which may vary in different parts of London.</p> <p>Tall building locations</p> <p>B Tall buildings should be part of a plan-led approach to changing or</p>

developing an area. Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate, taking account of:

- 1) the visual, functional, environmental and cumulative impacts of tall buildings (set out in part C below)
- 2) their potential contribution to new homes, economic growth and regeneration
- 3) the public transport connectivity of different locations.

Impacts

C The impacts of a tall building can be visual, functional or environmental. All three elements should be considered within plan-making and in deciding development proposals:

- 1) Visual impacts
 - a) The views of buildings from different distances need to be considered, including:
 - i Long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views
 - ii Mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality
 - iii Immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.
 - b) Whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding
 - c) Architectural quality and materials should be of an exemplary standard to ensure the appearance and architectural integrity of the building is maintained through its lifespan
 - d) Proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area
 - e) Buildings in the setting of a World Heritage Site must preserve the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it
 - f) Buildings near the River Thames, particularly in the Thames Policy Area, should not contribute to a canyon effect along the river which encloses the open aspect of the river and the riverside public realm, or adversely affect strategic or local views along the river
 - g) Buildings should not cause adverse reflected glare.
- 2) Functional impact
 - a) The internal and external design, including construction detailing, the building’s materials and its emergency exit routes must ensure

	<p>the safety of all occupants</p> <p>b) Buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process</p> <p>c) Entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas</p> <p>d) It must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building</p> <p>e) Infrastructure improvements required as a result of the development should be delivered and phased appropriately</p> <p>f) Jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area</p> <p>g) Buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.</p> <p>3) Environmental impact</p> <p>a) Wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building</p> <p>b) Air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect streetlevel conditions</p> <p>c) Noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.</p> <p>4) Cumulative impacts</p> <p>a) The cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.</p> <p>Public access</p> <p>D Publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings.</p>
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Old Oak and Park Royal OAPF (2015)

<p>Policy / paragraph reference</p>	<p>Policy and paragraph text</p>
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Objective 1	CREATE: To create a successful and inclusive new urban quarter, supporting delivery of 24,000 new homes in Old Oak and 1,500 new homes in non-industrial locations in Park Royal. This will include a mix of affordable and market tenures and typologies that meet the needs of new and existing residents. Development of new homes should achieve best practice standards of architecture and urban design, along with the delivery of appropriate levels of new social, physical and green infrastructure to support the future population. This will help create a vibrant and distinctive places / neighbourhoods, and contribute to an integrated, healthy and sustainable place.
Principle D3	Proposals should accord with London Plan policies 2.13, 7.6 and 7.7 and deliver: <ul style="list-style-type: none"> a. a world class exemplary architecture that contributes to the delivery of Lifetime Neighbourhoods; b. a positive contribution to the creation of a coherent public realm, streetscape and wider cityscape; c. greater heights and densities than the surrounding existing context to optimise the use of land in accordance with London Plan policy 2.13(B); d. taller buildings and higher densities should primarily be focussed at stations and other key destinations. There may also be opportunities for some taller elements in other locations so long as such proposals contribute to the creation of a coherent place and accord with the guidance set out in this planning framework; and e. new development should be mindful of their context and in particular sensitive locations in the surrounding area. In these locations lower densities may be more appropriate and applicants will be expected to demonstrate how their development proposals achieve such sensitive design. This is likely to require the highest standards of design.
Principle D4	Proposals should accord with London Plan Policy 7.8 and enhance built heritage assets to contribute to successful placemaking.

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Implement density and height policies flexibly: Land owners supported high density development with	Aurora Developments Ltd, Boropex Holdings Limited, City and Docklands Property Group, Diageo Plc, Old Oak	No change proposed. The Local Plan has been updated to take a more nuanced approach to densities rather

<p>some asking for the policy to be delivered flexibly including being supportive of delivering higher densities and tall buildings in sensitive locations.</p>	<p>Park, NQP Development Services, Westkite Ltd</p>	<p>than setting overarching density ranges as per the Regulation 18 draft. The overarching approach to densities and building heights is set out in Policy SP9 (Built Environment), which identifies the area as being appropriate for high densities and tall buildings but that development proposals must also respond appropriately to sensitive locations. The places chapter provides place specific guidance on minimum homes and jobs targets, informed by OPDC's Development Capacity Study and where appropriate, provides policy guidance on appropriate building heights and locations for tall buildings.</p>
<p>Density and building heights concerns: Public bodies, community groups and local residents raised concerns of high densities and tall buildings. They asked for the delivery of low rise high density development that aligns with the London Plan density matrix.</p>	<p>Brent Council, Friends of Wormwood Scrubs, Midland Terrace Residents' Group, Old Oak Interim Forum, The Hammersmith Society, 7 local residents</p>	<p>Noted. OPDC is committed to developing an exemplarily designed built environment and the Local Plan has been updated to contain more detailed policies ensuring that development delivers high quality design and high standards of sustainability.</p> <p>To ensure the Local Plan meets the London Plan housing and employment targets for the area, development will generally be a mix of medium and high densities and height. This recognises the area's designation as Opportunity Areas. Policy SP9 recognises the need for development to appropriately respond to sensitive locations.</p> <p>In parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in</p>

		the Mayor's Housing SPG and in the Old Oak and Park Royal OAPF.
<p>Managing impact on sensitive locations: The importance of managing the impact of building heights on sensitive locations was highlighted. Specifically where sensitive edges for lower density forms of development are located directly adjacent to high or highest density forms of development.</p> <p>Other suggestions included delivering lower densities and building heights so they do not impact on North Acton, St. Mary's and Kensal Green cemeteries, the Grand Union Canal and existing residential areas.</p> <p>Some stakeholders suggested that buildings heights should be lower around the Old Oak Common station to mitigate impacts on Wormwood Scrubs and that the focus for tall buildings should instead be around Hythe Road station.</p>	<p>Friends of Wormwood Scrubs, MP for Hammersmith, local resident, Hammersmith and Fulham Historic Buildings Group, Midland Terrace Residents' Group, Harlesden Neighbourhood Forum, Old Oak Interim Forum, Grand Union Alliance, Wells House Road Residents Association, Ealing Council, Inland Waterways Association, 15 local residents</p>	<p>Noted. The OPDC area will include new tall buildings. OPDC is mindful of the need to manage the transition from the high density development in Old Oak to surrounding areas, while optimising densities to deliver housing and employment targets. Policy SP9 requires that development responds appropriately to sensitive locations.</p> <p>The cemeteries have all been identified as sensitive locations.</p> <p>As a major transport interchange with the highest public transport accessibility in the OPDC area, the area around the Old Oak Common Station is considered to be appropriate for higher densities and taller buildings in accordance with the London Plan. Tall buildings will also be appropriate at locations near to the proposed Hythe Road Station; however, consideration would need to be given to the setting of the existing St. Mary's Cemetery, the Grade 1 listed Kensal Green Cemetery and proposed Cumberland Park Factory conservation areas.</p> <p>Any proposal for a tall building would be considered against Local Plan policies dealing with environmental issues such as amenity (D6), air quality (EU4) and any tall building proposals would also be considered against OPDC's tall buildings policy (D5).</p>

