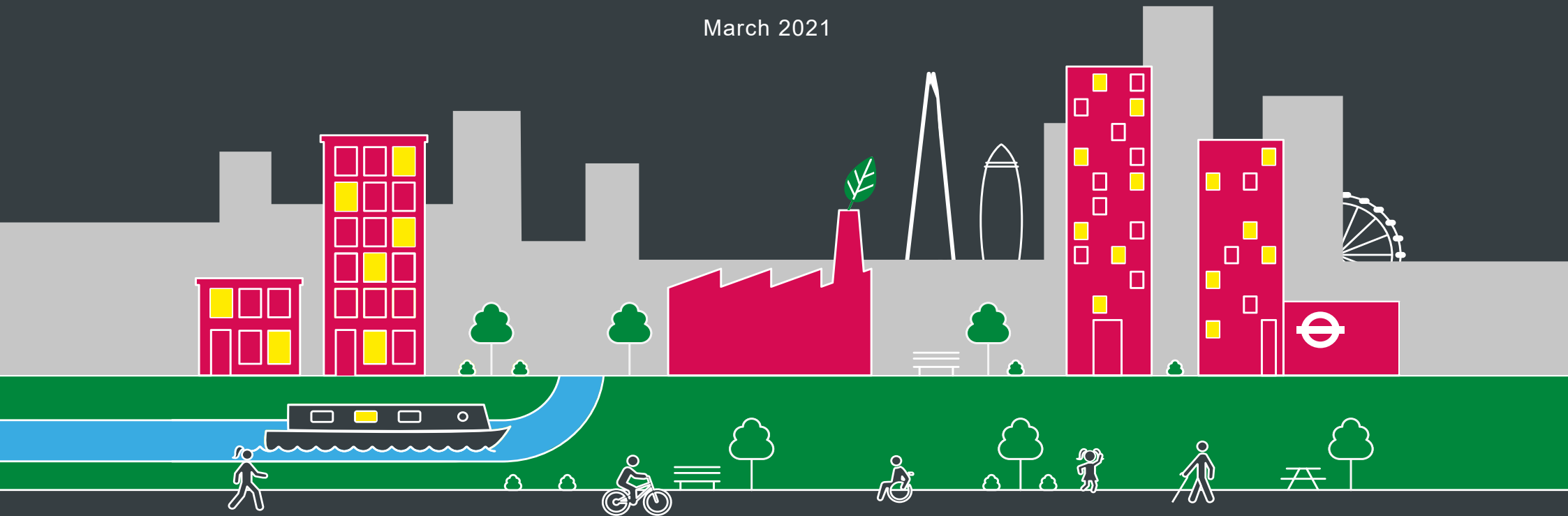


# Table of text modifications

## LOCAL PLAN SUPPORTING STUDY

March 2021



## **Main Modifications**

This Schedule of the proposed text modifications includes changes since the Regulation 19(2) version of the Local Plan aimed at resolving any potential soundness and/or legal compliance issues identified during the examination process.

The Inspector has asked that consultation be carried out on the proposed Main Modifications (MM). The proposed MMs are put forward without prejudice to the Inspector's final conclusions on the OPDC Local Plan. The Inspector will consider all the representations made on the proposed MMs before finalising the examination report and the final schedule of recommended Main Modifications.

The consultation provides an opportunity to comment on the specific changes contained in the proposed Main Modifications.

A separate Schedule of Proposed Modifications to the Figures in the Plan and Policies Map that correspond with the Main Modifications proposed in this schedule has been prepared. This includes the changes in map form.

## **Additional minor modifications**

OPDC also wish to make Minor modifications to the OPDC Local Plan. The reference of these changes is prefixed by MINOR so that they can be clearly distinguished from the Main Modifications which are referenced as MM. The additional (minor) modifications are not subject to the Main Modifications consultation.

## **How to use this document**

Text modifications are shown as tracked-changes. When providing comments, please quote the reference of the change which you are commenting on.

The proposed main and minor modifications have been generated from a variety of sources and are coded as follows:

- Modifications with the reference MM/PS2/OPDC/REF are main modifications that have been made to the draft Local Plan to address the inspector's interim findings, ensure general conformity with the Publication London Plan, ensure alignment with the new Use Class Order or address typographical errors or factual corrections.
- Modifications with the reference MINOR/PS2/OPDC/REF are minor modifications that have been made to the draft Local Plan after the publication of the inspector's interim findings.
- Modifications with the reference MM(1-17)/PS/REF are main modifications made to the draft Local Plan in response to requests from the planning inspector during the examination between November 2018 and August 2019, up to the point of the Inspector's Interim findings for the IIA and Old Oak North.
  - o Modifications with the reference 'Q' correspond to Inspector's Questions numbering.
  - o Modifications with the reference 'M' refer to the Hearing Matters numbering.

- Modifications with the reference 'OPDC' refer to those made by OPDC in response to issues raised at the 2019 hearing sessions
- Modifications with the reference MINOR/PS/REF are minor modifications made to the draft Local Plan in response to requests from the planning inspector during the examination between November 2018 and August 2019, up to the point of the Inspector's Interim findings for the IIA and Old Oak North.
  - Modifications with the reference 'Q' correspond to Inspector's Questions numbering.
  - Modifications with the reference 'M' refer to the Hearing Matters numbering.
  - Modifications with the reference 'OPDC' refer to those made by OPDC in response to issues raised at the 2019 hearing sessions
- Modifications with the reference MINOR/General or MINOR/2/REF are minor modifications that were made to the draft Local Plan following Regulation 19(2) public consultation in July 2018 and prior to the submission of the draft Local Plan to the Secretary of State in October 2018. These modifications were published at [submission](#) and have already been approved by the OPDC Board at its 28th September 2018 meeting.

The following colours are used to identify which modifications have been reviewed by the Inspector.

	Submission Modifications reviewed by the Inspector
	Other modifications reviewed by the Inspector
	Post submission modifications that have not been reviewed by the Planning Inspector
	Modifications superseded by post submission modification. These have not been reviewed by the Planning Inspector

## All chapters

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/2/G28 & MINOR/2/SV6	All relevant	All references to Old Oak Common Lane Station within text and images will be referred to as being potential.	To reflect current status of proposals.
MINOR/PS/General1	General	References to Park Road to be replaced with Union Way.	The name of Union Way has been agreed with the local highways authority.

## Introduction

Ref.	Policy/ Para/figure	Modification	Reason
MM16/PS/Q26	1.19	<p><u>On adoption of the Local Plan, the following existing borough Local Plan documents will be superseded for the OPDC area:</u></p> <p><b><u>London Borough of Brent</u></b></p> <ul style="list-style-type: none"> <li>• <u>Core Strategy</u></li> <li>• <u>Site Specific Allocation DPD</u></li> <li>• <u>Draft Development Management Policies DPD</u></li> <li>• <u>Saved UDP Policies</u></li> <li>• <u>Policies Map</u></li> </ul> <p><b><u>London Borough of Ealing</u></b></p> <ul style="list-style-type: none"> <li>• <u>Development (Core Strategy) DPD</u></li> <li>• <u>Development Management DPD</u></li> <li>• <u>Development Sites DPD</u></li> <li>• <u>Draft Planning for Schools DPD</u></li> <li>• <u>Policies Map</u></li> </ul> <p><u>Please note, that following the London Borough of Hammersmith and Fulham adopting their Local Plan in February 2018, their Core Strategy, Development Management Local Plan and associated Proposals Map were removed from the Development Plan.</u></p>	To remedy an omission to the Plan.

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/General1	1.25	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.	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
MM/PS2/OPDC/SV/1	Our Spatial Vision	It will comprise a network of places including an innovative industrial area <del>in Park Royal</del> and	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the only industrial area have been removed.
MM/PS2/OPDC/SV/2	Our Spatial Vision	a high-density new vibrant part of London <del>at Old Oak.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Old Oak as the only high-density mixed use area have been removed.
MM/PS2/OPDC/SV/3	Thinking Big	2. <del>Old Oak</del> The OPDC area will become a major new London centre providing high-density mixed use development, that will shape west London and support London's continued growth.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Old Oak as the only high-density mixed use area have been removed.
MM/PS2/OPDC/SV/4	Thinking Big	7. Park Royal <del>and Old Oak North</del> will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth.	To respond to the Inspector's Interim Findings, Old Oak North will be retained as SIL. To reflect this change in land use designations, Old Oak North is identified as SIL.

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/2/SV2 MM/PS2/OPDC/SV/5	Figure 2.1 Economic Growth	<del>Alongside a protected and strengthened Park Royal,</del> the area has the capacity to deliver <del>7,600</del> <sup>36,350</sup> new jobs over the next 20 years. This development potential could bring enormous rewards for the national, regional and local economy, generating billions in Gross Value Added (GVA) and provide local people with opportunities for lifelong learning and employment across a range of skills and sectors.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This change in land use designations has resulted in updated jobs figures.
MM/PS2/OPDC/SV/6	Figure 2.1 Transit Oriented Development	The new Old Oak Common station will provide the impetus for this, but other <del>potential new</del> (Hythe Road <del>and</del> Old Oak Common Lane) and improved rail stations (such Willesden Junction and North Acton) and new and improved walking and cycling connections,	To respond to the Inspector's Interim Findings Old Oak North will be retained as SIL. Hythe Road Station cannot be delivered with the retention of SIL in Old Oak North. Therefore, references to the delivery of Hythe Road Station have been removed.  Reference to Old Oak Common Lane changed to potential to be consistent with the remainder of the draft Local Plan.
MM/PS2/OPDC/SV/7	Figure 2.1 Grand Union Canal and Wormwood Scrubs	Development <del>in Old Oak</del> provides opportunities to enhance access to it and to provide sensitive enhancements so that it can be enjoyed by more Londoners and fulfil its role of a metropolitan park.	To respond to the Inspector's Interim Findings Old Oak North will be retained as SIL. Consequently, Old Oak Street connecting Old Oak South to Old Oak North and enabling the delivery of a bridge to Wormwood Scrubs cannot be delivered. Therefore, this modification is required to enable improved access from Scrubs Lane and Old Oak Common Lane.
MM/PS2/OPDC/SV/8	Figure 2.1 Park Royal	<b>Park Royal Industry</b> The <del>Park Royal Industrial Estate</del> industrial land within OPDC's boundary is a vital cog in the London economy and OPDC will work to protect, strengthen and intensify the Strategic Industrial Location in Park Royal and Old Oak North <del>the role of Park Royal as a Strategic Industrial Location</del> . However, the nature of industry in London will continue to change and Park Royal needs to be able to continue to respond to these changes to remain competitive. Regeneration in <del>Old Oak</del> the OPDC area presents a dichotomy for <del>the estate</del> industry. <del>Park</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area have been removed.

Ref.	Policy/ Para/figure	Modification	Reason
		<del>Royal</del> Industry can serve to support the needs of development <del>in Old Oak</del> , by providing ancillary services. This includes the potential for a circular economy, looking at ways that things <del>used in Old Oak</del> can be recycled and repurposed by businesses <del>in Park Royal</del> . However, regeneration <del>in Old Oak</del> could result in rent increases and increased pressure on infrastructure which if not managed could undermine what makes the Old Oak and Park Royal area a success	
MM/PS2/OPDC/SV/9	Figure 2.1: Diversity of Housing	The OPDC area is capable of accommodating <del>an</del> <u>minimum indicative</u> capacity of 26,500 homes, of which a minimum <u>19,850</u> could be delivered in the next 20 years	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. These modifications ensure that OPDC can meet the London Plan 10 year target of 13,670 homes. The Mayor of London has confirmed that the Local Plan is in general conformity with the London Plan in his Letter of General Conformity.
MM/PS2/OPDC/SV/10	Figure 2.1: Managing traffic and construction	The Old Oak and Park Royal area <del>does</del> suffers from significant congestion.	Corrected typographical error

### Strategic Policies

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/SP/1	3.1	The station will support the wider Old Oak <del>and Park Royal</del> area in becoming a new strategic destination - 10 minutes from Heathrow and the West End.	This amendment recognises that accessibility created by the Old Oak Common station will be of benefit to the entire OPDC area.
MM/PS2/OPDC/SP/2	3.3	The Mayor's London Plan identifies that the OPDC area can deliver a minimum 25,500 homes and 65,000 jobs, making it one of London and the UK's largest regeneration projects. <del>20,400</del> <u>19,850</u> of these homes and <del>40,400</del> <u>36,350</u> of these jobs can be delivered <del>within</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. Homes and jobs figures have subsequently been updated.

Ref.	Policy/ Para/figure	Modification	Reason
		<del>the next 20 years of this Local Plan by 2038</del> (see policies SP4 and SP5).	
MM/PS2/OPDC/SP/3	3.4 b)	The centre and its surroundings currently suffer from economic deprivation, falling within the top 10% most deprived wards nationally when measured against the Index of Multiple Deprivation (20159).	To reflect updated Index of Multiple Deprivation data
MM/PS2/OPDC/SP/4	3.4 c)	Kensal Canalside Opportunity Area is immediately to the east of the OPDC area and is identified in the London Plan as having the capacity to deliver <u>an indicative</u> 2,000 new jobs and <del>a minimum of</del> 3,500 new homes.	To align with revised wording in new London Plan.
MINOR/2/SP2/11	3.7	...Requirements are set out in the Environment and Utilities chapter, providing locally specific policies that build on policies and standards in the Mayor's London Plan and London Environment Strategy, <u>and the principle of environmental net gain as set out in the government's 25 Year Environment Plan.</u>	To demonstrate consistency with national guidance.
MM/PS2/OPDC/SP/5	3.8	High density development in <u>Park Royal</u> SIL will be different to <del>mixed use development in Old Oak</del> , but OPDC's Park Royal Intensification Study <u>and Old Oak North Intensification Study</u> demonstrates how <del>the Park Royal Industrial Estate</del> SIL could be regenerated to increase <u>industrial</u> floorspace and provide additional jobs, <del>to support Mayoral targets to deliver an additional 10,000 jobs in Park Royal.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed.
MM2/PS/Q3b	SP3(d) and 3.19	Proposals should: a) improve health and reduce health inequalities; b) design and operate internal and external spaces to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles; <u>and</u> c) ensure adequate access to facilities and services that support health, wellbeing and healthy lifestyles.; <u>and</u> <del>d) undertake Health Impact Assessments (HIAs) as part of major development proposals, to assess the development's impacts on health. HIAs should include recommendations to mitigate any negative impacts of</del>	Process removed from policy to ensure the effectiveness of the Plan.



Ref.	Policy/ Para/figure	Modification	Reason
		<p><del>major developments on health and should be conducted early enough in the planning process to influence the design and/or implementation of the proposal.</del></p> <p>3.19. Health impact assessments (HIAs) <u>will be required for major development proposals</u>. HIAs help to ensure that health and wellbeing are fully considered as part of new development proposals. The process looks at the positive and negative impacts of a development as well as assessing the indirect implications for the wider community. The aim is to identify the main impacts and seek to maximise benefits and mitigate or avoid potential adverse impacts. HIAs should be undertaken at the earliest stage possible to ensure that any required alterations to proposals can be made with minimal disruption.</p>	
MM/PS2/OPDC/SP/6	SP4 a)	<p>Protecting existing and providing new homes that help to meet a local and London-wide need by:</p> <ul style="list-style-type: none"> <li>ii. providing a range of housing tenures, types and sizes that deliver mixed and inclusive communities; and delivering at least <u>19,850</u> additional homes between 2018-38, <u>including 13,670 additional homes within the 2019-29 London Plan 0-10 year period</u> and supporting the attainment of an overarching 50% affordable housing target, measured in habitable rooms and subject to viability.</li> </ul>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. These modifications enable OPDC to be able to meet the London Plan 10 year target of 13,670 homes, which is now also referenced within this policy for clarity.</p>
MM/PS2/OPDC/SP/7	3.20	<p>The London Plan identifies that the Old Oak and Park Royal Opportunity Areas have the capacity to deliver an <u>indicative minimum of 25,500</u> new homes.</p>	<p>To align with new London Plan</p>
MM/PS2/OPDC/SP/8	3.20	<p>OPDC's Development Capacity Study demonstrates that <u>this target can be achieved over the total development period in the next 30 years, that</u> at least <del>20,400</del><u>19,850</u> new homes are deliverable within the</p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained</p>

Ref.	Policy/ Para/figure	Modification	Reason
		Local Plan period (2018-38) <u>and that at least 13,670 new homes are deliverable within the London Plan 0-10 year period (2019-29).</u>	as SIL. These modifications ensure that OPDC can meet the London Plan 10 year target of 13,670 homes.
<b>MM/PS2/OPDC/SP/9</b>	SP5	a) support the delivery of <u>36,350</u> new jobs between 2018-38;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This change in land use designations has resulted in updated job figures.
<b>MM/PS2/OPDC/SP/10</b>	SP5	b) protect, strengthen and intensify the Strategic Industrial Location (SIL) in <u>Old Oak North and</u> Park Royal;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed.
<b>MM/PS2/OPDC/SP/11</b>	3.25	The area has the capacity to accommodate <u>60,700</u> new jobs <u>over the total development period in the next 30 years and</u> , <del>40,400</del> <u>36,350</u> new jobs over the <del>next 20 years</del> <u>Local Plan period (2018-38).</u>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This change in land use designations has resulted in updated job figures.  Further clarity has been provided over the timescales for delivery of these indicative jobs targets.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/SP/12	3.26	The diversity of character across the OPDC area will support the delivery of a range of employment opportunities. Park Royal <del>and Old Oak North is form</del> London's largest industrial <del>area estate and is are</del> designated as a Strategic Industrial Location (SIL) in the London Plan. Protecting the SIL <del>in Park Royal</del> is vital to the London economy and opportunities should be taken to intensify its use where feasible (see Policy E1). <del>The Industrial Land Review Addendum (2021) demonstrates that there is potential to deliver a net gain of 250,428 sqm of industrial floorspace capacity through the intensification of SIL and co-location of industrial activities outside of SIL in the OPDC area. This increase will help contribute towards meeting the ongoing demand for industrial space in the wider market area.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed.  The paragraph has also been updated to provide a clearer position on OPDC's evidence base for industrial floorspace delivery within the OPDC area.
MINOR/PS/Q1a	3.27	...It will make a significant contribution to London's commercial space pipeline, <del>at a time when other large commercial projects in London</del> at a time when other current major regeneration schemes would be completed, or nearing completion, such as Kings Cross, Paddington and White City...	To correct a desktop publishing error.
MM/PS2/OPDC/SP/13	SP6(a)(iii)e	supports the creation of a new Cultural Quarter <del>in Old Oak;</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, references to Old Oak as being the sole location for a new Cultural Quarter have been removed.
MM/PS2/OPDC/SP/14	SP6(a)	Old Oak – a major town centre <del>across Old Oak</del> , that delivers a wide range of town centre and community uses.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, town centre uses will no longer be delivered in Old Oak North.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/SP/15	SP6(b)	The policy requirements for this centre can be found in policies P1, <del>P2</del> –P3, P7, P8 and <del>P9</del> 11;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, town centre uses will no longer be delivered in Old Oak North.
MM/PS2/OPDC/SP/16	SP6(d)	<del>Atlas Junction—a neighbourhood town centre serving existing and new communities around Old Oak Lane, Old Oak Common Lane and Victoria Road. The policy requirements for this centre can be found in Policy P8C1.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, Old Oak major town centre will be delivered in Atlas Junction and Channel Gate. This will subsume the Atlas Junction neighbourhood town centre.
MINOR/PS2/OPDC/SP/1	<del>3.28</del>	... OPDC will expect development proposals to ensure that the increase in employment opportunities benefit local people (see Policy <del>E25</del> ).	Typographical error
MM/PS2/OPDC/SP/17	3.36	<del>The comprehensive redevelopment of</del> Development in Old Oak and <del>intensification of</del> Park Royal will take many years.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed.
MM/PS2/OPDC/SP/18	3.39	OPDC's Cultural Principles document sets out how the OPDC area <del>and in particular Old Oak</del> , could play a significant role in supporting the Mayor's aspirations to promote London as the world's cultural and arts capital as set out in the Mayor's Draft Culture Strategy. This could be achieved by supporting new and enhanced catalyst, cultural, arts, night-time and meanwhile uses. OPDC will work with the GLA, neighbouring local authorities and developers to ensure that cultural provision in the area supports the creation of a new	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, references to Old Oak as being the sole location for a new Cultural Quarter have been removed.

Ref.	Policy/ Para/figure	Modification	Reason
		Cultural Quarter <del>in Old Oak</del> that can complement nearby cultural clusters and contribute to London's wider cultural offer.	
<a href="#">MM/PS2/OPDC/SP/19</a>	3.40	A key facet to place-making in the OPDC area will be the location, role and function of its town centres. The town centre hierarchy consists of <del>four</del> <u>three</u> centres (see figure 3.7), serving the needs of its existing and future residents, workers and visitors. The hierarchy consists of a new major town centre in Old Oak and <del>three</del> <u>two</u> neighbourhood town centres: <del>two</del> <u>one</u> new centres at North Acton and <del>Atlas Junction and</del> the continuation and expansion of Park Royal Centre. Each town centre will have its own character and mix of uses that support social interaction and thriving communities.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, Old Oak major town centre will be delivered in Atlas Junction and Channel Gate. This will subsume the Atlas Junction neighbourhood town centre.
<a href="#">MM/PS2/OPDC/SP/20</a>	3.42	Early development phases to the north <del>west of Old Oak South of the Grand Union Canal</del> will be expected to accord with this designation.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, Old Oak major town centre will be delivered in Atlas Junction and Channel Gate.
<a href="#">MM/PS2/OPDC/SP/21</a>	3.43	OPDC has also designated neighbourhood centres in North Acton <del>and</del> , Park Royal <del>and Atlas Junction</del> , to serve the local communities of workers and residents in and around these locations. Similarly to Old Oak, the North Acton <del>and Atlas Junction</del> centres <del>are</del> <u>is</u> not yet established <del>as a</del> neighbourhood town centres. This Local Plan sets the trajectory for the future scale of these centres and development proposals will be required to contribute towards their delivery. Park Royal Centre was previously designated in Ealing's Local Plan. OPDC supports this centre's continued growth, to support the envisaged increase in jobs and homes in Park Royal. Details on the function and character of each of the designated centres can be found in the following policies in the Places Chapter (chapter 4):	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, Old Oak major town centre will be delivered in Atlas Junction and Channel Gate. This will subsume the Atlas Junction neighbourhood town centre.

Ref.	Policy/ Para/figure	Modification	Reason
		<p>a) Old Oak (Policies P1, P1C1, <del>P2</del>, P3, P7, P7C2, P8, <del>P8C1 and P9 and P11</del>);</p> <p>b) North Acton (P7 and P7C1);</p> <p><del>c) Park Royal Centre (P6); and</del></p> <p><del>d) Atlas Junction (P8 and P8C1).</del></p>	
MM/PS2/OPDC/SP/22	Policy SP7 (b) (vi)	supporting the successful functioning and operation of <del>the Park Royal Industrial Estate</del> <u>Strategic Industrial Location (SIL)</u> , by implementing carefully planned servicing arrangements;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed.
MM/PS2/OPDC/SP/23	Policy SP7 (e) (ii)	ii. a new movement network <del>across Old Oak</del> comprised of the key routes as shown in figure 3.10;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change, reference to Old Oak specifically has been removed so the policy applies more generally across OPDC.
MINOR/2/SP7/14	SP7(e)(iv)	new and enhanced pedestrian and cycle connections <del>into</del> Wormwood Scrubs	To align with Policy P12.
MM/PS2/OPDC/SP/24 MINOR/PS/General1	Policy SP7 (g)	<p>g) supports delivery of Old Oak Street <del>and Union Way</del> <u>Park Road</u>:</p> <p>i. as early as is feasible and practicable;</p> <p>ii. as new though routes for walking cycling and where feasible, buses and providing access only for private vehicles;</p> <p>iii. as <u>an</u> active streets, providing town centre, employment and community uses <del>and primary shopping areas</del> at the</p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, Union Way is no longer required.</p> <p>To reflect revisions to Use Class Order and that through revisions to new Use Class E, OPDC will no longer look to define primary shopping areas and seek control proportion of A1 uses within such</p>

Ref.	Policy/ Para/figure	Modification	Reason
		intersections with other key routes and around rail stations; and	locations. Policy TCC3 has also been removed from the Local Plan.
MINOR/2/SP2/2	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 sustainability and enables people to live active and healthy lifestyles 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.	To ensure the role of transport in delivering Good Growth is recognised.
MM/PS2/OPDC/SP/25	3.46	Existing and potential London Overground stations at Willesden Junction, <del>Hythe Road</del> and Old Oak Common Lane and enhancements to London Underground stations within the area	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, Hythe Road Overground Station is no longer required.
MM/PS2/OPDC/SP/26 MINOR/2/SP7/11	3.46	<del>These</del> transport enhancements <del>in Old Oak should need</del> enable <u>parts of the Old Oak</u> area to achieve a PTAL of 6b to support an optimised approach to development <del>(see policies P1 and P2).</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change, the policy has been updated to apply more specifically to parts of Old Oak.
MM2/PS/Q3d	3.49	<del>Further details</del> Information can be found in the <u>Places chapter</u> , Transport chapter <del>and with further detail in</del> OPDC's Infrastructure Delivery Plan (IDP).	To ensure appropriate infrastructure information is contained within the Local Plan
MINOR/2/SP7/7	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 (see Policy T1). This should be achieved by delivering a	To clarify the need for securing new and enhanced public transport infrastructure.

Ref.	Policy/ Para/figure	Modification	Reason
		<p>high quality, attractive, accessible and inclusive public realm that not only provides people with the choice to walk and cycle but that actively incentivises these more sustainable types of movement , through the quality of the environment and supporting infrastructure (see Policy D2). <u>OPDC's sustainable transport hierarchy should not be viewed as a mechanism to restrict the essential delivery of new and enhanced public transport infrastructure given the significant investment required to deliver this infrastructure and the resultant benefits for the area and communities.</u></p>	
<p>MINOR/PS/Q5(15)</p>	<p>3.53</p> <p>7.24</p>	<p>To support the sustainable regeneration of the area, development will be required to deliver and/ or contribute to the creation of a series of high quality and accessible streets, <u>bridges and underpasses</u>, connecting the area seamlessly with its surroundings. This will ensure that existing and future communities can benefit from the transport improvements, services and employment opportunities on offer in the OPDC area and vice versa...</p> <p>New and enhanced bridges and underpasses, <u>are depicted in the place policies and</u> are identified within OPDC's IDP.</p>	<p>To ensure appropriate infrastructure information is contained within the Local Plan</p>
<p>MM/PS2/OPDC/SP/27</p> <p>MINOR/PS/General1</p>	<p>3.53</p>	<p>In <del>Park Royal</del><u>Strategic Industrial Location (SIL)s</u>, the focus will be on enhancing the function of the streets for all modes and improving their environment. <del>In Old Oak,</del> Scrubs Lane, Old Oak Lane, Old Oak Common Lane and Victoria Road are home to existing residential communities and businesses. They will be an important location for early development phases and development along these routes will play a key role in helping to knit together existing and new communities in the area. <del>An</del><u>a new enhanced</u> street network should be arranged to <del>connect to</del> these existing streets together and provide improved connectivity, focussed on the <del>23</del> new key</p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed.</p> <p>As such a new street network including Union Way is no longer required to support the delivery of the OON site allocations and therefore its reference has been removed.</p>



Ref.	Policy/ Para/figure	Modification	Reason
		routes of Old Oak Street, <del>Union Way Park Road</del> and Wormwood Scrubs Street.	
<b>MM/PS2/OPDC/SP/28</b>	3.54	Old Oak Street will play a particularly important role in improving connectivity across the area, supporting place making and facilitating an optimised approach to regeneration. <del>Old Oak Street will connect Old Oak's rail stations.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, Old Oak Street will no longer be able to connect all the Old Oak stations.
<b>MM/PS2/OPDC/SP/29</b>	3.54	<del>It will also connect to surrounding destinations, including Harlesden Town Centre, the Grand Union Canal and Wormwood Scrubs.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change, Old Oak Street will no longer extend into Old Oak and connect to Harlesden Town Centre, the Grand Union Canal and Wormwood Scrubs.
<b>MM/PS2/OPDC/SP/30</b>	3.55	<del>The complete delivery of the Old Oak Street may take many years.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change, Old Oak Street will no longer extend into Old Oak.
<b>MM/PS2/OPDC/SP/31</b>	3.55	<del>This approach would ensure surrounding areas can access the development area of Old Oak and new transport infrastructure as soon as is practically possible.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change, reference to Old Oak Street serving Old Oak has been removed.
<b>MM/PS2/OPDC/SP/32</b> <b>MINOR/PS/General1</b>	3.55	<del>Primary shopping areas have not been indicated on OPDC's Policies Map as the exact alignment of Old Oak Street and other streets is not yet fixed. However, when delivering Old Oak Street, primary shopping areas should be clustered around rail stations, and at junctions with key routes such as Union Way Park Road,</del>	To reflect revisions to Use Class Order and that through revisions to new Use Class E, OPDC will no longer look to define primary shopping areas and seek control proportion of A1 uses within such locations. Policy TCC3 has also been removed from the Local Plan.

Ref.	Policy/ Para/figure	Modification	Reason
		<del>Old Oak Common Lane, and Victoria Road and Harrow Road</del>	
MM/PS2/OPDC/SP/33 MINOR/PS/General1	3.56	<del>Union Way Park Road will be a key east west route providing an important early connection between Scrubs Lane and Old Oak Common Lane for pedestrians, cyclists and buses and access only for private vehicles. The Place policies (chapter 4) identify the locations along this route for town centre uses, but as a key early route, there will also be opportunities along Union Way Park Road for workspaces and other meanwhile town centre uses, delivered in advance of Old Oak Street.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. Consequently, Union Way is no longer required to support the delivery of these site allocations and therefore its reference has been removed.
MM/PS2/OPDC/SP/34	SP8 a) iii	appropriately providing and/or positively contributing to new green infrastructure and open spaces, that meet the needs of the development in terms of their quantum, quality, access and function, including delivering 30% of the developable area outside of Strategic Industrial Locations (SIL) as publicly accessible open space in accordance with Policy EU1, including delivering <del>23</del> new local parks <del>in Old Oak</del> , each of at least 2ha.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. Therefore, references to Old Oak solely delivering local parks have been removed.
MM2/PS/Q3c	SP8(d)	<del>;</del> <del>and</del> c) successfully integrating with the wider green infrastructure and open space network, including the Grand Union Canal, Wormwood Scrubs and All London Green Grid.; <del>and</del> <del>d) ensuring that major development proposals are delivered in accordance with an appropriate Green Infrastructure and Open Space Strategy and Management Plan.</del>	Process removed from policy to ensure the effectiveness of the Plan.
MM/PS2/OPDC/SP/35	3.63	The priority within this should be the delivery of <del>three</del> <del>two</del> new local parks of at least 2ha, <del>within the across the Old Oak North and Old Oak South</del> <del>and Channel Gate</del> places.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. Therefore, references to Old Oak solely delivering local parks have been removed.

Ref.	Policy/ Para/figure	Modification	Reason
MM2/PS/Q3d	3.63	<del>Further details on Information</del> for the requirements for open space provision can be found in the places chapter, in Policy EU1 (Open Space) <del>and with further details</del> in OPDC's Infrastructure Delivery Plan (IDP).	To ensure the effectiveness of the Plan.
MM17/PS/Q3e	3.72	Policy D78 provides further policy guidance on how development proposals should appropriately respond to heritage assets and place specific guidance is provided within the Places chapter (chapter 4).	To clarify the function of policies to guide development.
MM17/PS/Q3e	3.74	OPDC's detailed policy requirements for protection of amenity are provided in Policy D6D5.	To clarify the function of policies to guide development.
MM17/PS/Q3e	3.76	Further details on OPDC's requirements for creating an inclusive and accessible development can be found in Policy D23	To clarify the function of policies to guide development.
MMPS/OPDC/M4	3.78	The proposed level of investment in transport infrastructure and the planned public transport accessibility improvements, on a brownfield site in zone 2/3 west London, provides a strong rationale for the design and delivery of new high density development including new tall buildings in appropriate locations. Outside of SIL, modelling shows that in order to achieve the homes and jobs targets for the area, development will likely deliver average residential densities of 450 units per hectare. <u>The indicative density range is 300 to 600 units per hectare.</u> However, local context, character and environmental impacts are important factors to consider in the design process meaning development will be expected to deliver a range of densities and building heights, for example, responding with lower densities and building heights close to more sensitive locations and providing increased densities and building heights away from these sensitive locations and in areas of high public transport accessibility. Where appropriate, the Places policies set out more specificity about appropriate building heights, but in many parts of	To clarify the indicative density range within the OPDC area.

