

OPDC
OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION

Submission Proposed Minor Modifications

LOCAL PLAN SUBMISSION DOCUMENT

October 2018



MAYOR OF LONDON

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Role of this document

This document sets out the minor modifications made to OPDC's Second Regulation 19 Revised Draft Local Plan (June 2018). There are no proposed main modifications to OPDC's Second Regulation 19 Revised Draft Local Plan.

How to use this document

Minor modifications are shown as [red](#) tracked-changes and [green](#) tracked-changes to the Second Regulation 19 Local Plan tracked-change version (June 2018). [Red](#) tracked-changes result from the Second Regulation 19 consultation. [Green](#) tracked changes result from discussions with stakeholders following the close of the Second Regulation 19 consultation.

These changes may amend previous tracked changes to the First Regulation 19 Local Plan. Where this occurs, these previous tracked-changes are shown in [blue](#). The black text is that of the original First Regulation 19 Local Plan (June 2017).

The modification reference number is the same as the issue summary and response reference provided in the Statement of Consultation. Where 'General' is included in the reference number, these are modifications not carried out in response to consultation comments.

All chapters

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/2/G28 & MINOR/2/SV6	All relevant	All references to Hythe Road Station and Old Oak Common Lane Stations within text and images will be referred to as being potential.	To reflect current status of proposals.

Introduction

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/General1	Paragraph 1.23 (new)	<u>Figures in the Local plan should be treated as indicative. The exact boundaries for spatially specific policies are set out in OPDC's Policies Map.</u>	To provide clarity on status of figures within the main body of the Local Plan. This text is currently provided in the Local Plan appendix.

Spatial Vision

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/2/SV2	Figure 2.1	Alongside a protected and strengthened Park Royal, the area has the capacity to deliver a minimum of 71,600-7,600-40,400 <u>new jobs of which a minimum 64,200 could be delivered in over</u> the next 20 years of this Local Plan.	To correct a factual error.

Strategic Policies

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/2/SP 2/11	SP2 Paragraph 3.7	Requirements are set out in- OPDC has produced an Environmental Standards Study, that has assessed other regeneration projects to help develop a series of environmental standards, which have been embedded throughout the Local Plan's policies. the Environment and Utilities chapter, providing locally specific policies that build on policies and standards in the Mayor's London Plan and London Environment Strategy, and the principle of environmental net gain as set out in the government's 25 Year Environment Plan.	To demonstrate consistency with national guidance.
MINOR/2/SP 6/4	SP6 Figure 3.8	Amendment to figure 3.8 to show Wormwood Scrubs Street within the Old Oak South place and not within Wormwood Scrubs.	To clarify the location of Wormwood Scrubs Street.

MINOR/2/SP 2/2	SP7, paragraph 3.45	The ambition is to create a state of the art transport network that <u>implements the transport principles of Good Growth</u> and increases the area's public transport accessibility level to enable an optimised approach to development that can help support the economic sustainability of the UK, London and the local economy. There is an opportunity to deliver a transport network that achieves exemplar standards of <u>environmental</u> sustainability and enables people to live active and healthy lifestyles <u>and deliver on the Mayor's mode share target for over 80% of journeys in London to be made by walking, cycling or public transport.</u>	To ensure the role of transport in delivering Good Growth is recognised.
MINOR/2/SP 7/7	SP7, paragraph 3.50	The Healthy Streets Approach will be championed to ensure that where people do need to travel, they choose healthy, environmentally friendly ways to do so <u>(see Policy T1)</u> . This should be achieved by delivering a high quality, attractive, accessible and inclusive public realm that not only provides people with the choice to walk and cycle but that actively incentivises these more sustainable types of movement , through the quality of the environment and supporting infrastructure <u>(see Policy D2)</u> . <u>OPDC's 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 this infrastructure and the resultant benefits for the area and communities.</u>	To clarify the need for securing new and enhanced public transport infrastructure.
MINOR/2/SP 7/7	Figure 3.9: OPDC's Sustainable Transport Hierarchy	Amend figure as follows: Merge Pedestrians and Cyclists into a single box.	To further align with the Mayor's Transport Strategy.
MINOR/2/SP 7/11	SP7, paragraph 3.46	<u>The transport enhancements in Old Oak should seek to need to enable the area to achieve a minimum PTAL of 6b to support an optimised approach to development (see policies P1 and P2).</u>	To clarify the implementation of the policy.
MINOR/2/SP 7/14	SP7(e)(iv)	new and enhanced pedestrian and cycle connections <u>into</u> Wormwood Scrubs	To align with Policy P12.
MINOR/ General2	Figure 3.15: Sensitive Locations	Amend figure title as follows: Figure 3.15: Sensitive <u>Locations and locations appropriate for tall buildings in principle.</u>	To provide a correct title for figure 3.15.
MINOR/2/SP 9/7	Figure 3.15: Sensitive Locations	Amend key as follows: Kensal Green Cemetery <u>Grade 1 Listed</u> Registered Park and Garden	To provide correct reference for Kensal Green Cemetery Grade 1 Listed Registered Park and Garden.
MINOR/2/P1 1/1	Figure 3.16	Amend Figure 3.16 to show 21+ years shading to the west of Willesden Junction Station.	To reflect potential long-term development capacity.