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
There should be a hundred metre buffer between existing communities and new developments.	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 that the need to deliver appropriate standards of amenity for existing residential areas as being an important component in the design and delivery of development proposals. These proposals will need to be considered on a case by case basis. As such Local Plan policies SP9, D4, D5 and D6 with London Plan policies and national guidance will be used to ensure existing residential areas benefit from appropriate standards of amenity.
The document does not include a density map as per the 1st draft Local Plan. Should revert to having the density ranges that were in the Reg 18 draft Local Plan	Wells House Road Residents Association, Midland Terrace 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, St Quintin and Woodlands Neighbourhood Forum	Change proposed. Average density information has been provided within the supporting text to SP9. OPDC's Tall Building Statement provides information for the definition and location of tall buildings within the OPDC area.
Wish to be involved in the development of a list of community assets	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. Assets of Community Value are nominated by community groups and designated by the local Borough. Once designated, ACVs can be considered as material considerations in planning decisions.
Wish for the area not to become an area of poor quality design	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. OPDC wishes to support the delivery of a high quality built environment. This is embedded in the Local Plan's Spatial Vision and Spatial Vision Narrative 1. To realise this aspiration, national guidance, London Plan policies and relevant Local Plan policies such as

		SP2, SP9, D1, D2, D4 and D5 will be implemented.
The densities proposed in the Local Plan exceed established guidelines. The Plan is therefore unsound.	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. In parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG and in the Old Oak and Park Royal OAPF. The draft London Plan does not include a density matrix as it has been recognised by the Mayor that it did not appropriately recognise local context. The draft London Plan policy D6 recognises that appropriate densities should be determined through consideration of the site context, access to public transport accessibility and the capacity of surrounding infrastructure.
The plan is not specific about what are acceptable building heights or what is meant by tall buildings. Without this, the plan lacks transparency and therefore does not accord with the NPPF. The indicative densities are buried in the DCS and are not clearly set out in the Local Plan	TITRA, Midland Terrace Residents Association, 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	Change proposed. Policies D5 and SP9 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8(B) as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights

		<p>including appropriate locations for tall buildings, but within Old Oak North and Old Oak South there is a need for flexibility in the approach to achieving homes and jobs targets that will enable a response to site specific circumstances and the longer term development trajectory.</p> <p>No change proposed. OPDC considers policies SP9 and D5 are consistent with the requirements of the NPPF.</p> <p>Density ranges are defined within the DCS to define the development capacity of the OPDC area in accordance with national guidance. Policies SP9 and D5 provide guidance for the location of sensitive areas where densities and buildings should provide an appropriate response.</p>
<p>Support policies requiring development to respond to local context, in particular sensitive locations such as open spaces.</p>	<p>The Friends of Wormwood Scrubs, David Craine, ArtWest, Wormwood Scrubs Charitable Trust, 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</p>	<p>Noted.</p>
<p>Views from the Wormwood Scrubs should be given appropriate protection, and the Plan should clearly restrict building heights along the northern boundary of the scrubs.</p>	<p>The Friends of Wormwood Scrubs, Wormwood Scrubs Charitable Trust, 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</p>	<p>No change proposed. Policy D7 provides guidance for managing the impact of development proposals on views from Wormwood Scrubs. Local Plan policies SP9, D5, P1 and P1C1 alongside London Plan policy 7.7, national guidance provides guidance for the location of building heights along the southern edge of Old Oak South. Policy P1 identifies that tall buildings</p>

		should be located around Old Oak Common Station with buildings heights appropriately responding to Wormwood Scrubs as Metropolitan Open Land.
Welcome policies requiring development to respond to canal as sensitive location and heritage asset, but concerned this is not justified by evidence Grand Union Canal Massing and Enclosure Note.	The Inland Waterways Association-Middlesex Branch	No change proposed. Policy P3 provides guidance for "delivering heights of generally 6 to 8 storeys" with "opportunities for tall buildings at key crossing points" along the Grand Union Canal. This is based on the recommendations of the Grand Union Canal Massing and Enclosure Note. This note considers enclosure of potential development at points along the canal. It recognises that enclosure is one element in guiding building heights alongside London Plan, Local Plan and national guidance. The recommendation of delivering a range of generally 6 to 8 storeys that is embedded in Policy P3 is considered to be sufficiently flexible to enable the delivery of heights above and below this range.
Midland Gate site should not be shown as existing residential area due to recent commercial use.	Castlepride Limited	Change proposed. Figure 3.14 has been amended to remove Midland Gate from the depicted residential area.
'Nationally listed' should be 'statutory listed'	London Borough of Ealing	Change proposed. Key for Figure 3.14 has been corrected to state Statutory Listed.
Support approach to design of the built environment to optimise wider benefits	Association for Consultancy and Engineering (ACE)	Noted.
Europa Studios should not be identified as a non-designated heritage asset.	Old Oak Park Limited	Change proposed. To reflect its current status of not being on the Local Heritage Listings, Europa Studios has been removed as a Local Heritage Listings. However, this does not prevent it from being considered as a non-designated heritage asset.

Policy should state that if loss of assets is proposed then justification is required in accordance with policy D8	Old Oak Park Limited	No change proposed. This is dealt with in Policy D8 and OPDC does not consider it appropriate to repeat this here.
Agreement that development needs to be optimised	A40 Data Centre B.V	Noted.
Agreement that proposals should provide appropriate amenity	A40 Data Centre B.V	Noted.
Refer to listed buildings in RBKC including Kensal House and Day Nursery and St Charles Hospital and Kensal Cemetery being a Grade 1 Listed Registered Park and Garden.	Royal Borough of Kensington and Chelsea	Change proposed. Kensal House and Day Nursery, St Charles Hospital have been depicted as Statutory Listed assets. Kensal Cemetery has been depicted as Grade 1 Listed Registered Park and Garden.
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.
Applicants should be aware of other proposals in development that are in proximity. Acknowledgement of this in para 3.93 would be beneficial to the built environment.	London Borough of Hammersmith and Fulham	Change proposed. Supporting text to SP9 has been amended to reflect cumulative impacts.
SP9 is sound, positively prepared and / or legally compliant.	Raymond Gill, Friary Park Preservation Group, A Somefun	Noted.
Policy is unsound (no reason given)	Sarah Abrahart	No change proposed. OPDC considers policy SP9 to be sound.
Densities are too high and exceed London Plan targets.	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. In parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG and in the Old Oak and Park Royal OAPF. The draft London Plan does not include a density matrix and requires proposals to be