Ref.	Policy/ Para/figure	Modification	Reason
		the area, there is a need for flexibility in the approach to achieving homes and jobs targets (see chapter 4).	
MM2/PS/Q3d	SP10(c)	c) contributes appropriately and proportionately towards required infrastructure identified <u>in the Local Plan and the further detail in the OPDC's</u> Infrastructure Delivery Plan (IDP), at a rate and scale sufficient to support the area's development and growth;	To ensure the effectiveness of the Plan.
MM2/PS/Q3d	SP10(e)	e) safeguards land required to deliver area-wide and site-specific infrastructure identified <u>in OPDC's IDP and/or policies</u> in the Local Plan <u>and the further detail in the IDP;</u>	To ensure the effectiveness of the Plan.
MM2/PS/Q3d	SP10(h)	is appropriately designed so that the built form complements and does not unduly restrict development on adjacent and connected sites <del>and where appropriate, is accompanied by an Infrastructure Delivery Strategy.</del>	Process removed from policy to ensure the effectiveness of the Plan.
MM2/PS/Q3d	SP10(i)	<u>and</u> h) is appropriately designed so that the built form complements and does not unduly restrict development on adjacent and connected sites; <del>and</del> <u>i) where appropriate, is accompanied by an Infrastructure Delivery Strategy</u>	To ensure the effectiveness of the Plan.
MM/PS2/OPDC/SP/36	3.80	The redevelopment and regeneration of the OPDC area will be challenging. <del>Within the Old Oak area, A</del> number of large-scale operations need to be relocated, reconfigured and/or decked over.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, references to Old Oak as being the sole area where large-scale operations will need to be relocated, reconfigured and/or decked over has been removed.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/SP/37	3.84	Over the first ten years of the Local Plan period, the majority of <u>mixed use</u> development is likely to occur on land in North Acton, in the western parts of Park Royal <del>and to the north of the Grand Union Canal in Old Oak North</del> , along Scrubs Lane and on some sites along Old Oak Lane and Old Oak Common Lane.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, references to Old Oak North delivering mixed use development have been removed.
MINOR/PS/Q5(1)	3.88	A significant amount of new and/ or enhanced infrastructure will be required to unlock the regeneration of the area. <u>Details on</u> OPDC's infrastructure requirements are in <u>set out within Local Plan policies and</u> OPDC's Infrastructure Delivery Plan (IDP)...	To ensure appropriate infrastructure information is contained within the Local Plan
MM/PS2/OPDC/SP/38	SP10 Table 3.1	Please refer to the Local Plan to view updates to Table 3.1	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. In light of these changes, site allocations have been updated.
MINOR/PS/OPDC M18	Table 3.1 OPR.5	<del>40-54a</del> 32-36 & 38-42 Minerva Road	Typographical error

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.

## Places

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/PS2/OPDC/P/1	P4C1, P7C1, P7C2, P10C1, P10C2, P10C3,	Site allocations that are fully or partially located within clusters are identified.	To provide clarity in the implementation of cluster policies.

Ref.	Policy/ Para/figure	Modification	Reason
	P10C4, P10C5		
MM17/PS/Q3e	4.66, 4.93, P7C2(c)(v), 4.130,  4.59, 4.184, P10C2(d)(ii), 4.191, P11(g)(i), 4.223	Policy <del>D6</del> D5.  Policy D78.	To clarify the function of policies to guide development.
MM/PS/Q12Q13 Q16(2)	P7, P4, P5 and supporting figures	Additional policy clause in P4: <u>Safeguarding Twyford Waste Transfer Station site in accordance with the West London Waste Plan.</u>  Additional policy clause in P5: <u>Safeguarding Chase Road site in accordance with the West London Waste Plan.</u>  Additional policy clause in P7: <u>Safeguarding Quattro site in accordance with the West London Waste Plan.</u>  Amend figures supporting policies P4, P5, P7 and P9 to indicatively illustrate West London Waste Plan safeguarded sites.	To provide clarity for the location of West London Waste Plan sites.
MM/PS2/OPDC/P1/1	P1(c)(i)(ii)	Supporting the creation of a thriving mixed use, high-density place that contributes to the delivery of: a) <del>15,200</del> 17,100- new jobs and a minimum of <del>350</del> 100 new homes in the plan period; and b) <del>34,000</del> 35,700-new jobs and a minimum of <del>4,100</del> 3,700 new homes for the full development period.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations and mitigate it's impacts to ensure General Conformity with the London Plan, development capacity and trajectory information has been updated.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/P1/2	P1(d)	Establishing a commercial centre around Old Oak Common Station, that supports London's growth, by delivering a significant amount of Use Class <del>B1a-E</del> floorspace <u>that is appropriately designed and serviced to support the commercial centre;</u>	To respond to the changes made to the Use Class Order.
MM/PS2/OPDC/P1/3	P1(f)	Contributing to the activation of this place and creation of a Cultural Quarter <del>in Old Oak</del> , delivering cultural and catalyst uses within Old Oak South;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, references to Old Oak as being the sole location for a new Cultural Quarter have been removed.
MM/PS2/OPDC/P1/4 MINOR/PS/Q12Q13 Q16(1) and MINOR/PS/M3c(1)	P1(g)	Contributing to and/or enabling, the delivery of a permeable, inclusive and accessible street network as shown in figure 4.2 <u>including Old Oak Street as an all modes route and a walking and cycling route from Old Oak Common Station to Scrubs Lane which is access only for private vehicles</u>	To provide clear information for the location of Old Oak Street.  The Inspector's Interim Findings conclude that site allocations 2 and 3 would not be viable and capable of effective delivery for mixed use within the plan period. Consequently, Old Oak Street bridge connecting Old Oak South to Old Oak North cannot be delivered and a walking and cycling route to the east is required to provide a local connection to Scrubs Lane.
MM/PS2/OPDC/P1/5	P1(h)	Delivering active and positive frontages along the edge of the Elizabeth Line Depot <u>and along the walking and cycling route from Old Oak Common Station to Scrubs Lane</u> where feasible;	The Inspector's Interim Findings conclude that site allocations 2 and 3 would not be viable and capable of effective delivery for mixed use within the plan period. Consequently, Old Oak Street bridge connecting Old Oak South to Old Oak North cannot be delivered and a walking and cycling route to the east is required to provide a local connection to Scrubs Lane.
MM/PS2/OPDC/P1/6	P1(i)(ii)	<del>Grand Union Canal Local Park provided between Old Oak North and Old Oak South including the Canal Park and Canalside spaces Birchwood Nature Reserve that are linked by bridges and is a minimum of 2 hectares in size;</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, Grand

Ref.	Policy/ Para/figure	Modification	Reason
			Union Canal Local Park will no longer be deliverable. Therefore, references to the Grand Union Canal Local Park being delivered in Old Oak South have been removed. Smaller canalside spaces, in addition to the Birchwood Nature Reserve, will continue to be supported.
MM/PS2/OPDC/P1/7	4.6  4.8  4.11	<p>Old Oak South sits between Wormwood Scrubs in the south and the Grand Union Canal in the north. The area is currently dominated by railway infrastructure. These pieces of existing infrastructure sever the area from its surroundings. Old Oak Common Station is set to open <del>in 2026</del> after 2028 and will make Old Oak South one of the best connected locations in London. The station will be one of the largest transport interchanges in the country and will be the largest sub-surface station ever built in the UK, providing access to the HS2 line, Elizabeth Line and the Great Western Main Line alongside local connections to the London Overground, buses, walking and cycling networks and taxis.</p> <p>Early development in Old Oak South will be supported. However, it is likely that most of development in Old Oak South will be delivered after the opening of Old Oak Common Station <del>in 2026</del> and development on the Elizabeth Line depot and sidings and IEP depot is not envisaged to commence until beyond the Local Plan period.</p> <p>This commercial centre will likely be delivered following the opening of Old Oak Common station <del>(2026)</del>. This timing puts Old Oak South in a strong position to contribute to London's commercial floorspace pipeline, at a time when other current major regeneration schemes would be completed, or nearing completion, such as Kings Cross, Paddington and White City.</p>	To reflect updated delivery programme of Old Oak Common Station.



Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/P1/8	4.9	The excellent public transport access created by the new Old Oak Common Station provides the opportunity to deliver a minimum of <del>350-100</del> new homes during the plan period <sup>1</sup> within high density mixed use development across the area in a range of building heights. Old Oak South also has capacity to deliver <del>15,200</del> <sup>17,100</sup> new jobs <sup>2</sup> across new commercial, retail and leisure uses, within the plan period. <del>4,100</del> <sup>3,700</sup> new homes <del>34,000</del> <sup>35,700</sup> new jobs are also currently envisaged to be delivered during the full development period.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations and mitigate its impacts to ensure General Conformity with the London Plan, development capacity and trajectory information has been updated.
MM/PS2/OPDC/P1/9	4.10	Key sectors that will likely be attracted to this new accessible brownfield site will include ICT, media and creative services, professional and financial services and life sciences <sup>4</sup> . To support this, new development should enable delivery of a significant amount of new flexible <del>B1a- Use Class E</del> employment space <u>that supports the functioning of the commercial centre.</u>	To respond to the changes made to the Use Class Order.
MM/PS2/OPDC/P1/10	4.12	Old Oak South will also be home to part of the new Old Oak major town centre. Town centre uses should be focused in the town centre as depicted in figure 3.7. Town centre uses should also complement and connect with other sections of this new town centre located within <del>Old Oak North (P2)</del> <u>Old Oak Lane and Old Oak Common Lane (P8), Channel Gate (P9)</u> and North Acton and Acton Wells (P7).	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, references to delivering a major town centre in Old Oak North have been removed.
MMPS2/OPDC/P1/11	4.13	Cultural, meanwhile and catalyst uses can play an important role in supporting the development of this new major town centre destination and Cultural Quarter <del>in Old Oak</del> (see Policy SP6).	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, references to Old Oak as being the sole location for a new Cultural Quarter have been removed.
MM/PS2/OPDC/P1/12	4.15	The key routes <del>s</del> within the new movement network to be delivered during the plan period <del>are</del> <u>is</u> <del>Old Oak Street (including the bridge to Wormwood Scrubs), and Park Road.</del>	The Inspector's Interim Findings conclude that site allocations 2 and 3 would not be viable and capable of effective delivery for mixed use within the plan period. Consequently, Union Way connecting Old

Ref.	Policy/ Para/figure	Modification	Reason
			<p>Oak South to Old Oak North cannot be delivered. Therefore, it is no longer a key route.</p> <p>Consequently, Old Oak Street connecting Old Oak South to Old Oak North and enabling the delivery of a bridge to Wormwood Scrubs cannot be delivered. Therefore, the reference to this bridge has been removed.</p>
MM/PS2/OPDC/P1/13	4.15	The delivery of Wormwood Scrubs Street is expected to take place after the plan period <u>within Old Oak South</u> and is contingent on the redevelopment of the IEP Depot.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, development on North Pole East depot will be accelerated. It will also contribute to the delivery of Wormwood Scrubs Street during the plan period within the Scrubs Lane Place.
MM/PS2/OPDC/P1/14	4.15	Although outside of the plan period, development proposals should <del>appropriately</del> safeguard <u>for and if relevant and appropriate, contribute to and / or deliver</u> Wormwood Scrubs Street's future delivery.	To provide clarity for development to contribute to and / or deliver Wormwood Scrubs Street outside of the plan period.
MM/PS2/OPDC/P1/15	4.16	The delivery of connections to Old Oak Common Station from the surrounding places will be critical in fully connecting Old Oak South into its surroundings in a clear and legible manner. <del>Connections to Old Oak North will be particularly important after the opening of the station to enable people to reach Old Oak Common Station.</del>	The Inspector's Interim Findings conclude that site allocations 2 and 3 would not be viable and capable of effective delivery for mixed use within the plan period. Consequently, these sites will remain designated as SIL. Although connections between Old Oak North SIL and Old Oak Common Station continue to be required, they are not as critical as previously for mixed use development. Therefore, references to this particular importance have been removed.
MM/PS2/OPDC/P1/16	4.16	Delivering Old Oak Street as a high quality route will be particularly important for connectivity <u>as well as providing walking and cycling access to the Scrubs Lane.</u>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. Consequently, Old Oak Street connecting Old Oak South to Old Oak North cannot be delivered. However, an eastern access to Old Oak Common Station continues to be required and will

Ref.	Policy/ Para/figure	Modification	Reason
			be delivered as a walking and cycling connection to Scrubs Lane via the Grand Union Canal towpath.
MM/PS2/OPDC/P1/17	4.17	<del>Equally important will be providing a new bridge to Wormwood Scrubs off Old Oak Street, to enable communities to access this important area of Metropolitan Open Land and Metropolitan Park. In addition,</del> Old Oak Common Station should not preclude a connection to <del>Wormwood Scrubs the south</del> in the future <del>and development should safeguard for and if relevant and appropriate, contribute to and / or deliver a bridge to Wormwood Scrubs.</del> Any connection will need to consider how it will cross and provide passive provision for future development on the IEP Depot.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. Consequently, Old Oak Street connecting Old Oak South to Old Oak North and enabling the delivery of a bridge to Wormwood Scrubs cannot be delivered. Therefore, the reference to this bridge has been removed. Clarity for development to contribute to and / or deliver Wormwood Scrubs Street outside of the plan period has also been provided.
MM/PS2/OPDC/P1/18	4.18	Within Old Oak South, 30% of developable land should be publicly accessible open space. This can be achieved through the delivery of the new Old Oak South Local Park (please refer to Policy SP8 for the area of search for this park), enhancements to the Birchwood Nature Reserve ( <del>as part of the Grand Union Canal Local Park</del> —see Policy P3) and a range of other spaces. <del>In the long term there is also the potential to explore the delivery of an additional Local Park in Old Oak South through the release of the Elizabeth Line Depot for development if demonstrated to be feasible.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, Grand Union Canal Local Park will not be deliverable. As such, references to the Grand Union Canal Local Park being delivered in Old Oak South have been removed.  The Elizabeth Line Depot is currently identified as not being developed in the plan period; however, earlier development is supported. As part of this development there is a potential for the delivery of a Local Park.
MINOR/PS/Q5(3) MM/PS2/OPDC/P1/19	4.20	<del>...Local Plan policies OPDC's IDP</del> identify <del>ies</del> the likely requirements for infrastructure in the area, <del>detailed further in OPDC's IDP.</del> A significant amount of social infrastructure will be required. Current population and child yield projections indicate that there is a need to deliver <del>one community hub,</del> one super nursery and one sports centre in Old Oak South. These requirements are	To ensure appropriate infrastructure information is contained within the Local Plan.  An update to the Social Infrastructure Needs Study has been produced to updated to identify the social infrastructure needed to meet the needs of the updated development capacity and phasing. This

Ref.	Policy/ Para/figure	Modification	Reason
		based on current population and child yield projections, which could change over time thereby impacting on the size and type of facilities required (see Policy TCC4). Proposals should appropriately safeguard land for and contribute to and/or deliver these and other infrastructure requirements set out in the <a href="#">Local Plan and the further detail set out in the IDP</a> , in accordance with Policy SP10.	has resulted in changes to the location, phasing and quantity of social infrastructure across the OPDC area.
<p><b>MINOR/PS/OPDC M16 (4)</b></p> <p><b>MM/PS2/OPDC/P1C1/1</b></p>	4.23	The Old Oak Common Station will serve High Speed 2 Ltd, the Elizabeth Line and Great West Mainline. OPDC will work positively, proactively and transparently with relevant stakeholders including the Department for Transport, High Speed 2, Network Rail and Transport for London to support the timely delivery of the Old Oak Common Station, associated works and the comprehensive regeneration of Old Oak South. OPDC will also work with transport operators to appropriately safeguard land for other supported rail connections into the station. At the time of publication of this Local Plan, this include the proposed Chiltern Line services. <del>Please see OPDC's IDP for up-to-date requirements for safeguarding. Development proposals should also safeguard land for the potential delivery of the Chiltern Line to Old Oak Common Station.</del>	To ensure rail connectivity is optimised.
<p><b>MM/PS2/OPDC/P2/1</b></p> <p><b>MM9/PS/Q5(2)</b></p> <p><b>MM10/PS/Q5(4)</b></p> <p><b>MINOR/PS/General1</b></p> <p><b>MM9</b></p> <p><b>MINOR/PS/Q12Q13Q16(1)</b></p> <p><b>MINOR/PS/M3c(1)</b></p>	P2	A full re-write of Policy P2 and supporting text has been undertaken. To review the new policy text, please refer to the Local Plan.	To respond to the Inspector's Interim Findings, Old Oak North will be retained as SIL and references to Old Oak as a mixed use area have been removed and associated considerations have been amended to reflect new supporting studies for Old Oak Old North.

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/ 2/P3/3	P3, Vision	...Moorings, open spaces and canalside activities will support its role as a <u>community asset and</u> lively leisure and recreation destination...	To reflect the role of the canal within the community.
MM/PS2/OPDC/P3/1	P3(a)	Supporting the activation of the Grand Union Canal and canalside spaces within <del>Old Oak</del> Channel Gate by delivering:	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, Channel Gate is identified to provide canalside activation.
MM/PS2/OPDC/P3/2	P3(a)(i)	permanent and meanwhile town centre, leisure, <del>commercial</del> employment, community and canal-related uses with active frontages in areas of higher activity	To respond to the changes made to the Use Class Order.
MM/PS2/OPDC/P3/3	P3(b)	Supporting overlooking, security and safety along the canal and canalside spaces within Park Royal and <del>Channel Gate</del> Old Oak North by delivering positive frontages;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, and as with Park Royal SIL, development in Old Oak North SIL will be required to provide positive frontages.
MM/PS2/OPDC/P3/4	P3(g)(i)	<del>delivering a segregated cycling route where feasible and where not,</del> delivering a high quality shared walking and cycling route;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, a segregated cycling route is not sought along the canal towpath.
MM/PS2/OPDC/P3/5	P3(h)	Supporting local connectivity by contributing to and/or delivering a continuous local walking and cycling route along the northern side of the canal within <del>Old Oak</del> Channel Gate;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, Channel Gate is identified to provide a canalside walking and cycling route.
MM/PS2/OPDC/P3/6	P3(j)(i)(iii)	i) <del>the Grand Union Canal Local Park within Old Oak North and Old Oak South of at least 2 hectares in size,</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed

Ref.	Policy/ Para/figure	Modification	Reason
		<p><del>including the Birchwood Nature Reserve and Canal Park</del>  <u>Channel Gate Local Park;</u>            iii) improvements to existing open spaces including <u>Birchwood Nature Reserve</u>, Mary</p>	use development and Old Oak North will be retained as SIL. To reflect this change in land uses, the Old Oak North and Grand Union Canal Local Parks will not be deliverable. Therefore, references to these Local Parks have been removed to reflect the delivery of a Local Park in Channel Gate and emphasis has been placed on improving Birchwood Nature Reserve included.
<u>MM/PS2/OPDC/P3/7</u>	P3(n)(i)(ii)	<p>within <del>Old Oak</del><u>Channel Gate</u>, delivering heights of generally 6 to 8 storeys fronting directly onto the Grand Union Canal with opportunities for tall buildings at key crossing points such as <del>Old Oak</del><u>Channel Gate</u> Street, <del>Park Road</del>, Old Oak Lane and Scrubs Lane; and</p> <p>within Park Royal <u>and Old Oak North</u>, delivering appropriate heights to support the functioning and intensification of the Strategic Industrial Location.</p>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses. As with Park Royal SIL, appropriate building heights in Old Oak North SIL will be supported to enable the functioning and intensification of the SIL.
<u>MM/PS2/OPDC/P3/8</u>	4.31	<del>The development of Old Oak and intensification of Park Royal (including Channel Gate)</del> <u>Development along the canal</u> provides the opportunity for proposals to contribute to and/or enable the enhancement of these existing functions and to deliver new roles and uses along, and on, the canal.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, Channel Gate is identified to provide canalside activation.
<u>MM/PS2/OPDC/P3/9</u> <u>MM/PS2/OPDC/P3/10</u>	4.33	<p>New permanent and temporary moorings will be supported along the length of the canal with a focus at publicly accessible open spaces and other accessible locations including at:</p> <p><del>the Old Oak North food and beverage quarter</del><u>Channel Gate Local Park;</u>            the Atlas Junction Cluster;            Birchwood Nature Reserve;  <del>Rolls Royce Yard;</del></p>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, Channel Gate Local Park is identified as suitable location for moorings. Rolls Royce is no longer identified to be delivered. Therefore, specific reference to moorings to activate this open space has been deleted.
<u>MM/PS2/OPDC/P3/11</u>	4.36	New bridges will play a critical role in supporting movement <del>between Old Oak North and Old Oak South</del> ,	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed

Ref.	Policy/ Para/figure	Modification	Reason
		supporting locally distinctive place-making and helping to activate canalside spaces.	use development and Old Oak North will be retained as SIL. To reflect this change in land uses, the locations of new bridges have been amended.
MM/PS2/OPDC/P3/12	4.37	The northern canalside route <del>in Old Oak</del> also provides an opportunity for areas within <del>Old Oak North</del> <u>Channel Gate</u> and <del>Old Oak Lane</del> <u>Scrubs Lane</u> to be connected by a continuous walking and cycling route. The location of this route will likely vary, running beside the canal and around buildings located directly on to the water.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, Channel Gate is identified to provide a canalside walking and cycling route.
MM/PS2/OPDC/P3/13	4.40	<del>Within Channel Gate, the Local Park should be located on the Grand Union Canal and perform a range of functions including leisure, walking and cycling routes, canalside activities and community uses. Within Old Oak, the delivery of the Grand Union Canal Local Park on both sides of the canal should provide a minimum of two hectares of publicly accessible open space. The Grand Union Canal Local Park will be an important feature in informing local character. It will also perform a range of roles, including leisure, walking and cycling routes, canalside activities, community uses and providing a focus for food and beverage uses. To support these roles, the Grand Union Canal Local Park will include green landscaping, civic space and a range of outdoor leisure facilities that will complement the different characters of the Local Parks in Old Oak North and Old Oak South.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, the Old Oak North and Grand Union Canal Local Parks will not be deliverable. Therefore, references to these Local Parks have been removed to reflect the delivery of a Local Park in Channel Gate.
MM/PS2/OPDC/P3/14	4.41	The development of <del>Old Oak</del> <u>Channel Gate</u> provides the opportunity for new water spaces in the form of basins and/or widening of the existing canal. New canal water spaces must contribute to conserving and enhancing the character of the canal <del>and must help to address drainage issues across Old Oak.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, new canal spaces will not be sought in Old Oak North.
MM/PS2/OPDC/P3/15	P3(n)	n) Contributing to a variety of building heights <del>that respond to the canal's heritage, character, biodiversity and amenity roles by delivering heights</del>	To clarify that building heights adjacent to the canal will be determined in accordance with relevant policies and material considerations.

Ref.	Policy/ Para/figure	Modification	Reason
	4.44	<p><del>and massing</del> that support the functioning, designations, amenity and character of the canal and canalside spaces by:</p> <ul style="list-style-type: none"> <li>i. <u>Subject to the impact on the heritage, character, biodiversity and amenity of the Grand Union Canal,</u> within <del>Old Oak Channel Gate</del>, delivering heights of generally 6 to 8 storeys fronting directly onto the Grand Union Canal with opportunities for tall buildings at key crossing points such as <del>Old Oak Channel Gate</del> Street, <del>Park Road</del>, Old Oak Lane and Scrubs Lane; and</li> <li>ii. <u>within Park Royal and Old Oak North,</u> delivering appropriate heights <u>that balance the need to conserve and enhance the heritage, character, biodiversity and amenity of the Grand Union Canal to support</u>with the functioning and intensification of the Strategic Industrial Location.</li> </ul> <p>Policy SP9 identifies the canal as a sensitive location, reflecting its existing character, use, SINC designation and conservation area status. In response to these roles, for proposals sitting directly on to the canal, buildings of generally 6 to 8 storeys are considered to be appropriate<sup>5</sup>. However, each site will need to consider the site specific circumstances <u>and accord with relevant London Plan and Local Plan policies alongside other material considerations</u></p>	
MM/PS2/OPDC/P3/16	4.44	<p>Within <del>Park Royal</del><u>Strategic Industrial Locations</u>, building heights will need to respond to OPDC's aspirations to support economic growth and job creation through the intensification of industrial floorspace<sup>6</sup> while continuing to conserve and enhance the canal in terms of its heritage and ecology designations.</p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the</p>



Ref.	Policy/ Para/figure	Modification	Reason
			only mixed use area have been removed and associated considerations have been amended.
MM/PS2/OPDC/P3/17	4.45	Unlocking the comprehensive redevelopment of <del>Old Oak areas</del> will necessitate the provision of a substantial amount of new and improved physical infrastructure along and across the Grand Union Canal.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
MM/PS2/OPDC/P3/18	4.45	Any <u>development or</u> infrastructure adjacent to or across the canal will need to ensure that the canal's structural integrity is not compromised, <u>in accordance with the relevant national policy and guidance in place at the time (including relevant paragraphs of the NPPF and Land Stability NPPG).</u>	To ensure the structural integrity of the canal is maintained.
MINOR/PS/Q5(5)	4.45	... <del>The Local Plan-OPDC's IDP</del> identifies the likely requirements for infrastructure which are based on current population projections. These could change over time impacting on the size and type of infrastructure required, <u>further detailed within OPDC's IDP.</u>	To ensure appropriate infrastructure information is contained within the Local Plan
MM/PS2/OPDC/P3/19	4.46	In addition to its roles in managing flooding, the canal also provides an opportunity to generate localised heat and cooling for development <del>in Old Oak</del> <del>7.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Old Oak as the sole location for the canal to provide an opportunity to generate heat and cooling for development has been removed.
MINOR/PS/CRT1	4.47	The Canal and River Trust is a key stakeholder as the landowner of the canal and elements of canalside sites. Alongside the Trust, OPDC will work positively with other stakeholders, such as boating groups and other	To clarify ongoing working with the Canal & River Trust and development of OPDC's Canal Place Making Strategy.

Ref.	Policy/ Para/figure	Modification	Reason
		canal users, to support the delivery of aspirations in this policy. <u>OPDC will continue to work with the Canal &amp; River Trust and other relevant stakeholders to develop a Canal Place Making Strategy for the area that further develops the vision for the Grand Union Canal. The strategy will be embedded into relevant planning guidance documents to guide development on and alongside the canal corridor.</u>	
MM/PS2/OPDC/P4/1	P4(a)  4.50	Delivering <u>3,5403,390</u> new jobs within SIL, by taking opportunities to intensify the use of all sites, but in particular on identified site allocations, and having regard to the locations and typologies identified in OPDC's Park Royal Intensification Study;  OPDC has carried out work to explore ways to deliver additional floorspace and industrial jobs <sup>1</sup> . This work highlights sites and typologies where industrial intensification may be possible through vertical/horizontal extensions, internal subdivision or comprehensive redevelopment. It demonstrates that, overall, an uplift of around <u>3,5003,390</u> jobs could be achieved, although this figure is indicative and is dependent on site specific constraints.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations and mitigate its impacts to ensure General Conformity with the London Plan, development capacity and trajectory information has been updated.
MM/PS2/OPDC/P4/2	P4(b)	Delivering <u>6120</u> new jobs and a minimum <u>1,200575</u> homes on sites outside of SIL, achieving early delivery of housing to contribute towards OPDC's 0-10 year housing supply, in line with the Brewery Cluster, <u>and</u> First Central <u>and Lakeside Drive</u> site allocations.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity in order to ensure General Conformity with the London Plan, sites within Park Royal West are now identified as coming forward within the Plan period. This change aligns with the updated development capacity and trajectory information.
MINOR/PS/Q12Q13 Q16(2)	P4 (new)	<u>Safeguarding Twyford Waste Transfer Station site in accordance with the West London Waste Plan;</u>	To reflect the West London Waste Plan.

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/PS2/OPDC/P4/1	P4	creating new or upgraded continuous walking and cycling routes particularly along key routes, to/from stations, Park Royal Centre and the Grand <u>Union Canal</u> ;	Typographical error
MM/PS2/OPDC/P4/3	P4(e)(i)	<del>Supporting</del> <u>safeguarding for and if relevant and appropriate, contributing to and/or delivering</u> a new vehicular, pedestrian and cycle route to link Park Royal to Channel Gate;	To reflect that updates have now been undertaken to the IDP to provide further clarity on in infrastructure required to support the draft Local Plan
MM/PS2/OPDC/P4/4	4.50	The site is adjacent to the Twyford Waste and Recycling Centre which is safeguarded for waste apportionment purposes through the West London Waste Plan 2016 (see Policy EU6). <u>If the Twyford Waste and Recycling Centre were redeveloped for a non-waste use then compensatory provision would need to be made in line with the London Plan Policy S19, WLWP and Local Plan Policy EU6.</u>	To reflect waste planning policy provisions.
MM/PS2/OPDC/P4/5	4.51	There are a number of non SIL sites within Park Royal West, including First Central, <u>Lakeside Drive</u> and surrounding sites, and the Bashley Road Gypsy and Traveller site. Further information <del>on First Central and surrounding sites are is</del> set out in the First Central <u>and Lakeside Drive</u> site allocations and Brewery Cluster (Policy P4C1). Provision for Gypsy and Traveller accommodation is addressed in the Housing chapter (Policy H8).	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity in order to ensure General Conformity with the London Plan, sites within Park Royal West are now identified as coming forward within the Plan period. This change aligns with the updated development capacity and trajectory information.
MM/PS2/OPDC/P4/6	4.53	A key contributing factor to existing congestion levels is the high number of Park Royal's employees currently travelling to work by car – approximately 35% of the total trips made by car into Park Royal are from within a 5 km radius, which represents the average cycle trip length <sup>3</sup> . <u>There is also a significant amount of 'rat-</u>	To clarify the interventions, in line with OPDC's Liveable Neighbourhoods proposals, that would help deliver the aspirations of the Mayor's Transport Strategy to encourage walking, cycling and public transport use, fewer vehicle trips and more attractive, healthy, accessible and safer streets.

Ref.	Policy/ Para/figure	Modification	Reason
		<p><del>running' through the estate.</del> These travel patterns contribute to high levels of traffic and congestion, particularly along the Big X; <del> affecting bus journey times/reliability theyand</del> are also likely to exacerbate environmental issues such as noise, dust and poor air quality. There is an opportunity to <del> support-deliver changes thatto address these issues and that, this travel behaviour to help address these issues and</del> improve the functioning of the road network and <del> ensure</del> timely business operations and deliveries. <del> The interventions proposed to address this includeThe modal shift from private car trips to public transport, walking and cycling can be achieved by:</del></p> <p><del> a) ensuring there are safe, continuous, well-lit and legible routes; b) increasing pavement widths; c) creating and upgrading cycle lanes; d) improving junctions to support walking and cycling; and e) increasing bus capacity.</del></p>	

Ref.	Policy/ Para/figure	Modification	Reason
		<ul style="list-style-type: none"> <li>• <u>removing through traffic on the Big X;</u></li> <li>• <u>supporting fast and reliable bus services and increasing capacity, including the potential for a complementary night shuttle bus service for shift workers;</u></li> <li>• <u>removing and rationalising car parking;</u></li> <li>• <u>supporting more efficient freight movements;</u></li> <li>• <u>better connecting the six rail stations surrounding Park Royal, via the big X, with better public realm, crossings, traffic calming, CCTV, lighting and signage to support walking and cycling;</u></li> <li>• <u>creating new public spaces and support street greening within the town centre;</u></li> <li>• <u>creating and upgrading cycles lanes to deliver a joined up cycle route network</u></li> </ul>	
MM/PS2/OPDC/P4/7	4.57	<p>... Opportunities must also be taken to provide new spaces along the Grand Union Canal, within the Brewery Cluster and <del>First Central</del> <u>as part of Site</u></p> <p>Allocations <del>and</del> to ensure public access into open spaces and/or providing additional greening and tree cover where possible.</p>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity in order to ensure General Conformity with the London Plan, new site allocations are now identified as coming forward within the Plan period. This change aligns with the updated development capacity and trajectory information.
MM/PS2/OPDC/P4C1/1	4.65	<p>There are opportunities to deliver this mix of uses on development sites focussed along Coronation Road (First Central and Coronation Road South). New development in this location should incorporate 'walk to' <del>A-class</del> <u>town centre</u> uses, employment and community facilities at the ground floor level to create active frontages focused around key routes and Mason's Green Lane. As part of a mixed use approach, residential uses would also <u>be</u> appropriate above these ground floor</p>	To respond to the changes made to the Use Class Order and correct a typographical error

Ref.	Policy/ Para/figure	Modification	Reason
		frontages or in other locations, where this provides positive frontages onto residential focused streets and open spaces; and does not compromise the function of the SIL in accordance with Policies D6 and E1.	
MM/PS2/OPDC/P5/1	P5 Vision	Old Park Royal's established industrial land use and historic character will be protected. Today, this place is a prominent hub for smaller businesses. Opportunities to intensify industrial uses will support the continued growth of start-up businesses and innovative activities across a range of employment sectors. The enhancement of buildings along with improvements to the public realm and movement network will support a functional and exciting place that helps to mediate the transition between <del>Old Oak and Park Royal</del> <u>West industrial and mixed use areas</u> .	To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
MINOR/PS/Q12Q13 Q16(2)	P5(c)	<u>Safeguarding Chase Road site in accordance with the West London Waste Plan.</u>	To reflect the West London Waste Plan.
MINOR/PS/Q12Q13 Q16(2) MM/PS2/OPDC/P5/2	4.78	Although this is the most intensively used part of Park Royal, there is a significant opportunity to deliver more jobs within Old Park Royal Place, particularly within site allocations. Site allocations have been identified for two sites in Old Park Royal – land at Bashley Road and 40-54a Minerva Road. The land at Bashley Road is a particularly key site. It covers over 3.8 ha and has been identified as having the capacity to deliver a minimum 30,100 sqm of broad industrial type activities. A comprehensive and coordinated approach should be taken to the delivery of this site to unlock its potential, in accordance with Policy SP10. Smaller scale intensification will also be achievable in Old Park Royal on other sites <sup>3</sup> , to capitalise on the area's higher PTALs and to take advantage of Old Park Royal's proximity to Old Oak. Delivering this intensification within site allocations and other sites could equate to 1,600 new jobs and growth opportunities across with a	To support new policy clause introduced through <u>MM/PS/Q12Q13 Q16(2)</u> by cross referencing information in the West London Waste Plan and to reflect waste planning policy provisions.