MINOR General 3	Table 3.1: Site allocations	Replace minimum commercial or industrial floorspace over the plan period for Cargiant currently identified as 2,650 with 48,800.	To correct an error and align with the Development Capacity Study.
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Places

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/ General4	SP7 to SP10	Correct paragraph numbering of supporting text to policies SP7 to SP10 within the tracked change version of the Local Plan.	To correct a formatting error.
MINOR/2/P2/3	P2, OON.6	<u>The OONDFP identifies that to optimise development capacity, support the vibrancy of Old Oak major town centre and deliver high quality connected mixed use neighbourhoods, the West London Line should be delivered on a raised viaduct and the remaining embankment slopes should be reduced or where feasible, removed to increase the availability of land for development, public realm and publicly accessible open space.</u>	To recognise the potential of the potential Hythe Road Station to be beneficial to the vibrancy of Old Oak major town centre.
MINOR/2/P2/5	P2, Figure 4.7	<u>Figure amendment: walking and cycling route north of Park Road will be labelled as Old Oak Street.</u>	To ensure figure 4.7 reflects information provided in the supporting text to Policy P1.
MINOR/ 2/SP7/11	P2, paragraph OON.12	<u>Development will need to should seek to achieve a minimum PTAL of 6b, including through improved access to Willesden Junction and Old Oak Common stations, high quality walking, cycling connections and a new bus network.</u>	To clarify the implementation of the policy.
MINOR/ 2/P3/3	P3, Vision	<u>Moorings, open spaces and canalside activities will support its role as a community asset and lively leisure and recreation destination.</u>	To reflect the role of the canal within the community.
MINOR/ 2/P7/8	P7 (l)(ii)	within Acton Wells East, generally 10 to 12 storeys along Victoria Road <u>north of Old Oak Street;</u>	To ensure consistency with figure 3.15 showing where tall buildings are an appropriate form in principle and better reflect recommendations of the Victoria Road and Old Oak Lane Development Framework Principles.
MINOR/ 2/P7C1/2	P7C1, paragraph NAT.4	<u>Proposals will should contribute to the delivery of a new square, or alternative public realm layout, to the north of North Action Station.</u>	To ensure the design of public realm responds to future detailed design of improvements to North Acton Station.
MINOR/ 2/P7/12	P7, paragraph NA.18	<u>Development proposals within Acton Wells should safeguard land to enable the potential delivery of the West London Orbital Line, which may include an interchange with Old Oak Common Lane Station and passenger services running on the existing Dudding Hill Line. TfL is currently undertaking work with stakeholders to further develop the proposal, including reviewing the feasibility of the scheme and updating the business case.</u>	To provide the most up to date information regarding the proposed West London Orbital Line at time of writing.

MINOR/ 2/P7C2/6	P7C2, paragraph OCL.3	By clustering active town centre and employment uses around the station square, <u>or alternative public realm layout</u> , the activation of this space will assist in local legibility and access to the station.	To ensure the design of public realm responds to any future detailed design of Willesden Junction Station.
MINOR/ 2/P7C2/7	P7C2 (b)(ii) & (d)	is integrated with <u>a potential new</u> Old Oak Common Lane Station; <u>Supporting the delivery</u> Delivering of <u>a potential a</u> Old Oak Common Lane London Overground Station	To reflect the current status of the station.
MINOR/ 2/P10/3	P10 (g)(vi)	vi. visual permeability between tall buildings. <u>vi. visual permeability between tall buildings.</u>	To provide clarity for the need for visual permeability and complement Local Plan Policy D4 and Draft New London Plan policy D8.
MINOR/ 2/P11/3	P11, paragraph WJ.12	A new station entrance onto Old Oak High Street to the east of the station would be supported. Aligned to the location of this entrance, a generous new station square, <u>or alternative public realm layout</u> , on Old Oak High Street would ensure the station has a strong sense of arrival and, as part of this, ample space should be provided for interchange facilities.	To ensure the design of public realm responds to any future detailed design of Willesden Junction Station.
MINOR/ 2/P11/4	P11, paragraph WJ.15	Station upgrades <u>will need to be agreed with stakeholders including TfL and Network Rail and</u> should be delivered in a phased manner to best facilitate the comprehensive redevelopment of the station <u>and surrounds</u> whilst ensuring that the station can continue to function and serve the local community.	To clarify the need for an agreed joint approach for station enhancements.
MINOR/ 2/P12/5	P12 Figure 4.45	Label for Wormwood Scrubs Street moved.	To clarify the location of Wormwood Scrubs Street to the north of Wormwood Scrubs, and not within the Scrubs.
MINOR/ 2/P12/8	P12, New paragraph after WS.3	<u>The playing fields within the Scrubs provide a key function in catering for the sporting, leisure and recreational needs of the surrounding metropolitan area.</u>	To emphasise the sports function of the playing fields in Wormwood Scrubs and their relationship to surrounding areas.
MINOR/ 2/P12/9	P12 Paragraph WS.1	Wormwood Scrubs is a locally cherished open space covering almost 68 hectares. It is the largest green <u>publicly accessible</u> open space in the London Borough of Hammersmith and Fulham and provides local people and Londoners with the opportunities to have access to nature, playing fields sports pitches and space for recreation and relaxation.	To ensure that statutory protection of the Wormwood Scrubs playing fields is reflected in the Local Plan wording.
MINOR/ 2/P12/9	P12 Paragraph WS.5	<u>In delivering and / or contributing to high quality sports pitches playing fields, existing sports pitches playing fields should be retained and / or replaced at an equal or higher quality and function in accordance with Policy TCC6. The existing sports pitches playing fields and areas in the east and west of the Scrubs are also identified to be susceptible to surface water flooding which restricts their access and their use.</u>	To ensure that statutory protection of the Wormwood Scrubs playing fields is reflected in the Local Plan wording.
MINOR/ 2/P12/13	P12 New paragraph after WS.5	<u>The London Borough of Hammersmith and Fulham is also developing a management plan for Wormwood Scrubs.</u>	To reflect the future development of a management plan for Wormwood Scrubs.