		optimised through a designed approach.
Support principle of policy but design is subjective and have not been impressed with schemes granted to date	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	Noted. OPDC is committed to developing a high quality built environment. The Local Plan contains a range of detailed policies to ensure that development delivers high quality design and high standards of sustainability.
Concerns with reference to high densities and tall buildings. Heights should be under 20 storeys and densities below 350 units per hectare.	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. High quality tall buildings and high density development at appropriate locations will be a component element of the built character and environment of the OPDC area and will be supported where they accord with the relevant development plan policies. OPDC's Tall Building Statement provides information supporting this approach. Policy D5 sets out guidance for delivering high quality tall buildings with SP9 and place policies providing guidance for their locations. OPDC's Development Capacity Study sets out the methodology undertaken to define the development capacity of the OPDC area based on Local Plan supporting studies and development scheme precedents that meets London Plan homes and jobs targets.
Support approach to heritage assets and designation of the Cumberland Park Factory Conservation Area	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	Noted.
OPDC should compile a list of unregistered heritage assets for the whole area.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts,	Noted. OPDC has consulted on its proposed local heritage listings.

	Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
OPDC's Place Review Group should have representation from community members	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	OPDC's Place Review Group comprises a panel of built environment experts to provide independent advice for development proposals. A community forum has been established to inform the development management process.
Planning applications are unduly influencing policy development. This and policies DI1 and DI2 are unjustified.	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. The Local Plan has been developed based on a significant number of supporting studies to provide an evidence based approach to ensure development of Old Oak and Park Royal is plan-led. OPDC considers policies DI1 and DI2 are sound based on robust and deliverable evidence base.
Insufficient justification for tall buildings and demonstration that this will deliver lifetime neighbourhoods has been provided. The Plan does not provide enough clarity on future building heights, locations of tall buildings or definitions of tall buildings. A map of tall building locations should be provided. Indicative building heights of 40 storeys + are not justified. Density information in DCS is not reflected in the Local Plan This does not conform with London Plan policy 7.7 or NPPF para 58 and 59.	Joanna Betts, Nadia Samara, Nicholas Kasic, Francis, Marc and Caroline Sauzier, Patrick Munroe, Lily Gray, Wells House Road Residents Association, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Hammersmith Society, ArtWest, St Quintin and Woodlands Neighbourhood Forum, Nicky Guymer, Bruce Stevenson, Tom Ryland, Oonagh Heron, Mark Walker, Old Oak Interim Neighbourhood Forum, Dave Turner, TITRA, Grand Union Alliance, Midland Terrace Residents, Nye Jones	Change proposed. Further wording has been inserted into the supporting text of SP9 to clarify the average densities expected in the OPDC area based on DCS outputs to achieve homes and jobs targets. Change proposed. Policies D5 and SP9 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. Change proposed. An indicative map depicting locations where tall buildings

		<p>would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8(B) as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings, but within Old Oak North and Old Oak South there is a need for flexibility in the approach to achieving homes and jobs targets that will enable a response to site specific circumstances and the longer term development trajectory.</p> <p>No change proposed. OPDC considers policies SP9 and D5 are consistent with the requirements of NPPF paragraphs 58 and 59.</p>
Only MOL and SINCS are included in map 3.14. Other spaces should be included.	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	Change proposed. The map supporting policy SP8 has been amended to include all publicly accessible open space.
Carry out a detailed analysis of actual land available for housing supply once all the other requirements for land have been taken into account, e.g.: employment, transport (particularly roads), social infrastructure and green spaces.	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. OPDC's Development Capacity Study has taken into account the need to provide non-residential floorspace and the need for public realm and streets. The capacity figures are based on the net developable area.
Support proposals for new bridges and underpasses, which must be designed to a high standard and need to be	Brent Cyclists	No change proposed. ODPC will promote the use of high quality materials to ensure bridges and underpasses are

perceived as safe to use		well designed and therefore well used
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Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Empty homes across London should be made available before delivering high density development. Proposals are creating a two-tier society.	Anita Ringsell	No change proposed. Policy H5 seeks to work with relevant stakeholders to bring vacant residential properties back into use. Policy SP2 provides guidance to ensure the delivery of vibrant, mixed and inclusive lifetime neighbourhoods. Policy SP4 also seeks to deliver a range of housing tenures, types and sizes that deliver mixed and inclusive communities including an overarching 50% affordable housing target.
<p>A buffer zone should be provided around low rise areas and existing open space, particularly at Old Oak Common Station. Station entrances should be moved to the centre of Old Oak and tall buildings focused in Old Oak North to minimise impact on surrounding communities.</p> <p>Residential above industrial uses in Park Royal should be delivered.</p>	West Acton Residents Association	<p>No change proposed. 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.</p> <p>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 ongoing demand for industrial space. The proliferation of non SIL uses within SIL would undermine the functioning of existing</p>

		and future industrial uses. Detailed changes to the SIL boundary have been assessed in the Industrial Land Review Addendum.
Policies do not provide adequate protection of existing neighbourhoods and conservation areas. Suggested amendments relate to protecting sensitive locations, protecting amenity, high standards of amenity and addressing crime.	Nye Jones, Gail Dobinson, Rachel Riffeld, Ciara Solmi, Bernie Timmins, Thomas Dyton, Jane Dreaper, M. Szoke, James Trew, Eileen Hannington, Thomas Dyton, Marta Donaghey, Jamie Sutcliffe, TITRA, Pablo Navarrete, Jason Salkely, Elaine Gristock, David Turner, Nicky Guymmer, Pendle Harte, Wells House Road Residents Association, Oonagh Heron, Midland Terrace Residents, Grand Union Alliance, Wells House Road Residents Association	No change proposed. The Local Plan provides a range of policies to protect the amenity of existing uses, communities, deliver a safe environment and conserve and enhance heritage assets. These include policies D2, D4, D6, D8, EU5, H7, TCC9, P8 and P9 alongside London Plan policies.
Wells House Road and Midland Terrace should be conservation areas	Wells House Road Residents Association, Midland Terrace Residents	No change proposed. OPDC's Heritage Strategy undertook a comprehensive review of the historic significance of Wells House Road and Midland Terrace. This recommends that Wells House Road is identified as a Local Character Area. OPDC will be progressing heritage guidance for Wells House Road in due course. Midland Terrace is recognised as a historic residential enclave. Both are recognised as sensitive locations.
SP9 should refer to "heritage canalside warehouses"	Hammersmith Society	No change proposed. These warehouses are proposed to be identified as Buildings of Local Heritage Interest that will clarify their status as non-designated heritage assets. Non-designated heritage assets are referenced in policy SP9 and policy D8.
The OPDC area should give serious consideration to supporting cultural uses	Grand Union Alliance	Noted. Policies SP6 and TCC5 provide guidance to support the delivery of cultural uses.
Supporting text and figure 3.15 should be amended to reference Kensal Green	Royal Borough of Kensington and Chelsea	Change proposed. The key to Figure 3.15 will be amended to label Kensal