Ref.	Policy/ Para/figure	Modification	Reason
		range of sectors in Old Park Royal although this figure is highly indicative and is dependent on site specific constraints. <u>The Chase Road site is identified as an existing waste site in the West London Waste Plan 2016 (see Policy EU6) so the policy also supports the safeguarding and protection of this site in accordance with the West London Waste Plan. If the site were redeveloped for a non-waste use then compensatory provision would need to be made in line with the London Plan Policy SI9, WLWP and Local Plan Policy EU6.</u>	
MM/PS2/OPDC/P5/3	4.80	Old Park Royal is sandwiched between the wider industrial area of Park Royal West <del>where change will be incremental and Old Oak where change will be transformational, and Old Oak North, where industrial intensification is also being planned for and other mixed use areas.</del> As a consequence, Old Park Royal will have a pivotal role to play as a transition area between <del>both</del> these areas and become a key route between Old Oak and Park Royal in the future.	To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this, references to Old Oak as a mixed use area have been removed.
MM/PS2/OPDC/P6/1	P6a)	Supporting the delivery of a thriving mixed use neighbourhood centre by contributing to the delivery of 1,400 new jobs and a minimum of <del>650-800</del> new homes to support OPDC's 0-10 year housing supply;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity in order to ensure General Conformity with the London Plan, sites within Park Royal Centre are now identified as coming forward within the Plan period. This change aligns with the updated development capacity and trajectory information.
MM/PS2/OPDC/P6/2	P6b)	Delivering and maintaining a quantum and mix of <del>A class town centre</del> floorspace <u>with ground floor active frontages that are appropriately designed and serviced to support the town centre</u> , including smaller units, to meet anticipated future demand in the most up to date Retail and Leisure Needs Study;	To respond to the changes made to the Use Class Order.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/P6/3	P6d)(i)	delivers a mix of town centre use floorspace, including small <del>A-class</del> units, as ground floor active frontages facing onto Park Royal Road and Coronation Road;	To respond to the changes made to the Use Class Order.
MM/PS2/OPDC/P6/4	P6e)	<del>Delivering social infrastructure iversifying the services, amenities, D-class and other appropriate town centre uses within appropriate to</del> the Neighbourhood Centre <del>and</del> to supporting new and existing industrial, health and residential uses;	To respond to the changes made to the Use Class Order.
MM/PS2/OPDC/P6/5	P6(h)(i)	h) Contributing to and/or enabling delivery of new and improved cycling routes, to create: i) continuous <del>two-way</del> cycle lanes <del>in both directions</del> , particularly <del>along</del> Coronation Road, Park Royal Road, Abbey Road and Acton Lane; and	To clarify the interventions, in line with OPDC's Liveable Neighbourhoods proposals, that would help deliver the aspirations of the Mayor's Transport Strategy to encourage walking, cycling and public transport use, fewer vehicle trips and more attractive, healthy, accessible and safer streets.
MM/PS2/OPDC/P6/6	P6(k)	k) Contributing to, enabling and/or delivering <del>a major realignment of the</del> improvements to Coronation Road/Park Royal Road/Abbey Road/Acton Lane junction <del>that remove through traffic and improve their function for local business related freight, public transport, walking and cycling.</del>	To clarify the interventions, in line with OPDC's Liveable Neighbourhoods proposals, that would help deliver the aspirations of the Mayor's Transport Strategy to encourage walking, cycling and public transport use, fewer vehicle trips and more attractive, healthy, accessible and safer streets.
MM/PS2/OPDC/P6/7	P6(l)(ii)	ii) within the ASDA site <del>and in association with the realignment of the Coronation Road/ Park Royal Road/ Abbey Road/Acton Lane junction.</del>	To clarify the interventions, in line with OPDC's Liveable Neighbourhoods proposals, that would help deliver the aspirations of the Mayor's Transport Strategy to encourage walking, cycling and public transport use, fewer vehicle trips and more attractive, healthy, accessible and safer streets.
MM/PS2/OPDC/P6/8	P6(n)	Contributing to a variety of building heights including a single tall building at the north-eastern corner of the ASDA site to support local legibility <del>and where this facilitates the delivery of the realigned road junction</del>	To clarify the interventions, in line with OPDC's Liveable Neighbourhoods proposals, that would help deliver the aspirations of the Mayor's Transport Strategy to encourage walking, cycling and public transport use, fewer vehicle trips and more attractive, healthy, accessible and safer streets.
MM/PS2/OPDC/P6/9	4.83	Other uses include supported housing and smaller services such as banks and cafes which help provide	To respond to the changes made to the Use Class Order.



Ref.	Policy/ Para/figure	Modification	Reason
		facilities for local employees, residents and visitors but there are still gaps in local provision for business focused services, such as meeting spaces. <del>and an identified need for an additional 3,000sqm of additional A use class floorspace within Park Royal Centre in</del> OPDC's <del>most recent</del> Retail and Leisure Needs Study <u>identifies the likely amount of town centre floorspace required (3,000sqm) within Park Royal Centre based on estimates for A class uses prior to changes to the Use Class Order in September 2020.</u>	
<del>MINOR/PS/General3</del>	4.85	Add the following sentence as a final sentence to paragraph: ... <u>Complementary residential accommodation has recently been delivered in the form of supported housing along Acton Lane.</u>	To recognise that planning permissions have been implemented for supporting housing along Acton Lane in response to a request from the London Borough of Brent.
<del>MM/PS2/OPDC/P6/10</del>	4.86	A mix of town centre uses that can support local workers, residents and the industrial estate, <del>primarily focused on the delivery of new A use class floorspace</del> can be delivered here, alongside complementary residential, social infrastructure and industrial uses.	To respond to the changes made to the Use Class Order.
<del>MM/PS2/OPDC/P6/11</del>	4.87	The target of <del>650-800</del> homes across the centre is a minimum. Early work as part of the Park Royal Development Framework Principles document highlights the potential to deliver over 1,100 homes across a number of sites in the centre.	To recognise that planning permission has been granted for development of the Central Middlesex Hospital North East Site.
<del>MM/PS2/OPDC/P6/12</del>	4.88	<del>PRC.6. The junction of Abbey Road, Acton Lane, Park Royal Road and Coronation Road — which are the roads referred to as the 'Big X' — sits at the heart of the town centre. The existing staggered junction is inefficient and one of the biggest contributors to road congestion in Park Royal, adversely affecting the operation of the SIL. The junction dissects the town centre and acts as a significant barrier to movement and the creation of a</del>	To clarify the interventions, in line with OPDC's Liveable Neighbourhoods proposals, that would help deliver the aspirations of the Mayor's Transport Strategy to encourage walking, cycling and public transport use, fewer vehicle trips and more attractive, healthy, accessible and safer streets.

Ref.	Policy/ Para/figure	Modification	Reason
		<p><del>coherent centre. A poor pedestrian experience and cycling links into the centre make it difficult to travel to and navigate around.</del></p> <p><del>PRC.7. To address these issues, proposals should support and contribute appropriately to a realigned junction. This realignment would improve the capacity and functionality of the junction, ensuring a smoother flow of traffic through the centre and allow for the introduction of better crossing facilities. To deliver the junction realignment, some land from the current ASDA car park would be required, and future development on the ASDA site must safeguard and facilitate delivery of this infrastructure scheme. Delivering the junction realignment will be costly but will benefit uses in the town centre. Therefore, all development proposals are expected to appropriately contribute to and enable its implementation.</del></p>	

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/P6/13	4.90	<p><u>The junction of Abbey Road, Acton Lane, Park Royal Road and Coronation Road – which are the roads referred to as the ‘Big X’- sits at the heart of the town centre. The Big X forms the basis of the local bus network and the primary walking and cycling routes connecting Park Royal centre to the six surrounding rail stations, and nearby town centres. The junction dissects Park Royal Neighbourhood Centre and acts as a significant barrier to movement and the creation of a coherent centre. A poor pedestrian experience and cycling links into the centre make it difficult to travel to and navigate around. The Big X routes are heavily trafficked, dominated by car parking and congested, and this affects bus journey times/reliability, air quality and the quality of the public realm. There is an opportunity to address these issues as part of the wider transformation of Park Royal into an exemplar industrial estate, and through the following focussed interventions:</u></p> <ul style="list-style-type: none"> <li>• <u>removing through traffic on the Big X;</u></li> <li>• <u>supporting fast and reliable bus services and increasing capacity, including the potential for a complementary night shuttle bus service for shift workers;</u></li> <li>• <u>removing and rationalising car parking;</u></li> <li>• <u>supporting more efficient freight movements;</u></li> <li>• <u>better connecting the-six- rail stations surrounding Park Royal, via the big X, with better public realm, crossings, traffic calming, CCTV, lighting and signage to support walking and cycling;</u></li> <li>• <u>creating new public spaces and support street greening within the town centre;</u></li> <li>• <u>creating and upgrading cycles lanes to deliver a joined up cycle route network</u></li> </ul>	<p>To clarify the interventions, in line with OPDC’s Liveable Neighbourhoods proposals, that would help deliver the aspirations of the Mayor’s Transport Strategy to encourage walking, cycling and public transport use, fewer vehicle trips and more attractive, healthy, accessible and safer streets.</p>

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/P6/14	4.92	New publicly accessible open space should be provided in Park Royal Centre to contribute to the target to deliver 30% public open space (see Policies SP8 and EU1). This should include new publicly accessible open spaces around the <del>realigned</del> Big X junction and enhanced publicly accessible open space at the front of CMH. Subject to the rationalisation of the bus network on the CMH and removal of surface car parking, there is also potential for new publicly open space on this site.	To clarify the interventions, in line with OPDC's Liveable Neighbourhoods proposals, that would help deliver the aspirations of the Mayor's Transport Strategy to encourage walking, cycling and public transport use, fewer vehicle trips and more attractive, healthy, accessible and safer streets.
MM/PS2/OPDC/P6/15	4.93	Park Royal Centre has a diverse range of buildings and uses within and surrounding it. The design and height of new buildings in Park Royal Centre will need to appropriately respond to the surrounding context and will be subject to an assessment of their potential impacts on amenity (see Policy D6). A single tall building is supported in principle <sup>1</sup> on the north east corner of the ASDA site in this location where it would support the viability of delivering improvements to the <del>road junction</del> Big X , <del>including its realignment</del> and new publicly accessible open space.	To clarify the interventions, in line with OPDC's Liveable Neighbourhoods proposals, that would help deliver the aspirations of the Mayor's Transport Strategy to encourage walking, cycling and public transport use, fewer vehicle trips and more attractive, healthy, accessible and safer streets.
MM/PS2/OPDC/P7/1	P7(c)  4.98  4.99	Supporting the delivery of mixed use high density residential and student accommodation by: <ul style="list-style-type: none"> <li>i. contributing to the delivery of <del>4,600</del>6,200 new jobs and a minimum of <del>6,000</del>8,000 new homes, including early delivery of a minimum of <del>3,200</del>5,250 new homes to support OPDC's 0-10 year housing supply;</li> </ul> <p>North Acton and Acton Wells have the capacity to deliver a minimum of <del>6,000</del>8,000 new homes during the plan period<sup>1</sup>.</p> <p>North Acton can accommodate a range of new employment spaces to support the activation of the area</p>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations and mitigate its impacts to ensure General Conformity with the London Plan, development capacity and trajectory information has been updated.

Ref.	Policy/ Para/figure	Modification	Reason
		and continue its mixed use character. The area has the capacity to deliver <u>4,3006,200</u> new jobs during the plan period2	
MINOR/PS/Q5(6) MM/PS2/OPDC/P7/2 MM/PS2/OPDC/P7/2A	P7(d)  4.109	<p>Focusing town centre, <u>employment, social infrastructurecommunity</u>, cultural and catalyst uses <u>and Use Class E uses that are appropriately designed and serviced to support the within</u>-North Acton Neighbourhood Town Centre <u>within the town centre</u> and along Old Oak Street;</p> <p>The development of high density mixed use areas will necessitate the provision of a substantial amount of social and physical infrastructure. Within <u>North Acton and Acton Wells</u>, <del>OPDC's IDP</del><u>the Local Plan</u> identifies that there is a need for one super nursery and <del>an on-site secondary school</del><u>one health hub</u>. <del>Based on current phasing and population yield assumptions, the study identifies the need for 9 forms of entry within this facility.</del> Further details on the <u>phasing specification and the approach to the provision of this facility (including alternative arrangements)</u> are set out in the IDP. In accordance with Policy SP10, an equitable equalisation mechanism will be applied to the delivery of <del>the secondary school</del><u>any onsite social infrastructure</u>, to ensure even sharing of the costs of delivering <del>the facilities</del>.</p>	<p>To ensure appropriate infrastructure information is contained within the Local Plan.</p> <p>An update to the Social Infrastructure Needs Study has been produced to updated to identify the social infrastructure needed to meet the needs of the updated development capacity and phasing. This has resulted in changes to the location, phasing and quantity of social infrastructure across the OPDC area.</p>
MINOR/PS/Q12Q13 Q16(1) and MINOR/PS/M3c(1)	P7(f)	Contributing to and/or enabling delivery of a permeable, inclusive and accessible street network with new connections to surrounding areas as shown in figure 4.21 <u>including Old Oak Street west of the potential Old Oak Common Lane Station</u>	To provide clear information for the location of Old Oak Street.
MM/PS2/OPDC/P7/3	P7 (l)(i)	<p>I. Contributing to a variety of building heights that includes:</p> <p>i. tall buildings across North Acton <u>and Acton Wells</u> in appropriate locations in accordance with policies SP9, D5 and</p>	To reflect policy SP9, figure 3.15 and the Victoria Road and Old Oak Lane Development Framework Principles document.

Ref.	Policy/ Para/figure	Modification	Reason
		figure 3.15 that do not result in an overbearing wall of development;	
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.
MM/PS2/OPDC/P7/4	P7(m)	Safeguarding <u>for and if relevant and appropriate, contribute to and / or deliver Old Oak Common Lane Station and</u> land for the delivery of the West London Orbital Line station and services within Acton Wells;	To reflect current status of proposals and ensure development appropriately safeguards for or contributes to and / or delivers Old Oak Common Station.
MINOR/PS/Q12Q13 Q16(2)	P7(o)	<u>Safeguarding Quattro site in accordance with the West London Waste Plan.</u>	To reflect the West London Waste Plan.
MM/PS2/OPDC/P7/5	4.97	The ongoing redevelopment of North Acton will continue and represents some of the earliest development in the OPDC area, whereas the development of Acton Wells is unlikely to commence until after the opening of Old Oak Common Station <del>in 2026</del> , when the sites are no longer required for construction purposes.	To reflect up to date timings for the delivery of Old Oak Common Station.
MM/PS2/OPDC/P7/6	4.99	The area has the capacity to deliver <del>4,3006,200</del> new jobs during the plan period <sup>2</sup> delivered across a range of town centre, <del>B1, B2 and B8 uses</del> <u>Use Class E</u> and community and cultural uses.	To respond to the changes made to the Use Class Order.
MM/PS2/OPDC/P7/7	4.101	At the time of the publication of this Local Plan, the Quattro site in Acton Wells is safeguarded within the West London Waste Plan (2015). Proposals should accord with this designation or any future policy guidance provided within an updated West London Waste Plan or other Development Plan Document. <u>If the site were redeveloped for a non-waste use then compensatory provision would need to be made in line with the London Plan Policy SI9, WLWP and Local Plan Policy EU6.</u>	To reflect the waste planning policy provisions.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/P7/8	Table 4.1	Tall buildings across North Acton <u>and Acton Wells</u> in appropriate locations in accordance with policies SP9, D5 and figure 3.15 that do not result in an overbearing wall of development.	To reflect policy SP9, figure 3.15 and the Victoria Road and Old Oak Lane Development Framework Principles document.
MINOR/2/P7/12	4.111	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. <u>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/P7C1/2	4.117	Proposals should contribute to the delivery of a new square, <u>or alternative public realm layout,</u> to the north of North Acton Station.	To ensure the design of public realm responds to future detailed design of improvements to North Acton Station.
MM/PS2/OPDC/P7C1/1	P7C1(a)  4.115	Supporting the delivery of a neighbourhood town centre by clustering a range of permanent and meanwhile town centre uses and <del>employment</del> <u>Use Class E uses, that are appropriately designed and serviced to support the town centre,</u> around the existing southern and new northern station squares, along Victoria Road south of North Acton Station and along Portal Way with residential above;  North Acton neighbourhood town centre has been designated to provide local services to existing and new communities <sup>1</sup> . Active meanwhile and permanent town centre and <del>employment</del> <u>Use Class E</u> uses will be supported within this new centre <u>that are appropriately designed and serviced to support the role of the town centre.</u> These should provide active and positive frontages with residential above. Active uses should continue at ground and lower levels along Victoria Road and Portal Way to help activate these key routes.	To respond to the changes made to the Use Class Order.

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/2/P7C2/7	P7C2 (b)(ii) & (d)	b)ii) is integrated with <u>a potential new</u> Old Oak Common Lane Station;  d) Supporting the delivery of <u>a potential</u> Old Oak Common Lane London Overground Station...	To reflect the current status of the station.
MM/PS2/OPDC/P7C2/1	4.121	The potential Old Oak Common Lane Station is a TfL transport requirement, to provide an appropriate interchange between services within Old Oak Common Station and other local services. The Station will need to be designed to support this role. <u>The station is not required to directly support Old Oak's development transport needs; however, to support strategic transport needs, development should safeguard for and if relevant and appropriate, contribute to and / or deliver the station.</u>	To reflect current status of proposals and ensure development appropriately safeguards for or contributes to and / or delivers Old Oak Common Station.
MM/PS2/OPDC/P7C2/1A	P7C2(a)  4.123	Supporting the delivery of Old Oak major town centre by clustering permanent and meanwhile town centre and <u>employment Use Class E uses, that are appropriately designed and serviced to support the town centre,</u> along Old Oak Street with residential above.  The station should also be designed to support the delivery of Old Oak Street through the station as a continuous 24 hour ungated walking and cycling route. Entrances should be clearly located onto Old Oak Street with interchange functions on the station square to the west of the station. Further work will be required to define the detailed design of Old Oak Street between the two stations and any other routes. However, emerging feasibility studies by Transport for London identify that Old Oak Street may need to be delivered as a cycling and footbridge through the station. By clustering active town centre and <u>employment Use Class E uses around the station square, or alternative public realm layout,</u> the activation of this space will assist in local legibility and access to the station.	To respond to the changes made to the Use Class Order.



Ref.	Policy/ Para/figure	Modification	Reason
<del>MINOR/2/P7C2/6</del>	4.123	...By clustering active town centre and employment uses around the station square, <del>or alternative public realm layout.</del> 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.
<del>MM/PS2/OPDC/P8/1</del>	P8 Vision	Old Oak Lane and Old Oak Common Lane will be a place that sensitively integrates transport routes, existing neighbourhoods and new development. It will be a place that mediates between <del>the</del> comprehensive <del>mixed use</del> -redevelopment <del>of Old Oak</del> and <del>the</del> industrial intensification <del>in Park Royal and Channel Gate.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
<del>MM/PS2/OPDC/P8/2</del>	P8(a)(i)  4.129	Supporting the delivery of a vibrant mixed use place by: a) contributing to the delivery of <del>4,600</del> <u>1,700</u> new jobs and a minimum of <del>2,800</del> <u>2,750</u> new homes over the plan period including early delivery of a minimum of 1,200 homes to contribute to OPDC's 0-10 year housing supply; and  Old Oak Lane and Old Oak Common Lane is identified to have the capacity to deliver a minimum of <del>2,600</del> <u>2,750</u> new homes and a capacity of <del>1,100</del> <u>1,700</u> new jobs during the plan period <sup>1</sup> .	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations and mitigate its impacts to ensure General Conformity with the London Plan, development capacity and trajectory information has been updated.
<del>MM/PS2/OPDC/P8/3</del>	P8 a) ii	delivering ground floor town centre uses within <del>Atlas Junction neighbourhood town centre</del> <u>Old Oak major town centre.</u>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the location of Old Oak major town centre has been amended and has subsumed Atlas Junction neighbourhood town centre.
<del>MM/PS2/OPDC/P8/4</del>	P8 b)	<del>Supporting the functioning of SIL while delivering active and positive frontages on sites facing onto Victoria Road and Old Oak Lane;</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed

Ref.	Policy/ Para/figure	Modification	Reason
			use development and Old Oak North will be retained as SIL. SIL frontages will no longer be located on to Victoria Road and Old Oak Lane within the Place of Old Oak Lane and Old Oak Common Lane.
MM/PS2/OPDC/P8/5	P8 c)	i. delivering a mix of housing and compatible <del>employment industrial and/or town centre</del> floorspace, including space for small businesses, to make use of the close proximity to Old Oak Common Station in accordance with policy E2; and ii. delivering <del>employment town centre uses, social infrastructure and/or community facilities and/or community uses</del> on the ground floor with residential above directly facing Wormwood Scrubs.	To align with new glossary definitions and amendments to the Use Class Order.
MM/PS2/OPDC/P8/6	P8 g) iv	new and improved spaces within <del>Atlas Junction neighbourhood</del> <u>Old Oak major</u> town centre; and	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the location of Old Oak major town centre has been amended and has subsumed Atlas Junction neighbourhood town centre.
MM/PS2/OPDC/P8/7	4.126	Positioned between <del>Old Oak and Park Royal</del> <u>mixed use areas and Strategic Industrial Locations (SIL)</u> , it is a place of transition in terms of land use, built form and character and will play an important role in integrating <del>Old Oak</del> <u>the OPDC area</u> with surrounding <del>areas</del> <u>locations</u> . This transition is reflected by its diverse mix of employment and residential uses <u>including Strategic Industrial Locations (SIL), other employment floorspace</u> and the four established residential neighbourhoods of the Island Triangle, Shaftesbury Gardens, Midland Terrace and Wells House Road.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
MM/PS2/OPDC/P8/8	4.127	During the construction of development within Old Oak <u>South</u> and Old Oak Common Station, this traffic will increase resulting in further impacts on amenity and the	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development

Ref.	Policy/ Para/figure	Modification	Reason
		functioning of the public realm if not appropriately mitigated. Further impact on amenity from construction activities could be created by the High Speed 2 (HS2) construction activities <u>and post-construction developments</u> in the adjacent locations of Channel Gate and Acton Wells.	and Old Oak North will be retained as SIL. To reflect this change in land use designations, specific focus on development within Old Oak South is provided.
<u>MM/PS2/OPDC/P8/9</u>	4.129	This development potential provides the opportunity for new and improved connections to be embedded across the area, for existing neighbourhoods to be integrated with surrounding areas and for <u>the Old Oak major a new neighbourhood</u> town centre to be established at Atlas Junction.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the location of Old Oak major town centre has been amended and has subsumed Atlas Junction neighbourhood town centre.
<u>MM/PS2/OPDC/P8/10</u>	4.130	The Willesden Junction Bus Garage <u>and areas directly to the south of the Island Triangle neighbourhood are is</u> within SIL designations. In accordance with London Plan policy and to support the local industrial economy, industrial and/or transport uses should be delivered in <u>these</u> locations	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development
<u>MM/PS2/OPDC/P8/11</u>	4.132	These issues will be amplified during the construction of Old Oak <u>South</u> and Old Oak Common Station as significant amounts of HS2 and other construction traffic will be moving between Old Oak South, Acton Wells and Channel Gate.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, specific focus on development within Old Oak South is provided.
<u>MM/PS2/OPDC/P8/12</u>	4.134	Access to publicly accessible open spaces within Old Oak Lane and Old Oak Common Lane is currently restricted to a series of roadside spaces, including Cerebos Gardens and Wormwood Scrubs to the south of the place. The potential development sites provide opportunities to enhance and expand existing open spaces and deliver new open spaces <sup>5</sup> that contribute to the 30% open space requirements set out in Policy SP8. These include:	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, there is an opportunity for the Old Oak Community Garden to be enhanced and expanded to support mixed use development in Channel Gate.

Ref.	Policy/ Para/figure	Modification	Reason
		<p>a) Cerebos Gardens and Midland Terrace play space – enhanced to mitigate impacts of traffic and improve access;</p> <p>b) Old Oak Community Gardens – enhanced and expanded to support the amenity of the Island Triangle neighbourhood <u>and Channel Gate</u>;</p>	
<u>MM/PS2/OPDC/P8C1/1</u>	P8C1 title	Atlas Junction <del>Town Centre</del> -Cluster	To respond to the Inspector’s Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the location of Old Oak major town centre has been amended and has subsumed Atlas Junction neighbourhood town centre.
<u>MM/PS2/OPDC/P8C1/2</u>	P8C1 Vision	<del>This neighbourhood town centre</del> <u>As part of Old Oak Major Town Centre, Atlas Junction</u> will provide local services for communities centred on an improved Atlas Junction and <u>Union Way</u> <del>Park Road that provides a key route into Old Oak</del> . Active uses will sit beside high quality canal side spaces helping to establish this stretch of the canal as a place to visit and enjoy.	To respond to the Inspector’s Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the location of Old Oak major town centre has been amended and has subsumed Atlas Junction neighbourhood town centre. Additionally Union Way will no longer be connecting to Old Oak North and will no longer be a key route.
<u>MM/PS2/OPDC/P8C1/3</u> <u>MM/PS2/OPDC/P8C1/3.5</u>	P8C1 a)	Supporting the delivery of <del>the neighbourhood</del> <u>this portion of the Old Oak major town centre</u> by clustering active town centre and <del>employment</del> <u>Use Class E uses, that are appropriately designed and serviced to support the town centre</u> , along existing streets and new routes shown in figure 4.30 <del>outside of SIL</del> on ground and lower floors with residential above;	<p>To respond to the Inspector’s Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the location of Old Oak major town centre has been amended and has subsumed Atlas Junction neighbourhood town centre, while SIL frontages will no longer be located on the western corner of Atlas Junction.</p> <p>To respond to the change in the use class order.</p>

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/P8C1/4	P8C1 b)	<del>Supporting the functioning of SIL by delivering high density high quality SIL compliant broad industrial type activities with active frontages at the Rowan House site on the western corner of Atlas Junction.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, SIL frontages will no longer be located on the western corner of Atlas Junction.
MM/PS2/OPDC/P8C1/5	P8C1 b)(i)	Supporting the activation of the canal and canalside spaces by delivering and/or enabling: <del>leisure, eating and drinking</del> <u>Use Class E, -uses, that deliver high levels of activation,</u> fronting on to the Grand Union Canal;	To align with new amendments to the Use Class Order.
MM/PS2/OPDC/P8C1/6	P8C1 b)(iii)	meanwhile uses <del>within the neighbourhood town centre and Oaklands North</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the location of Old Oak major town centre has been amended and has subsumed Atlas Junction neighbourhood town centre, meaning meanwhile uses are appropriate across the entire cluster.
MM/PS2/OPDC/P8C1/7 MM/PS/Q12Q13 Q16(1) and MM/PS/M3c(1)	P8C1(c)(i)	Delivering a high quality public realm by contributing to and/or delivering: i. <del>Union Way as an important all modes access route providing walking and cycling access to the Grand Union Canal towpath which is access only for private vehicles</del> <u>Park Road;</u> and	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the location of Old Oak major town centre has been amended and has subsumed Atlas Junction neighbourhood town centre. Additionally Union Way will no longer be connecting to Old Oak North and will no longer be a

Ref.	Policy/ Para/figure	Modification	Reason
			key route. Instead, a walking and cycling route will connect with the Grand Union Canal towpath.
MM/PS2/OPDC/P8C1/8 MINOR/PS/General1	P8C1 h) ii	on Oaklands North, generally 6 to 8 storeys facing on to the Grand Union Canal, <u>with</u> generally 10 storeys along <u>Union Way</u> <del>Park Road that defines its role as a key north-south route and canal crossing point</del> ; and	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, Union Way will no longer be a key route and is no longer an appropriate location for a tall building.
MM/PS2/OPDC/P8C1/9	P8C1(g)(iii)	<del>at Rowan House</del> on the western corner of Atlas Junction, heights of generally 8 to 10 storeys.	To reflect the demolition of Rowan House.
MM/PS2/OPDC/P8C1/10	4.140-4.141	Reflecting its local accessibility and existing town centre uses, Atlas Junction is well placed to serve nearby existing and new residential and business communities. To support these uses, <del>a neighbourhood town centre has been designated</del> <u>the area has been designated as part of the Old Oak major town centre</u> . The existing Collective development demonstrates the development potential within Atlas Junction town centre. The Willesden Junction Maintenance Depot, the adjacent Power House and the sites on the east and west of Atlas Junction represent an opportunity to coordinate and optimise development to help establish this <del>new neighbourhood</del> <u>part of the major</u> town centre.  <del>The town centre also overlaps with the Strategic Industrial Location (SIL) designation to the west of Atlas Junction. By ensuring development within SIL provides active and/or positive frontages to the street, these uses will contribute to the vibrancy of the town centre and adjacent locations. These uses could include ancillary front-of-house spaces for industrial uses alongside local walk-to uses. Outside of SIL, the provision of residential uses above ground and lower floors will be supported.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the location of Old Oak major town centre has been amended and has subsumed Atlas Junction neighbourhood town centre. Additionally, SIL within Old Oak Lane and Old Oak Common Lane will no longer overlap with the major town centre.
MM/PS2/OPDC/P8C1/11	4.143	To support local people reaching their destinations, development should contribute to the delivery of <u>Union</u>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will

Ref.	Policy/ Para/figure	Modification	Reason
		<del>WayPark Road</del> and its associated <del>bridge-walking and cycling connection to the southern towpath and to a new/enhanced pedestrian/cycle bridge into Old Oak North across the canal.</del>	be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, Union Way will no longer be connecting to Old Oak North and will connect to the Grand Union Canal towpath via a walking and cycling route.
MM/PS2/OPDC/P8C1/12	4.144	In addition to walking and cycling, a substantial amount of freight and construction traffic will pass through the cluster. This movement will need to be supported to facilitate the construction of Old Oak Common Station <del>and</del> , wider Old Oak <del>and</del> <del>and to allow for the continuing functioning of Park Royal as a successful industrial estate.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
MM/PS2/OPDC/P8C1/13	4.146	Across Old Oak Lane and Old Oak Common Lane there are a range of building heights. The current tallest building is The Collective adjacent to the Grand Union Canal. Development sites provide the opportunity to help support local legibility to stations and <del>both Atlas Junction and Old Oak town centres</del> and provide appropriate densities to make the best use of land and optimise development. Building heights have been informed by the Victoria Road and Old Oak Lane Development Framework Principles <del>and Channel Gate Development Framework Principles</del> supporting studies. Development of the Willesden Junction Maintenance Depot and sites to the south should reflect the existing height of The Collective in the north of the site and decrease to respond to the existing Victoria Terrace.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the location of Old Oak major town centre has been amended and has subsumed Atlas Junction neighbourhood town centre. Reference is also made to the new Channel Gate Development Framework Principles supporting study which informs the proposals for Channel Gate.
MM/PS2/OPDC/P8C1/14	4.146	On the east and west corners of Atlas Junction, building heights provide the opportunity to help define the <del>junction with Rowan House on the</del> western corner <del>of the junction</del> providing 8 to 10 storeys to create a suitable enclosure to the junction and along Victoria Road.	To reflect the demolition of Rowan House.

Ref.	Policy/ Para/figure	Modification	Reason
<a href="#">MM/PS2/OPDC/P9/1</a>	P9	A full re-write of Policy P9 and supporting text has been undertaken. To review the new policy text, please refer to the Local Plan.	To respond to the Inspector's Interim Findings, Channel Gate will be released from SIL.
<a href="#">MM/PS2/OPDC/P10/1</a>	P10 Vision	Scrubs Lane will be a characterful and well connected <del>street neighbourhood</del> sitting as a hinge between <del>surrounding areaseast and west helping to integrate Old Oak with surrounding areas</del> . Development will continue its employment heritage and will integrate space for living, creating and working	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, further consideration has been given to Scrub Lane as a linear neighbourhood and its connectivity to surrounding destinations. These considerations have been reflected in the Scrubs Lane Place vision.
<a href="#">MM/PS2/OPDC/P10/2</a>	P10(a)	Supporting the delivery of a range of <u>residential-led</u> mixed use development along Scrubs Lane	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, further consideration has been given to Scrub Lane as a residential-led area with supporting town centre and employment uses.
<a href="#">MM/PS2/OPDC/P10/2A</a>	P10(a)	by contributing to the delivery of <del>1,200-1,100</del> new jobs and a minimum of <del>2,600-3,500</del> new homes including <del>1,950-2,450</del> new homes within the first 0-10 years;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, adjustments to development capacity and phasing have been undertaken.
<a href="#">MM/PS2/OPDC/P10/3</a>	P10(b)	<u>Delivering a range of 'walk to' town centre uses focussed within identified clusters, providing local services for people living and working in the Scrubs Lane Place;</u>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, town centre uses are required in focussed locations to meet the needs of people living and working with the Scrubs Lane place.



Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/P10/4	P10(b)	Supporting the local economy and strengthening local identity by delivering high quality ground and lower floor employment floorspace on sites fronting Scrubs Lane and existing or proposed yard spaces, consisting of <u>appropriately designed and serviced</u> small business units for <del>B1a, B1c, E,</del> B2 and B8 uses along its length;	To respond to the changes made to the Use Class Order to continue to support employment uses along Scrubs Lane.
MM/PS2/OPDC/P10/5	P10(c)	Supporting residential amenity by locating housing: i. above the ground and lower floors onto Scrubs Lane and railway lines; ii. at the ground floor away from Scrubs Lane where appropriate.; <del>and</del> iii. <del>in a residential-led area south of the canal to the east of Scrubs Lane.</del>	The modification set out in MM/PS2/OPDC/P10C5/1 require this policy to be removed to avoid repetition.
<del>MM12/PS/Q5(10)</del> MM/PS2/OPDC/P10/6	P10(d)  4.166	<u>Infrastructure</u> <del>Contributing to and/or enabling the delivery of an energy centre along Scrubs Lane;</del>  OPDC has produced a Scrubs Lane Development Framework Principles ( <del>OO</del> NSLDFP) document to provide further detail on the area's development capacity, land use mix and infrastructure required to support the needs of development and create a high quality place. The principles within this document inform the policy for this place. <del>OPDC will also produce an Old Oak North and Scrubs Lane Supplementary Planning Document, which will include more detailed guidance principles for the Old Oak North (see Policy P2) and Scrubs Lane places.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, a decentralised energy network will not be delivered for Old Oak North or Scrubs Lane.
MM/PS2/OPDC/P10/7	P10(e)	improving existing, <u>safeguarding for</u> and creating new east-west routes at each cluster	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will

Ref.	Policy/ Para/figure	Modification	Reason
			be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations a new potential route into Old Oak North via Laundry Lane is being safeguarded to support industrial intensification if required.
MM/PS2/OPDC/P10/8	P10(f)(iii)	<del>new publicly accessible open space adjacent to Little Wormwood Scrubs; and</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, adjustments to development capacity and phasing have been undertaken. This includes the delivery of North Pole East Depot within the plan period. The delivery of this sites enables the designation of the new Mitre Way Cluster where a new publicly accessible open space will be required in accordance with policy P10(f)(i).
MM/PS2/OPDC/P10/8A	P10(f)(iv)	yards as open spaces <del>to the north of the canal along Scrubs Lane</del> to support employment uses and as communal or private open spaces for housing.	To further reflect existing character and the historic context.
MM/PS2/OPDC/P10/9	P10(g)(v)	<del>within clusters, a variety of building heights including generally a single tall building in each cluster; and</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This results in Hythe Road becoming the primary existing east to west route into Old Oak North and destinations further to the west and east. To signify Hythe Road's role, two tall buildings are appropriate to reinforce the emerging spatial hierarchy of the local and wider context and aid legibility and wayfinding to Hythe Road.
MINOR/2/P10/3	P10 (g)(vi)	<del>vi. visual permeability between tall buildings.</del>	To provide clarity for the need for visual permeability and complement Local Plan Policy D4 and Draft New London Plan policy D8.
MM/PS2/OPDC/P10/10	4.163	<del>Scrubs Lane sits as a hinge between a series of surrounding neighbourhoods that are undergoing</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will

Ref.	Policy/ Para/figure	Modification	Reason
		<p><u>significant change and growth. To its north is Harlesden Town Centre and Willesden Junction station where significant enhancements are proposed to ensure the station better serves local communities. To its west is Old Oak North which will undergo significant redevelopment and industrial intensification during the lifetime of OPDC's Local Plan and will be supported by ancillary uses and new open spaces and connections. Old Oak Common station will also be within 10 minutes walking distance of Scrubs Lane, accessed via a new pedestrian and cycle link from the Grand Union Canal. To its south is White City Opportunity Area which has already seen significant housing and employment delivery, with further growth planned. Finally, to its east is the Kensal Canalside Opportunity Area where an additional 3,500 homes and series of canalside spaces are planned. As this hinge, Scrubs Lane has the ability to deliver enhanced connections which tie together these surrounding neighbourhoods and deliver a high quality place which makes a significant contribution to local homes and jobs provision in its own right. The ability to secure early delivery of homes and jobs along Scrubs Lane provides an opportunity to cement forthcoming change in the wider area and to improve connections to Old Oak North.</u></p>	<p>be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, further consideration and emphasis on Scrubs Lane's role as a hinge and connector to surrounding destinations has been provided.</p>
MM/PS2/OPDC/P10/11	4.165	<p><u>Cargiant own and operate 18 hectares of adjoining land in Old Oak North as a contiguous car plant employing directly and indirectly over 2,000 people. Cargiant's operational land includes properties located on Scrubs Lane. Therefore, it is appropriate that the sites owned and occupied by the Cargiant operation in Scrubs Lane will be safeguarded from other uses whilst those sites are used in conjunction with the main Cargiant operations on Hythe Road and Salter Street<sup>1</sup>. Equally, development proposals to support the intensified operational use of these sites will be supported.</u></p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, further information has been provided to support Cargiant as a flourishing local business and significant employment provider.</p>

Ref.	Policy/ Para/figure	Modification	Reason
		<p><u><a href="#">1 In a statement issued on 13 December 2019, the OPDC confirmed that it no longer intended to seek to acquire land owned by Cargiant and would make the necessary amendments to the draft Local Plan to confirm that this part of Old Oak North will remain a business and employment location for the foreseeable future.</a></u></p>	
MM/PS2/OPDC/P10/12	4.167	<p>A significant proportion of early development will be seen on Scrubs Lane. Scrubs Lane has the capacity to deliver a minimum of <u><a href="#">2,6003,500</a></u> new homes and <u><a href="#">4,2001,100</a></u> new jobs in the plan period.</p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, development capacities are also being updated.</p>
MM/PS2/OPDC/P10/13	4.167	<p><u><a href="#">Once OPDC's Local Plan has been adopted, the Scrubs Lane place would have been de-designated from SIL and would comprise land allocated for housing. In accordance with Mayoral affordable housing policy, sites brought forward for housing on Scrubs Lane would therefore be eligible for the Mayor's fast track approach to affordable housing viability at 35% affordable housing.</a></u></p>	<p>To clarify the affordable housing approach for former SIL sites within Scrubs Lane.</p>
MM/PS2/OPDC/P10/14	4.168	<p><u><a href="#">The early delivery of development along Scrubs Lane presents a number of challenges. These include providing uses and services to support the emerging community while the wider area of Old Oak will continue to be developed. Within the specific context of Scrubs Lane, The new community along Scrubs Lane will need to be supported by suitable range of amenities and services. Harlesden Town Centre is in close proximity to Scrubs Lane and includes town centre uses that will provide a range of services for those living and working on Scrubs Lane. However, there is also a need for more localised 'walk to' town centre uses. These should be focussed within identified clusters, which are located at</a></u></p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, town centre uses are required in focussed locations to meet the needs of people living and working with the Scrubs Lane place.</p>

Ref.	Policy/ Para/figure	Modification	Reason
		<p><u>places where Scrubs Lane is crossed by east-west movement routes. The clusters will</u> have a key role in sustaining the presence of active uses to support this new community, add life to the street and ultimately support the delivery of Lifetime Neighbourhoods in accordance with Policy SP2.</p>	
MM/PS2/OPDC/P10/15	4.169	<p><del>These active Town centre</del> uses will differ from cluster to cluster depending on each cluster's specific character - please see the cluster policies for further detail. They will be expected to include a mixture of small scale 'walk-to' town centre uses, community and employment uses that have a good relationship to the street. <u>Examples may include shops, cafés, restaurants, community spaces, gyms and local office space.</u></p>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, town centre uses are required in focussed locations to meet the needs of people living and working with the Scrubs Lane place.
MM/PS2/OPDC/P10/16	4.170	<p>To deliver Scrubs Lane's employment capacity and continue to enhance its industrial character, sites fronting onto Scrubs Lane will be expected to <del>re-provide compatible broad industrial type activities</del> <u>deliver employment uses at ground floors fronting on to Scrubs Lane and railways. This will also help to deliver appropriate levels of amenity for residential uses above.</u> These <u>employment</u> spaces will need to accord with Policies E2 and E3 with regard to their design and operation, be compatible with housing as part of mixed used residential development and provide positive and/or active street frontages.</p>	To respond to the changes to the Use Class Order, specifically inclusion of employment uses within Use Class E.
MM/PS2/OPDC/P10/17	4.171	<p>Scrubs Lane is currently a key connector route, facilitating freight and passenger movement to Harlesden in the north and White City and Shepherd's Bush in the south. East - west connectivity is <u>currently</u> poor with only one access into Old Oak North at Hythe Road, one pedestrian route into St. Mary's Cemetery, one stepped access to the southern Grand Union Canal towpath and one access to the Mitre Industrial Estate. To enhance east-west connectivity new and improved</p>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, Park Road can no longer be delivered. However, a potential route to Old Oak North from Scrubs Lane is safeguarded for at Laundry Lane.

Ref.	Policy/ Para/figure	Modification	Reason
		connections are proposed at <del>Ellisland Way, Park Road</del> <u>Laundry Lane</u> , Hythe Road, <del>and along both sides of the Grand Union Canal southern towpath and through the delivery of Wormwood Scrubs Street.</del> <u>P</u> providing <u>improved</u> access to Kensal Canalside Opportunity Area <del>will also be facilitated by improved connections to the east.</del>	The retention of SIL within Old Oak North prevents the delivery of a walking and cycling route along the north of the Grand Union Canal.  The delivery of North Pole East Depot within the first ten years of the plan enables the delivery of Wormwood Scrubs Street within the plan period.
<u>MM/PS2/OPDC/P10/18</u>	4.172	Scrubs Lane <del>will</del> <u>may</u> need to accommodate increased vehicular movement generated by the construction and operation of new development. <del>However, as industrial uses are replaced with mixed use development in Old Oak, HGV freight traffic will decrease. To address the impacts of this, there is an opportunity</del> <u>This provides opportunities</u> to introduce:	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the change in vehicular movements have been recognised.
<u>MM/PS2/OPDC/P10/19</u>	4.172	segregated cycle lanes linking with the surrounding cycling network <u>including the Cycle Future Route 23 linking Wembley to Fulham being delivered from 2022.</u> These will need to appropriately integrate with <u>any</u> enhanced or new junctions into Old Oak North;	To reflect the planned Cycle Future Route 23 along Scrubs Lane.
<u>MM2/PS/Q3d</u>	4.175	To support place making and provide facilities for new and existing communities, new publicly accessible open spaces and public realm improvements should be delivered as early as is feasible. <del>Further</del> <u>R</u> requirements for these publicly accessible open spaces can be found in the proceeding cluster policies <del>and with further detail</del> in OPDC's Infrastructure Delivery Plan (IDP).	To ensure the effectiveness of the Plan.
<u>MM/PS2/OPDC/P10/20</u>	4.178	The historic character and the surrounding context provide opportunities to conserve and enhance historic assets and shape a coherent building heights strategy along Scrubs Lane. New development needs to be delivered in a way that supports the achievement of homes and jobs targets, <del>and</del> responds appropriately to sensitive locations <del>and delivers an appropriate sense of</del>	To clarify the implementation of policies D2 and D4 in relation to Scrubs Lane.

Ref.	Policy/ Para/figure	Modification	Reason		
		<p><u>enclosure to the street avoiding a canyon effect.</u> As such, the heights and responses outlined in table 4.2 should be delivered<sup>6</sup>.</p>			
<p>MM/PS2/OPDC/P10/21</p>	<p>4.159</p>	<p><del>Development on Scrubs Lane is envisaged to largely be delivered during the first 10 years of the plan period, but the North Pole East Depot site to the south of the Grand Union Canal is potentially a longer term development site, subject to the depot no longer being required for operational purposes. Although the depot is currently not identified as being deliverable or developable within the Local Plan period, OPDC would support its earlier delivery and the potential for this site to contribute to homes and jobs provision and deliver enhanced east-west connections to the Kensal Canalside Opportunity Area.</del></p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To address the loss of housing capacity in Old Oak North, other deliverable or developable sites that benefit from updated development information have been included in plan period. This includes the North Pole East Depot.</p>		
<p>MM/PS2/OPDC/P10/22</p>	<p>Table 4.2</p>	<table border="1"> <tr> <td data-bbox="806 751 1137 1369"> <p><u>Within clusters, a variety of building heights including generally a single tall building. A single tall building in each cluster identified in P10(b)</u></p> </td> <td data-bbox="1137 751 1476 1369"> <p><u>Generally, A</u> single tall building within each cluster is considered to be more appropriate than the</p> <ul style="list-style-type: none"> <li>• uncoordinated delivery of tall buildings along Scrubs Lane;</li> <li>• delivery of increased heights and massing along the length of Scrubs Lane;</li> </ul> <p><u>The exception to this approach is the Hythe Road cluster where additional tall buildings are considered to be</u></p> </td> </tr> </table>	<p><u>Within clusters, a variety of building heights including generally a single tall building. A single tall building in each cluster identified in P10(b)</u></p>	<p><u>Generally, A</u> single tall building within each cluster is considered to be more appropriate than the</p> <ul style="list-style-type: none"> <li>• uncoordinated delivery of tall buildings along Scrubs Lane;</li> <li>• delivery of increased heights and massing along the length of Scrubs Lane;</li> </ul> <p><u>The exception to this approach is the Hythe Road cluster where additional tall buildings are considered to be</u></p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This results in Hythe Road becoming the primary existing east to west route into Old Oak North and destinations further to the west and east. To signify Hythe Road's role, two tall buildings are appropriate to reinforce the emerging spatial hierarchy of the local and wider context and aid legibility and wayfinding to Hythe Road.</p>
<p><u>Within clusters, a variety of building heights including generally a single tall building. A single tall building in each cluster identified in P10(b)</u></p>	<p><u>Generally, A</u> single tall building within each cluster is considered to be more appropriate than the</p> <ul style="list-style-type: none"> <li>• uncoordinated delivery of tall buildings along Scrubs Lane;</li> <li>• delivery of increased heights and massing along the length of Scrubs Lane;</li> </ul> <p><u>The exception to this approach is the Hythe Road cluster where additional tall buildings are considered to be</u></p>				

Ref.	Policy/ Para/figure	Modification	Reason
		<p><u>appropriate to reinforce the emerging spatial hierarchy of the local and wider context and aid legibility and wayfinding to Hythe Road as the existing route into Old Oak North that will be enhanced.</u></p> <p>These <u>four-six locations</u> for tall buildings will support legibility at key east-west intersections with the street, help to meet homes and jobs targets, maintain the character of Scrubs Lane, support the delivery of social infrastructure and open space and manage impacts on the townscape and heritage assets.</p>	
MM17/PS/Q3e	Table 4.2	The definition of tall buildings is stated in Policy D4.	To clarify the function of policies to guide development.
MM/PS2/OPDC/P10C1/1	P10C1(a)	Supporting the delivery of a community and employment focused cluster by: a) clustering active <u>employment Use Class E, B2 and B8 uses, that are appropriately designed and</u>	To respond to the changes to the Use Class Order, specifically inclusion of employment uses within Use Class E.



Ref.	Policy/ Para/figure	Modification	Reason
		<u>serviced for small business units</u> , and community uses along Harrow Road and Ellisland Way;	
<u>MM/PS2/OPDC/P10C1/2</u>	P10C1(b)	Supporting local connectivity by delivering Ellisland Way as a new walking and cycling route <u>and safeguarding a long-term providing a</u> new route <del>to the new connection</del> to Willesden Junction Station;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the additional new east-west routes cannot be delivered. In the case of Ellisland Way, there is longer term potential for it connect to future development sites outside of the plan period.
<u>MM/PS2/OPDC/P10C1/3</u>	P10C1(e)	Supporting health and well-being and resilience to climate change by delivering new publicly accessible open space on Ellisland Way adjacent to 2 Scrubs Lane; <del>and</del> <u>i. at the entrance to Old Oak Street if demonstrated to be feasible.</u>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the additional new east-west routes cannot be delivered including the connection to Old Oak Street which itself is no longer able to be delivered in Willesden Junction.
<u>MM/PS2/OPDC/P10C1/4</u>	4.179	The Harrow Road cluster sits at the busy junction of Harrow Road <u>and</u> , Scrubs Lane <del>and the proposed new connection to Willesden Junction and Old Oak North.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the additional new east-west routes cannot be delivered including the connection to Old Oak Street which itself is no longer able to be delivered in Willesden Junction.
<u>MM/PS2/OPDC/P10C1/5</u>	4.180	To support the activation of Ellisland Way and a high quality street environment along Harrow Road and Scrubs Lane, active <u>and appropriately designed and serviced</u> employment <u>(Use Class E, B2 and B8 uses)</u> and community uses with a good street presence are required on both streets.	To respond to the changes to the Use Class Order, specifically inclusion of employment uses within Use Class E.
<u>MM/PS2/OPDC/P10C1/6</u>	4.182	Harrow Road will continue to be a heavily trafficked road connecting with <u>an improved new</u> route to	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will

Ref.	Policy/ Para/figure	Modification	Reason
		Willesden Junction <del>and Old Oak North. In the long-term and if demonstrated to be feasible, T</del> to create a high quality walking and cycling environment, Ellisland Way should provide an additional choice for walking and cycling between <del>the new route to</del> Willesden Junction and Scrubs Lane2	be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the additional new east-west routes cannot be delivered including the connection to Old Oak Street which itself is no longer able to be delivered in Willesden Junction.
MM/PS2/OPDC/P10C1/7	4.185	This location is considered to support wayfinding to the retained community uses, <del>Old Oak Street</del> and Harlesden town centre.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, Old Oak Street cannot be delivered in Old Oak North and Willesden Junction.
MM/PS2/OPDC/P10C2/1	P10C2 Name	Laundry <u>Lane</u> Cluster	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. Therefore Park Road can no longer be delivered and a potential route into Old Oak North via Laundry Lane is being safeguarded for. The cluster has been renamed to reflect the potential delivery of Laundry Lane.
MM/PS2/OPDC/P10C2/2	P10C2 Vision	<del>A residential led cluster with employment and town centre uses centred on Laundry Lane as a publicly accessible open space / potential new route into Old Oak North and to the east, enhanced connections to St Mary's Cemetery.</del> <del>A key new route mediating complex ground levels to deliver connections into Old Oak North.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations a new potential route into Old Oak North via Laundry Lane is being safeguarded to support industrial intensification if required. Prior to the delivery of the potential route, the space will be a publicly accessible open space.  To reflect these changes, the vision has been updated.
MM/PS2/OPDC/P10C2/3	P10C2(b)(i)	Supporting local connectivity by:	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will

Ref.	Policy/ Para/figure	Modification	Reason
		<ul style="list-style-type: none"> <li>i. <del>safeguarding for and if relevant and appropriate, contributing to and / or delivering Laundry Lane access road and bridge</del> <u>delivering Park Road</u>, connecting Old Oak <del>South-North</del> to Scrubs Lane, as a high quality <del>all modes</del> <u>vehicular</u> route <del>as a priority, or a walking and cycling connection if this is demonstrated not to be feasible;</del></li> <li>a) <del>subject to Park Road being an all-modes route, supporting the potential to deliver a vehicular access route from Park Road to the Haul Road, to serve the Old Oak Sidings Waste site and European Metal Recycling site, whilst operational;</del></li> </ul>	<p>be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations a new potential route into Old Oak North via Laundry Lane is being safeguarded to support industrial intensification if required.</p>
MM/PS2/OPDC/P10C2/4	<p>P10C2(b)(iii)</p> <p>P10C2(e)</p> <p>4.190</p>	<p>delivering active frontages along <del>Park Road</del> <u>Laundry Lane</u> and the western side of Scrubs Lane.</p> <p>Supporting health and well-being and resilience to climate change by contributing <u>to and / or delivering:</u></p> <ul style="list-style-type: none"> <li>i. <u>Laundry Lane as a publicly accessible open space in advance of the potential delivery of Laundry Lane as a new route to Old Oak; and</u></li> <li><del>i. — towards publicly accessible open space at the junction of Scrubs Lane and Park Road, that:</del> <ul style="list-style-type: none"> <li>ii. <del>addresses level changes in its design; and</del></li> <li>iii. <del>ii. mitigates impacts of noise and air quality generated by Union Way Park Road and Scrubs Lane.</del></li> </ul> </li> </ul> <p>Time-limited access to St. Mary's Cemetery is currently provided via a gate. To support access to and from the cemetery, a new pedestrian and cycling crossing should be delivered from <del>Park Road</del> <u>Laundry Lane</u>. Any improved access to the cemetery will be explored in discussion with the management company for St. Mary's Cemetery.</p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. Therefore Park Road can no longer be delivered and a potential route into Old Oak North via Laundry Lane is being safeguarded for.</p>

Ref.	Policy/ Para/figure	Modification	Reason
	4.192	Delivering a single tall building to the east of the railway and north of <del>Park Road</del> Laundry Lane is considered to be appropriate in principle, subject to detailed assessment of its impacts in accordance with all relevant policy and guidance.	
MM/PS2/OPDC/P10C2/5	4.188	It is located at the point where the <del>potential</del> <del>proposed</del> key route of <del>Park Road</del> Laundry Lane route <del>will</del> <del>would</del> join Scrubs Lane, providing an east-west connection <del>across to Old Oak North if required to support industrial intensification, to Old Oak Common Lane.</del> - Proposals should <del>safeguard for and if relevant and appropriate, contribute to and / or deliver support and/or contribute to the delivery of this key route and</del> Laundry Lane as part of the Cumberland Business Park site allocation and ensure level changes are addressed in its design. <del>In advance of the delivery of Laundry Lane Bridge, development proposals should deliver a publicly accessible open space. The open space should contribute positively to the character of the area, informed by local industrial character and local heritage designations. Hard and green landscaping will be appropriate.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations a new potential route into Old Oak North via Laundry Lane is being safeguarded to support industrial intensification if required. Prior to the delivery of the potential route, the space will be a publicly accessible open space.
MM/PS2/OPDC/P10C2/6	4.189	<del>Current evidence shows that</del> Active ground floor uses, such as town centre and employment uses, will support the activation of <del>the public open space/ route into Old Oak North</del> <del>Park Road</del> and Scrubs Lane. Residential uses will be appropriate above the ground floor.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations a new potential route into Old Oak North via Laundry Lane is being safeguarded to support industrial intensification if required. Prior to the delivery of the potential route, the space will be a publicly accessible open space.
MM/PS2/OPDC/P10C2/7	4.192	This location is considered to support wayfinding to <del>Park Road</del> Laundry Lane as both a publicly accessible open space and <del>,</del> a key route into Old Oak North.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development

Ref.	Policy/ Para/figure	Modification	Reason
			and Old Oak North will be retained as SIL. To reflect this change in land use designations a new potential route into Old Oak North via Laundry Lane is being safeguarded to support industrial intensification if required. Prior to the delivery of the potential route, the space will be a publicly accessible open space.
MM/PS2/OPDC/P10C3/1	P10C3 Vision	This cluster will provide <del>new and</del> improved walking, cycling and vehicular access into Old Oak North.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the additional new east-west routes cannot be delivered.
MM/PS2/OPDC/P10C3/2	P10C3(a)	Supporting the delivery of a retail, leisure, employment and community focused cluster by: <ul style="list-style-type: none"> <li>a) clustering <del>these</del> active uses at the junction of Hythe Road, Scrubs Lane and any other access routes required into Old Oak North; and</li> </ul>	To respond to the change in the Use Class Order.
MM/PS2/OPDC/P10C3/3	P10C3(a)(i)	<del>delivering a range of active meanwhile uses that complement the activation of the Rolls Royce Building during the early phases of development.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, meanwhile uses will no longer be required.
MM/PS2/OPDC/P10C3/4	P10C3(b)(i)	Supporting local connectivity by: enhancing Hythe Road as an all modes key route, with significant enhancements to the walking and cycling environment, <del>into Old Oak North, that is successfully integrated with the Rolls Royce Building, adjacent railway structures</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the adjustment to the alignment of Hythe Road beside the Rolls Royce Building will no longer be required.
MM/PS2/OPDC/P10C3/5	P10C3(b)(iii)	<del>supporting another access into Old Oak North, if required. Applicants should engage early with OPDC to understand if this is necessary and the transport functions to be provided; and</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect

Ref.	Policy/ Para/figure	Modification	Reason
			this change in land use designations, the additional new east-west routes cannot be delivered.
MM/PS2/OPDC/P10C3/6	P10C3(b)(iv)	in the long term, support the potential relocation of the vehicular access to Old Oak Sidings and, <del>if operational,</del> EMR sites <del>in accordance with Policy P10C2Bii,</del> to release the existing route for publicly accessible open space and/or yard space.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, additional flexibility for the relocation of the vehicular access to Old Oak Sidings has been provided.
MM/PS2/OPDC/P10C3/7	P10C3(f)	Contributing to a variety of building heights including <del>locating a single two</del> tall buildings <del>se</del> at the <del>south western corner of the</del> Scrubs Lane and Hythe Road junction.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This results in Hythe Road becoming the primary existing east to west route into Old Oak North and destinations further to the west and east. To signify Hythe Road's role, two tall buildings are appropriate to reinforce the emerging spatial hierarchy of the local and wider context and aid legibility and wayfinding to Hythe Road.
MM/PS2/OPDC/P10C3/8	4.194	The Hythe Road cluster is located at the <del>current</del> main access point into Old Oak North along Hythe Road. <del>In future, access into Old Oak North will be enhanced in this location, through an improved Hythe Road providing all modes access with improved walking and cycling infrastructure1. In addition, there may be a need for an additional all modes access to the north of Hythe Road were the West London Line within Old Oak North not to be provided on a viaduct2. The Old Oak North and Scrubs Lane SPD will provide further information regarding this connection.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, the adjustment to the alignment of Hythe Road and new access to the north of Hythe Road will not be delivered.
MM/PS2/OPDC/P10C3/9	4.195	<del>To support the access and functioning of these routes,</del> <u>aTo support the cluster's role as a key place of activity for Scrubs Lane,</u> a range of active ground floor land uses should be provided around the junction fronting a	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect

Ref.	Policy/ Para/figure	Modification	Reason
		high quality and robust public realm. This should include small-scale 'walk-to' uses to complement the wider town centre hierarchy. <del>The collection of routes also supports the delivery of active meanwhile uses to help draw people into Old Oak North and the nearby meanwhile uses within and around the Rolls Royce Building.</del>	this change in land use designations, Hythe Road will remain as the main access point into Old Oak North which will support active uses. With the retention of SIL in Old Oak North, Old Oak North will no longer be significant destination. Therefore, meanwhile uses are not required to draw people into the area.
MM/PS2/OPDC/P10C3/10	4.197	The existing Old Oak Sidings and European Metal Recycling waste management sites are currently accessed through Mitre Yard along the Haul Road. In the longer term, and if demonstrated to be feasible, there is an aspiration to work with landowners to provide a new vehicular access to these sites. <del>off of Park Road to the north and remove the existing access route through Mitre Yard.</del> The resultant spaces would then be made available for new publicly accessible open space and/or yards for workspaces. As such, proposals should demonstrate how they will provide positive and / or active frontages in the long term while mitigating environmental impacts of freight traffic in the short term.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, additional flexibility for the relocation of the vehicular access to Old Oak Sidings has been provided.
MM/PS2/OPDC/P10C3/11	4.199	Delivering <del>a single two</del> tall buildings, <del>one on either side on the south</del> of Hythe Road, is considered to be appropriate in principle, <u>reflecting the location's role as the main access point into Old Oak North and Hythe Road as the key existing east to west route linking to onward walking and cycling routes. Any tall buildings will be,</u> subject to detailed assessments of <del>its their</del> impacts in accordance with all relevant policy and guidance. <u>The delivery of these two buildings will need to ensure their location and form deliver appropriate levels of amenity for building users and for the public realm. By having two tall buildings at T</u> this location is considered to <u>reinforce the emerging spatial hierarchy of the local and wider context while</u> supporting wayfinding to the routes into Old Oak and St. Mary's	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This results in Hythe Road becoming the primary existing east to west route into Old Oak North and destinations further to the west and east. To signify Hythe Road's role, two tall buildings are appropriate to reinforce the emerging spatial hierarchy of the local and wider context and aid legibility and wayfinding to Hythe Road.

Ref.	Policy/ Para/figure	Modification	Reason
		Cemetery and manage <del>e</del> ings impacts on surrounding heritage assets.	
MM/PS2/OPDC/P10C4/1	P10C4(a)(i)	clustering publicly accessible active community; <del>leisure and eating/drinking, and Use Class E uses, that deliver high levels of activation,</del> facing on to Mary Seacole Gardens, the Grand Union Canal and at the junction between 115-129 Scrubs Lane and Mitre Wharf; and	To respond to the change in the Use Class Order.
MM/PS2/OPDC/P10C4/2	<p>P10C4(b)(i)</p> <p>4.202</p> <p>4.204</p> <p>4.206</p>	<p>Supporting local connectivity by:</p> <ul style="list-style-type: none"> <li>i. contributing to the improvement of walking and cycling access from Mitre Bridge to the southern canal towpath <del>and along the north of the canal to Old Oak;</del> and</li> <li>ii. delivering walking and cycling routes to the canal at Mitre Wharf.</li> </ul> <p>Reflecting the assets of the Grand Union Canal and Mary Seacole Gardens, the cluster has the opportunity to be a focus for delivering a range of active community and leisure canalside uses that will capitalise on the high footfall delivered by the <del>new and improved Mary Seacole Gardens and development on Mitre Wharf east-west canalside routes</del><sup>1</sup>.</p> <p><del>New and improved walking and cycling routes along the north of the canal should be delivered to enable people to access Old Oak North, Mary Seacole Gardens and Scrubs Lane.</del> The delivery of a separate walking and cycling bridge alongside the Mitre Bridge and linked railway bridge would be supported if demonstrated to be required and feasible<sup>3</sup>. This will enable a continuous high quality walking and cycling route along Scrubs Lane.</p> <p><del>To the west of Mitre Bridge, a new connection to Mary Seacole Gardens should be delivered to improve the</del></p>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. Due to this change in land use designation and resultant development guidance, delivering a new walking and cycling route along the north of the canal is no longer deliverable.