MINOR/ 2/P12/14	Figure 4.45	Amend figure as follows: Walking and cycling route along the southern boundary of Wormwood Scrubs added.	To correctly identify walking and cycling routes.
MINOR/ 2/P12/17	P12 Connections	Connections <u>Public realm and movement</u>	To reflect the policy content which the title relates to.
MINOR/ 2/P12/20	P12 Figure 4.45 (Key)	Rail side habitat <u>Local Nature Reserve</u>	To reflect the designations of the habitats shown in the figure.

Design

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/ 2/D5/8	D5, paragraph 5.42	<u>Tall</u> buildings can <u>should</u> deliver significant benefits for both the surrounding built environment and existing and future local communities.	To provide clarity that tall buildings can deliver significant benefits for all communities.
MINOR/ 2/D5/9	D5, paragraph 5.42	Due to the prominence of tall buildings and interest of existing communities, OPDC will expect applicants to demonstrate proactive engagement with the community and other stakeholders <u>on issues including the location, height, scale, massing and design of tall buildings</u> to enable the design of proposals to respond to comments.	To provide clarity regarding potential issues to inform engagement with the community and other stakeholders.
MINOR/ 2/D8/4	D8(b)	<u>OPDC will give great weight to the conservation and enhancement of the significance of designated heritage assets, including their settings. Proposals harming the significance of a designated heritage asset will require clear and convincing justification should be justified having regard to their heritage interest, reasonable alternatives to avoid or mitigate harm and delivery of public benefits.</u>	To clarify the need to provide clear and convincing justification for the harm to the significance of a designated heritage asset.
MINOR/ 2/D8/5	D8(d)	Proposals <u>which have the potential to impact upon any affected heritage assets and their settings</u> will <u>should</u> be supported <u>by a where they submit a</u> Heritage Impact Assessment that sets out:	To clarify the requirement of delivering a Heritage Impact Assessment.
MINOR/ 2/D8/6	D8, paragraph 5.61	<u>Designated heritage assets within the OPDC area consist of Statutory Listed Buildings and conservation areas. These benefit from protection in the NPPF and legislation, which should be implemented alongside policy D8(b).</u>	To clarify that legislation is also used to conserve and enhance heritage assets.
MINOR/ 2/D8/8	D8, Table 5.1	<u>The</u> ise includes s proposals for designated statutory listed buildings and structures, <u>Registered Parks and Gardens locally listed buildings and structures,</u> and conservation areas. areas of local character and other buildings of local heritage interest.	To provide comprehensive information for designated heritage assets relevant to the OPDC area.
MINOR/ 2/D9/4	D9, paragraph 5.72	<u>Dedicated playspace should also be protected from areas that are exposed to wind and to air and noise pollution hotspots in accordance with policies EU4 and EU5.</u>	To ensure exposure to noise from within play space is addressed.

Environment and utilities

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/ 2/EU2/5	EU2	People's health, attitudes and behaviour are is positively affected when they come into contact with nature, <u>and urban greening can make a significant contribution to improvements in local air quality.</u>	To clarify the role of urban greening in improving air quality.
MINOR/ 2/EU3/6	EU3 d)	<u>Thames River</u> Basement <u>Basin Management Plan</u>	To reference the correct document title.
MINOR/ 2/EU3/7	EU3 e)	<u>undertake Flood Risk Assessments (FRAs) for schemes meeting the thresholds set out in DEFRA and EA guidance or within the critical drainage areas (CDA) identified in figure 6.4;</u>	To provide additional clarity on where an FRA will be required.
MINOR/ 2/EU3/7	EU3 Figure 6.4	Addition of Critical Drainage Areas.	To support clarifications in policy and support text that FRAs will be required for development located within a Critical Drainage Area.
MINOR/ 2/EU3/18	EU3 Paragraph 6.36	Thames Water has indicated that the existing Counters Creek catchment area <u>combined sewers currently</u> has ve no capacity to accept increased flows.	To clarify that capacity concerns relate to the catchment area and not a single sewer.
MINOR/ 2/EU3/6	EU3 Paragraph 6.39	<u>...Thames River</u> Basement <u>Basin Management Plan...</u>	To reference the correct document title.
MINOR/ 2/EU3/7	EU3 6.40	All major <u>developments that are located in flood risk areas which meet the thresholds set out in DEFRA and EA guidance</u> and/or are within the CDAs identified in figure 6.4 should undertake a Site Specific Flood Risk Assessment (FRA) to ensure that the development will remain safe and will not increase flood risk to others	To provide additional clarity on where an FRA will be required.
MINOR/ 2/EU4/3	EU4 Paragraph 6.54	OPDC will adopt EU established health-based standards and objectives for a number of air quality indicators (NOX, PM10 and PM2.5) until these are superseded by UK standards. <u>In addition, the London Environment Strategy has committed to establishing new targets for air quality with the aim of meeting World Health Organization guidelines by 2030.</u>	To reference the Mayor's commitment achieving World Health Organisation (WHO) guidance with respect to air quality in the London Environment Strategy and Draft New London Plan.
MINOR/2/D6/4	EU4, Paragraph 6.52	The design and layout of the new development including the orientation, massing and height of buildings and location of social infrastructure, <u>green infrastructure</u> and <u>open green</u> space influence exposure to poor air quality.	To clarify that green infrastructure can also influence exposure to air pollution.
MINOR/ 2/EU6/13 and MINOR/ 2/EU6/14	EU6b)	<u>Any allocated or existing</u> waste management site(s) lost to a non-waste use will be required to provide <u>equivalent or enhanced</u> compensatory site provision which <u>normally</u> meets the maximum throughput that the lost site could <u>could</u> achieved. Site provision should be made in <u>the most appropriate location, according to the</u> following sequential manner:	To provide clarity that the policy would apply to allocated waste sites, even if that are not currently in a waste management use, and to maximum throughput that sites could achieve.