<p>Cemetery as a Grade 1 Listed Registered Park and Garden.</p> <p>A key view should be from the Round Pond in Kensington Gardens.</p>		<p>Green Cemetery Grade 1 Listed Registered Park and Garden.</p> <p>No change proposed. Para 3.73 provides reference to Kensal Green Cemetery Grade 1 Listed Registered Park and Garden.</p> <p>No change proposed. OPDC does not consider it appropriate to identify Kensington Gardens Round Pond as a viewing point as development is highly unlikely to be viewable from this location.</p>
<p>Support for Figure 3.15</p>	<p>Osbourne Investments Limited and Quattro Holdings Limited</p>	<p>Noted.</p>
<p>Boden House should be identified as a star as a location appropriate for a tall building.</p>	<p>Osbourne Investments Limited and Quattro Holdings Limited</p>	<p>No change proposed. Boden House and surrounding land is identified on Figure 3.15 as an area where tall buildings are an appropriate form of development in principle. Specific locations where tall buildings are an appropriate form of development in principle, and illustrated by a star, are those that benefit from further analysis for suitability of tall buildings and/or planning permissions for tall buildings.</p>
<p>Elizabeth Line should be removed from the area where tall buildings are an appropriate form of development as it will be delivered outside of the plan period.</p>	<p>Transport for London</p>	<p>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.</p>
<p>Social infrastructure and housing needs of migrants cannot be met. Empty homes should be brought back into use. Green belt should be built on. Inequalities will increase.</p>	<p>Anita Ringsell</p>	<p>No change proposed. OPDC's Local Plan's guidance for delivering a range of homes and social infrastructure is supported by the Strategic Housing Market Assessment and the Social Infrastructure Needs Study. Policy H5 sets out guidance for bringing empty homes</p>

		back into use. It is not the role of the Local Plan to provide guidance for development on Green Belt. The Local Plan's Integrated Impact Assessment includes an Equalities Impact Assessment which identifies benefits from the development.
Delivery of Hythe Road London Overground Station is not confirmed. Therefore, the increase in PTAL generated by the station cannot be used to justify high densities (and resultant building heights) in Old Oak North	The Hammersmith Society, Old Oak Neighbourhood Forum	No change proposed. Development capacities and densities for Old Oak North are informed by a range of elements including existing and planned transport capacity. This includes improvements to existing stations and proposed new stations such as Old Oak Common Station and Hythe Road Station. The Public Transport Accessibility Levels generated by Old Oak Common Station, improvements to Willesden Junction Station and existing/planned bus routes supports the development capacity identified for Old Oak North without solely relying on improved public transport access generated by Hythe Road Station. The policy supports the delivery of the highest public transport levels to support density of development.
Supporting text should reinstate wording: "Any proposal for a tall building would need to accord with the requirements of OPDC's tall buildings policy (PolicyD5). Proposals would also need to assess their impact on key views identified in OPDC's Views Study, as required by Policy D7 (Key Views)"	The Friends of Wormwood Scrubs	No change proposed. The National Planning Practice Guidance states that Local Plans should avoid undue repetition. It is considered that repeating the requirements of policies D5 and D7 would result in unwarranted repetition.
Support for the definition of proposed location of tall buildings.	Canal & River Trust	Noted.
Tall Buildings Statement is	Midland Terrace Residents,	No change proposed. The

<p>inadequate, based on future PTAL assumptions and does not provide information for anticipated building heights. The Draft New London Plan will unlikely be adopted before the OPDC Local Plan examination. Therefore the Local Plan's approach to tall buildings should be assessed against existing London Plan policies.</p> <p>Query the approach to not identifying general tall building heights.</p> <p>Information used to define tall buildings does not include density information and does not include height information for tower elements of precedents.</p>	<p>St. Quintin and Woodlands Neighbourhood Forum</p>	<p>methodology for defining a tall building within the OPDC area is set out in OPDC's Tall Building Statement. This meets the requirements of Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. This is based on a review of Local Plan supporting studies, precedent schemes and OPDC permitted schemes. This review defines an average range of shoulder heights appropriate for the OPDC area of 8 to 12 storeys. The Draft New London Plan requires tall building definitions to relate to the evolving context. To recognise the evolving context of Old Oak and Park Royal as a high density area a range is considered to be appropriate to inform the tall building definition. The definition also makes an assumption to address site specific circumstances before reaching a height to be defined as a tall building. Site specific circumstances may include a site with a complex geometry or the need to respond to in-situ retained existing infrastructure. Buildings heights are provided in place policies where these are supported by evidence base. OPDC considers the evidence based and pragmatic approach informed by Local Plan supporting studies, precedents, permitted schemes and an assumption to recognise the area's evolving context to be justified and appropriate for the role of a Local Plan. It is in general conformity with the existing and Draft New London Plan.</p>
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		<p>No change proposed. Identifying general heights of tall buildings is not considered to be appropriate at this time. This is due to the evolving context of the OPDC area as an Opportunity Area and recognising the area-specific complex circumstances in planning and delivering priorities for affordable housing, commercial uses, local and nationally significant infrastructure, new street networks, high standards of sustainability, securing deliverability of development and addressing multifaceted challenges. However, where appropriate within the Local Plan place policies, general shoulder and/or podium heights are defined based on recommendations by supporting studies. As further supporting studies are developed and challenges are resolved, OPDC will provide guidance for general heights of tall buildings in future versions of the Local Plan and in forthcoming Supplementary Planning Documents. As further supporting studies are developed and challenges are resolved, OPDC will provide guidance for general heights of tall buildings in future versions of the Local Plan and in forthcoming Supplementary Planning Documents.</p> <p>No change proposed. Density information for this information is set out in OPDC's Development Capacity Study. The approach to defining a tall building within the OPDC area is based on heights</p>
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		above a range of shoulder and/or podium heights. As such the height of tower elements of precedents was not considered to be required for the purpose of establishing a definition of tall buildings.
Tall buildings are not justified, particularly with regard to the impact of tall buildings on surrounding communities.	Thomas Dyton, Wells House Road Residents Association, Anita Ringsell	No change proposed. High quality tall buildings and high density development at appropriate locations will be a component element of the built character and environment of the OPDC area and will be supported where they accord with the relevant development plan policies. OPDC's Tall Building Statement provides information supporting this approach. Policy D5 sets out guidance for delivering high quality tall buildings with SP9 and place policies providing guidance for their locations. Policies D6 and P8 provide guidance to ensure new development does not cause unacceptable harm to the amenity of existing uses.
Tall buildings should be located in Old Oak North to decrease impact on existing communities	Thomas Dyton, Wells House Road Residents Association	No change proposed. 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.
Definition of a tall building should consider a contextual and characterisation approach, as advocated by Draft New London Plan Policy D8. This also reflects Historic England's response to the Draft New London	Historic England	No change proposed. The methodology has considered the local context and character by considering the recommendations of supporting studies which respond to the local context. Draft New London Plan