Ref.	Policy/ Para/figure	Modification	Reason
		<del>choice of walking and cycling routes and continue to provide access to existing and new moorings5.</del>	
MM/PS2/OPDC/P10C4/3	4.203	Moorings play an important role in supporting the historic canalside character, in meeting housing need and in providing space for employment and leisure activities. To support these roles, existing and new permanent and temporary moorings should be delivered in agreement with the Canal and River Trust, <u>other relevant canal-side landowners</u> and local residential mooring associations2.	To recognise the need for other canalside landowners to agree to the delivery of moorings.
MM/PS2/OPDC/P10C5/1	P10C5 policy and supporting text (new)	The new P10C5 cluster policy has been included. To review the new policy text, please refer to the Local Plan.	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To address the loss of housing capacity in Old Oak North, other deliverable or developable sites that benefit from updated development information have been included in plan period. This includes the North Pole East Depot.</p> <p>Wormwood Scrubs Street and the North Pole East Depot were previously identified to be delivered after the current plan period.</p> <p>However, the landowner of the North Pole East Depot has confirmed a willingness to develop the site within the first 10 years of the Local Plan period. This would enable the delivery of Wormwood Scrubs Street and walking/cycling access to Scrubs Lane.</p> <p>Due to this improved east-west connectivity provided by Wormwood Scrubs Street, the Mitre Way area meets the criteria for a cluster set out in paragraph 4.3 in the Local Plan.</p>

Ref.	Policy/ Para/figure	Modification	Reason
			Therefore the new Mitre Way Cluster policy has been included within the Local Plan.
MM/PS2/OPDC/P11/1	P11 Vision	An enhanced station will provide better public transport connections and new and/or enhanced routes will <u>improve connectivity to</u> Harlesden <del>and to</del> Old Oak	Typographical corrections to reflect that some of the connections will be new and some will be enhancements to existing.
MM/PS2/OPDC/P11/2	P11(a)(ii)	<del>supporting the long term redevelopment of the Willesden Train Maintenance Depot provided an appropriate solution for the relocation, reconfiguration and/or development can be agreed;</del> and	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This prevents the delivery of Old Oak Street in Old Oak North and Willesden Junction which would have provided access to Willesden Train Maintenance Depot as a potential development site. As such, development of the depot is unlikely to be deliverable or developable.
MM/PS2/OPDC/P11/3	P11 b)	b) Delivering a range of high quality <del>B1 workspaces</del> and employment and/or town centre uses across Willesden Junction where residential uses are less appropriate;	To align with new Use Class Order
MM/PS2/OPDC/P11/4	P11(a)(iii) and (c)	supporting development on the western side of Willesden Junction station that contributes to a coordinated delivery of Willesden Junction Station upgrades <u>and</u> ; the enhancement of Station Approach <del>and delivery of Old Oak Street.</del>  Encouraging activation of the area by delivering a range of meanwhile uses with active and/or positive frontages on ground floors, particularly along Station Approach, <del>Old Oak Street, the connection to Harrow Road</del> and around Willesden Junction Station.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This prevents the delivery of Old Oak Street in Old Oak North and Willesden Junction.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/P11/5	P11(d)	Ensuring station upgrades are delivered in a phased and co-ordinated manner <del>to best facilitate a comprehensive station redevelopment</del>	The Inspector's Interim Findings conclude that site allocations 2 and 3 would not be viable and capable of effective delivery for mixed use within the plan period. Consequently, the wholesale redevelopment of Willesden Junction station is no longer proposed. Upgrades instead focus on more targeted enhancements to the station.
MM/PS2/OPDC/P11/6 MINOR/PS/Q12Q13 Q16(1) and MINOR/PS/M3c(1)	P11(e)	Contributing to and/or delivering a permeable, inclusive and accessible movement network as shown in figure 4.44 <del>including Old Oak Street as a walking and cycling route north of Park Road to Willesden Junction Station;</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This prevents the delivery of Old Oak Street in Old Oak North and Willesden Junction.
MM/PS2/OPDC/P11/7	P11(f)	<del>Willessden Junction Station Square; and</del>	Following the inspector's interim findings, proposed modifications have been made to Old Oak North to re-instate SIL. As a consequence of the change in land use approach, there is no longer a requirement for a new station entrance to be delivered to the south-east of Willesden Junction station and the associated station square is no longer required.
MM/PS2/OPDC/P11/8	P11(f)	embedding green infrastructure along <del>Old Oak Street,</del> Station Approach and within other streets.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This prevents the delivery of Old Oak Street in Old Oak North and Willesden Junction.
MM/PS2/OPDC/P11/9	4.216	It is critical that high quality walking and cycling routes are provided that connect Old Oak <del>North</del> with Willesden Junction and Harlesden so that <del>surrounding residents and businesses can access and benefit from the regeneration opportunities at Old Oak</del> <u>employees and visitors can access industrial uses.</u>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. However, employees and visitors will continue to need to move between Willesden Junction and Old Oak North. To support this, improvements to the existing pedestrian bridge will be supported.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/P11/10	4.217	In the future, there will be an increasing number of people <del>wanting to directly access Old Oak from making use of</del> this station.	to respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This prevents the delivery of Old Oak Street that would have connected Old Oak North and Willesden Junction.
MINOR/PS/OPDC M6(2)	4.218	The public transport access already available at Willesden Junction provides the opportunity for new high density development and employment uses on land in and around the station. <del>Currently development is expected to take place outside the plan period.</del> OPDC will work with landowners and stakeholders to facilitate <del>earlier</del> delivery of homes, <del>town centre uses</del> and employment space <del>including over- and adjacent-station development.</del> , where <del>deliverable viable.</del>	To reflect the potential for development within Willesden Junction.
MM/PS2/OPDC/P11/11	4.220	Willesden Junction needs to be supported by a high quality movement network that facilitates access across it and to the surrounding areas north and south. <del>Improving the southern walking route to Old Oak North is of particular importance and will need to be supported by wayfinding elements and public realm improvements. If feasible, the delivery of step-free access would be supported.</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This prevents the delivery of Old Oak Street in Old Oak North and Willesden Junction.  However, employees and visitors will continue to need to move between Willesden Junction and Old Oak North. To support this, improvements to the existing pedestrian bridge will be supported.

Ref.	Policy/ Para/figure	Modification	Reason
<p><del>MM/PS2/OPDC/P11/12</del></p> <p><del>MM/PS/OPDC M3c(2)</del></p> <p><del>MINOR/PS/Q5(8)</del></p>	4.190-4.191	<p><del>A proposed street network centred on Old Oak Street aims to address issues of severance<sup>1</sup>. Old Oak Street seeks to connect Willesden Junction station to Harlesden town centre, providing an improved, convenient and direct connection. It will also connect Willesden Junction station south to Harlesden Place in Old Oak North. Infrastructure studies<sup>2</sup> have shown that the delivery of the northern most section of Old Oak Street across Harlesden Place to Willesden Junction is likely to be very challenging to deliver as an all modes route and at the time of the publication of this Local Plan, OPDC would support its delivery as a wide pedestrian and cycle only connection, but stakeholders should refer to OPDC's Infrastructure Delivery Plan (IDP) to find the most up-to-date position on infrastructure requirements. Updates to the IDP will be used to inform updates to the Local Plan.</del></p> <p><del>Evidence also shows that it will be very challenging to technically and viably deliver Old Oak Street from Old Oak North to Harrow Road as a vehicular connection. The priority will therefore be to deliver a high quality walking and cycling route. However, if future work shows the delivery of the this route as a vehicular connection is feasible, viable and acceptable in terms of its transport impacts, this would be supported.</del></p>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This prevents the delivery of Old Oak Street in Old Oak North and Willesden Junction.
<p><del>MM/PS2/OPDC/P11/13</del></p>	4.192	<p><del>Old Oak Street could potentially provide points of access onto the Willesden Train Maintenance Depot. The Depot is not identified as coming forward in the plan period but would be supported for earlier delivery if the site is proven to no longer be required for operational purposes or if development could occur over the depot without it impacting on operational requirements.</del></p>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, development of the depot is unlikely to be deliverable or developable.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/P11/14	4.221	Delivery of a high quality east-west unpaid pedestrian and cycle route through or adjacent to the station would provide permeability and connect Harlesden Town Centre with <del>Old Oak Street</del> <u>the station</u> .	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This prevents the delivery of Old Oak Street in Old Oak North and Willesden Junction.</p> <p>However, employees and visitors will continue to need to move between Harlesden and Old Oak North. To support this, improvements to the existing pedestrian bridge will be supported.</p>
MM/PS2/OPDC/P11/15 MINOR/2/P11/3	4.222	<del>A new station entrance to the east of the station would be supported. Aligned to the location of this entrance, a new station square, or alternative public realm layout, on Old Oak Street would ensure the station has a strong sense of arrival and, as part of this, ample space should be provided for interchange facilities. The new station entrance would be in addition to the existing entrance on Station Approach. Alongside this, there will be a need to enhance Station Approach to provide a high quality integrated connection to Harlesden town centre from Old Oak Street. Station Approach and so that it continues to perform an important role as a point of arrival and interchange, in the early years in advance of Old Oak Street being delivered.</del>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This prevents the delivery of Old Oak Street in Willesden Junction that would have enabled the delivery of a new station entrance to the east.</p>
MM/PS2/OPDC/P11/16 MINOR/2/P11/4 MINOR/PS/OPDC M6(1)	4.225	Early evidence indicates that the station is in need of upgrading to improve current congestion in the peak periods and improve the passenger experience. Capacity enhancements will also be needed at the station to accommodate future growth, with passenger numbers forecast to potentially more than double in the morning peak and nearly triple in the evening peak by 2041. 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	<p>To reflect that consequent to the inspector's interim findings, OPDC is proposing to re-instate Strategic Industrial Location designations in Old Oak North. Consequently, there is no longer a requirement to deliver a new south-eastern entrance to Willesden Junction station and comprehensively redevelop the station.</p> <p>To clarify the need for an agreed joint approach for station enhancements.</p>

Ref.	Policy/ Para/figure	Modification	Reason
		<del>comprehensive-coordinated</del> redevelopment of the station and surrounds whilst ensuring that the station can continue to function and serve the local community. <u>Upgrades should also not result in reduced access to public transport services provided by the station for areas to the north of Willesden Junction.</u> The station design should seek to improve the passenger experience, facilities, wayfinding and support the delivery of public realm within and surrounding the station. There is an opportunity to ensure that any future upgrades safeguard the ability to deliver West Coast Main line platforms at Willesden Junction to enhance accessibility and connectivity.	To help to ensure that public transport accessibility of areas to the north of Willesden Junction are not negatively impacted by station improvements
<u>MINOR/2/P12/17</u>	P12 Connections	<del>Connections</del> <u>Public realm and movement</u>	To reflect the policy content which the title relates to.
<u>MINOR/2/P12/9</u>	4.227	Wormwood Scrubs is a locally cherished open space covering almost 68 hectares. It is the largest publicly accessible open space in the London Borough of Hammersmith and Fulham and provides local people and Londoners with the opportunities to have access to nature, <del>playing fields sports pitches</del> and space for recreation and relaxation...	To ensure that statutory protection of the Wormwood Scrubs playing fields is reflected in the Local Plan wording.
<u>MINOR/2/P12/8</u>	4.230	<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.
<u>MM/PS2/OPDC/P12/1</u>	4.231	Wormwood Scrubs' character as a publicly accessible open space that is more wild than tamed, will inform how the regeneration of <del>the area Old Oak</del> relates to Wormwood Scrubs.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/P12/2	4.231	This range of designations, management arrangements and local interest of community groups will enable Wormwood Scrubs to be conserved and sensitively enhanced so it may successfully respond to the impacts resulting from the opening of Old Oak Common Station and the wider regeneration of Old Oak <u>and Park Royal</u>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
MINOR/2/P12/9	4.232	...In delivering and / or contributing to high quality <u>sports pitches playing fields</u> , existing <u>sports pitches playing fields</u> should be retained and / or replaced at an equal or higher quality and function in accordance with Policy TCC6. The existing <u>sports pitches playing fields</u> 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...	To ensure that statutory protection of the Wormwood Scrubs playing fields is reflected in the Local Plan wording.
MINOR/2/P12/13	4.233	<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.
MM/PS2/OPDC/P12/3	4.239	As such, existing communities and proposed new communities in <u>the OPDC area Old Oak</u> to the north are not able, and will not be able to easily make use of the open space	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
MM/PS2/OPDC/12/4	4.234	The following key walking and cycling routes and enhancements are proposed: a) from Old Oak Common Station and surrounds; b) <u>a potential route east of Old Oak Common Station from Old Oak Street</u> via a high quality bridge; e)b) from Scrubs Lane via new and improved sensitively designed points of access;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, a new walking and cycling connection to Wormwood Scrubs from Old Oak North is no longer essential. However, a



Ref.	Policy/ Para/figure	Modification	Reason
		<p>d)c) from Old Oak Common Lane via a widened footpath and segregated cycling lane; and</p> <p>e)d) from Wormwood Scrubs Street running parallel to the northern boundary of the Scrubs.</p>	potential walking and cycling route from the east of Old Oak Common Station is identified to enable people to reach Wormwood Scrubs from the Grand Union Canal towpath and Scrubs Lane.
MINOR/PS/Q5(9)	4.235	However, as development proceeds, there may be a need for additional or alternative locations/ alignments for these accesses. The most up to date requirements are set out in <a href="#">figure 4.45 and</a> OPDC's Infrastructure Delivery Plan (IDP).	To ensure appropriate infrastructure information is contained within the Local Plan

## Design

Ref.	Policy/ Para/figure	Modification	Reason
MM17/PS/Q3e MINOR/PS/OPDCM17(1) and (3)	D1 and paragraphs throughout development management policies chapter	<p>5.1 Design relates to all components of the built environment. Delivering a high quality and well-designed built environment for both Park Royal and Old Oak is fundamental to successful place making. It is also critical to long-term sustainability, resilience and ensuring integration with surrounding neighbourhoods.</p> <p>5.2 High quality design has a number of positive interdependencies with sustainability. It can help improve people's physical, mental and emotional health and well-being. Good design is also a fundamental component in supporting and establishing an area's identity and informing people's perception of a place. It can contribute to people's sense of pride for where they live, work and play which in turn contributes to supporting thriving communities and a resilient local economy.</p> <p>5.3 This chapter does not deal with the spatial locations for the elements of design and should be read in conjunction with the place policies and strategic policies</p>	<p>To clarify the function of policies to guide development.</p> <p>To clarify the role of post occupancy surveys.</p>

Ref.	Policy/ Para/figure	Modification	Reason
		<p>contained within chapters 3 and 4 and specifically with Policy SP6 (Places and Destinations) and Policy SP9 (Built Environment). It also has strong linkages with the Environment and Utilities Chapter (chapter 6) and the Transport Chapter (chapter 7).</p> <p>5.4 <u>The chapter comprises a series of Principles for securing high quality design and design policies.</u></p> <p><b><u>POLICY D4</u>Principles for Ssecuring high quality design</b></p> <p>OPDC will support development proposals where they have been subject to a high quality and comprehensive design process resulting in high quality design outcomes. To deliver this <u>the following design principles have been developed to help guide development.</u></p> <ol style="list-style-type: none"> <li>1. <u>For</u> all development proposals, <u>they</u> should, where relevant and appropriate: <ol style="list-style-type: none"> <li>i. commit to using mechanisms to secure delivery of design quality, as defined in submission documents, where these elements are not approved on the grant of planning permission;</li> <li>ii. make use of the OPDC Place Review Group and OPDC Community Review Group; and</li> <li>iii. engage positively and proactively with OPDC and relevant statutory consultees as early as possible in the design process.</li> </ol> </li> <li>2. <u>For</u> major development proposals, <u>they</u> should, where relevant and appropriate: <ol style="list-style-type: none"> <li>i. demonstrate use of best practice in developing project briefs;</li> <li>ii. clearly demonstrate how different options for site development have been</li> </ol> </li> </ol>	

Ref.	Policy/ Para/figure	Modification	Reason
		<p>considered as part of the pre-application process;</p> <ul style="list-style-type: none"> <li>iii. undertake proactive engagement with the community and potential end users to inform design in line with OPDC's Statement of Community Involvement (SCI);</li> <li>iv. <u>consider</u> <u>committing</u> to providing a Section 106 monitoring contribution if the original design team is not retained for the detailed design stage; and</li> <li>v. for outline or hybrid applications, include binding design codes with the application material to inform design within development parameters at the reserved matters stage.</li> </ul> <p><u>For</u> proposals referable to the Mayor, <u>they</u> should, where relevant and appropriate provide digital modelling and supporting data in an agreed format with OPDC officers during the development of design and at submission.</p> <p>Delivering on the principles of Good Growth will require a high quality development design process. The requirements for achieving high quality design are set out in the NPPF, the London Plan, Policy SP9 (Built Environment), the Places Chapter and the Design Chapter. <del>These policies' requirements</del> <u>The principles for securing high quality design</u> should be embedded from the beginning of the development design process and should be proportionate to the size and/or potential impact of the proposal.</p> <p>The development design process should deliver a high quality proposal supported by appropriate evidence that has been informed by an iterative process with clear development options considered with OPDC officers and submitted as part of planning applications for</p>	

Ref.	Policy/ Para/figure	Modification	Reason
		<p>determination. OPDC will expect applicants to demonstrate a commitment to high quality design and not to include inappropriate substitutions which compromise the quality of design. To support this approach, mechanisms, such as Section 106 agreements and conditions will be used to ensure that design quality is carried through into the detailed design and construction of the development.</p> <p>The OPDC Place Review Group is an independent body used by OPDC to advise on the production of planning policy and development proposals. This group draws on its membership of experts from planning, landscape architecture, architecture, conservation, engineering and other built environment sectors. The OPDC Community Review Group is formed of local community representatives. The advice provided to OPDC by both these groups is valuable to the development design process. Proposals will be expected to be reviewed by these groups where relevant and appropriate. Further details regarding these groups is available on OPDC's website.</p> <p>A critical component of successful proposals is ensuring that the design considers the people using and impacted by the development. As such, major applications will be supported where they demonstrate effective engagement with local communities and potential end users of the development. Further information is set out in OPDC's SCI. Continued learning following the implementation of development is also important. <del>Developers will be required to undertaken post-occupancy surveys to support the delivery of high quality places (see Policy D13).</del></p> <p>Amendments to the design of major applications can have a significant impact on the quality of the design by virtue of their scale and impact on surroundings, <u>A s106 monitoring contribution can be offered to provide reassurance that if the original architects or landscape</u></p>	

Ref.	Policy/ Para/figure	Modification	Reason
		<p><del>architects are not retained for the detailed design stage, the OPDC can commission design advice to ensure that the original design quality is maintained in its consideration of detailed design proposals. To manage any potential change to the design team, OPDC will expect a Section 106 monitoring contribution to be payable if the original architects or landscape architects are not retained for the detailed design stage. The contribution will be used to secure design advice on revisions to the scheme to ensure that the original design quality is maintained through detailed design.</del></p> <p>Contributions will need to be agreed on a case-by-case basis depending on the site specific circumstances. Major outline or hybrid applications should be supported by design guidelines secured as part of Section 106 agreements and / or planning conditions to ensure the delivery of high quality detailed design at reserved matter stage(s). Design codes should relate specifically to the proposal. Applicants will be expected to discuss the scope of their content with the case officer early in the development design process to ensure a sufficient level of detail is provided. OPDC will expect design codes to include a sufficient level of detail for ground floors and where development addresses the street and wider public realm.</p> <p>Proposals referable to the Mayor are defined in the glossary. Given the potential significant impact of these proposals, these schemes will require substantial analysis during their determination. To support this process, proposals will be expected to provide digital models and any other relevant data to OPDC, in formats agreed by OPDC officers, during pre-application discussions and at submission.</p>	
MM/PS2/OPDC/D2/1	5.13	The long term development of <del>Old Oak and ongoing protection and intensification of Park Royal</del> the OPDC	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and

Ref.	Policy/ Para/figure	Modification	Reason
		<del>area</del> requires careful consideration of how the design, delivery and management of new and improved public realm is coordinated.	locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed.
MM/PS2/OPDC/D2/2	5.15	Durability will be key within the high density environment created in the OPDC area. <del>Within Old Oak</del> Temporary materials may need to be utilised during the construction phase and be coordinated with adjacent permanent areas of public realm. Policy EU8 provides guidance for using sustainable materials.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Old Oak as the only mixed use area have been removed.
MM17/PS/Q3e	5.16	These elements should be focused in appropriate locations of publicly accessible open spaces, town centres, clusters, canalside spaces and other accessible locations with good levels of direct sunlight (see Policy <del>D6D5</del> ).	To clarify the function of policies to guide development.
MM/PS2/OPDC/D2/3	5.20	The development of a new <del>and improved</del> street and public realm network <del>within Old Oak and improved walking and cycling connections in Park Royal</del> will require privately owned land to be provided for public access and use.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and Old Oak as the only mixed use area have been removed and associated movement networks have been amended.
MM/PS2/OPDC/D3/1	5.23	The <del>comprehensive</del> redevelopment of Old Oak <del>and Park Royal DePDC area</del> represents an unparalleled opportunity to deliver a new part of London that is accessible and inclusive for all sections of the community.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and to Old Oak as the only mixed use area have been removed and associated considerations including delivering accessible and

Ref.	Policy/ Para/figure	Modification	Reason
			inclusive public realm across the OPDC have been amended.
MM/PS2/OPDC/D3/1	5.25	The existing transport infrastructure, <del>and level changes within Old Oak, along with</del> and the poor quality congested environment <del>within Park Royal</del> restrict accessibility across the area.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
MM3/PS/Q3f	D3(c)	c) <del>demonstrate whether</del> engagement with relevant stakeholders <del>has to</del> inform <del>ed the design of</del> proposals <del>at the earliest opportunity.</del>	To ensure the effectiveness of the Plan by including as policy, requirements only referred to in the supporting text.
MM3/PS/Q3e	5.26	Applicants will be required to work with a range of stakeholders to achieve this aspiration <del>and demonstrate whether this engagement has informed the design of development within proposals' Design and Access Statements. Stakeholders</del> including the OPDC Place Review Group, OPDC Community Review Group, local access groups and the GLA Strategic Access Panel. This engagement will be expected throughout the design development <del>process in accordance with Policy D4 as set out in the Principles for Securing High Quality Design.</del>	To clarify the function of policies to guide development.
MM/PS2/OPDC/D4/1	5.29	By relating well to existing positive elements of the local character and context, proposals can enhance positive elements of character and help to inform new character areas to nurture a sense of place. This will be critical during the long term development of <del>Old Oak and evolution of Park Royal</del> the OPDC area. See Policy D78 and OPDC's Heritage Strategy for further information.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and to Old Oak as the only mixed use area have been removed.  To clarify the function of policies to guide development.
MM17/PS/Q3e			

Ref.	Policy/ Para/figure	Modification	Reason
MM17/PS/Q3e	5.31	The interface between the design of a building and public realm needs careful consideration to ensure they complement one another and enhance the local character and environment (see Policy <del>D2D1</del> ).	To clarify the function of policies to guide development.
MM17/PS/Q3e		Amenity will also be an important factor in considering how a building contributes to the townscape. Policy D56 provides relevant guidance.	To clarify the function of policies to guide development.
MM/PS2/OPDC/D4/2		The <del>high density environment of Old Oak and industrial nature of Park Royal</del> <u>form of development in the OPDC area</u> will require the use of materials that are hard-wearing, weather well and are adaptable. This is specifically relevant to <del>Old Oaks</del> schemes where temporary materials may need to be utilised during the construction phase. For both permanent and temporary materials, the use of sustainable coordinated materials will be critical (see Policy EU8).	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and to Old Oak as the only mixed use area have been removed and considerations on use of materials have been amended.
MM/PS2/OPDC/D4/3	5.36	<del>The amount of New</del> high density development <del>in Old Oak</del> will provide an extensive area of roof space alongside <del>the</del> existing roof space <del>in Park Royal</del> .	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and to Old Oak as the only mixed use area have been removed and considerations on use of roof space have been amended.
MM4/PS/Q3c	D5(c) and (d), 5.45	<b>POLICY</b> Proposals for tall buildings will be supported as an appropriate form of development in principle where they:	To ensure the effectiveness of the Plan by including as policy, requirements only referred to in the supporting text.



Ref.	Policy/ Para/figure	Modification	Reason
		<p>a) accord with latest relevant national guidance, London Plan policies, Policy SP9 and relevant policies within the Places Chapter;</p> <p>b) deliver significant benefits for the surrounding area and communities including promoting legibility to destinations;</p> <p>c) <del>demonstrate whether undertake proactive</del> engagement with the community and other relevant stakeholders, including the Greater London Authority and Historic England <del>has informed the design of proposals</del>; and</p> <p>d) accord with relevant guidance for RAF Northolt safeguarding zones <del>including consulting with the Defence Infrastructure Organisation on any proposals of 91.4m above ground level.</del></p> <p>5.44 Old Oak and Park Royal is located within the safeguarding zone surrounding RAF Northolt and consultation should be carried out with the Defence Infrastructure Organisation on any buildings which exceed the height threshold <del>of 91.4m above ground level.</del></p>	
MINOR/2/D5/8	5.43	Tall buildings should deliver significant benefits for both the surrounding built environment and existing and future <del>local</del> communities...	To provide clarity that tall buildings can deliver significant benefits for all communities.
MINOR/2/D5/9	5.43	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 <del>on issues including the location, height, scale, massing and design of tall buildings</del> 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.
MM17/PS/Q3e	5.44	Proposals should accord with Policy D56 and relevant London Plan policies in protecting amenity and be supported by information clearly demonstrating how they do not adversely impact on their surroundings.	To clarify the function of policies to guide development.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/D6/1	5.51	Apartments will comprise the majority of housing in <del>Old Oak</del> the OPDC area. Private open space will mainly be provided as balconies alongside terraces and roof gardens.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Old Oak as the only mixed use area have been removed.
MM2/PS/Q3h	D6(a), (h(i)) and (i(i)), 5.53	<p><b>POLICY</b> Proposals will be required to deliver an appropriate standard of amenity by:</p> <p><del>a) submitting a Daylight, Sunlight and Microclimate Assessment where the scale of proposed buildings has the potential to affect the amenity of sensitive neighbouring uses;</del></p> <p>b) achieving the benchmarks for amenity set out in table 5.1 or alternatives agreed with OPDC;</p> <p>c) implementing the Agent of Change principle so that:</p> <p>i) new development does not materially affect the ongoing functioning of existing employment uses and/or town centre uses; and</p> <p>ii) new development does not cause unacceptable harm to the amenity of existing uses;</p> <p>d) maximising the quality and availability of daylight and direct sunlight within buildings and to the public realm;</p> <p>e) delivering appropriate levels of privacy;</p> <p>f) ensuring bedrooms are located away from and / or designed to mitigate light pollution;</p> <p>g) ensuring proposals that include residential private and / or communal open space:</p> <p>i) receives direct sunlight for a reasonable period of the day;</p> <p>ii) supports integrated solutions for food growing; and</p> <p>iii) are located away from and/or designed to mitigate air, light and noise pollution.</p> <p>h) minimising the effects of the urban heat island effect including by:</p>	To ensure the effectiveness of the Plan.

Ref.	Policy/ Para/figure	Modification	Reason
		<p><del>i) requiring proposals referable to the Mayor of London to undertake modelling to identify potential impacts on the urban heat island effect; and</del>  ii) mitigating overheating of buildings and the public realm where impacts are identified by utilising appropriate mitigation measures.  i) minimising excessive wind speeds generated by development by:  <del>i) requiring proposals referable to the Mayor of London to undertake wind tunnel modelling early in the design process; and</del>  ii) mitigating negative impacts on buildings and the public realm where identified including through the use of green infrastructure.</p> <p>5.52. High density development can give rise to the urban heat island effect. As Building Regulations become more stringent, buildings are increasingly suffering from overheating. The reasons for this are complex and are set out in the OPDC Environmental Standards Study but multi-storey high density development is particularly susceptible to overheating. In light of this, proposals referable to the Mayor of London (defined in the Mayor of London Order 2008) should undertake <u>urban heat island and wind</u> modelling to <u>identify and</u> assess the cumulative impact of existing and committed development and to mitigate impacts where necessary.</p>	
MM2/PS/Q3	D7(b)	<p>Proposals that impact on a key view will be supported where they:  <del>a) contribute positively to the character and composition of identified key views relevant to the proposal. ; and</del>  <del>b) define, assess and justify their impact on any other views relevant to the proposal and clearly demonstrate how it delivers a positive contribution to the relevant key views.</del></p>	To ensure the effectiveness of the Plan.

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/2/D8/4	D8(b)	<p>OPDC will give great weight to the conservation and enhancement of the significance of designated heritage assets, including their settings. Proposals harming the significance of a designated heritage asset <u>will require clear and convincing justification should be justified</u> having regard to their heritage interest, reasonable alternatives to avoid or mitigate harm and delivery of public benefits;</p>	<p>To clarify the need to provide clear and convincing justification for the harm to the significance of a designated heritage asset.</p>
MM2/PS/Q3	D8(c)(d)(e), 5.63	<p>Replace existing D8(c)(d)(e) with the following wording:</p> <p><u>c) Proposals should:</u></p> <p><u>(i) reflect in their design a positive response to non-designated heritage assets; and</u>  <u>(ii) avoid an unjustified adverse effect on the significance of non-designated heritage assets;</u></p> <p><u>(d) proposals to demolish a building in a Conservation Area will only be permitted after approval of and commitment to the construction of a replacement building;</u>  <u>(e) Proposals that affect or have the potential to affect archaeological heritage assets will be supported, where they demonstrate the appropriate level of investigation and recording.</u></p> <p>OPDC officers also propose to amend supporting text in relation to the modified policy D8(c)(i):</p> <p>5.62. Ensuring development contributes to promoting and enhancing the significance of heritage assets and their settings can include the viable reuse of assets <u>and ensuring the relevant lost asset informs the character of new development.</u> It can also include the principle of improving access to heritage assets while ensuring that any harm to significance is minimised and outweighed by the public benefit of securing access.</p>	<p>To ensure the effectiveness of the Plan.</p> <p>To ensure that development resulting in the loss of a non-designated heritage asset could, in part, accord with D8(c)(i) by ensuring the significance of the lost asset informs the character of new development.</p>

Ref.	Policy/ Para/figure	Modification	Reason
MM17/PS/Q3e	5.60, 5.62	Policy D7 <del>8</del>	To clarify the function of policies to guide development.
MINOR/2/D8/6	5.62	Designated heritage assets within the OPDC area consist of Statutory Listed Buildings and conservation areas. These benefit from protection in the NPPF <u>and legislation</u> , which should be implemented alongside policy D8(b)...	To clarify that legislation is also used to conserve and enhance heritage assets.
MINOR/2/D8/8	Table 5.1	<del>These</del> includes <del>proposals for designated</del> statutory listed buildings and structures, <u>Registered Parks and Gardens</u> <del>locally listed buildings and structures</del> , and conservation areas. <del>areas of local character and other buildings of local heritage interest.</del>	To provide comprehensive information for designated heritage assets relevant to the OPDC area.
MM/PS2/OPDC/D9/1	5.73	Maximising access to a range of dedicated child play space will be critical in the high density environment of <u>parts of Old Oak and Park Royal</u> .	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Old Oak as the only mixed use area have been removed.
MINOR/2/D9/4	5.73	...Dedicated playspace should also be protected from areas that are exposed to wind and to air <u>and noise</u> pollution hotspots in accordance with policies <u>EU4 and EU5</u> .	To ensure exposure to noise from within play space is addressed.
MM/PS/OPDC M2e(2)	5.75	To support use of dedicated play space and prevent anti-social behaviour, play space should have natural surveillance, including from homes or social infrastructure and be located outside at ground level <u>as a priority</u> .; <del>pediums, terraces or roofs.</del>	To ensure supporting text further reflects policy wording.

## Environment and Utilities

Ref.	Policy/ Para/figure	Modification	Reason
MM17/PS/Q3e	6.45, 6.60  EU1(d)(i)	Policy <del>D6</del> D5.  Policy D <del>8</del> 9	To clarify the function of policies to guide development.
MM/PS2/OPDC/EU1/1	EU1  c)	c) support the delivery of a minimum of 30% of the developable area outside of Strategic Industrial Location (SIL), as publicly accessible open space, including spaces identified in the Places chapter by: i. contributing towards and/or delivering <del>2</del> 3 new local parks that are each at least 2ha in size, in the locations identified in the places chapter;	Modification needed to reflect loss of OON and Grand Union Canal Local Park, and delivery of new Local Park in Channel Gate site.
MM/PS2/OPDC/EU1/2	EU1  6.12	An important element of the publicly accessible open space network is Local Parks. <del>OPDC's Environmental Standards Study identifies that three</del> Two local parks of at least 2ha should be incorporated into the development area <del>at Old Oak</del> . One local park is proposed in Old Oak South near to the Old Oak Common station. Another is proposed in <del>Old Oak North</del> Channel Gate adjacent to the Grand Union Canal, whilst the third local park is proposed by the Grand Union Canal, with contributions towards its delivery from development in both the <del>Old Oak South and Old Oak North places</del> . Further details on these local parks can be found in the Old Oak South (P1), <del>Old Oak North (P2)</del> and Grand Union Canal (P3) <del>and Channel Gate (P9)</del> place policies. These parks would provide much needed on-site open space, that would act as a focal point for the new community, provide important ecological assets and will be a major component of a climate resilience strategy. In addition to <del>three</del> local parks, development proposals will be expected to demonstrate that sites are supported by existing or proposed smaller open spaces and contribute to the delivery of other publicly accessible open spaces as set out in the Places chapter and/or in the IDP.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. Therefore, references to Old Oak solely delivering local parks have been removed.

Ref.	Policy/ Para/figure	Modification	Reason
MM2/PS/Q3d	6.12	In addition to three local parks, development proposals will be expected to demonstrate that sites are supported by existing or proposed smaller open spaces and contribute to the delivery of other publicly accessible open spaces as set out in the Places chapter and <del>or any further detail</del> in the IDP.	To ensure the effectiveness of the Plan.
MINOR/2/EU2/5	6.21	People's health is positively affected when they come into contact with nature, <del>and urban greening can make a significant contribution to improvements in local air quality.</del>	To clarify the role of urban greening in improving air quality.
MM17/PS/Q3e	6.26	In accordance with Policy D34, green roofs should be used to provide a variety of services including rainwater attenuation, renewable energy generation, play space and food growing facilities.	To clarify the function of policies to guide development.
MM5/PS/Q3k	EU3 (b), (c) and (e) and (i)	Development proposals will be supported where they: <ul style="list-style-type: none"> <li>a) work positively with OPDC and its development partners to deliver an integrated strategy for managing foul and surface water and for supplying potable and non-potable water;</li> <li>b) Provide sufficient attenuation storage capacity to ensure the peak rate of surface water runoff generated during rainfall events up to the 1 in 100 years plus a 40% climate change allowance, does not exceed greenfield run-off rates by applying the following hierarchy: <ul style="list-style-type: none"> <li><del>i) delivering where appropriate and through agreement with the Canal and River Trust, outfalls to the Grand Union Canal, where the water is of an adequate quality, in accordance with the Water Framework Directive or any subsequent standards, and would not have a detrimental effect on the ecological and chemical status of waterbodies;</del></li> <li>i) providing on-site source control to attenuate on-site. The priority for on-site attenuation</li> </ul> </li> </ul>	To ensure the effectiveness of the Plan by including as policy, requirements only referred to in the supporting text.