		<p>i. within the OPDC area borough where that the site is located; or i. ii. within the the relevant waste plan or authority area based on where the lost site is located; or ii. West London Waste Authority and Western Riverside Planning Authority area within which the site is located; or iii. within Greater London within Greater London;</p>	
MINOR/ 2/EU6/15	Figure 6.7	<p>Amend figure as follows:</p> <p>Additional site added to the map and list of West London Waste Plan waste sites corresponding to O C S Group Ltd, Unit 2 and Yard, Sovereign Park.</p> <p>Show sites 3, 4 and 5 as stars.</p>	To reflect the list of sites in the West London Waste Plan.

Transport

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/ 2/T1/4	T1, paragraph 7.7	Applicants will be required to use the Healthy Streets guidance to guide street design <u>for both vehicular and non-vehicular routes.</u>	To clarify the implementation of the Healthy Streets Approach.
MINOR/ 2/T3/14	Figure 7.7: Indicative Future Cycle Network	<p>Amend figure as follows:</p> <p>Show correct location of the Quiet Way within Wormwood Scrubs.</p>	To provide correct information.
MINOR/ 2/T1/10 and MINOR/ 2/OONDFP/19	T1, paragraph 7.9	<p>7.9 All new and improved roads must be built to adoptable standards. <u>As part of development management discussions, OPDC will consult with the local highways authorities to identify any streets sought for adoption. If streets are identified, OPDC will secure through section 106 agreements that these new streets are offered for adoption to the relevant Local Highway Authority. and a</u> Any agreement between the developer and decision to adopt streets will need to be made in the relevant local <u>highway</u> authorities <u>to adopt a road will need to be secured in accordance with section 38 of the Highways Act 1980.</u></p>	To enable streets to be offered to local highways authorities.
MINOR/ 2/T1/13	T1, paragraph 7.9	<p>20 mile per hour speeds will be expected to be implemented in <u>consultation with the local highway authorities,</u> through both design features and signage on all new and existing roads, except the A40 and A406 which are part of the Transport for London Road Network (TLRN).</p>	To clarify the role of local highways authorities.
MINOR/ 2/T3/13	T3, paragraph 7.27	<p>OPDC will also support proposals for infrastructure which will enable other complementary cycle hire schemes to be developed and</p>	To clarify the role of local highways authorities.

		implemented across the area. <u>Any proposals will need to be delivered in consultation with the local highways authorities.</u>	
MINOR/ 2/T3/12	T3(h)	(h)deliver and/ or contribute towards the provision of cycle hire across Old Oak and Park Royal, <u>including from independent providers which may include complementary independent local cycle hire operators.</u>	To clarify the need to complement existing cycle hire infrastructure.
MINOR/ 2/T4/13	T4(a)(ii)	(ii) <u>strongly encouraging requiring</u> car-free development for <u>residential</u> developments located in <u>existing</u> areas with PTAL between 4 and 6B; (iii) <u>strongly encouraging</u> car-free development for <u>residential</u> developments located in areas with PTAL between 4 and 6B;	To reflect Draft New London Plan requirements.
MINOR/ 2/T3/11	T3(E)	deliver and/ or contribute to new and improved cycling connections to and through rail stations ensuring <u>sufficient cycle infrastructure allows sufficient cycle infrastructure allows</u> seamless interchange between public transport and cycling;	To reflect the need for cycle infrastructure at rail stations.