Plan.		paragraph 3.8.2 also requires that in large areas of extensive change, such as Opportunity Areas, definitions of tall buildings should relate to the evolving context. This requirement has been used in the Tall Building Statement methodology for defining the height of a tall building in the OPDC area.
The delivery of a new built form typology for high density development with towers has not been acknowledged.	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	No change proposed. The Old Oak North Development Framework Principles supporting study recognises the delivery of a new typology and illustrates this with an indicative massing of a development proposal in Old Oak North. This level of detail is considered appropriate for inclusion in the forthcoming Old Oak North and Scrubs Lane Supplementary Planning Document.
Figure 3.15 should mark all specific locations where tall buildings would be acceptable, including Oaklands.	London Borough of Hammersmith and Fulham	No change proposed. Figure 3.15 identifies all areas and specific locations where tall buildings would be an appropriate form of development in principle based on the methodology set out in the Tall Buildings Statement. Oaklands is located within an area where tall buildings would be an appropriate form of development in principle.
SP9 should set out further detailed guidance for assessing the benefits of appropriateness of tall buildings. SP9 b) should include: "Tall buildings need to be assessed on their own merits to avoid harm and protect and enhance identified sensitive locations and accord with all other relevant policies within OPDC's Local Plan."	Grand Union Alliance	No change proposed. Other policies in the London Plan and Local Plan provide this guidance. Relevant Local Plan policies include D4, D5, D6 and D8 and place policies.
The proposed green space	Thomas Dyton, Wells House	No change proposed. OPDC

<p>between Wells House Road and Old Oak Common Station by HS2 should be delivered.</p>	<p>Road Residents Association</p>	<p>considers that this is an important development site to optimise development capacity around the station. Development on this site is supported by HS2 Ltd, subject to it not conflicting with the effective operation of the station.</p>
<p>OPDC does not have a commitment to design quality.</p>	<p>Thomas Dyton, Wells House Road Residents Association</p>	<p>No change proposed. OPDC is committed to developing a high quality built environment. The Local Plan contains a range of detailed policies to ensure that development delivers high quality design and high standards of sustainability. These include SP2, SP9, D1, D2, D4 and D5.</p>
<p>Para 3.71 is unclear and should read “High design quality is sought for a broad range of building typologies, and can be subjective.....”</p>	<p>London Borough of Hammersmith and Fulham</p>	<p>No change proposed. OPDC considers the existing text to be sufficiently clear.</p>
<p>Design quality of North Acton's recent development is of poor quality. OPDC must take responsibility of North Acton.</p>	<p>Old Oak Neighbourhood Forum</p>	<p>Noted. OPDC has a scheme of delegation with the London Borough of Ealing. All planning applications will be determined by LB Ealing using OPDC's Local Plan. Local Plan policies SP2, SP9, D2 and P7 provide guidance to delivery new high quality public realm and improve the existing public realm of North Acton.</p>
<p>Figure 3.15 shows locations previously identified as sensitive locations as being locations appropriate for tall buildings in principle.</p>	<p>Grand Union Alliance</p>	<p>No change proposed. Figure 3.15 was amended from the first Regulation 19 Local Plan to remove proposed Locally Listed assets reflecting their proposed status. Should these be adopted by OPDC prior to the Independent Examination, their depiction in Figure 3.15 will be proposed as a minor modification. Subject to the Planning Inspector's decision, these assets will be shown alongside the areas and specific locations where tall buildings are an</p>

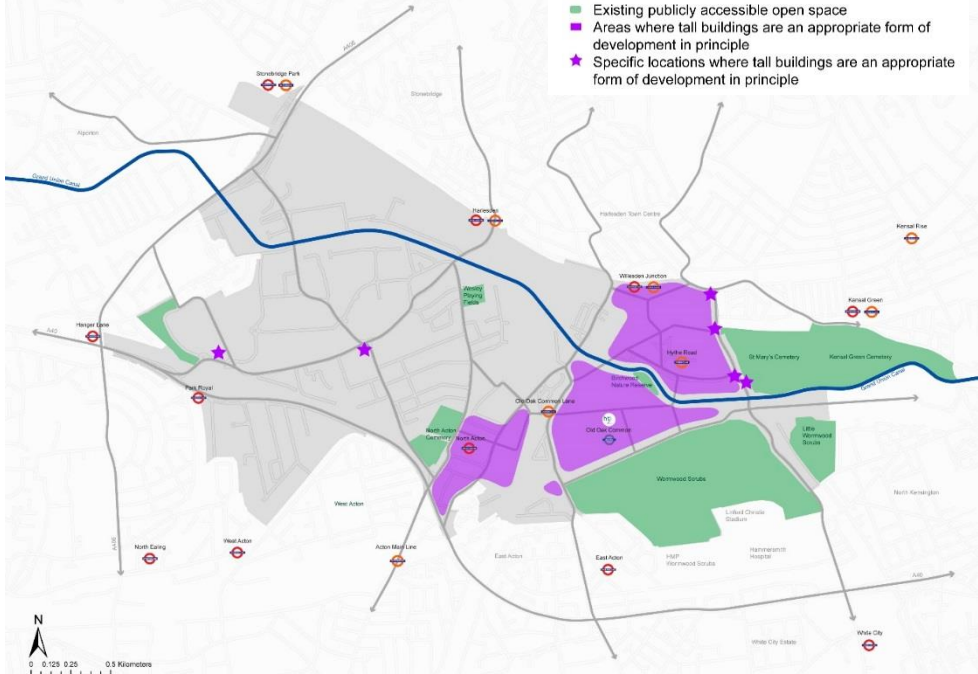
		<p>appropriate form of development in principle. These will be managed by Local Plan Policy D8 and other relevant material considerations.</p>
<p>The Local Plan lacks of clear and transparent information for building heights.</p>	<p>Thomas Dyton, Wells House Road Residents Association, Stephanie Hewett, Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum, Gail Dobinson, Rachel Ritfeld, Ciara Solmi, Bernie Timmins, Jane Dreaper, M. Szoke, James Trew, Eileen Hannington, Marta Donaghey, Jamie Sutcliffe, TITRA, Pablo Navarrete, Jason Salkely, David Turner, Nicky Guymer, Nye Jones, Natasha Salkey, Elaine Gristock, Mark Walker, St. Quintin and Woodlands Neighbourhood Forum, The Hammersmith Society</p>	<p>No change proposed. The definition of a tall building for the OPDC area is defined in Policies SP9, D5, the Local Plan glossary and the Tall Buildings Statement supporting study. This is based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. Building height ranges, where appropriate, have been added to the place policies. Building height ranges are only specified where there is a need for more specific policy guidance and where OPDC has undertaken more detailed design work to support such a policy. It is not considered appropriate to set height ranges on a place-wide basis as in many parts of the area, flexibility is required to reflect the evolving context, site specific requirements and the longer term phasing of development. OPDC considers this level of detail for building heights to be appropriate for the role of a Local Plan and to be consistent with the NPPF's (2012) requirement for clarity. It is also in general conformity with the existing and Draft New London Plan.</p> <p>Buildings heights are</p>