Ref.	Policy/ Para/figure	Modification	Reason
		<p>should be the provision of vegetated Sustainable Drainage Systems (SuDS), with other solutions, including below ground attenuation, only deemed acceptable where all vegetated options have been fully explored; and</p> <p><u>ii) Where source control SuDS features cannot achieve sufficient attenuation, delivering and/ or contributing to strategic SuDS, which should be incorporated into streets, open spaces and other public realm areas;</u></p> <p><u>iii) delivering where appropriate and through agreement with the Canal and River Trust, outfalls to the Grand Union Canal, where the water is of an adequate quality, in accordance with the Water Framework Directive or any subsequent standards, and would not have a detrimental effect on the ecological and chemical status of waterbodies;</u></p> <p><u>iv) controlled release of water into the combined sewer, through agreement with the borough and Thames Water.</u></p> <p>c) <u>ensure sufficient capacity within the sewerage network by, as part of applicants' Water Efficiency, SuDS and Drainage Statement,</u> demonstrating how the development will enable capacity to be released within the existing combined sewer network to accommodate additional foul water flows, without compromising the ability of other developers to meet future development needs;</p> <p>d) comply with any relevant requirements of local authority Surface Water Management Plans (SWMPs) and the Thames River Basement Management Plan;</p> <p><u>e) undertake Flood Risk Assessments (FRAs) for schemes meeting the thresholds set out in DEFRA and EA guidance;</u></p>	



Ref.	Policy/ Para/figure	Modification	Reason
		(i) maximise the efficient use of <del>potable</del> water by: i) delivering on-site water recycling technologies <del>particularly in non-residential developments</del> , including rainwater harvesting and/or greywater recycling, where these are shown to be viable; ii) for all non-residential developments, seeking to achieve the maximum score for water use in the BREEAM ratings (or an equivalent in any future nationally recognised assessment scheme); and iii) designing residential development to minimise the use of mains water to better the Mayor's per capita water consumption targets, where viable.	
<del>MINOR/2/EU3/6</del>	EU3 d)	...Thames River <del>Basement Basin</del> Management Plan;	To reference the correct document title.
<del>MINOR/2/EU3/7</del>	EU3 e)	<del>undertake Flood Risk Assessments (FRAs) for schemes meeting the thresholds set out in DEFRA and EA guidance or within the critical drainage areas (CDA) identified in figure 6.4;</del>	<del>To provide additional clarity on where an FRA will be required.</del> Modification superseded by M5/PS/Q3k
<del>MM2/PS/Q3d</del>	6.34	OPDC recognises the environmental and cost benefits realised from an integrated approach to water management, in accordance with Policy SP10. An Integrated Water Management Strategy (IWMS) has been produced that identifies options for sustainably managing water to meet the changing needs of occupiers of the development. The approach set out in the IWMS seeks to reduce the risks of flooding across the development area and wider drainage network whilst minimising the demand on stressed water resources, taking into account the effects of climate change. The recommendations from the IWMS have been embedded into this policy, the relevant Place policies and the <del>infrastructure requirements in the</del> Infrastructure Delivery Plan (IDP).	To ensure the effectiveness of the Plan.

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/2/EU3/18	6.36	Thames Water has indicated that the <u>existing</u> Counters Creek <u>catchment area combined sewer currently</u> has no capacity to accept increased flows...	To clarify that capacity concerns relate to the catchment area and not a single sewer.
MINOR/PS/OPDC M12 (1)	6.38	Where development cannot divert surface water into the Grand Union Canal, or can only meet part of it's the requirement via this route, applicants will be required to provide on-site attenuation to achieve the greenfield runoff rate. <u>OPDC's Integrated Water Management Strategy identifies that a greenfield run off rate for a central location in the OPDC area is 12.5 litres per second per hectare (L/s/ha). However, it recognises that this may vary significantly across the OPDC area and runoff rates should be confirmed at a site specific scale.</u> Where on-site attenuation is provided, priority should be given to the provision of above ground vegetated space including green space, raingardens and green roofs. In accordance with the Mayor's drainage hierarchy, below ground attenuation will only deemed acceptable where all above ground options have been appropriately explored. Where onsite attenuation cannot achieve run-off rates, applicants should consider off-site strategic attenuation measures, integrated within public open spaces and highway networks.	To clarify that there is a single run-off rate applicable to the OPDC area.
MINOR/2/EU3/6	6.39	...Thames River <u>Basement-Basin</u> Management Plan.	To reference the correct document title.
MINOR/2/EU3/7	6.40	All 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</u> 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.
MM2/PS/Q3	EU4 (a) and (b), (c), 6.44 and 6.45	Development proposals will be supported where they appropriately minimise air pollution <u>during the demolition, construction and operational phases of development on the site and on neighbouring sites</u> and make a positive contribution to overall improvement in air quality by:	To ensure the effectiveness of the Plan.

Ref.	Policy/ Para/figure	Modification	Reason
		<p><del>a) submitting an Air Quality Assessment:</del></p> <ul style="list-style-type: none"> <li><del>i) for all major planning applications; and/or</del></li> <li><del>ii) where the proposed development includes new uses or buildings that have the potential to generate air pollution; and/or</del></li> <li><del>iii) where a sensitive use is proposed in close proximity to an existing source of air pollution;</del></li> </ul> <p><del>b) ensuring the Air Quality Assessment required under a) considers:</del></p> <ul style="list-style-type: none"> <li><del>i) the potential impacts of pollution from the development on the site and on neighbouring sites;</del></li> <li><del>ii) potential exposure to pollution above the Government's air quality objective concentration targets; and</del></li> <li><del>iii) the impacts of demolition, construction and operational phases of development;</del></li> </ul> <p>c) ensuring the Air Quality Assessment required under a) identifies delivering mitigation measures to be implemented to reduce:</p> <ul style="list-style-type: none"> <li>i) emissions, particularly of nitrogen oxide and particulate matter, including PM10 and PM2, to meet the Air Quality Positive objective; and</li> <li>ii) exposure to acceptable levels;</li> </ul> <p>d) implementing the recommendations of the Old Oak and Park Royal Air Quality Study (AQS) summarised in table 6.1;</p> <p>e) helping to reduce pollution in air quality focus areas, identified in figure 6.6, to comply with the most up to date national air quality standards;</p> <p>f) delivering and/or contributing to the provision of new automatic monitors and diffusion tubes, with equipment to monitor NO2 and PM10 at locations identified in figure 6.6;</p>	

Ref.	Policy/ Para/figure	Modification	Reason
		<p>g) complying with the relevant borough's Air Quality Action Plans (AQAPs) and the mitigation measures identified therein;</p> <p>h) meeting EU or subsequent nationally established health-based standards and objectives for NO2 and PM10 and other particulates;</p> <p>i) designing and positioning buildings, civic and open spaces to minimise exposure to elevated levels of pollution by avoiding creating street canyons, or building configurations that inhibit effective pollution dispersion. In particular, bus and taxi facilities should be designed to avoid the build-up of pollution;</p> <p>j) minimising emissions from any combustion based sources of energy that are deployed by ensuring low emission plant is used and where appropriate suitable after treatment technologies are adopted; and</p> <p>k) designing and positioning any energy facilities within the development area to minimise harmful emissions and maximise the rapid dispersion of any residual pollutants to minimise impact.</p> <p>6.44. Air quality has a significant role to play in health and wellbeing <u>during the demolition, construction and operational phases of development</u>. Poor air quality can reduce life expectancy and contribute to a number of illnesses like asthma.</p> <p>6.45. The 'agent of change' principle will be applied to the assessment and treatment of poor air quality (see Policy D6). Air Quality Assessments should be undertaken to identify the potential for air quality to impact on or be caused by new development and to demonstrate how these impacts are being appropriately mitigated. <u>Air Quality Assessments should be submitted:</u></p> <ul style="list-style-type: none"> <li>• <u>for all major planning applications; and/or</u></li> </ul>	

Ref.	Policy/ Para/figure	Modification	Reason
		<ul style="list-style-type: none"> <li>• <u>where the proposed development includes new uses or buildings that have the potential to generate air pollution; and/or</u></li> <li>• <u>where a sensitive use is proposed in close proximity to an existing source of air pollution.</u></li> </ul> <p>Air Quality Assessments should accord with the requirements of the above policy and any other requirements in Mayoral policy and/or guidance.</p>	
MINOR/2/D6/4	6.53	...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 open space influence exposure to poor air quality...	To clarify that green infrastructure can also influence exposure to air pollution.
MINOR/2/EU4/3	6.55	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.
MMX/PS/Q3m	EU5(a), 6.62	Development proposals will be supported where they: <del>a) submit a Noise and Vibration Assessment (NVA) which will be required for all major developments and in respect of all applications where the location is likely to be particularly sensitive to noise. The NVA should cover both the construction and operation phases of development and include predictive noise and vibration modelling to:</del> a) <del>i) avoid significant adverse impacts of noise and vibration on health and quality of life as a result of both the construction and operational phases of new development;</del> <del>b) ii) demonstrate development complies with the most relevant and current building standards (BS); and c) iii) identify unacceptable impacts and secure the appropriate</del> deliver y of mitigation	To ensure the effectiveness of the Plan.

Ref.	Policy/ Para/figure	Modification	Reason
		<p><u>measures to address unacceptable impacts</u>; 6.60. OPDC will require all major development or developments that are particularly sensitive to noise and/or vibration to undertake a Noise and Vibration Assessment (NVA).</p> <p>6.62. The NVA should demonstrate that development proposals will comply with the most up-to-date British Standards Institution's (BSI's) Building Standards (BS), <u>and it should also demonstrate how significant adverse impacts of noise and vibration on health and quality of life as a result of new development will be avoided and</u> include predictive modelling to identify appropriate mitigation measures both at the construction and occupation phases of the development.</p>	
MINOR/2/EU6/13 and MINOR/2/EU6/14	EU6b)	<p>Any <u>allocated or</u> existing waste management site(s) lost to a non-waste use will be required to provide equivalent or enhanced compensatory site provision which <u>normally</u> meets the maximum throughput that the lost site <u>could achieved</u>. Site provision should be made in the most appropriate location, according to the following sequential manner:</p> <ul style="list-style-type: none"> <li>i. within the OPDC area; or</li> <li>ii. within the relevant waste authority area based on where the lost site is located; or</li> <li>iii. within Greater London;</li> </ul>	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.
MM/PS/ Q3n	EU6(d)(i), 6.67	<p>d) Major development proposals will be supported where they demonstrate: i) <u>through a Site Waste Management Plan, that their</u> waste will be managed, both during construction and operation, as high up the waste hierarchy as possible; ii) a collaborative approach with the Waste Authorities and OPDC is being positively adopted to help deliver strategic waste management systems in order to meet national and London waste recycling targets; iii) adequate provision for waste storage and collection within developments, in accordance with the London Waste Recycling Board's</p>	To ensure the effectiveness of the Plan.

Ref.	Policy/ Para/figure	Modification	Reason
		<p>(LWARB) guidance on recycling and storage, ensuring: A) source segregation of bio-waste and other recyclables; B) control of odour, nuisance and air and noise pollution from waste storage and collection; and C) working with relevant local waste authorities to ensure waste collection approaches align with current and future waste collection arrangements;</p> <p>6.67. Waste is a major issue for London. London is seeking to reduce waste and in particular waste sent to landfill by promoting the waste hierarchy, as set out in the London Plan (see figure 6.8). It gives top priority to preventing waste in the first place. When waste is created, it gives priority to preparing it for re-use, then recycling, then recovery, and last of all disposal (e.g. landfill). Developments should demonstrate how they have considered managing waste in accordance with the waste hierarchy through design, construction and operation <u>within a Site Waste Management Plan as part of their submitted Sustainability Statement.</u></p>	
MM/PS2/OPDC/EU6/1	6.70	<p>The WLWP and the safeguarding of these sites provided sufficient capacity to meet the <del>current</del> London Plan (2016) apportionment targets for Brent and Ealing. <u>However, the London Plan (2021) has revised apportionment targets for Brent and Ealing and OPDC will work with the London Boroughs of Brent, Ealing and other waste planning authorities covered by the WLWP to adopt a new WLWP.</u></p>	To ensure general conformity with the Publication London Plan.
MM2/PS/Q3o	EU7	<p>Major development proposals <u>will be supported where: required to submit a Circular and Sharing Economy Statement, demonstrating:</u> a) <u>how</u> the design and construction of the development enables buildings and their constituent materials, components and products to be disassembled and reused at the end of their useful life;</p>	To ensure the effectiveness of the Plan.

Ref.	Policy/ Para/figure	Modification	Reason
		<p>b) <del>where</del>, so far as is possible, the circular and sharing economy has been promoted through leasing or rental arrangements for building systems, products and materials;</p> <p>c) <del>how</del> sharing economy principles have been adopted in the design, construction and on-going operation of the development; and</p> <p>d) <del>how</del> circular economy principles have informed the design and implementation of energy (including heating and cooling), water and waste infrastructure.</p>	
MM17/PS/Q3e	6.91 (h)	Communal space: Providing space in communal areas for facilities that people need, but do not often use. Examples could be laundry facilities, communal kitchen space, spare rooms for visitors and hardware and tools (see Policy D34).	To clarify the function of policies to guide development.
MINOR/PS/Q19	6.91 and 6.96	<p>6.91. Major development proposals will be expected to demonstrate through submission of a circular and sharing economy statement within Sustainability Statements, how the principles of the circular and sharing economy have been incorporated into the design, construction, operational use of and end life disassembly of new development. At Old Oak and Park Royal there are many opportunities to adopt circular and sharing economy principles and practice. <u>The following list includes some examples of these opportunities including:</u> a) Food: Park Royal is one of the biggest centres for food processing in the UK. Industrial and domestic food waste could be collected and treated to create nutrient, energy, CO2, water and other products that could be reused locally to produce energy, food and resources for the pharmaceutical and other industries thereby turning a product that is expensive to dispose of and is polluting into a high value resource. The process <del>can should</del> be applied to the whole supply chain so that waste is reduced at the point of supply (see Policies P4 and P5). b) Water:</p>	To amend wording in supporting text which could be considered as policy.



Ref.	Policy/ Para/figure	Modification	Reason
		<p>Water can be harvested, stored, treated and reused on site thereby relieving pressure on the sewers, reducing demand for potable water, and contributing to the quality of green infrastructure (see Policy EU3). c) Energy: Renewable and low carbon energy including free sources of heat from the sewers, canal, data centres, Energy from Waste (EfW) and other sources can be harvested and used to provide heat and cooling to homes. Renewable electricity can be generated and supplied to homes and commercial space. Storage can be used to balance supply and demand and community interest companies could be formed to take part in supply and demand management (see Policy EU10). d) Materials: Low impact, renewable materials can be specified in development. Materials that can easily be recovered at the end of their life <u>should can</u> be used and assembly of materials and products (whether in buildings or white goods etc.) <u>should can also</u> be designed for disassembly (see Policy EU8). e) Fabrication: use of off-site and modular construction can reduce waste and enhance efficiency of construction. <u>There is an opportunity for</u> Light weighting of buildings and buildings, that can be disassembled and reused, <u>should to</u> be embedded in the design process. Building facades and other elements that will be replaced or repaired over their life <u>have the potential to should</u> be designed so they enable repair, reuse or refurbishment at low cost. Leasing of short and medium life products <u>should can also</u> be considered (see Policies SP2 and EU8). f) Mobility: <u>Promotion of Walking</u> and cycling <u>should be promoted</u> as the preferred choice where possible and practical; <u>promotion of</u> low carbon and zero emission vehicles <u>should be promoted</u> that provide energy storage when not in use to the power network (see Policy T4); and <u>design of</u> new mobility services <u>should be designed</u> to maximise asset utilisation. These <u>should can</u> be</p>	

Ref.	Policy/ Para/figure	Modification	Reason
		<p>supported by sensor networks, predictive analytics and user-facing digital services to help optimise use of system and deliver a high quality user experience. g) Transport: <del>Promotion of M</del>measures such as car clubs <del>should be promoted, in accordance with (see Policy T4) that are. These should be</del> accompanied by suitable electric vehicle charging infrastructure <del>which should be designed to limit excessive peaks in electrical demand and where possible, utilise locally generated renewable energy.</del> h) Communal space: Providing space in communal areas for facilities that people need, but do not often use. Examples could be laundry facilities, communal kitchen space, spare rooms for visitors and hardware and tools (see Policy D4). i) Maker and mender centres: Locations in the neighbourhood where communities can take, make and repair products. These centres could be designed to take all sorts of products from bulky furniture to electrical items as long as they can be reused, repaired or repurposed. The centres could be kitted out with machinery and facilities to help repair from 3D printers to routers and laser cutters. They would help reduce waste and provide new jobs. These facilities would be part of the social infrastructure (see Policy TCC4). j) Skills sharing: providing space or an online platform for the community to share their skills and resources (see Policies D4 and EU11). k) Logistics: <del>Consolidation of M</del>ovement of goods <del>should be consolidated,</del> smart technology used to optimise use of vehicles; last mile deliveries <del>should be</del> by clean vehicles <del>and</del> at times when they cause least disruption; reverse logistics should be adopted to support waste reuse where possible; new technologies like drones can be used to enhance optimisation and reduce impacts on roads. Nonroad based transport including rail and water should be fully integrated and used to support movement of goods and waste (see Policies T7, T8 and EU11). l) Flexible design: <del>in</del></p>	

Ref.	Policy/ Para/figure	Modification	Reason
		<p><del>accordance with Policy SP2, buildings and public space should be designed buildings and spaces so that they are to be</del> highly adaptable to economic, demographic/social, technical and commercial and environmental change. <del>They should be designed for flexibility, interoperability, disassembly and reuse. Consideration should be given to Ssharing</del> and leasing of space over different timescales to optimise use. <del>This could include sharing spaces between different uses at different times of the day and night</del> Maker space, for example, could be rented out for different periods of time and by the desk, room or whole facility. m) Digital platforms: <del>These should be p</del>Provided to help communities connect and share space, resources, time, experience and skills <del>and enable. G</del> community ownership of assets (energy, mobility, shared space, social and cultural infrastructure, goods and services) <del>should be enabled and supported</del> (see Policies EU11 and DI3). n) Waste: <del>There are O</del>opportunities <del>should be maximised</del> for the separation and collection of recyclables and minimising waste during the life of the building through innovative use of collection methodologies/ technologies, and a coordinated campaign of communications and engagement on waste minimisation and recycling (see Policy EU6). o) Smart monitoring: Exploring the use of smart technology to measure, monitor and track waste collection, processing and resource utilisation to enable better waste management practices and to enhance resource recovery (see Policy EU11). 6.96...</p> <p>h) <del>Innovation in the use of rapidly renewable materials should also be promoted. The use of rapidly renewable materials.</del> These are materials that are defined as natural, non-petroleum based building materials that have harvest cycles under 10 years. Such materials include bamboo, straw, cork, natural linoleum products</p>	

Ref.	Policy/ Para/figure	Modification	Reason
		<p>(such as Marmoleum), wool, wheatboard and strawboard. The USA based Leadership in Energy and Environmental Design (LEED) assessment process, which is the biggest green building certification system in the world, is promoting the use of these materials as they can contribute to better land management and biodiversity and generate income for farmers; and i) Responsible sourcing of materials. <u>This</u> is encouraged by the London Plan and required by BREEAM. Developments are increasingly using materials from suppliers who participate in responsible sourcing schemes that are accredited and recognised across industry. Such schemes include but are not limited to the BRE BES 6001 Framework Standard for Responsible Sourcing and FSC and PEFC certified timber. The UK government established Central Point of Expertise on Timber (CPET) has carried out work demonstrating that sustainable timber can be procured at little or no extra cost. <u>OPDC's Environmental Standards Study has also demonstrated that the use of suppliers that operate Environmental Management Systems certified against ISO 14001 or EU Eco-Management and Audit Scheme (EMAS) standards can be delivered at no additional cost. Materials should also be procured from suppliers that operate Environmental Management Systems certified against ISO 14001 or EU Eco-Management and Audit Scheme (EMAS) standards, covering all stages of material manufacturing. These schemes are regularly used on major projects by developers like Lond Lease, British Land and Hammersons and can be delivered at no additional cost as evidenced in OPDC's Environmental Standards Study.</u></p>	
MM/PS2/OPDC/EU8/1	6.92	<p>The high density <u>and industrial</u> environment of Old Oak and <del>industrial nature of</del> Park Royal will require the use of materials that are hard-wearing and adaptable, and that will last and weather well.</p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained</p>

Ref.	Policy/ Para/figure	Modification	Reason
			as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed. Requirements for use of hard-wearing and adaptable materials apply to both land uses.
MM2/PS/ Q3p	EU9(a), 6.98, 6.103 and 6.105	<p>a) Major development proposals will be supported where they:</p> <ul style="list-style-type: none"> <li>i) meet or exceed the on-site carbon emissions targets set out in the London Plan energy hierarchy;</li> <li>ii) where they cannot deliver the London Plan CO2 reduction targets on-site, they make a sufficient financial contribution towards carbon reduction in line with the OPDC's carbon offset policy;</li> <li>iii) design buildings to use low carbon heat sources and when connecting into heat networks, design building services to achieve low flow return temperatures to optimise network efficiency;</li> <li><del>iv) carry out post-construction audits to demonstrate that the carbon reduction measures have been fully implemented and are achieving the calculated CO2 reduction targets;</del></li> <li>v) demonstrate that the risks of overheating have been addressed through the design of the development <u>and accord with the Mayor's cooling hierarchy;</u> <del>and To address the risks of overheating, applicants for major developments should accord with the Mayor's cooling hierarchy and carry out modelling in line with the most up to date guidance from the GLA and CIBSE. Modelling should take account of the predicted risks of climate change;</del></li> </ul>	To ensure the effectiveness of the Plan.

Ref.	Policy/ Para/figure	Modification	Reason
<p>MINOR/PS/OPDC M17(1)</p>		<p>vi) provide appropriate smart technologies and guidance to enable occupiers to monitor and manage their energy use; <del>and</del>  <del>vii) submit an energy statement which shows compliance with this policy.</del></p> <p>6.98. The London Plan requires all new residential development to be zero carbon, with non-residential development meeting this target from 2019. In line with the London energy hierarchy, buildings should be designed to reduce energy demand. This will allow occupants to both minimise their fuel bills and reduce their carbon emissions. This positively supports the governments affordable warmth agenda, designed to take people out of fuel poverty. The Mayor's vision is that London becomes a zero carbon city by 2050. The draft new London Plan (2017) and the London Environmental Strategy encourage Opportunity Areas and in particular, Mayoral Development Corporations to set high standards in environmental sustainability. The draft new London Plan (2017) requires the regulated CO2 emissions for new homes to be reduced by a minimum of 10% against Part L of Building Regulations Target Emission Rates, through energy efficiency alone. Non-domestic development is encouraged to reduce regulated CO2 emissions by 15% or more through energy efficiency measures alone. OPDC expects developments to meet and where feasible improve on these targets. <u>To demonstrate how proposals accord with this policy, an Energy Statement should be included in submitted Sustainability Statements.</u></p> <p>6.103. Studies have shown that buildings do not perform as well in operation as anticipated when they were being designed. <u>Post-construction Undertaking audits and testing will help identify and rectify</u> causes of</p>	

Ref.	Policy/ Para/figure	Modification	Reason
		<p>the performance gap resulting from <u>the planning, construction and commissioning of the building. Where possible the OPDC would expect this information to be used by developers and management companies to address any issues</u>; and</p> <p>6.105. The risks now and into the future of overheating are significant particularly on dense and tall development, in south and west facing apartments and in single aspect units. In preparing an energy statement, developers should set out the design measures that have been introduced to mitigate the risk of overheating and minimise the demand for cooling. Developers should undertake dynamic overheating modelling in line with CIBSE guidance TM52, TM59 and using TM49 guidance in relation to weather data for London, or where these approaches are superseded the most up to date modelling standards and guidance should be followed. <u>Modelling should take account of predicted risks of climate change.</u></p>	
<p>MM13/PS/Q5(11) MM2/PS/Q3d</p>	<p>EU10(f)</p>	<p>f) contribute to and/or deliver new heat, cooling and electricity networks <u>set out in the policies of this plan.</u></p> <p>contribute to and/or deliver new heat, cooling and electricity networks <u>and infrastructure</u> to accord with the specification requirements set out in <u>OPDC's Infrastructure Delivery Plan (IDP)the policies of this plan. -within Old Oak North and Scrubs Lane and in other locations where networks are in place before development commences on site.</u></p>	<p>To ensure the effectiveness of the Plan.</p>
<p>MM2/PS/Q3d</p>	<p>6.111</p>	<p>In respect of heat, OPDC's preferred approach is to develop a strategically planned decentralised heat network. In accordance with the new draft London Plan, secondary heat sources for decentralised networks should be prioritised. OPDC's Utilities Study demonstrates that the OPDC area has access to a number of low carbon heat sources including heat from</p>	<p>To ensure the effectiveness of the Plan.</p>

Ref.	Policy/ Para/figure	Modification	Reason
		<p>the Grand Union Canal, sewage networks, aquifers and potentially heat from Energy from Waste (EfW). The work has also demonstrated that the available low carbon heat sources could meet much of the baseload heat demand for the development. Any heat network would need to accord with <u>guidance-the specification requirements</u> set out in OPDC's Infrastructure Delivery Plan (IDP).</p>	
<p>MM2/PS/ Q3g</p>	<p>EU13(e), 6.134</p>	<p><del>e) prior to permission being granted to:</del>  <del>i) carry out a Preliminary Risk Assessment, including a desk-top study and production of a conceptual site model; and</del>  <del>ii) produce a Site Investigation Scheme</del></p> <p>f) following planning permission being granted, to effectively treat, contain or control any contamination, in the following sequential manner:</p> <ul style="list-style-type: none"> <li>i) undertake necessary site investigations;</li> <li>ii) refine the conceptual model;</li> <li>iii) undertake an options appraisal and evaluate options to define a remediation strategy;</li> <li>iv) produce a remediation strategy;</li> <li>v) implement the remediation strategy;</li> <li>vi) submit a verification study; and</li> <li>vii) monitor how well remediation has worked;</li> </ul> <p>6.134. Where land is known or found to be contaminated, or where a sensitive use is proposed or exists, developers will be expected to assess their proposals using the eight stage process outlined in Table 6.2, <u>including submitting a Preliminary Risk Assessment and Site Investigation Scheme as part of planning applications.</u></p>	<p>To ensure the effectiveness of the Plan.</p>

Transport



Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/T/1	7.1	Transport is the catalyst for the <del>comprehensive regeneration of the OPDC area</del> Old Oak and plays an <del>integral role in protecting, strengthening and intensifying the Park Royal industrial estate</del> . The transport network at Old Oak and Park Royal must be planned and delivered to support the needs of existing and future communities living, working and visiting the area.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and to Old Oak as the only mixed use area have been removed and associated transport considerations have been amended.
MINOR/2/T1/4	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.
MM/PS2/OPDC/T/1	7.8	<del>In Old Oak</del> <u>Outside of designated Strategic Industrial Location areas</u> , measures to prioritise bus movement, provide segregated facilities for cyclists and create pedestrianised areas will be supported. In <del>Park Royal</del> SIL, the road network will need to support the movement of freight to facilitate business growth by implementing measures to address existing congestion issues.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and to Old Oak as the only mixed use area have been removed and associated transport considerations have been amended.
MINOR/2/T1/13	7.9	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)...	To clarify the role of local highways authorities.
MINOR/2/T1/10 and MINOR/2/OONDFP/19	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 Any agreement between the developer and decision to adopt streets will need to be made in</u>	To enable streets to be offered to local highways authorities.

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/PS/Q20	7.10	<p>the relevant local highway authorities <u>to adopt a road will need to be secured in accordance with section 38 of the Highways Act 1980...</u></p> <p>To achieve a connected place and reduce existing severance across Old Oak and Park Royal new and improved bridges and underpasses will be required. In accordance with Policy SP7, it will be important that the bridges and underpasses are integrated into the proposed street network and serve key desire lines. <del>The street network must also be accessible for all users, ensuring that gradients improve on 1:20 and adequate seating is designed in from the outset.</del> The Healthy Streets for London vision requires the delivery of <u>adequate seating within sStreets that are also</u> should be well-lit and safe environments.</p>	To amend wording in supporting text which could be considered as policy.
MINOR/PS/Q5(13) MM2/PS/Q3d  MM/PS2/OPDC/T2/1	T2(a), 7.14	<p>Development proposals will be supported where they: a) deliver or contribute to new and enhanced walking infrastructure, in line with Policy SP7 on connections <u>and figure 7.5 and the walking interventions identified within the Infrastructure Delivery Plan (IDP);</u></p> <p>7.14 The regeneration of Old Oak and Park Royal presents an opportunity to enhance the existing and provide new environments for pedestrians across and into the wider surrounding area. <del>OPDC's IDP identifies the key interventions in walking infrastructure required to maximise the number of walking trips through the delivery of a high quality walking environment. These interventions must also be supported by a high quality on-site walking environment.</del> Figure 7.5 shows the indicative future key walking routes in Old Oak and Park Royal. In <del>Old Oak,</del> in addition to the key walking routes identified, other local streets would also contribute towards the walking network. <u>OPDC's IDP identifies further details of the key interventions in walking infrastructure required to maximise the number of walking trips through the delivery of a high quality</u></p>	<p>To ensure appropriate infrastructure information is contained within the Local Plan</p>          <p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use</p>

Ref.	Policy/ Para/figure	Modification	Reason
		<u>walking environment. These interventions must also be supported by a high quality on-site walking environment.</u>	designations, references to walking routes have been amended.
MINOR/PS/Q5(14) MM2/PS/Q3d	T3(a), 7.21, 7.24	<p>Development proposals will be supported where they: a) deliver and/ or contribute to new and existing cycle networks <u>shown on figure 7.7 and infrastructure identified in the IDP;</u></p> <p>7.21. OPDC will support the delivery of a comprehensive cycle network that improves cycle permeability throughout the OPDC area. OPDC will seek to enhance access to rail stations where there should be significant provision for high quality cycling infrastructure. Figure 7.7 shows the indicative future cycle network in Old Oak and Park Royal <u>and further details are provided in OPDC's Infrastructure Delivery Plan (IDP).</u></p> <p>7.24 . New and enhanced bridges and underpasses, <u>are depicted in the place policies and</u> are identified within OPDC's IDP. These are needed where there are currently barriers to movement, such as across the A40, the A406, the various rail lines and the Grand Union Canal...</p>	To ensure appropriate infrastructure information is contained within the Local Plan
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</u> seamless interchange between public transport and cycling;	To reflect the need for cycle infrastructure at rail stations.
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.
MM/PS2/OPDC/T3/1	7.21	In <del>Old Oak,</del> in-addition to the key cycle routes identified, other local streets would also contribute towards the cycle network.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect

Ref.	Policy/ Para/figure	Modification	Reason
			this change in land use designations, references to Old Oak as the only mixed use area have been removed and associated considerations have been amended including cycling routes.
MM/PS2/OPDC/T3/2	7.22	<del>In Old Oak, r</del> Redevelopment presents an opportunity to provide state of the art and innovative cycling infrastructure and parking facilities that can benefit everyone who lives and works in the area	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Old Oak as the only mixed use area have been removed and associated considerations have been amended including cycle infrastructure.
MINOR/PS/ Q21	7.25	<del>Investments in- The importance of delivering</del> "end-of-journey" cycle facilities in the form of secure cycle parking, lockers and showers <del>for places of work are is recognised in the London Cycle Design Standards. also vital. Major employers, businesses and landowners should invest in this infrastructure, recognising its value and importance to businesses, tenants and employees.</del> OPDC will work to develop training and guidance and improve awareness of the benefits of cycling to employees, to encourage more cycling...	To amend wording in supporting text which could be considered as policy.
MINOR/2/T3/13	7.27	...OPDC will also support proposals for infrastructure which will enable other complementary cycle hire schemes to be developed and implemented across the area. <del>Any proposals will need to be delivered in consultation with the local highways authorities ...</del>	To clarify the role of local highways authorities.
MM17/PS/Q3e		Docking stations must be appropriately embedded into the public realm in accordance with Policy <del>D2D1</del> .	To clarify the function of policies to guide development.
MINOR/2/T4/13	T4(a)(ii)	(ii) <del>strongly encouraging requiring</del> car-free development for residential developments located in <del>existing or planned</del> areas with PTAL between 4 and 6B;	To ensure general conformity with Publication London Plan.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/T4/1	T4 c)ii.	i. incorporate 20% active and 80% passive electric charging points for electric vehicles at all new <u>residential parking spaces and infrastructure for electric vehicles in all new operational non-residential car parking spaces, including active charging points for all taxi spaces;</u>	To ensure general conformity with Publication London Plan.
MINOR/2/T4/13	Para 7.29	OPDC will <del>strongly encourage</del> <u>require</u> development to be car free <u>on sites where the highest existing or planned PTALs fall within 4-6b.</u>	To ensure general conformity with Publication London Plan.
MM/PS2/OPDC/T4/2	7.33	Providing sufficient charging points is essential in encouraging the uptake of electric vehicles. To this end, OPDC requires that 20% of all new <u>residential</u> parking spaces have active provision for electric vehicles and the remaining 80% of all new <u>residential</u> parking spaces have passive provision for electric vehicles. <u>100% of the car parking spaces used operationally for non-residential developments should have electric vehicle charging infrastructure and proposals should provide active charging points for all taxi spaces.</u>	To ensure general conformity with Publication London Plan.
MM/PS2/OPDC/T4/3	7.35	In particular, it is likely that facilities for scheduled coach services in Old Oak <u>South</u> (in particular at Old Oak Common Station) will need to be provided.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change, the policy has been updated to apply more specifically to parts of Old Oak.
MINOR/PS/Q5(16)	T5(a), New paragraph after 7.42)	Development proposals will be supported where they: a) deliver/ contribute towards rail infrastructure and capacity, <u>including the range of rail interventions identified within the Infrastructure Delivery Plan, and place policies which aim to enhance rail capacity within Old Oak and Park Royal;</u>  <u>Interventions aimed at enhancing rail capacity within Old Oak and Park Royal are identified in place policies</u>	To ensure appropriate infrastructure information is contained within the Local Plan

Ref.	Policy/ Para/figure	Modification	Reason
		<u>and further details are set out in OPDC's Infrastructure Delivery Plan (IDP).</u>	
MM/PS2/OPDC/T5/1	7.37	<del>Three-Two</del> new rail stations are proposed (see figure 7.12): Old Oak Common (High Speed, Elizabeth Line and Great Western Mainline), and the potential London Overground Stations <u>at</u> : Old Oak Common Lane <del>and Hythe Road</del> .	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, Hythe Road Overground Station is no longer required to support the delivery of these site allocations and therefore its reference has been removed.
MM/PS2/OPDC/T5/2	7.38	<del>Old Oak</del> <u>The OPDC area</u> will become one of the most connected places in the UK once <u>Old Oak Common</u> <del>the proposed new</del> stations are opened.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended to apply more generally across the OPDC area.  The change also recognises that Old Oak Common station will be the station that brings a significant step change in public transport access to the OPDC area.
MM/PS2/OPDC/T5/3	7.41	New rail stations and rail lines should support <del>Old Oak</del> <u>the OPDC area</u> becoming a major new commercial and high- density residential centre by optimising development opportunities on and/ or adjacent to stations and tracks.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended to apply more generally across the OPDC area.