Housing

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/ 2/H1/1	H1 b)	OPDC will support the delivery of a minimum of <u>20,100</u> new homes during the Plan period. <u>This new housing will be achieved through: b) supporting the delivery of 13,670 homes between 2019 and 2029 the 10-year net housing delivery targets for the OPDC area, as set out in the most up-to-date London Plan</u>	To make specific reference to the actual 10-year target to clarify conformity with the Draft New London Plan.
MINOR/ 2/H2/6	H2 b) & c)	All residential developments... will be required to provide affordable housing..., by: b) including early, <u>mid</u> , and advanced stage review mechanisms in line with Mayoral guidance, to maximise the delivery of affordable housing <u>and in particular, social rent level housing (including London Affordable Rent)</u> , where development viability improves; c) providing <u>a minimum of 30%</u> of affordable housing as <u>social rent level housing (including London Affordable Rent)</u> and <u>the remainder 70%</u> as a range of <u>social rent level housing (including London Affordable Rent)</u> , intermediate housing, including London Living Rent and London Shared Ownership (except for Build to Rent, see Policy H6) <u>and</u> ; x) <u>including ensuring intermediate units homes that</u> are affordable to households on <u>median average</u> incomes in the host local authorities;	To clarify conformity with the Draft New London Plan in terms of the presumption that the 40% to be decided by the Local Planning Authority will focus on social rent/London Affordable Rent, subject to viability constraints and delivering mixed and balanced communities. The changes to the policy and supporting text identify the 30% social rent/London Affordable Rent target as a minimum target by seeking to optimise social rent/London Affordable Rent through review mechanisms, public grant and seeking to exceed the 30% social rent/London Affordable Rent target on schemes that do not meet the Mayor's threshold approach to viability.
MINOR/General 5			To further support maximising the delivery of affordable housing through mid-stage reviews.
MINOR/General 6	8.22	The AHVA has assessed the viability of delivering different levels and types of affordable housing. <u>As recognised above, the scale of</u>	To align with borough methodologies for ensuring affordability of intermediate homes.

<p>MINOR/General 7</p> <p>MINOR/General 8</p> <p>MINOR/General 9</p> <p>MINOR/General 10</p>	<p>8.23</p> <p>New paragraphs after 8.23</p>	<p><u>regeneration on what is a complex brownfield site presents significant challenges in terms of viability. The AHVA demonstrates that delivering social rent level housing (including London Affordable Rent housing) has the greatest impact on viability given the high cost of delivering housing at this level of discount on the market value. Further evidence on tenure, housing need and development viability is available in the supporting Housing Evidence Statement.</u></p> <p><u>Given the viability constraints identified above, the threshold level of affordable housing that developments must achieve to follow the Fast Track Route in OPDC should comprise: In order to create inclusive new communities at Old Oak and Park Royal that are mixed and balanced by housing tenure and household income, OPDC's target ratio for affordable housing is</u></p> <p>a) <u>at least a minimum of 30% social rent level housing (including London Affordable Rent);</u></p> <p>b) <u>the remainder a range of combination of social rent level housing (including London Affordable Rent), 70% mix of intermediate housing including London Shared Ownership and London Living Rent.</u></p> <p><u>xxx. Given OPDC's and London's need for social rent level housing, OPDC will seek to maximise the level of social rent housing by:</u></p> <ul style="list-style-type: none"> - <u>prioritising the delivery of social rent level housing (including London Affordable Rent) where early, mid and or late stage review mechanisms secured in Section 106 agreements identify that there is a surplus;</u> - <u>seeking to exceed 30% social rent level housing (including London Affordable Rent) on schemes that do not meet the Mayor's threshold approach to viability; and</u> - <u>prioritising the provision of the London Affordable Rent homes through housing grant.</u> <p><u>xxx. Following adoption of the Local Plan, OPDC will also revisit this policy and its associated viability evidence at the earliest opportunity to ensure that any increased development value can maximise the delivery of London Affordable Rent homes.</u></p>	<p>To further support the delivery of social rent level housing (including London Affordable Rent), the previous modification to insert 'at least' has been replaced with 'a minimum of'.</p> <p>To further support the delivery of social rent level housing (including London Affordable Rent), the previous modification to insert 'combination' has been replaced with 'range of'.</p> <p>To further support the delivery of social rent level housing (including London Affordable Rent), the previous modification to insert 'or' has been replaced with 'and'.</p> <p>To commit that this policy will be reviewed to ensure that it can maximise delivery of social rent/London Affordable Rent housing. This modification has been further revised to clarify when the review will happen.</p>
<p>MINOR/General 11</p>	<p>H2</p> <p>Paragraph 8.21</p>	<p>OPDC's SHMA has identified that there is an 86% need for social rent level housing (including London Affordable Rent or equivalent) housing as part of affordable housing need in the area <u>as a consequence of the high cost of private renting or buying a home in the area. These households would additionally need to. This does not necessarily mean that these households would qualify for social rent level or London Affordable Rent housing through their council <u>and this is determined under a number of factors under the Housing Act</u></u></p>	<p>To provide clarity of the qualification process for social rent or London Affordable Rent homes.</p>