		provided in place policies where these are supported by evidence base.
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Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Character Areas Study	<ul style="list-style-type: none"> • Elements are identified for each character area which should be retained or responded to as part of any future development. • A level of potential impact on character is identified for each character area, taking into account the value of existing character and potential impact from future development. • For areas within the OPDC area, character issues to address through future policy interventions or development are identified.
Heritage Strategy	<p>Outlines a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:</p> <ul style="list-style-type: none"> • 5 broad historic themes: <ul style="list-style-type: none"> ○ Grand Union Canal; ○ Rail heritage; ○ Industrial heritage; ○ Residential enclaves; and ○ Scrubland and open space. • a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets. • heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.
Environmental Modelling Framework Study	<ul style="list-style-type: none"> • There are no existing definitive standards. The nature and density of development will place big challenges on the quality of the environment including access to daylight and sunlight and changes to the micro climate and wind regime. The tools that are used have been developed for much less dense and tall development. • New parametric modelling should therefore be adopted to test outline development proposals and detailed planning applications to ensure that they meet minimum standards. • New standards should be adopted but this should be done with caution and as development comes forward assessments during the design phase and then in occupation should be undertaken to hone these standards.
Environmental Standards Study	<ul style="list-style-type: none"> • High density development poses significant challenges to the quality of development in Old Oak and Park Royal. The adoption of short, medium and long term targets should inform all development and applied rigorously or the overall quality of the development and its impact on London could be significant.
Precedents Study	<ul style="list-style-type: none"> • Lessons learnt from Hudson Yards, Aldgate Place, Highgate Shoreditch Hotel, The Shard and London Bridge Redevelopment and 30 St Mary Axe (Gherkin) on how to deliver high quality tall buildings in

<p>Tall Buildings Statement</p>	<p>high density developments.</p> <ul style="list-style-type: none"> • Within the OPDC area, a tall building is defined as being above 15 storeys or a minimum of 48 metres above ground level. • Tall buildings are considered to be appropriate in principle in the areas depicted in the image below:  <ul style="list-style-type: none"> • The definition and locations of tall buildings as an appropriate form of development in principle have been defined in accordance with Draft New London Plan policy D8.
<p>Views Study</p>	<ul style="list-style-type: none"> • Panoramic Views: It will be possible to identify clusters of taller development and individual tall buildings as part of a wider skyline. • Proposes guidelines for the Wormwood Scrubs Character Area to test any proposals for tall buildings in its views and carry out a landscape and visual impact analysis.
<p>Old Oak North Development Framework Principles</p>	<ul style="list-style-type: none"> • Average shoulder and/or podium height of 8 to 12 storeys above ground level with tall buildings above 15 storeys. • 6 to 8 storeys fronting on to Grand Union Canal. • Tall buildings are appropriate at locations of activity.
<p>Park Royal Development Framework Principles</p>	<ul style="list-style-type: none"> • Average shoulder and/or podium height of 6 to 8 storeys. • A tall building is appropriate within Park Royal Centre on the north east corner of the ASDA site.
<p>Scrubs Lane Development Framework Principles</p>	<ul style="list-style-type: none"> • Average shoulder and/or podium height of 6 to 10 storeys. • Lower heights adjacent to Cumberland Park Factory Conservation Area. • 6 to 8 storeys fronting on to Grand Union Canal. • A single tall building is appropriate within each of the four clusters.
<p>Victoria Road and Old Oak Lane Development Framework Principles</p>	<ul style="list-style-type: none"> • Average shoulder and/or podium height of 8 to 12 storeys. • Lower heights adjacent to sensitive locations. • Tall buildings are appropriate across North Acton and in locations along Old Oak Street within Acton Wells.

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

SP10: Integrated Delivery

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	<p>Planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.</p>
31	<p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development.</p>
41	<p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.</p>
47	<p>Local planning authorities should identify key sites which are critical to the delivery of the housing strategy over the plan period.</p>
156	<p>Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:</p> <ul style="list-style-type: none"> • the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); • the provision of health, security, community and cultural infrastructure and other local facilities;
162	<p>Local planning authorities should work with other authorities and providers to:</p> <ul style="list-style-type: none"> • assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and • take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.
177	<p>It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is</p>

	important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan.
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National Planning Practice Guidance (NPPG)

Design

Policy / paragraph reference	Policy and paragraph text
013	Ensuring a place is durable and adaptable will help make it less resource hungry over time. For example the layout of infrastructure servicing development (including water supply, sewerage, drainage, gas, electricity, cable, telephone, roads, footpaths, cycle ways and parks) should take account of foreseeable changes in demand to reduce the need for expensive future changes.

Local Plans

Policy / paragraph reference	Policy and paragraph text
018	<p>A Local Plan is an opportunity for the local planning authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when (including in relation to infrastructure). This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements of the plan as a whole will not prejudice the viability of development.</p> <p>The Local Plan should make clear, for at least the first 5 years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development. This may help in reviewing the plan and in development management decisions. For the later stages of the plan period less detail may be provided as the position regarding the provision of infrastructure is likely to be less certain. If it is known that a development is unlikely to come forward until after the plan period due, for example, to uncertainty over deliverability of key infrastructure, then this should be clearly stated in the draft plan.</p>

Development capacity

Policy / paragraph reference	Policy and paragraph text
https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment	Housing and economic land availability assessment

London Plan (2016)

Policy / paragraph reference	Policy and paragraph text
2.16	A The Mayor will, and boroughs and other stakeholders should, identify, develop and promote strategic development centres in outer London or adjacent parts of inner London with one or more strategic economic functions of greater than sub-regional importance (see para 2.77) by: <ul style="list-style-type: none"> a) co-ordinating public and private infrastructure investment
8.1	A The Mayor will work collaboratively to deliver a positive approach to enabling new development in London, optimising land use and promoting/enabling locations for strategic development. C The Mayor will work with boroughs, infrastructure providers, national government, regulators and others involved in infrastructure planning, funding and implementation to ensure the effective development and delivery of the infrastructure needed to support the sustainable management of growth in London and maintain its status as a world city in accordance with the vision and objectives set in Policy 1.1 .