Ref.	Policy/ Para/figure	Modification	Reason
MM2/PS/Q3d	T6(a)	Development proposals will be supported where they: (a) facilitate, deliver and contribute to the existing and future bus network and infrastructure, including the range of interventions identified within <u>the place policies</u> and the IDP, to provide a comprehensive and coherent bus network across Old Oak and Park Royal that is connected into the surrounding area, including priority measures where appropriate;	To ensure appropriate infrastructure information is contained within the Local Plan
MM2/PS/Q3d	7.45	Additional infrastructure is required for buses to effectively serve development in Old Oak and Park Royal and link to the wider area ( <u>for further details, see the bus infrastructure interventions identified within the IDP</u> ). Bus infrastructure will include bus priority measures such as bus lanes, priority at junctions, bus gates and bus only links as well as suitably located bus stops with countdown facilities, stands and welfare provision for drivers. This bus infrastructure will improve bus reliability, capacity and connectivity and reduce the likelihood of people using their private vehicles. Bus infrastructure will also unlock sites, providing an effective public transport mode that can provide the capacity to move thousands of people per day.	To ensure appropriate infrastructure information is contained within the Local Plan
MM2/PS/Q3f	T7(a), 7.51	Development proposals will be supported where they:  a) provide measures to coordinate and reduce freight, servicing and delivery trips by: <ul style="list-style-type: none"> <li><u>i) implementing a Delivery and Servicing Plan including providing a forecast of delivery activity associated with the development and relevant movement data that OPDC and TfL can use for dynamic modelling purposes;</u></li> <li><u>ii) producing and implementing a Delivery and Servicing Plan; and</u></li> <li><u>iii) utilising freight consolidation centres where feasible and appropriate;</u></li> </ul>	To ensure the effectiveness of the Plan.

Ref.	Policy/ Para/figure	Modification	Reason
		<p>7.51. A Delivery and Servicing Plan (DSP) must be provided by applicants. This needs to demonstrate how deliveries and servicing requirements will be managed, including:</p> <ul style="list-style-type: none"> <li><del>a)</del> <u>a) providing a forecast of delivery activity associated with the development and relevant movement data that OPDC and TfL can use for dynamic modelling purposes;</u></li> <li><del>b)</del> <u>a) how delivery and servicing trips associated with the development will be reduced;</u></li> <li><del>c)</del> <u>b) identification of safe and legal loading locations;</u></li> <li><del>d)</del> <u>e) the use of delivery companies who can demonstrate their commitment to best practice such as FORS members;</u></li> <li><del>e)</del> <u>d) delivery booking systems, which could be implemented to ensure that deliveries are managed according to the capacity of the loading facilities available;</u></li> <li><del>f)</del> <u>e) moving deliveries outside of peak or normal working hours;</u></li> <li><del>g)</del> <u>f) investigating alternative routings to avoid congestion;</u></li> <li><del>h)</del> <u>e) encouraging the adoption of low emission vehicle options (buying or leasing); and</u></li> <li><del>i)</del> <u>f) encouraging collaboration amongst companies.</u></li> </ul>	
MM2/PS/Q3s	T8(a)(i)(ii)	<p>Development proposals will be supported where they:</p> <ul style="list-style-type: none"> <li>a) provide measures to reduce construction trips by: <ul style="list-style-type: none"> <li><del>i) providing forecast vehicle trip information;</del></li> <li>ii) <del>producing and</del> implementing a Construction Logistics Plan and Construction Code of Practice, consistent with TfL guidance;</li> <li>iii) utilising construction consolidation centres and lorry holding areas, where appropriate; and</li> </ul> </li> </ul>	To ensure the effectiveness of the Plan.



Ref.	Policy/ Para/figure	Modification	Reason
		iv) managing construction traffic by making use of larger construction vehicles, re-timing deliveries, route planning, and reducing trip generation by using centralised batching plants where feasible;	
MM/PS2/OPDC/T8/1	7.58	Redevelopment in <del>Old Oak</del> the OPDC area alongside major infrastructure projects like HS2, will generate a large amount of construction vehicle movements, exporting waste and importing materials over a number of decades.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended to apply more generally across the OPDC area.
MM/PS2/OPDC/T8/2	7.65	The edge of construction sites should be designed to ensure the public's view of the construction sites are as positive as possible. This could include planting, design work and meanwhile uses to create successful connections and temporary uses amongst and adjacent to construction sites which can help to develop community and identity in <del>Old Oak</del> the OPDC area.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended to apply more generally across the OPDC area.

## Housing

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/H1/1	H1	OPDC will support delivery of a minimum of <u>19,850</u> new homes during the Plan period	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed

Ref.	Policy/ Para/figure	Modification	Reason
			<p>use development and Old Oak North will be retained as SIL.</p> <p>These modifications enable OPDC to be able to meet the London Plan 10 year target of 13,670 homes. The Mayor of London has confirmed that the Local Plan is therefore in general conformity with the London Plan in his Letter of General Conformity.</p>
MM/PS2/OPDC/H1/2	H1(a)	supporting proposals that contribute to the delivery of a minimum annual housing target of <del>4,005,993</del> homes, where these accord with other Local Plan policies;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. This has resulted in a change to the annual housing target.
MINOR/2/H1/1	H1 b)	<del>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</del>	To make specific reference to the actual 10-year target to clarify conformity with the Publication London Plan.
MM/PS2/OPDC/H1/3	H1c)	delivering a minimum of <u>18,900</u> homes on Site Allocations, supporting the achievement of the housing targets identified within the Place policies	Numbers tbc following amendments to site allocations.
MM/PS2/OPDC/H1/4	8.8	OPDC's Development Capacity Study (DCS) identifies that over the next 20 years of this Local Plan, <u>19,850</u> homes can be delivered.	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL.</p> <p>These modifications enable OPDC to be able to meet the London Plan 10 year target of 13,670 homes. The Mayor of London has confirmed that the Local Plan is therefore in general conformity with the London Plan in his Letter of General Conformity.</p>
MM/PS2/OPDC/H1/5	8.8	This constitutes an annual housing target of <del>4,005,993</del> .	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and

Ref.	Policy/ Para/figure	Modification	Reason								
			<p>other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL.</p> <p>These modifications have resulted in updated phasing and capacities which enable OPDC to be able to meet the London Plan 10 year target of 13,670 homes.</p>								
MM/PS2/OPDC/H1/6	Table 8.1	<table border="1"> <thead> <tr> <th>0 to 5 years</th> <th>6 to 10 years</th> <th>11 to 20 years</th> <th>21+ years</th> </tr> </thead> <tbody> <tr> <td><del>4,000</del>4,600</td> <td><del>7,000</del>6,950</td> <td><del>9,100</del>8,300</td> <td><del>6,400</del>6,150</td> </tr> </tbody> </table>	0 to 5 years	6 to 10 years	11 to 20 years	21+ years	<del>4,000</del> 4,600	<del>7,000</del> 6,950	<del>9,100</del> 8,300	<del>6,400</del> 6,150	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL.</p> <p>These modifications have resulted in updated phasing and capacities which enable OPDC to be able to meet the London Plan 10 year target of 13,670 homes.</p>
0 to 5 years	6 to 10 years	11 to 20 years	21+ years								
<del>4,000</del> 4,600	<del>7,000</del> 6,950	<del>9,100</del> 8,300	<del>6,400</del> 6,150								
MM/PS2/OPDC/H1/7	8.10	<p>The current London Plan sets a target for 1,367 homes <u>per annum</u> to be delivered in Old Oak and Park Royal between 2019 and 2029. OPDC's Development Capacity Study shows that the OPDC area can deliver <u>1,35980</u> homes per annum over this period. <del>However,</del> OPDC will undertake the following strategies to seek to support the attainment of this Mayoral target, including:</p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL.</p> <p>These modifications have resulted in updated phasing and capacities which enable OPDC to be able to meet the London Plan 10 target of 13,670 homes.</p>								
MM/PS/OPDC M9(1)  This incorporates the following <a href="#">minor modifications at submission</a> previously referenced as: MINOR/2/H2/6 MINOR/General5	H2 b), c), d)	<p>All residential developments... will be required to provide affordable housing..., by:</p> <p>b) including early, <u>mid</u> and advanced stage review mechanisms in line with Mayoral guidance, to maximise the delivery of affordable housing <u>and in particular, social rent or level housing (including London Affordable Rent)</u>, where development viability improves;</p>	<p>To clarify the requirement for 30 per cent of affordable housing to be provided as <i>either</i> London Affordable Rent <i>or</i> Social Rent.</p> <p>To clarify conformity with the Publication 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</p>								

Ref.	Policy/ Para/figure	Modification	Reason
<p>MINOR/General6 and further <a href="#">post submission modifications</a> reported at the hearing session</p>		<p>c) providing a minimum of 30% of affordable housing as <del>either social rent (including or London Affordable Rent)</del> and the remainder 70% as a range of <del>social rent level housing (including or London Affordable Rent)</del>. Intermediate housing, including London Living Rent and London Shared Ownership (except for Build to Rent, see Policy H6);</p> <p>e)d) <del>and</del> ensuring intermediate homes are affordable to households on <del>average</del> median incomes in the host local authorities;</p>	<p>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.</p> <p>To further support maximising the delivery of affordable housing through mid-stage reviews.</p> <p>To align with borough methodologies for ensuring affordability of intermediate homes.</p>
<p>MM/PS/OPDC M9(2)</p>	<p>Table 8.2</p>	<p>Title of first column: Social rent level housing <del>(including or London Affordable Rent)</del></p>	<p>To clarify the requirement for 30 per cent of affordable housing to be provided as <i>either</i> London Affordable Rent <i>or</i> Social Rent.</p>
<p>MM/PS2/OPDC/H2/1</p>	<p>8.19</p>	<p>However, it is recognised that site specific constraints, infrastructure requirements and financial viability may affect the amount of affordable housing that can be achieved on individual sites and will make the 50% strategic affordable housing target difficult to achieve without the availability of grant. This will particularly be the case on sites that require significant infrastructure to unlock development, <del>such as within Old Oak South and Old Oak North</del> (see chapter 4).</p>	<p>The Inspector's Interim Findings conclude that site allocations 2 and 3 would not be viable and capable of effective delivery for mixed use within the plan period. Consequently, given the withdrawal of the Housing Infrastructure Fund Bid, site allocation 4 is also no longer viable as a standalone proposition for mixed use. Therefore housing will not be delivered in Old Oak North.</p>

Ref.	Policy/ Para/figure	Modification	Reason
<p><b>MM/PS/OPDC M9(3)</b></p> <p>This incorporates the following <a href="#">minor modifications at submission</a> previously referenced as: <b>MINOR/General11</b> and further <a href="#">post submission modifications</a> reported at the hearing session</p>	8.21	<p>OPDC's SHMA has identified that there is an 86% need for <del>social rent level housing (including or</del> London Affordable Rent <del>or equivalent) housing</del> 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</u> London Affordable Rent housing through their council <u>and this is determined under a number of factors under the Housing Act 1996 and other relevant homelessness legislation, but is a consequence of the high cost of private renting or buying a home in the area.</u></p>	<p>To clarify the requirement for 30 per cent of affordable housing to be provided as <i>either</i> London Affordable Rent <i>or</i> Social Rent.</p> <p>To provide clarity of the qualification process for social rent or London Affordable Rent homes.</p>
<p><b>MM/PS/OPDC M9(4)</b></p> <p>This incorporates the following <a href="#">minor modifications at submission</a> previously referenced as: <b>MINOR/2/H2/6</b> and further <a href="#">post submission modifications</a> reported at the hearing session</p>	8.22	<p>The AHVA has assessed the viability of delivering different levels and types of affordable housing. <u>As recognised above, the scale of regeneration on what is a complex brownfield site presents significant challenges in terms of viability. The AHVA demonstrates that</u> <del>Delivering social rent level housing (including or</del> London Affordable Rent) <del>housing</del> has the greatest impact on viability given the high cost of delivering housing at this level of discount on the market value. Delivering intermediate housing (including London Living Rent and London Shared Ownership) helps to improve the overall viability of delivering affordable housing. <del>Further evidence on tenure, housing need and development viability is available in the supporting Housing Evidence Statement.</del></p>	<p>To clarify the requirement for 30 per cent of affordable housing to be provided as <i>either</i> London Affordable Rent <i>or</i> Social Rent</p> <p>To clarify conformity with the Publication 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</p>

Ref.	Policy/ Para/figure	Modification	Reason
<p><b>MM/PS/OPDC M9(5)</b></p> <p>This incorporates the following <a href="#">minor modifications at submission</a> previously referenced as: <b>MINOR/General7</b> <b>MINOR/General8</b> and further <a href="#">post submission modifications</a> reported at the hearing session</p>	8.23	<p><del>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</del> <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:</u></p> <ul style="list-style-type: none"> <li>a) <u>A minimum of 30% either social rent level housing or (including London Affordable Rent);</u></li> <li>b) <u>70% mix the remainder a range of either social rent level housing ( or including London Affordable Rent) and of intermediate housing including London Shared Ownership and London Living Rent.</u></li> </ul>	<p>To clarify the requirement for 30 per cent of affordable housing to be provided as <i>either</i> London Affordable Rent <i>or</i> Social Rent.</p> <p>To further support the delivery of social rent and London Affordable Rent 30% is now described as a minimum. The remainder can also now include social rent and London Affordable Rent.</p>
<p><b>MM/PS/OPDC M9(6)</b></p> <p>This incorporates the following <a href="#">minor modifications at submission</a> previously referenced as: <b>MINOR/General9</b> <b>MINOR/General10</b> and further <a href="#">post submission modifications</a> reported at the hearing session</p>	New paragraphs 8.24, 8.25	<p><u>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"> <li>a) <u>prioritising the delivery of either social rent level housing or (including London Affordable Rent) where early, mid and <del>or</del> late stage review mechanisms secured in Section 106 agreements identify that there is a surplus;</u></li> <li>b) <u>seeking to exceed 30% either social rent level housing or (including London Affordable Rent) on schemes that do not meet the Mayor's threshold approach to viability; and</u></li> </ul>	<p>To clarify the requirement for 30 per cent of affordable housing to be provided as <i>either</i> London Affordable Rent <i>or</i> Social Rent.</p> <p>To further support the delivery of social rent and London Affordable Rent through review mechanisms and grant.</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>

Ref.	Policy/ Para/figure	Modification	Reason
		<p><u>c) prioritising the provision of the social rent or London Affordable Rent homes through housing grant.</u></p> <p><u>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 social rent or London Affordable Rent homes.</u></p>	
MINOR/2/H2/1	8.26	<p><u>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.</u></p>	To recognise, in accordance with the Publication London Plan, that delivery of affordable housing can help to meet the need of essential workers.
MINOR/2/H2/11	8.28	<p>At the start of the design process, applicants should work positively with OPDC and other relevant stakeholders, <u>including the host borough</u>, 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 <u>social rent</u>/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.</p>	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	8.26	<p><del>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.</del></p>	Starter Homes are not considered to meet the Mayor's definition of genuinely affordable housing.

Ref.	Policy/ Para/figure	Modification	Reason
<p><b>MM/PS/OPDC M9(7)</b></p> <p>This incorporates the following <a href="#">minor modifications at submission</a> previously referenced as: <b>MINOR/General13</b> and further <a href="#">post submission modifications</a> reported at the hearing session</p>	H3 b)	New residential development should deliver a balanced mix of housing types... taking into account the following considerations:....b) providing <del>either social rent level housing or (including</del> London Affordable Rent homes) in a mix of sizes that accords with OPDC's most up to date Strategic Housing Market Assessment	<p>To clarify the requirement for 30 per cent of affordable housing to be provided as <i>either</i> London Affordable Rent <i>or</i> Social Rent.</p> <p>To ensure consistency with Publication London Plan definitions.</p>
<p><b>MM/PS/OPDC M9(8)</b></p> <p>This incorporates the following <a href="#">minor modifications at submission</a> previously referenced as: <b>MINOR/General13</b> and further <a href="#">post submission modifications</a> reported at the hearing session</p>	8.36	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 <del>social rent level housing or (including</del> London Affordable Rent) that is set out in the latest SHMA.	<p>To clarify the requirement for 30 per cent of affordable housing to be provided as <i>either</i> London Affordable Rent <i>or</i> Social Rent.</p> <p>To ensure consistency with Publication London Plan definitions.</p>
<p><b>MINOR/PS/Q23</b></p>	H4 a)	a) Where it is appropriate family housing should be located <b>as a priority</b> : i) at the ground or first floor of developments with direct access to a garden or other secure private and/or communal open space for doorstep play; and ii) close to usable publicly accessible open space and appropriate social infrastructure.	To clarify the potential locations of family housing within developments.
<p><b>MINOR/2/H5/1</b></p>	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. <b>It is also recognised that in appropriate locations the</b>	To clarify conformity with Publication 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.



Ref.	Policy/ Para/figure	Modification	Reason
		<u>general character of an area will change over time when conversions and/or redevelopment of existing housing will result in net additional housing provision.</u>	
<b>MM/PS2/OPDC/H8/1</b>	8.69	<del>The new draft London Plan 2017 has proposed a wider definition for planning purposes in London which includes gypsies and travellers who live in bricks and mortar housing due to the lack of sufficient pitch provision. If this new definition has been adopted, OPDC will have to review the GTANA and this policy.</del>	To ensure general conformity with the Publication London Plan.
<b>MM/PS2/OPDC/H10/1</b>	8.81	The Mayor's Academic Forum has provided projections for the growth of full time students in London <del>from 2011/12 to 2026/27 and the required additional purpose-built student accommodation that this growth generates.</del> These projections estimate <u>the need for approximately 88,000 net additional Purpose Build Student Accommodation (PBSA) bedspaces between 2016 and 2041, or 3,500 when annualised over the 25 year period that by 2026/27 London's current student population of just over 365,000 will have increased to between 429,391 and 487,317.</u>	To update the evidence base on the need for student accommodation in line with the Publication London Plan.
<b>MM17/PS/Q3e</b>	8.85	Proposals for student accommodation will be required to be of high quality in relation to design and size in accordance with Policy D34.	To clarify the function of policies to guide development.

## Employment

Ref.	Policy/ Para/figure	Modification	Reason
<b>MM/PS2/OPDC/E/1</b>	9.2	The development of a new major commercial centre <del>in Old Oak</del> over the next 30 years alongside the protection, strengthening and intensification of <del>Park Royal</del> <u>Strategic Industrial Locations</u> -represent opportunities to retain, grow, innovate and diversify the economic base.	To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area

Ref.	Policy/ Para/figure	Modification	Reason
			have been removed and associated considerations have been amended
MM/PS2/OPDC/E/2	9.2	Additional space will be created to support more businesses and jobs – an additional <u>36,350</u> new jobs over the next 20 years.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL.  These modifications have resulted in updated employment floorspace and job phasing and capacities.
MM/PS2/OPDC/E/3	9.3	This chapter sets out how new developments will protect, strengthen and intensify <del>the Park Royal</del> industrial <del>areas estate</del> and support new employment growth across a variety of sectors in <del>Old Oak</del> <u>other locations</u> .	To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
MM/PS2/OPDC/E1/1 MINOR/PS2/OPDC/E1A	E1	are comprised of uses suitable for broad industrial type activities, <del>as defined in line with</del> Mayoral policy and/or guidance, that contribute to meeting the strategic target of <u>36,350</u> new jobs in Policy SP5 and the relevant place jobs targets in chapter 4;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL.  These modifications have resulted in updated employment floorspace and job phasing and capacities.
MM/PS2/OPDC/E1/2 MINOR/2/E1/1	E1b)	b) achieve no net loss of industrial floorspace <u>capacity</u> and where feasible, intensify the use of sites, in particular on Site Allocations and on other sites identified in OPDC's Park Royal <u>and Old Oak North</u> Intensification Studies;	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.

Ref.	Policy/ Para/figure	Modification	Reason
			To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and references made to new supporting studies.
MINOR/2/E1/4	E1c)	c) provide a mix of unit sizes <del>and in particular, including</del> small business units. Existing small business units should be reprovided;	To provide clarity on the need for a mix of unit sizes, including larger and smaller premises.
MM2/PS/Q3	E1(e)	e) <del>demonstrate through a Design and Access Statement that they</del> are well designed for their intended purpose having regard to providing flexibility for a range of broad industrial type activities, including appropriate identified future employment growth sectors. Adequate floor to ceiling heights should be provided having regard to relevant evidence base studies.	To ensure the effectiveness of the Plan.
MM/PS2/OPDC/E1/3	9.5	<del>Together,</del> Park Royal <del>and Old Oak North is</del> are the largest reservoir of industrial land in London, and <del>is</del> are designated as a Strategic Industrial Location (SIL) (see figure 9.4). Large industrial estates <del>such as Park Royal and Old Oak North</del> are one of the few areas that can accommodate uses, including industrial activities, operating 24 hours a day and creating noise, which can lead to land use conflicts elsewhere.	To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/E1/4 MM/PS2/OPDC/E1/5	9.6	<p><del>Park Royal</del>The OPDC area has a long history of economic innovation and growth. Today, <del>Park Royal</del> is still hugely successful, and is home to around 1,700 businesses, including particularly high concentrations of food manufacturing, transport, logistics and wholesale, creative services/manufacturing businesses and a well established network of artist studios. Combined, these employ 43,100 members of staff, many of which live locally. Evidence demonstrates strong demand for industrial space in the OPDC area<sup>1</sup>, and anticipates that there will be continued demand from a range of broad industrial type activities which are likely to grow and be attracted to <del>Park Royal and Old Oak North</del>SIL within the OPDC area (see Figure 9.2). Across <del>Park Royal</del> SIL there is capacity to deliver <del>7,600</del>8,350 new jobs.</p>	<p>To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.</p> <p>As a result of these changes the jobs capacity figures have been updated.</p>
MM/PS2/OPDC/E1/6	9.7	<p><del>The release of SIL in Old Oak (see Figure 9.4) and</del>There is evidence of an accelerated loss of industrial land across London means that the remaining industrial land supply must be protected and used as intensively and efficiently as possible.</p>	<p>To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.</p>
MM/PS2/OPDC/E1/7	9.8	<p>The <del>Mayor's London Plan requires the</del>OPDC area <del>to</del> could achieve an overall increase in floorspace suitable for broad industrial type activities and intensification in <del>Park Royal</del>SIL will be key to achieving this<sup>2</sup>. This intensification could be achieved through a number of interventions such <del>as</del> horizontal/vertical extensions, infill development, development on vacant land and comprehensive development of existing sites. Design approaches could and should include multi-storey industrial typologies.</p>	<p>To ensure general conformity with the Mayor's London Plan.</p> <p>To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use</p>

Ref.	Policy/ Para/figure	Modification	Reason
			area have been removed and associated considerations have been amended.
<p>MINOR/2/E1/1 MINOR/PS/OPDC M16 (3) MINOR/PS2/OPDC/E1A</p>	9.9	<p><u>Policy E1 seeks to, as a minimum, protect existing industrial floorspace capacity or the potential industrial floorspace that could be accommodated on site. Wherever feasible, sites should deliver high plot ratios through industrial intensification.</u> 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>It is important that appropriate industrial use classes are secured in order to ensure floorspace can permanently accommodate industrial uses, and thereby maintain no net loss or deliver a net gain of industrial floorspace capacity as well as protecting the function and integrity of SIL.</u></p>	To provide clarity about how policy applies in particular circumstances.
MM/PS2/OPDC/E1/8	9.10	There are an array of different space types and sizes across the <del>Park Royal</del> SIL, which helps to make it a competitive and attractive business location <sup>3</sup> . It is important that proposals in <del>Park Royal</del> SIL are well designed and support the effective function of businesses across a wide range of sectors <sup>4</sup> and business sizes.	To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
<p>MINOR/PS2/OPDC/E1/1 MM17/PS/Q3e</p>	9.11	OPDC will apply <u>the</u> agent of change' principle, in accordance with policy D56, when considering the impact of proposals adjacent to SIL to ensure that development will not harm the functioning of existing or future employment and industrial activities in SIL and vice versa, proposals for broad industrial type activities on the edge of SIL will need to adequately protect the amenity of adjacent mixed use developments.	<p>Typographical error</p> <p>To clarify the function of policies to guide development.</p>

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/E2/1	E2	Outside of SIL, OPDC will support proposals that: a) deliver employment floorspace that: i) contributes to meeting the strategic jobs target of <u>36,350</u> in Policy SP5 and the place jobs targets in chapter 4;	The Inspector's Interim Findings conclude that site allocations 2 and 3 would not be viable and capable of effective delivery for mixed use within the plan period. Consequently, given the withdrawal of the Housing Infrastructure Fund Bid, site allocation 4 is also no longer viable as a standalone proposition for mixed use. Therefore, to respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL. The job figures are being updated to reflect these changes to land use designations and site allocations developed in response to the Inspector's Interim Findings.
MM/PS2/OPDC/E2/2	9.13	A significant quantum of new homes and new employment floorspace with opportunities for new jobs will be created outside of SIL through the regeneration and redevelopment of Old Oak <u>South</u> , North Acton, Park Royal Town Centre and First Central.	To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
MM/PS2/OPDC/E2/3 MM/PS2/OPDC/E2/4	9.14	On sites outside of the SIL designation, there is capacity to deliver <u>28,150</u> new jobs, across a range of economic sectors <sup>1</sup> . The majority of this new employment floorspace will be delivered within the proposed new commercial centre around Old Oak Common station and within the new town centre hierarchy (Old Oak Major Town Centre, North Acton Neighbourhood Town Centre <u>and</u> Park Royal Town Centre <del>and Atlas Junction Neighbourhood Town Centre</del> ), but there will be opportunities to deliver employment floorspace elsewhere, as part of mixed use development and in locations that could be unsuitable for residential accommodation. Proposals will be	To respond to the Inspector's Interim Findings, Old Oak North will be retained as SIL and, as a consequence, a new location for Old Oak major town centre is being identified that subsumes the Atlas Junction neighbourhood town centre. References to Atlas Junction Neighbourhood Town Centre have been removed to reflect this.  As a result of these changes the jobs capacity figures have been updated.

Ref.	Policy/ Para/figure	Modification	Reason
		supported that contribute to this target and the relevant place targets (see chapter 4) and Site Allocation targets (see Policy SP10).	
MM/PS2/OPDC/E2/5 MINOR/PS2/OPDC/E2A	9.15	<p>The delivery of high density development outside of designated SIL will mean that some existing employment sites will be redeveloped. However, there are opportunities to reprovide (co-locate) existing floorspace as part of future redevelopment in these areas. <del>There is approximately 87 ha of industrial land and 255,835 sqm of industrial floorspace in the de-designated SIL area in Old Oak2.</del> OPDC will seek to reprovide <del>this</del> industrial floorspace as part of new mixed use development outside of SIL, unless it can be demonstrated that it is not compatible or would compromise the delivery of relevant Place policies or Site Allocation targets. <del>This</del>Any reprovision, along with the industrial intensification in <del>Park Royal</del> SIL (see Policy E1) will help deliver an overall net gain of floorspace suitable for broad industrial type activities across the OPDC area, <del>as required by the Mayor's London Plan. It is important that, where required, appropriate industrial use classes are secured in order to ensure floorspace can permanently accommodate industrial uses, and thereby maintain no net loss or deliver a net gain of industrial floorspace capacity.</del> OPDC will monitor the loss/gain of industrial floorspace through its Authority Monitoring Report (AMR) to ensure that overall, development is resulting in a net gain in floorspace suitable for broad industrial type activities.</p>	To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended. To provide clarity on Publication London Plan and how policy applies in particular circumstances.
MINOR/PS/OPDC M16 (2)	9.19	<u>In accordance with DI4b, where appropriate, OPDC would make use of compulsory purchase powers to facilitate business relocations. This would be considered on a case by case basis.</u>	To clarify the potential use of compulsory purchase powers to facilitate business relocations.
MINOR/2/E3/5	9.25	<u>OPDC will consider the most appropriate type or nature of provision under policy E3a) on a site by site basis.</u> The <u>agreed</u> arrangements for affordable workspace	To provide clarity on the flexible application of the policy.

Ref.	Policy/ Para/figure	Modification	Reason
		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.	
MM/PS2/OPDC/E3/1	9.25	<u>For proposals to support the expansion of existing business tenants it is recognised that on-site provision of small, open and/or affordable workspace may not be practicable. In this circumstance, alternative arrangements to support local business growth will be considered acceptable, such as how the expansion of the existing business operation could indirectly support small business growth.</u>	To provide clarity on application of policy where proposals involve the expansion of existing business tenants.
MM6/PS/Q3u	E5, 9.35	<p>For major development proposals, a Local Labour, Skills and Employment Strategy and Management Plan will be <del>required</del> secured. This will to enable them to demonstrate how they: <del>The Local Labour, Skills and Employment Strategy and Management Plan must be developed in partnership with relevant stakeholders and subject to approval by the OPDC.</del></p> <p><u>a) maximise the use of local labour;</u>  <u>b) provide construction apprenticeships and vocational training; and</u>  <u>c) ensure that small and medium sized local businesses and social enterprises have appropriate access to supply chain opportunities generated by the development.</u></p> <p>9.34. To ensure proposals for major developments are meeting OPDC's socio-economic regeneration priorities <u>and the requirements of policies SP5 and E5</u>, a Local Labour, Skills and Employment Strategy and Management Plan (LLESMP) should be developed <u>in partnership with relevant stakeholders</u>, incorporating predictions on labour demand forecasts and likely skills requirements. <u>The LLESMP must be subject to approval by OPDC.</u> The strategy element of the</p>	To ensure the effectiveness of the Plan.



Ref.	Policy/ Para/figure	Modification	Reason
		LLSESMP should be included within applicant's Socio-Economic Statements and should cover the following key areas:	

### Town centre and community uses

Ref.	Policy/ Para/figure	Modification	Reason
MM17/PS/Q3e	10.45, 10.75	Policy D5 <del>6</del>	To clarify the function of policies to guide development.
MM/PS2/OPDC/TCC1/1	TCC1-e and 10.9	<p><u>e) be delivered in phases, in accordance with demand created by the delivery of homes and jobs;</u></p> <p><u>10.9 In order to complement the surrounding town centre hierarchy and mitigate impacts, town centre uses should be phased in accordance with the provision of homes and jobs. It is recognised that in early development phases, town centre uses can support the activation of the area and place making and OPDC will take a more flexible approach to the phasing of town centre uses when considering these early development sites. This is particularly the case for proposals providing catalyst and/or meanwhile uses. The requirements for these are covered in policies TCC8 and TCC9.</u></p>	To respond to the changes to the Use Class Order
MM/PS2/OPDC/TCC1/2	TCC1-f and 10.10	<u>f) should have regard to the up to date retail and leisure needs study for the OPDC area, including the recommended distribution of town centre uses across the area;</u>	To respond to the changes to the Use Class Order

Ref.	Policy/ Para/figure	Modification	Reason
		<p><u>10.10 OPDC's Retail and Leisure Needs Study (RLNS) identifies the likely town centre uses required to serve those living, working and visiting the OPDC area, and has informed the figures for non-residential floorspace set out in the site allocations within Policy SP10. These floorspace figures balance the needs generated by the development and the requirement to ensure that the existing network of town centres can also benefit from spending growth, providing wider benefits to the network of centres. It should be noted that these figures are based on previous estimates for A-Class uses prior to changes to the Use Class Order in September 2020. Current development capacity figures and up to date information on population projections and estimates of expenditure retention should be taken into account in proposals for town centres uses.</u></p>	
MM2/PS/Q3v	TCC1(e) and (h),10.9 and 10.10	<p>To support, complement and avoid significant adverse impacts to the role and function of OPDC's designated town centres and the surrounding town centre hierarchy, proposals for town centre uses:</p> <p><u>e) should be supported by a Town Centre Uses Statement, where they provide over:</u></p> <p><u>i 5,000sqm of town centre uses in the Old Oak Major Town Centre; or</u></p> <p><u>ii 2,500sqm of town centre uses elsewhere;</u></p> <p><u>hg) should contribute, where appropriate, to measures that will support the continuing vitality and viability of Harlesden District Town Centre, when providing town centre uses that exceed the thresholds set out in paragraph 10.9. in e)i. and ii.</u></p> <p>10.911. The OPDC area is relatively unique in that the designated town centres at Old Oak, North Acton and Atlas Junction either do not yet exist or are at a very early phase of their development. To ensure that the growth of these centres is carefully managed, OPDC</p>	To ensure the effectiveness of the Plan.