		1996 and other relevant homelessness legislation. but is a consequence of the high cost of private renting or buying a home in the area.	
MINOR/ 2/H2/1	H2 New paragraphs after 8.23	This policy provides the opportunity to deliver homes that can meet the needs of London's essential workers who maintain the function and resilience of the city, such as those working in health, fire, police, transport and support services. OPDC will work with the host local authorities to identify how this can be achieved through their respective housing allocations policies.	To recognise, in accordance with the Draft New London Plan, that delivery of affordable housing can help to meet the need of essential workers.
MINOR/ 2/H2/11	H2 8.25	At the start of the design process, applicants should work positively with OPDC and other relevant stakeholders, including the host borough, to consider how the design of proposals can support the delivery of a range of tenures on the site and specifically, the requirements for the delivery of social rent/London Affordable Rent housing. Applicants should engage with a Registered Provider partner at the pre-application stage to determine the most appropriate affordable tenure mix on a site.	To ensure that the host borough is engaged in the design of developments to promote the delivery of social rent/London Affordable Rent housing.
MINOR/ 2/H2/7	H2 8.26	Starter Homes may be included as part of the affordable housing product range and be considered as an intermediate product in accordance with the requirements of the Housing and Planning Act 2016, once they come into force.	Starter Homes are not considered to meet the Mayor's definition of genuinely affordable housing.
MINOR/ General12	Table 8.2	Title of first column: Social rent level housing (Including London Affordable Rent)	To ensure consistency with London Plan definitions.
MINOR/ General13	H3 b) 8.34	New residential development should deliver a balanced mix of housing types... taking into account the following considerations: b) providing social rent level housing (including London Affordable Rent homes) in a mix of sizes that accords with OPDC's most up-to date Strategic Housing Market Assessment. To help meet needs, applicants will be expected to deliver 25% of all homes as units providing 3 or more bedrooms. The overall housing mix should include delivering the size mix for social rent level housing (including London Affordable Rent) that is set out in the latest SHMA.	To ensure consistency with London Plan definitions.
MINOR/ 2/H5/1	H5 8.48	Conversions can also increase the supply of smaller homes. However, the potential cumulative stress from conversions of larger dwellings to smaller homes on both the supply of family sized homes and on on-street parking provision, waste collection and other social amenities needs to be weighed against the wider economic benefits from such conversions and the resultant overall growth in the number of new homes. It is also recognised that in appropriate locations the general character of an area will change over time when conversions	To clarify conformity with Draft New London Plan policy H2 in that it may be appropriate for general character to change where small site redevelopment can increase the number of homes.

		<u>and/or redevelopment of existing housing will result in net additional housing provision.</u>	
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Employment

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/ 2/E1/1	E1b)	<u>b) achieve no net loss of industrial floorspace capacity and where feasible, intensify the use of sites, in particular on Site Allocations and on other sites identified in OPDC's Park Royal Intensification Study;</u>	To provide clarity that the policy applies in circumstances where there was reduced or no existing industrial floorspace on site i.e. where sites have been cleared in advance of the submission of a planning application.
MINOR/ 2/E1/4	E1c)	<u>c) provide a mix of unit sizes and in particular, including small business units. Existing small business units should be reprovided;</u>	To provide clarity on the need for a mix of unit sizes, including larger and smaller premises.
MINOR/ 2/E1/1	E1, para 9.6	<u>Policy E1 seeks to, as a minimum, protect existing industrial floorspace capacity or the potential industrial floorspace that could be accommodated on site. The draft new London Plan uses the existing floorspace or a 65% plot ratio (whichever is the greater) as the basis for measuring this. Wherever feasible, sites should exceed this, delivering high densities through industrial intensification. Applicants must set out all options explored for intensification in their Planning Statements. OPDC will only accept schemes that do not result in intensification if robust evidence has been provided by the applicant demonstrating that it is not feasible.</u>	To provide clarity that the policy applies in circumstances where there was reduced or no existing industrial floorspace on site i.e. where sites have been cleared in advance of the submission of a planning application.
MINOR/ 2/E3/5	E3, para 9.24	<u>OPDC will consider the most appropriate type or nature of provision under policy E3a) on a site by site basis. The agreed arrangements for affordable workspace including the quantum, type, rent levels, management and timescales will be secured via a legal agreement. Affordable workspace should also accord with relevant London Plan policy requirements.</u>	To provide clarity on the flexible application of the policy.

Town centre and community uses

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/ 2/TCC4/15	TCC4 Paragraph 10.32	In respect of health, the modelling undertaken by the Clinical Commissioning Groups (CCGs) shows the on-site need for space within the Local Plan period is for approximately 4,500sqm 1,564sqm of on-site health facility space within the Local Plan period. The Local Authorities and Clinical Commissioning Groups (CCGs) have confirmed that the preferred approach for the delivery of this the on-site floorspace is within one building, which allows the provision of health services at scale and provides for cost efficiencies. The Education and Health	To clarify that the figure for on-site health care provision is indicative and based on current projections and does not inhibit the CCGs from exploring alternative options for delivery.

		<u>Social Infrastructure</u> Needs Study has assessed <u>different site options for the new facility and identifies the Cargiant site allocation in Old Oak North as the preferred option the on-site needs for this facility, which shows the need for this facility within the Cargiant site allocation</u> , based on current projections.	
MINOR/ 2/TCC4/12	TCC4 Paragraph 10.33	<u>The community hubs should provide for a variety of community facilities including space for libraries, and could include facilities such as public toilets, a community café, faith space, youth space and halls for hire.</u>	To clarify that space for libraries should be provided as part of the proposed community hubs.
MINOR/ 2/TCC4/6	TCC4 Paragraph 10.33	<u>...could include facilities such as public toilets, a community café, faith space, youth space and halls for hire. New community spaces should be made appropriately available and affordable to the local community.</u>	To clarify that new community space should be provided at affordable rates to the local community.
MINOR/ 2/TCC6/6	TCC6 c)	requiring proposals to contribute towards and/or deliver <u>new</u> public access and affordable <u>indoor and outdoor</u> sports and leisure facilities, <u>including playing fields-pitches</u> , that:	To ensure consistency with terminology in national guidance.
MINOR/ 2/TCC6/6	TCC6 10.52	<u>OPDC will also support applications for and secure the delivery of and/or contributions towards outdoor sports and leisure facilities including playing fields-pitches, that serve needs and provide public and affordable access.</u>	To ensure consistency with terminology in national guidance.
MINOR/ 2/TCC7/6	TCC7 a)	the public house has been competitively marketed; i. <u>_____ for 24 months as a public house and for an alternative local community facility;</u> ii. <u>_____ at an appropriate price following independent valuation;</u> iii. <u>_____ in appropriate publications and through specialised licensed trade agents;</u> iv. <u>_____ in a condition that allows the premises to continue operating as a pub-or-as-a-community-facility; and</u> i-v. <u>and there has been with</u> no interest in either the freehold or leasehold <u>either as a public house-or-as-a-community-facility-falling within the 'D1' use class;</u>	To clarify requirements for the competitive marketing of public houses with respect to use classes.