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
GG2	To create high-density, mixed-use places that make the best use of land, those involved in planning and development must: <ul style="list-style-type: none"> A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites. B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach. C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character. D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening. E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth. F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.
DF1	Delivery of the Plan and Planning Obligations <ul style="list-style-type: none"> A Applicants should take account of Development Plan policies when developing proposals and acquiring land. It is expected that viability

	<p>testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery.</p> <p>B If an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application.</p> <p>C Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations. Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG.</p> <p>D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this:</p> <ol style="list-style-type: none"> 1) Recognise the role large sites can play in delivering necessary health and education infrastructure; and 2) Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth. <p>E Boroughs are also encouraged to take account of part D in developing their Community Infrastructure Levy Charging Schedule and Regulation 123 list.</p>
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Supplementary Planning Guidance (SPG)

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
Principle DL1	<p>Proposals must:</p> <ol style="list-style-type: none"> a. Ensure a comprehensive approach to the regeneration of the area, development that restricts the ability to secure the comprehensive regeneration of the area will not be supported; b. Demonstrate joined up working between key stakeholders such as the public and private sector landowners, local authorities, statutory undertakers and infrastructure providers and adjacent landowners and developers; c. Optimise development and accelerate delivery of public sector assets by ensuring that public sector landowners are joined up and have an aligned strategy; and d. Kick start regeneration in advance of the planned Old Oak Common station in 2026;
Principle DL2	Proposals should provide the necessary infrastructure to support the needs of development.

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph	Policy and paragraph text

reference	
	No alternative policy options were considered.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
<p>Infrastructure Delivery: Concern raised over various aspects of infrastructure delivery, including education - with the Boroughs concerned regarding the ability of the existing schools capacity to expand; and health – the need to be flexible with this.</p>	<p>Old Oak Park (DP9), HUDU, Hammersmith and Fulham Council, Grand Union Alliance, Brent Council, 3 local residents</p>	<p>Change proposed. Further work on education provision has been undertaken as part of OPDC's Education and Health Needs Study. This identifies that there are schools that can be expanded off-site to meet the needs of early phases of development. The revised Local Plan also now clearly identifies the needs for on-site provision. The supporting text to Policy TCC4 recognises that this need is based on current population projections based on tenure, mix and capacity assumptions and that this need might flex over time and needs to be carefully monitored and that there therefore needs to be a degree of flexibility in the approach taken to social infrastructure provision.</p>
<p>Infrastructure Prioritisation: Various opinions expressed regarding what infrastructure should be prioritised.</p> <p>Consensus that education and health in particular are important for social infrastructure. Improvements to Willesden Junction Station also got particular mention.</p>	<p>Brent Council, Diocese of London, 15 local residents</p>	<p>Change proposed. Education and health needs have been informed by OPDC's Education and Health Study. Needs are contingent on the speed of delivery and type of housing (tenure, size, quantum), but the Infrastructure Delivery Plan (IDP) identifies likely dates that facilities need to be delivered or expanded. On-site requirements have had sites allocated and these are referenced in Policy TCC4</p>

		and in the relevant place policies.
<p>Infrastructure costs and funding gap: Some concern were expressed regarding the level of funding gap, how this would be covered and the impact this could have on the delivery of Affordable Housing.</p>	<p>Grand Union Alliance, Hammersmith and Fulham Disability Forum, Old Oak Park (DP9)</p>	<p>Change proposed. The revised Local Plan sets out further detail in the Delivery and Implementation chapter on the strategies that OPDC will employ to support the timely regeneration of the area and secure the necessary infrastructure to support the needs of the new population. OPDC's Local Plan is supported by an Affordable Housing Viability Assessment and Whole Plan Viability Assessment, which has assessed the viability of affordable housing delivery to inform OPDC's affordable housing policy. The Delivery and Implementation chapter recognises that a balance will have to be struck between the requirements of the Local Plan and the priorities to deliver affordable housing, sustainability standards and infrastructure.</p>
<p>Table 16: Infrastructure requirements additional items: Requests were made to add items to Table 16:</p> <ul style="list-style-type: none"> - Mitre Road Bridge; - Additional capacity on North and West London Lines; - Infrastructure to support operation of the Grand Union Canal; - Public realm enhancements; - Cycling facilities; - Items from Park Royal Transport Strategy; - Soil treatment; - Link to Kensal canalside; - Future of Grand Union Canal sub surface 132kV cables; and - Waste disposal facilities. 	<p>GLA, TfL, Hammersmith and Fulham Council, Brent Council, The Hammersmith Society and 2 local residents</p>	<p>Change proposed. OPDC's evidence base has been significantly updated between the Regulation 18 and Regulation 19 versions of the Local Plan. The Regulation 19 Plan includes a longer list of infrastructure requirements, informed by this evidence. Suggested infrastructure items were considered as part of this evidence. OPDC's Infrastructure Delivery Plan (IDP) supports the Local Plan and sets out the required infrastructure to support development in the area.</p>
	<p>Old Oak Park (DP9), Canary</p>	<p>Change proposed. The</p>

<p>Phasing of development and infrastructure: A range of respondents commented on the phasing of development across the area. Several private landowners expressed a desire to bring their sites forward sooner than set out within the Local Plan.</p> <p>Members of the public were more concerned that the planning for the longer term phases was occurring too soon and that the infrastructure was not in place to support the amount of development that was occurring in earlier phases. Conversely developers claimed that infrastructure was being front-loaded and that this was not required.</p>	<p>Wharf PLC, Brent Council, Montagu Evans (for a private land owner, Quod (for a private land owner)</p>	<p>phasing diagrams and Development Capacity Study have been updated to take on board comments from stakeholders. Policy SP10 supports development being brought forward in advance of the phasing identified.</p> <p>The Local Plan is supported by an Infrastructure Delivery Plan (IDP) which identifies what infrastructure is needed, when and sources of funding/financing.</p> <p>Further work has been undertaken across a number of studies to identify infrastructure requirements and the phasing of infrastructure to support the delivery of homes and jobs and this has been included in the IDP.</p>
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Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Service providers should be party to all funding and delivery mechanisms.	Hammersmith and Fulham Council	Noted.
Figure should be amended to remove Lakeside Drive as a 0-5 year development site, but include the open space on Twyford Abbey Road	Diageo Plc	No change proposed. Officers do not propose to designate open space at Twyford Abbey Road as a development site and land at Lakeside Drive as an open space. Figure 3.16 therefore does not require amending on this basis.
Support the principle of bringing forward development in advance of the phasing identified in Figure 3.16	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Noted.
Welcome the positively planned approach to physical and social infrastructure	Mayor of London	Noted
Welcome recognition in SP10 that developers should contribute 'appropriately and proportionately to	Old Oak Park Ltd	Noted.