Delivery and implementation

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/2/G43	D13, paragraph 11.36	The Localism Act (2011) introduced neighbourhood planning, giving local communities the powers to establish neighbourhood forums and to develop neighbourhood plans for their local area. Neighbourhood planning is a valuable tool, giving local communities a powerful say on how they wish to see their area regenerated. To support the delivery of this Local Plan, OPDC is committed to working closely with and providing support to emerging and established Neighbourhood Forums in the development of their neighbourhood plans. <u>Currently there are</u>	To reflect existing neighbourhood forums and areas.

		the Harlesden and Old Oak neighbourhood forums within the OPDC area who are progressing the development of their neighbourhood plans. Further details on how OPDC supports neighbourhood planning this can be found in OPDC's SCI.	
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Glossary

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/2/G13	Glossary	Metropolitan Park: These are large areas of open space that provide a similar range of benefits to Regional Parks and offer a combination of facilities at a sub-regional level. They are readily accessible by public transport and are managed to meet best practice quality standards. Sites of Metropolitan Importance are selected on a London-wide basis reflecting their strategically-important conservation sites for London	To ensure consistency with London Plan definitions.
MINOR/ General14	Glossary	Social rent (including London Affordable Rent) Low-cost rented homes intended for low-income households, typically nominated by London Boroughs, who are unable to secure or sustain housing on the open market.	To ensure consistency with London Plan definitions.
MINOR/General15	Glossary	Industrial Uses: Broad industrial type uses which are suited to industrial areas. These can include: general industrial; light industrial; research and development; storage and distribution; waste management and recycling; some transport related functions; utilities; wholesale markets; and other industrial related activities (i.e. some creative industries).	To remove an old reference in the Glossary which was replaced by the term: Broad Industrial Type Activities.

Appendix

Ref.	Policy/ Para/figure	Modification	Reason
No proposed minor modifications.			

Supporting Studies

Ref.	Supporting Study & para/figure	Modification	Reason
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MINOR/ 2/P10C3/1	Infrastructure Development Plan	TV21: Upgraded Hythe Road underpass for to cater for <u>double-decker</u> buses, access only vehicular traffic and improved pedestrian and cycle link.	To clearly reflect requirements of OPDC's Bus Strategy.
MINOR/ 2/OONDFP/5	Old Oak North Development Framework Principles	PR5, supporting text. This principle sets out guidance to deliver development for the preferred and alternative option as well as guidance common to development for both options. <u>OPDC and TfL support the West London Line and Hythe Road Station to be delivered as a viaduct.</u>	To emphasise TfL's support for the West London Line delivered as a viaduct and the new Hythe Road Station.
MINOR/ 2/OONDFP/10	Old Oak North Development Framework Principles	PR1 a) contribute to and enable delivery of new transport infrastructure to <u>seek to</u> deliver the highest Public Transport Accessibility Level of 6B in accordance with Principles 2 and 3;	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.
MINOR/ 2/OONDFP/10	Old Oak North Development Framework Principles	PR1 c) ensure the design and function of all streets <u>and non-vehicular routes</u> contribute to the delivery of Healthy Streets;	To ensure all routes contribute to delivering Healthy Streets.
MINOR/ 2/OONDFP/12	Old Oak North Development Framework Principles	PR3 d) a north-south walking and cycling route from Willesden Junction Station, through Harlesden Place, Oak Park, over Old Oak Bridge, <u>and</u> on to Wormwood Scrubs <u>and Old Oak Common Station</u> ;	To provide clarity that Old Oak Street will connect to Old Oak Common Station.
MINOR/ 2/OONDFP/13	Old Oak North Development Framework Principles	PR4, supporting text. Bridges and underpasses will need to <u>deliver high quality walking and/or cycling routes and</u> accommodate utilities infrastructure to ensure development is adequately served.	To ensure bridges and underpasses supporting walking and cycling routes.
MINOR/ 2/OONDFP/15	Old Oak North Development Framework Principles	PR2 f) appropriate heights <u>for key routes of and infrastructure for Park Bridge, Park Road Underpass, Hythe Road Viaduct, Hythe Road Underpass, Laundry Bridge and Old Oak Bridge crossing the West London Line</u> to enable movement of double-decker buses in accordance with Principle 5.	To support movement of double decker buses.
MINOR/ 2/OONDFP/21	Old Oak North Development Framework Principles	PR3 g) a segregated high quality cycling route along Scrubs Lane, <u>where feasible</u> ;	To ensure consistency with the Scrubs Lane Development Framework Principles.
MINOR/ 2/OONDFP/25	Old Oak North Development Framework Principles	Amend Figure 19 as follows: Show Birchwood Nature Reserve as depicted in the key.	To correct graphical error.
MINOR/ 2/DTC	Waste Apportionment Study	New paragraph: <u>The Waste Technical Paper shows a surplus of capacity in the OPDC/LBHF based on optimising the Powerday site, and the ability for LBHF to meet their apportionment target. It also identifies a gap in waste capacity for Lambeth, Kensington and Chelsea and</u>	To reference the other findings in the Waste Technical Paper.

		Wandsworth for both apportioned waste and non apportioned (Construction, Demolition and Excavation) waste. These Councils have submitted representations to the Local Plan – please refer to the Statement of Consultation and Duty to Cooperate Statement for further information.	
MINOR/ General16	Duty to Cooperate Statement	The Duty to Cooperate Statement has been amended to ensure information on duty to cooperate engagement activities is up to date and to provide additional detail.	To provide updated and additional detail.
MINOR/ General17	Habitats Regulation Assessment Screening Report	1.4 Legislation and Guidance <ul style="list-style-type: none"> • Case C323/17, People over Wind, Peter Sweetman v Coillte Teoranta 	To provide clarity between standard mitigation measures and mitigation measures specific to mitigating impacts of development in relation to the People over Wind, Peter Sweetman v Coillte Teoranta ruling.
MINOR/ General18	Habitats Regulation Assessment Screening Report	<p>Conclusion: This HRA Screening of the OPDC Regulation 19(2) Second Revised Draft Local Plan has considered the potential implications of the plan for European designated sites within 20 km of the OPDC area boundary.</p> <p>It is important to note that none of the policies set out in the OPDC Local Plan would lead to direct impacts upon European Sites.</p> <p>It is considered that the only effects likely to arise as a result of implementation of the OPDC Local Plan are reduced air quality (as a result of construction activities and increased transport during the construction and operational phases) and increased population. These factors could impact the European designated sites through habitat degradation and increased recreational pressure.</p> <p>The closest European designated site is more than 7 km from the OPDC boundary. It is considered that potential effects are very unlikely to be significant, given the distance between the European designated sites and the nature of the developments likely to arise from the OPDC Local Plan policies, as well as the standard mitigation measures that are required of such developments (such as pollution prevention).</p> <p>The assessment of in-combination effects of various plans and policies revealed that it is not considered that the OPDC Local Plan would contribute to significant in-combination effects, primarily due to the distance of the plans, policies and projects from the European designated sites.</p>	To provide clarity between standard mitigation measures and mitigation measures specific to mitigating impacts of development in relation to the People over Wind, Peter Sweetman v Coillte Teoranta ruling.

		It has therefore been concluded that the OPDC Local Plan is unlikely to have any significant effects on the European sites identified, either alone or in-combination with other plans or projects. As such, it is not proposed to undertake Appropriate Assessment.	
MINOR/ General19	Habitats Regulation Assessment Screening Report	6.3: Avoidance and Mitigation Potential: This screening exercise has not identified any likely significant effects on any European designated sites as a result of implementation of the plan. As such, no specific avoidance or mitigation measures (above and beyond standard mitigation measures that are required of developments, such as pollution prevention) are considered necessary.	To provide clarity between standard mitigation measures and mitigation measures specific to mitigating impacts of development in relation to the People over Wind, Peter Sweetman v Coillte Teoranta ruling.
MINOR/ General20	Habitats Regulation Assessment Screening Report	6.4: Screening Summary It is considered that any air quality effects that may arise from the OPDC Local Plan policies are very unlikely to be significant, given the distance between the European Sites and the OPDC area. The implementation of standard mitigation measures that are required of developments (such as pollution prevention) to meet with National Policies and frameworks also provide a further 'safety net' to ensure that significant damage to European Sites is avoided.	To provide clarity between standard mitigation measures and mitigation measures specific to mitigating impacts of development in relation to the People over Wind, Peter Sweetman v Coillte Teoranta ruling.
MINOR/ General21	Integrated Impact Assessment	Non-technical summary: It is considered that the only effects likely to arise as a result of implementation of the OPDC Local Plan could be reduced air quality (as a result of construction activities and increased transport during the construction and operational phases) and increased population. These factors could impact the European designated sites through habitat degradation and increased recreational pressure. However, the Local Plan policies seek to mitigate this kind of impact and that coupled with standard mitigation measures that are required of such developments (such as pollution prevention) it is therefore unlikely that the OPDC Local Plan will have any significant effects on the European sites identified, either alone or in-combination with other plans or projects.	To provide clarity between standard mitigation measures and mitigation measures specific to mitigating impacts of development in relation to the People over Wind, Peter Sweetman v Coillte Teoranta ruling.
MINOR/ General22	Integrated Impact Assessment	7.13 Habitats Regulations Assessment Screening: The closest European designated site is more than 7 km from the OPDC boundary. It is considered that potential effects are very unlikely to be significant, given the distance between the European designated sites and the nature of the developments likely to arise from the OPDC Local Plan policies, as well as the standard mitigation measures that are required of such developments (such as pollution prevention).	To provide clarity between standard mitigation measures and mitigation measures specific to mitigating impacts of development in relation to the People over Wind, Peter Sweetman v Coillte Teoranta ruling.

Policies Map

MINOR/ General23	Policies Map	Minor modification to Policies Map as follows: Show safeguarded Bashley Road Gypsy and Traveller Site within Policies map	To ensure consistency with Policy H8.
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