infrastructure.		
It should also be recognised that the equalisation mechanism would be applied between early sites that come forward ahead of new infrastructure yet rely on it, and later developments which provide the infrastructure.	Old Oak Park Ltd	Change proposed. Further wording has been inserted to clarify the workings of the equitable equalisation mechanism, including that it would apply to early sites coming forward in advance on on-site infrastructure, the sites delivering the infrastructure and later sites contributing towards that infrastructure through a retrospective pooling contribution.
Support Policy SP10	Healthy Urban Development Unit, Environment Agency, Hammersmith and Fulham Council, Friary Park Preservation Group, Hammersmith Society, Education and Skills Funding Agency, 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.
Support para 3.105 and will seek to support OPDC to ensure development contributions are sought for specific and wider infrastructure needs.	Hammersmith and Fulham Council	Noted.
Support requirement for an Infrastructure Delivery Strategy, but reference should be made to service providers being involved in discussions in para 3.109	Hammersmith and Fulham Council	Change proposed. Text has been added to the paragraph to require developers to hold early discussions with infrastructure service providers.
Supports joint working to manage impacts on amenity and on the highway network	Hammersmith and Fulham Council	Noted.
The policy is not effective as delivering development as early as possible will not realise wider benefits and support sustainable development.	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,	No change proposed. The policy is considered effective. Delivering development early will help meet the need for homes, jobs and services in the area and also help to meet more strategic needs. Policies across the plan

	Lynette Hollender, Jeremy Aspinall, Thomas Dyton	require that impacts of development are appropriately mitigated. This includes securing the necessary infrastructure to support development (SP10 and DI2), mitigating impacts during construction (SP10 and T8) and applying the agent of change principle when considering issues such as noise and vibration (EU5).
When considering infrastructure, need to factor that there will be demands arising from other growth outside of the OPDC area	West London Line Group	Noted. In accordance with the Duty to Cooperate, OPDC has been in discussions with other local authorities and public bodies to understand whether needs outside of OPDC's area are also required to met through planning policy and where necessary and appropriate, these requirements have been addressed in the Local Plan.
Twyford Tip site should be identified as being deliverable within 0-5 years in the phasing diagram	Ashia Centur Limited	No change proposed. OPDC has undertaken a study looking at the viability of delivery of development options on the Twyford Tip site. This has shown that the site is not likely to be viable to be delivered for development, given its significant contamination. OPDC therefore does not consider the site to be deliverable within the next 5 years.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Consideration needs to be given to providing infrastructure to support tall buildings.	Anita Ringsell	No change proposed. The requirement for the provision of infrastructure at a rate and scale sufficient to support all development is set out in Policy SP10.
Welcome the clarification provided in relation to the	Old Oak Park Limited	Noted.

way in which the equalization mechanism for infrastructure will operate.		
Welcome that Local Plan has been amended to reflect that no housing units or commercial floor space could be delivered at the Elizabeth Line Depot within the plan period but should be identified for delivery in the longer term beyond the plan period.	Transport for London	Noted.
The EMR site is capable of greater and earlier delivery of new homes and other development than is suggested.	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. Housing capacity of site allocations are defined as minimums within table 3.1. SP10 supports the early delivery of development.
Recommend that OPDC revises its proposals for Victoria and Westway industrial estate.	SEGRO	No change proposed. Housing capacity of site allocations are defined as minimums within table 3.1.
Support the introduction of site allocations in Park Royal.	SEGRO	Noted.
This draft Local Plan provides numerical site allocations which are or may not be sound estimations of optimum capacity and phasing and no justification is given for the revisions. There is no qualitative guidance on place ambitions and proposals. The policy wording, stated vision, and adjoining spatial key diagrams are inconsistent and whole Plan is unsound.	Grand Union Alliance	No change proposed. The Second Regulation 19 Revised Draft Local Plan tracked change version provides an overview of the specific and first Regulation 19 consultation amendments. The amendment relating to the whole of table 3.1 makes reference to the updated capacity and phasing being based on the updated Development Capacity Study. The Development Capacity Study has been developed in accordance with the National Planning Practice Guidance on Housing and Economic Land Availability Assessments. The Development Capacity Study includes development capacity information set out in the Old Oak North Development Framework Principles, Park Royal Development Framework Principles, the Industrial Land Review, Future

		<p>Employment Growth Sectors Study, Scrubs Lane Development Framework Principles document and the Victoria Road and Old Oak Lane Framework Principles document. It also includes updated development management information.</p> <p>No change proposed. OPDC considers the Local Plan to be sound. The content of the Local Plan has been developed to be consistent between each policy regardless of location or spatial scale.</p> <p>No change proposed. Qualitative guidance for each place appropriate to the role of a Local Plan, including areas of the major town centre, is provided within the Place Policies.</p>
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Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	<ul style="list-style-type: none"> • Within the plan period, the OPDC area has capacity to deliver 20,100 new homes and space for 40,400 new jobs.
Development Infrastructure Funding Study	<ul style="list-style-type: none"> • Planning policy and strategy must remain flexible enough to cope with changing market and economic conditions – for example, perhaps by delivering lower levels of affordable housing in the early phases in order to pump-prime infrastructure delivery with increased levels of funding. • A very practically orientated project delivery ‘roadmap’ needs to be written which would identify tasks on the critical path, set dates for those issues to be resolved, and clarify delivery roles and responsibilities; focus head-on on how any problems will be resolved; and define issues in time sequence, which would allow the focusing of resources on short term issues and a process of active planning for medium term issues. This would also help the political process by clarifying decisions that need to be taken, when they need to be taken, and what the ramifications of choices are.
Infrastructure Delivery Plan	<ul style="list-style-type: none"> • Deliver a range of new and enhanced transport, green, utilities and social infrastructure within, and where appropriate outside,

	<p>the OPDC area to meet demands of the development.</p> <ul style="list-style-type: none"> • The IDP will be used by the OPDC to assist in the delivery of projects and assist in identifying and negotiating appropriate Section 106 contributions from developers and for the prioritisation of the use of other monies received as developer contributions e.g. Community Infrastructure Levy (CIL) by OPDC.
Social Infrastructure Needs Study	<ul style="list-style-type: none"> • 1 primary school • 1 secondary school • 1 health hub • Expansions to Central Middlesex Hospital and Hammersmith Hospital • 4 supernurseries • 2 community hubs • 2 sports centres
Utilities Study	<ul style="list-style-type: none"> • The pace, timing and location of specific plots that are released for development, in addition to their intended mix, ownership and decision-making responsibility, creates a complex challenge for the overall configuration of essential enabling infrastructure, energy assets and utility systems. There is a progressive opportunity, which should be reviewed cyclically, to establish core assets and to optimise systems in order to deliver: <ul style="list-style-type: none"> • Resource efficiencies • Cost efficiencies (reducing the capital outlay for new infrastructure assets) • Innovation and technology advancement (delivering an international exemplar of smart enabled development)

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	None

Other evidence base

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