Ref.	Policy/ Para/figure	Modification	Reason
		<p>will require development proposals that <u>provide 5,000sqm of town centre uses in the Old Oak Major Town Centre or 2,500sqm of town centre uses elsewhere meet the relevant thresholds</u> to include within their Planning Statement a Town Centre Uses Statement. The Town Centre Uses Statement should include:</p> <p>a) a vision statement, explaining the rationale and intended market profile of the development, including plans for how it will be presented to the market and its long-term management (for example, there might be a single entity managing the asset in a similar way to Covent Garden, Marylebone High Street or Regent Street). The statement should include (but not be limited to):</p> <ul style="list-style-type: none"> <li>i) evidence on target market;</li> <li>ii) details of unit specification (i.e. size, height, depth);</li> <li>iii) examples of comparable tenants the scheme will target; and</li> <li>iv) planning conditions or obligations being proposed by the applicant; and</li> </ul> <p>b) a masterplan detailing:</p> <ul style="list-style-type: none"> <li>i) the proposed quantum and phasing of town centre uses;</li> <li>ii) the proposed spatial distribution and mix of town centre uses;</li> <li>iii) how these would relate to the existing and planned town centre uses on adjacent sites; and</li> <li>iv) a statement outlining how the proposals would support the wider vision and place making objectives of this Local Plan.</li> </ul> <p>10.-<del>10</del>12. Impact assessments are a national requirement for retail, leisure and office schemes</p>	

Ref.	Policy/ Para/figure	Modification	Reason
		<p>outside of designated town centres. An impact assessment is not usually required within designated town centres but OPDC's Retail and Leisure Needs Study concludes that given that three out of four of OPDC's designated centres are either non-existent or in an early phase of their gestation, there is a need for a greater degree of scrutiny of town centre use proposals as they emerge, to ensure that any proposals complement designated centres within OPDC and its wider hinterland. OPDC will require a full impact assessment for those applications that <u>provide over 5,000sqm of town centre uses in the Old Oak Major Town Centre or 2,500sqm of town centre uses elsewhere are caught by the relevant threshold in the policy.</u> This should address the requirements of the NPPF and its associated National Planning Practice Guidance (NPPG), specifically, ensuring that the scale of the development is appropriate within the wider hierarchy of centres. Where necessary, impact assessments will need to take into account the cumulative effect of permissions. The assessment will assess the likelihood of a significant adverse impact on the investment within existing centres, and on their vitality and viability, taking into account the health of the existing centres. Any mitigation being proposed by the applicant should be set out clearly.</p>	
MM7/PS/Q3v	TCC1(g)	<p>f) <u>deliver mitigation measures, where identified should be supported</u> by an impact assessment, in accordance with the NPPF and NPPG, where proposals are providing retail, leisure or office development that exceeds the thresholds <u>in set out in paragraph 10.9 e), and ii;</u> and</p>	<p>To ensure the effectiveness of the Plan by including as policy, requirements only referred to in the supporting text.</p>
MM/PS2/OPDC/TCC1/3	10.4	<p><u>three-two</u> neighbourhood centres at North Acton <u>and</u>, Park Royal Centre <u>and Atlas Junction.</u></p>	<p>To respond to the Inspector's Interim Findings, Old Oak North will be retained as SIL and, as a consequence, a new location for Old Oak major town centre is being identified that subsumes the Atlas Junction neighbourhood town centre.</p>

Ref.	Policy/ Para/figure	Modification	Reason
			References to Atlas Junction Neighbourhood Town Centre have been removed to reflect this.
MM/PS2/OPDC/TCC1/4	10.7	OPDC acknowledges that small-scale walk-to town centre uses can help manufacturing businesses in <del>Park Royal</del> <u>SIL</u> that may wish to sell their produce on their premises, help to serve the needs of workers and help to improve the character and vibrancy of the area.	To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
MM/PS2/OPDC/TCC1/5 MM2/PS/Q3v	10.11, 10.12	<p>The OPDC area is relatively unique in that the designated town centres at Old Oak <del>and</del>, North Acton <del>and Atlas Junction</del> either do not yet exist or are at a very early phase of their development. To ensure that the growth of these centres is carefully managed, OPDC will require development proposals that <del>meet the relevant thresholds</del> <u>provide 5,000sqm of town centre uses in the Old Oak Major Town Centre or 2,500sqm of town centre uses elsewhere</u> to include within their Planning Statement a Town Centre Uses Statement.</p> <p>OPDC will require a full impact assessment for those applications that <u>provide over 5,000sqm of town centre uses in the Old Oak Major Town Centre or 2,500sqm of town centre uses elsewhere</u> <del>are caught by the relevant threshold in the policy.</del></p>	To respond to the Inspector's Interim Findings, Old Oak North will be retained as SIL and, as a consequence, a new location for Old Oak major town centre is being identified that subsumes the Atlas Junction neighbourhood town centre. References to Atlas Junction Neighbourhood Town Centre have been removed to reflect this.
MM/PS2/OPDC/TCC2/1 MM/PS2/OPDC/TCC2/2	TCC2 (a) and 10.16	a) Applications for town centre uses will be supported where they:	To respond to the changes to the Use Class Order

Ref.	Policy/ Para/figure	Modification	Reason
		<p>i. <u>are designed and serviced to support the role and function of the relevant town centre including maximising</u> the proportion of the ground floor fronting a street as a positive and/or active frontage. Servicing areas and blank façade should be avoided on key routes; <del>and</del></p> <p>ii. <u>support flexibility and adaptability so that uses can expand and/or change between use classes subject to demand and appropriate permissions/agreements; and</u></p> <p>iii. <u>include at least 10% of floorspace at ground level for units of 80 sqm or less when delivering more than 1,000 sqm of E-class uses at ground level.</u></p>	

Ref.	Policy/ Para/figure	Modification	Reason
		<p>10.16 <u>Within the OPDC area, it will be important to provide a variety of retailers in order to create vibrancy and ensure the long term vitality of its designated centres. OPDC recognises that chain stores are likely to form a key part of the spine of the area's town centres, but there is a risk that without appropriate interventions to support independents, the area's town centres could become 'cloned' town centres. To support diversity, OPDC will expect E-class proposals to provide for a range of unit sizes. For major E-class use proposals providing over 1,000sqm at ground level, OPDC will require at least 10% of floorspace at ground level for units of 80sqm or less (defined in the London Small Shops Study 2010), which will help support the establishment of SMEs and independent retailers in the OPDC area, who tend to operate in smaller units. To assist with their affordability, these should be focussed, where feasible, within secondary retail frontages and applicants should actively market these units within the local communities for a sustained reasonable period prior to letting.</u></p>	
MM2/PS/Q3v	TCC2(b), 10.17	<p><b>POLICY</b>  b) Applications providing outdoor uses such as eating and drinking uses with outdoor seating, event space or street markets will be supported where they do not detract from residential amenity and transport connectivity. <del>Any proposals for event space and/or street markets would need to be accompanied by a management plan;</del></p>	To ensure the effectiveness of the Plan.

Ref.	Policy/ Para/figure	Modification	Reason
		<p>10.17. Uses that help to activate the public realm will play an important role in place making. However, the impacts on the amenity of residents and workers would need to be carefully considered. <u>OPDC will require a management plan to be submitted for proposals for outdoor uses defined in TCC2(b) to demonstrate how uses do not detract from residential amenity (see Policy D5) or transport connectivity (See Policy SP7). A management plan Any proposals for street markets would need to be accompanied by a management plan that identifies its hours of operation and storage arrangements when not in use, types of traders, advertising, servicing and pedestrian and transport impacts. A management plan for Event spaces will also require a management plan regarding types of events, frequency of use, noise levels, advertising, servicing and pedestrian transport impacts.</u></p>	
MM/PS2/OPDC/TCC2/3	TCC2 10.14	<p><u>c) Existing town centre uses should be protected, unless:</u></p> <ul style="list-style-type: none"> <li><u>i. it is no longer economically viable as demonstrated by accounts data and through competitive marketing for a period of at least 12 months; or</u></li> <li><u>ii. the facility can be appropriately replaced or provided elsewhere in the locality; or</u></li> <li><u>iii. the facility is located within Park Royal SIL and exceeds the floorspace threshold in Policy TCC1 c) ii;</u></li> </ul> <p>10.14 <u>Where existing uses remain viable, OPDC will look to protect existing town centre facilities, or require their replacement within the locality</u></p>	To respond to the changes to the Use Class Order.
MM/PS2/OPDC/TCC2/4	TCC2 10.14	Proposals must ensure that town centre uses are accessible and are designed to the highest quality, considering how proportions, materials and detailing relate to and complement their surroundings,	To respond to the changes to the Use Class Order



Ref.	Policy/ Para/figure	Modification	Reason
		particularly <del>when considering the design of A-class uses</del> in designated town centres.	
MM/PS2/OPDC/TCC2/5	TCC2 (e) and 10.19, and 10.20	<p>e) Applications for new hot food takeaways will be supported where they:</p> <p>iv. result in no less than two <del>non-A5 other</del> units between hot food takeaways;</p> <p><del>10.16</del> <b>10.19</b> OPDC's Healthy Town Centres Study also identifies the growing concerns about the growth in hot food takeaways (<del>Class A5 uses</del>) and their impact on health, in particular, regarding the proximity of takeaways to schools and the impact that this has on childhood obesity. The type of food on sale nearest to schools can influence the diet of schoolchildren and the availability of "unhealthy" foodstuffs can make healthier choices less likely. To support the health and wellbeing of communities, OPDC will resist proposals for new takeaways in close proximity of secondary and primary school entrances and will accept the loss of existing takeaways within these areas. In addition, OPDC will resist proposals that would result in the clustering of <del>A5 uses hot food takeaways</del> to the detriment of the character and function or vitality and viability of a designated centre. Data will be published as part of OPDC's Authority Monitoring Report showing the location and proportion of hot food takeaways in town centres.</p> <p><del>10.17</del> <b>10.20</b> The Healthier Catering Commitment is a scheme supporting food businesses in London to offer healthier food options. The scheme promotes a reduction in consumption of fat, salt and sugar and increases in availability of fruit and vegetables and a</p>	To respond to the changes to the Use Class Order

Ref.	Policy/ Para/figure	Modification	Reason
		<p>logo is awarded to those outlets that meet the set criteria. OPDC will condition all permitted applications involving <del>A5 uses hot food takeaways</del> to require the operator to achieve, and operate in compliance with, the Healthier Catering Commitment standard. Public Health England's Food Buying Standards aim at ensuring that food buyers maintain good standards of welfare, nutrition, environmental sustainability and ethics. In accordance with OPDC's and the Mayor's Good Growth aspirations, OPDC will condition all <del>A5 uses hot food takeaways</del> to ensure operators are complying with these standards.</p>	
MM/PS2/OPDC/TCC3/1	TCC3	Policy TCC3 has been deleted.	To respond to the changes to the Use Class Order
<p><del>MINOR/PS/Q5(17)</del> <del>MINOR/PS/Q5(18)</del> <del>MINOR/PS/Q5(19)</del></p>	TCC4(c) and (d(i)), 10.26, 10.27	<p>(c) securing the delivery of, or contributions towards, enhanced or new social infrastructure facilities to meet the needs arising from development. Social infrastructure facilities should meet the specification requirements outlined in <u>supporting text to this policy and</u> OPDC's Infrastructure Delivery Plan (IDP), unless otherwise agreed by OPDC and the relevant service provider;</p> <p>d) locating new social infrastructure:</p> <p>i) in locations identified in the Places <del>chapter shown in Figure 10.6A</del> and <del>or</del> OPDC's IDP, unless the on-site facility can be provided on an alternative site, if this is agreed by OPDC and the service provider and it is shown that the delivery of the facility on an alternative site meets the needs of the development and is deliverable;</p> <p>10.26. OPDC will work positively with social infrastructure providers wishing to deliver new or expanded facilities that help to meet existing and future</p>	To ensure appropriate infrastructure information is contained within the Local Plan

Ref.	Policy/ Para/figure	Modification	Reason
		<p>needs within the OPDC area and its surrounds. OPDC will also support facilities that better meet the needs of the area's existing population and will work positively with other local authorities in accordance with the Duty to Cooperate to consider how OPDC can help address wider needs for social infrastructure provision arising from development, where necessary and appropriate and so long as OPDC is able to achieve its homes and jobs targets, particularly in site allocations (see Policy SP10, chapter 3). Given the significant scale of regeneration planned in the area, OPDC has identified a need for a significant amount of new social infrastructure facilities to serve the population arising from development in the area. These requirements are set out in <a href="#">the following paragraphs, place policies and further details are set out in</a> OPDC's Infrastructure Delivery Plan (IDP).</p> <p>10.27. <a href="#">Figure 10.6A, the place policies and t</a>The IDP identifies the specific places required to deliver education, health, community and sports and leisure facilities. <a href="#">Further details on the specification requirements are set out in OPDC's IDP.</a> Development proposals will need to have regard to this and ensure that land required for these facilities is safeguarded in accordance with policy SP10. Where development proposals are having to provide social infrastructure to meet a significantly greater need than that of just their own development, OPDC will look to employ a retrospective pooling contribution mechanism, to provide additional planning contributions towards delivery of the facility from other developments which benefit from the social infrastructure.</p>	
MM/PS2/OPDC/TCC4/1	TCC4 d) and	<p>d) locating new social infrastructure:  iii. <del>health facilities and</del> community facilities within or in close proximity to designated town centres or clusters;</p>	To respond to the changes to the Use Class Order, specifically inclusion of health facilities within Use Class E.

Ref.	Policy/ Para/figure	Modification	Reason
		<p><del>10.37</del> 10.40 When providing new social infrastructure facilities, OPDC will require that <del>health and</del> community facilities are within or in close proximity to designated town centres, where they will easiest to access. In the case of education facilities, the priority will be to ensure that facilities are located close to publicly accessible open spaces.</p>	
MM/PS2/OPDC/TCC4/2	10.25	<p>OPDC's Social Infrastructure Needs Study (20<del>21</del>18) outlines the current approach to the provision of education, health, community and emergency service facilities in the OPDC area.</p>	<p>To respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL.</p> <p>This change in land use designations has resulted in updated development capacity, population modelling and health facility needs which have been modelled within an updated Social Infrastructure Needs Study.</p>
MM/PS2/OPDC/TCC4/3	10.28	<p>In respect of education, current modelling shows the need for on-site provision of:</p> <ul style="list-style-type: none"> <li>• a 43 form entry (FE) primary school, including early years provision;</li> <li>• <del>a 9FE secondary school, including further education provision; and</del></li> <li>• four super nurseries.</li> </ul>	<p>The Inspector's Interim Findings conclude that site allocations 2 and 3 would not be viable and capable of effective delivery for mixed use within the plan period. Consequently, given the withdrawal of the Housing Infrastructure Fund Bid, site allocation 4 is also no longer viable as a standalone proposition for mixed use. Therefore, to respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL.</p> <p>This change in land use designations has resulted in updated development capacity, population modelling and health facility needs.</p>
MM/PS2/OPDC/TCC4/4	10.29	<p>The trigger years for required on-site facilities have been matched against OPDC's phasing trajectory in order to derive which sites are likely to be being</p>	<p>The Inspector's Interim Findings conclude that site allocations 2 and 3 would not be viable and capable of effective delivery for mixed use within</p>

Ref.	Policy/ Para/figure	Modification	Reason
		<p>constructed in the year the facility is required, which sites are available for their delivery and which sites are the most appropriate, based on an assessment against a set of criteria. The Social Infrastructure Needs Study identifies that based on current modelling, the primary school should be delivered <u>in 2031 within the latter half of the Local Plan period. To reflect this later phasing, a degree of flexibility is required when identifying an appropriate location in accordance with policy TCC3(d). Therefore, the location of the primary school will be kept under review., within the Cargiant site allocation, the secondary school should be delivered within the Acton Wells East site allocation and.</u> <del>‡</del>The four super nurseries should be spread across the OPDC area, with one each in Old Oak South (P1), <del>Old Oak North (P2) and</del> North Acton and Acton Wells (P7) <u>and Channel Gate (P9)</u> with the location of the fourth nursery to be kept under review.</p>	<p>the plan period. Consequently, given the withdrawal of the Housing Infrastructure Fund Bid, site allocation 4 is also no longer viable as a standalone proposition for mixed use. Therefore, to respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL.</p> <p>This change in land use designations has resulted in updated development capacity, population modelling and educational facility needs.</p>
<p><b>MM/PS2/OPDC/TCC4/5</b> <b>MINOR/ 2/TCC4/15</b></p>	<p>10.30</p>	<p>In respect of health, <del>the</del> modelling <u>undertaken by the Clinical Commissioning Groups (CCGs)</u> shows the need for 1,564sqm of on-site health facility space within the Local Plan period. The Local Authorities and <del>Clinical Commissioning Groups (CCGs)</del> have confirmed that the preferred approach for the delivery of <del>this</del><u>the on-site</u> floorspace is within one building, which allows the provision of health services at scale and provides for cost efficiencies. The Social Infrastructure Needs Study has assessed <del>the on-site needs for this facility, which shows the need for this facility within the Cargiant site allocation</del> <u>different site options for the new facility and identifies the Cargiant site allocation in Old Oak North</u> <del>North Acton and Acton Wells as the preferred option</del>, based on current projections.</p>	<p>The Inspector's Interim Findings conclude that site allocations 2 and 3 would not be viable and capable of effective delivery for mixed use within the plan period. Consequently, given the withdrawal of the Housing Infrastructure Fund Bid, site allocation 4 is also no longer viable as a standalone proposition for mixed use. Therefore, to respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL.</p> <p>This change in land use designations has resulted in updated development capacity, population modelling and health facility needs.</p>

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/TCC4/6  MINOR/ 2/TCC4/6 MINOR/ 2/TCC4/12 MM14/PS/Q5(20)	10.33	In respect of community space, modelling shows the need for two community hubs, each of 2,600sqm. The community hubs should provide for a variety of community facilities, <u>including space for libraries</u> , and could include facilities such as public toilets, a community café, faith space, youth space and halls for hire. <u>New community spaces should be made appropriately available and affordable to the local community</u> . Current modelling shows that one of these community hubs should be located in <u>Old Oak North (P2)Channel Gate (P9)</u> and the <u>location of the other hub should be kept under review in Old Oak South (P1)</u> .	The Inspector's Interim Findings conclude that site allocations 2 and 3 would not be viable and capable of effective delivery for mixed use within the plan period. Consequently, given the withdrawal of the Housing Infrastructure Fund Bid, site allocation 4 is also no longer viable as a standalone proposition for mixed use. Therefore, to respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL.  This change in land use designations has resulted in updated development capacity, population modelling and community facility needs.
MM14/PS/Q5(20)	TCC4(new policy clause)  10.31	<u>securing the delivery of, or contributions towards 3 Neighbourhood Police Facilities within the OPDC area;</u>  The Social Infrastructure Needs Study also identifies a need for on-site emergency service provision <u>and expansion of existing facilities</u> . <u>In relation to on-site provision, current modelling shows 3 Police Ward Offices-Neighbourhood Police Facilities are required which can be co-located with other social infrastructure across the OPDC area-see the IDP for further details</u> . Requirements for sports and leisure facilities are set out in further detail in Policy TCC6.	The Inspector's Interim Findings conclude that site allocations 2 and 3 would not be viable and capable of effective delivery for mixed use within the plan period. Consequently, given the withdrawal of the Housing Infrastructure Fund Bid, site allocation 4 is also no longer viable as a standalone proposition for mixed use. Therefore, to respond to the Inspector's Interim Findings and mitigate the loss of housing capacity, new sites will be released from SIL for mixed use development and Old Oak North will be retained as SIL.  This change in land use designations has resulted in updated development capacity, population modelling and community facility needs.
MINOR/PS/Q5(21)	10.33	...The most up-to-date position on all required social infrastructure provision is set out in <u>the Local Plan with further detail in</u> OPDC's IDP.	To ensure appropriate infrastructure information is contained within the Local Plan
MM2/PS/Q3d	10.35	...Proposals for large-scale social infrastructure that are not required to meet the needs of development and are not included in <u>the Local Plan or in more detail in</u>	To ensure appropriate infrastructure information is contained within the Local Plan

Ref.	Policy/ Para/figure	Modification	Reason
		OPDC's IDP, would also be considered against the criteria in the catalyst uses policy (see Policy TCC8).	
MM17/PS/Q3e	10.36	Facilities should be accessible and should be inclusive and welcoming to people from a wide variety of cultures and ethnicities, in accordance with Policy <del>D3D2</del> .	To clarify the function of policies to guide development.
<b>MM/PS2/OPDC/TCC5/1</b>	TCC5	OPDC will support the provision of a high quality cultural offer in the OPDC area <del>and Cultural Quarter in Old Oak</del> by:	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, references to Old Oak as being the sole location for a new Cultural Quarter have been removed.
<b>MM/PS/Q3x</b>	TCC5(e)	OPDC will support the provision of a high quality cultural offer in the OPDC area and cultural quarter <del>in Old Oak</del> by: a) protecting existing cultural space unless: i) it is no longer economically viable as demonstrated by accounts data and through competitive marketing for a period of at least 12 months; or ii) the facility can be appropriately replaced or provided elsewhere in the locality; or iii) the facility is giving rise to unacceptable impacts on residential amenity and/or the transport network; b) supporting applications for new cultural space, where they; i) are located within designated town centres or areas of high public transport access and do not give rise to unacceptable impacts on the transport network; ii) meet identified needs; and iii) do not give rise to unacceptable impacts on residential amenity; c) supporting the retention of existing, and the provision of new, artist studios in accordance with the requirements of policies E1- E3; and	To ensure the effectiveness of the Plan.

Ref.	Policy/ Para/figure	Modification	Reason
		d) securing contributions towards and/or the provision of public art; <del>and</del> <del>e) requiring schemes providing over 2,500sqm of town centre uses to submit a Cultural Action Plan.</del>	
MM/PS2/OPDC/TCC5/2	10.45	The Cultural Action Plan should include details such as: a) the proposed locations for public art – on buildings and within the public realm; b) proposed activities and projects that will support the creation of a cultural quarter <del>in Old Oak</del> ;	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, references to Old Oak as being the sole location for a new Cultural Quarter have been removed.
MINOR/2/TCC6/6	TCC6 c)	requiring proposals to contribute towards and/or deliver public access and affordable indoor and outdoor sports and leisure facilities, including playing <del>fields-pitches</del> , that:...	To ensure consistency with terminology in national guidance.
MINOR/PS/Q5(22)	TCC6(c(iv))	delivers new public sports and leisure centres in locations identified in <del>place policies supporting text and the Infrastructure Delivery Plan (IDP)</del> .	To ensure appropriate infrastructure information is contained within the Local Plan
MINOR/PS/Q5(23)	10.48	...Specific large-scale public access facilities should be provided in the locations identified in <del>place policies supporting text and in</del> OPDC's Infrastructure Delivery Plan (IDP)...	To ensure appropriate infrastructure information is contained within the Local Plan
MM/PS2/OPDC/TCC6/1	10.49	Based on current population projections, this would result in a need for <del>gives rise to an approximate need for</del> 650sqm of public pool space during the plan period, which would equate to approximately two 12x25m pools or one 50x12m pool	Duplicate text removed.
MINOR/2/TCC6/6 MINOR/PS/Q5(22)	10.50	OPDC will also support applications for and secure the delivery of and/or contributions towards outdoor sports and leisure facilities including playing <del>fields-pitches</del> , that serve needs and provide public and affordable access.	To ensure consistency with terminology in national guidance and ensure the plan is effective.



Ref.	Policy/ Para/figure	Modification	Reason
		delivers new public sports and leisure centres in locations identified <u>in place policies supporting text and the Infrastructure Delivery Plan (IDP).</u>	
<p><b>MM/PS/OPDC M15 (3)</b></p> <p><b>(Incorporating MINOR/2/TCC7/6)</b></p>	TCC7 (a), (b)	<p>OPDC will support the loss of public houses where:</p> <p>a) the public house has been competitively marketed:</p> <p>i) for 24 months as a public house <u>and for an alternative local community facility;</u></p> <p>ii) at an appropriate price following independent valuation;</p> <p>iii) in appropriate publications and through specialised licensed trade agents;</p> <p>iv) in a condition that allows the premises to continue operating as a pub <u>or as a community facility;</u> and</p> <p>v) with 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></p> <p><u>b) an objective evaluation method, has been employed to assess the viability of the business and the outcomes demonstrate that the public house is no longer economically viable;</u></p> <p><u>c) b) an assessment has been made of alternative licensed premises within easy walking distance of the public house and premises are identified which offer similar facilities and a similar community environment to the public house which is the subject of the application;</u></p>	To strengthen the policy by requiring economic information to inform determination of a loss of a public house. Also, to clarify requirements for the competitive marketing of public houses with respect to use classes.
<p><b>MM/PS/OPDC M15 (2)</b></p>	10.51	<p>Public houses act as hubs for community life, and are important for mental health and well-being. They <u>provide exhibit qualities of</u> a social space and promote community cohesion, provide economic benefits by providing jobs, support local food suppliers, bringing activity to town centres and can also provide heritage value. <u>This policy will apply all existing and future drinking establishments including that exhibit these qualities including public houses and wine bars.</u> Within the OPDC area there are currently three public houses:</p>	To clarify that provision of Policy TCC7 apply to drinking establishments which demonstrate the qualities of a public house.

Ref.	Policy/ Para/figure	Modification	Reason
		a) The Castle, North Acton; b) The Fisherman's Arms, Old Oak Lane; and c) The Grand Junction Arms, Acton Lane.	
MM8/PS/Q3v	TCC8(a) and (b)	<p><del>a) Planning applications that satisfy the below criteria will be required to submit a Catalyst Uses Statement:</del></p> <p><del>i) a use and/or building or a cluster of uses/ buildings that together would function as a single facility, that occupy inclusive of associated public realm, in excess of 10,000sqm and / or 0.25 hectares of land; and</del></p> <p><del>ii) within the following types of buildings and/or land uses:</del></p> <ul style="list-style-type: none"> <li><del>» Sports stadia and facilities;</del></li> <li><del>» Retail and leisure;</del></li> <li><del>» Culture, education and health; or</del></li> <li><del>» Business and conference space.</del></li> </ul> <p><del>b) The Catalyst Uses Statement should demonstrate how the proposal performs positively against the five following objectives and associated criteria set out in Table 10.2:</del></p> <p><del>Proposals that comprise a use and/or building or a cluster of uses / buildings that occupy, inclusive of associated public realm, in excess of 10,000sqm and / or 0.25 hectares of land and are sports stadia and facilities; retail and leisure uses; culture, education and health uses; or business and conference space uses should perform positively against the following five objectives and associated criteria set out in Table 10.2:</del></p> <p><del>i) a) Is part of a holistic offer;</del></p> <p><del>ii) b) Is financially sustainable;</del></p> <p><del>iii) c) Complements the wider environment;</del></p> <p><del>iv) d) Generates momentum in delivering the comprehensive redevelopment of the area; and</del></p> <p><del>v) e) Leverages HS2 and Crossrail.</del></p>	To ensure the effectiveness of the Plan by including as policy, requirements only referred to in the supporting text.
MM/PS2/OPDC/TCC8/1	10.54	Regeneration of the OPDC area and in particular Old Oak will result in large-scale development of brownfield	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate

Ref.	Policy/ Para/figure	Modification	Reason
		land in a location that will be well connected. This is likely to make the area suitable for a number of larger scale destination or catalyst uses.	will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, references only emphasising Old Oak as a location for large scale development have been removed.
MM2/PS/Q3d	10.59	...These comparable projects should be discussed and agreed with OPDC prior to the submission of the Statement. Catalyst Uses Statements would not be required for <u>infrastructure</u> facilities identified in <u>the relevant policies of this plan or further detailed in</u> OPDC's IDP, which are necessary to meet the needs of development, such as a school or primary care centre.	To ensure the effectiveness of the Plan.
MM2/PS/Q3z	TCC9(b)	<p>a) OPDC will support proposals for meanwhile uses where the proposed use:</p> <ul style="list-style-type: none"> <li>i) contributes positively to the character and early activation of an area;</li> <li>ii) reinforces the longer term uses planned for the area. Where appropriate, mechanisms should be put in place to support meanwhile occupiers securing permanent spaces within developments;</li> <li>iii) would not impact on the deliverability of Site Allocations identified in the Places chapter (Chapter 4); and</li> <li>iv) does not give rise to an unacceptable impact on residential amenity and on the transport network.;</li> </ul> <p><del>b) All major development proposals will be required to submit an appropriate Meanwhile Feasibility Study and if feasible, an appropriate Meanwhile Strategy.</del></p>	To ensure the effectiveness of the Plan.
MM/PS2/OPDC/TCC9/1	10.61	Meanwhile uses are likely to play a huge role in early place making in the OPDC area, <del>particularly in Old Oak</del> , where there will be many temporarily vacant land parcels awaiting development in the longer term and where meanwhile uses can help provide facilities to	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land uses, references

Ref.	Policy/ Para/figure	Modification	Reason
		support its designation as a Cultural Quarter (see Policy SP6)	only emphasising Old Oak as a location for meanwhile uses have been removed.
MM2/PS/Q3aa	TCC10(a)(ii)	OPDC will contribute to London's visitor infrastructure and London's overall need for hotel bedspaces by: a) supporting proposals for new and expansions to existing visitor accommodation where they: i) are located in accordance with the NPPF sequential test and close to public transport, in particular rail stations, and do not give rise to unacceptable impacts on the transport network; <del>ii) are accompanied by an appropriate management plan;</del> iii) provide at least 10% of hotel bedrooms as wheelchair accessible and submit Accessibility Management Plans; iv) are not permanently occupied; and v) do not compromise the delivery of housing targets and support the delivery of job targets, particularly within Site Allocations.	To ensure the effectiveness of the Plan.

### Delivery and implementation

Ref.	Policy/ Para/figure	Modification	Reason
MINOR/PS/Q5(29)	Policy DI1(b)	b) secure the delivery of infrastructure necessary to support sustainable development, meet the needs of development and where necessary, mitigate the impacts of development as identified in the Local Plan policies and <del>for</del> in the <u>further detail set out in the Infrastructure Delivery Plan (IDP) by:...</u>	To ensure the effectiveness of the Plan.
MM/PS2/OPDC/DI/1	11.2	The <del>redevelopment-regeneration</del> of Old Oak and <del>the regeneration of</del> Park Royal has <del>ve</del> the potential to deliver a significant number of new homes and jobs to help meet local and London-wide needs.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect

Ref.	Policy/ Para/figure	Modification	Reason
			this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
<b>MINOR/PS2/OPDC/DI/1</b>	11.5	This station is planned to open <del>in 2026</del> after 2028	To recognise the change in delivery date for HS2.
<b>MINOR/PS/Q5(24)</b>	11.7	OPDC's Infrastructure Delivery Plan (IDP) <del>identifies</del> <u>sets out further details on</u> the key infrastructure required to unlock the comprehensive regeneration of the area. The IDP is an important supporting document for this Local Plan and will be updated regularly to stay 'live' to the infrastructure delivery requirements and challenges that implementing this Local Plan will entail. The IDP updates will be informed by phasing and capacity information that will also be regularly monitored as the development comes forward in the OPDC area. <u>This information will be used to update the Local Plan.</u>	To ensure appropriate infrastructure information is contained within the Local Plan
<b>MM/PS2/OPDC/DI/2</b>	11.8	The scale of infrastructure required to support the regeneration of the OPDC area is significant. OPDC's <del>Development Infrastructure Funding Study (2015)</del> IDP estimates that infrastructure could total approximately £1.5 billion. <u>Much of this infrastructure is already funded, some of this infrastructure is not required within the plan period and some is considered desirable, but not essential to delivering the homes, jobs and place-making ambitions within this Local Plan, but there remains a sizeable bill for infrastructure that is unfunded and that is required to deliver this vision and policy targets within this Local Plan.</u>	To reflect that updates have now been undertaken to the IDP to provide further clarity on in infrastructure required to support the draft Local Plan and on infrastructure funding.
<b>MM/PS2/OPDC/DI/3</b>	11.9	<del>Essential</del> infrastructure <del>required</del>	To reflect that updates have now been undertaken to the IDP to provide further clarity on in infrastructure required to support the draft Local Plan

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/DI/4	11.9	Details on the approaches to infrastructure delivery and sources of funding and financing are set out in the proceeding paragraphs <u>and are also outlined in further detail in OPDC's IDP.</u>	To reflect that updates have now been undertaken to the IDP to provide further clarity on in infrastructure required to support the draft Local Plan
MINOR/PS/Q5(25)	11.11	...In accordance with OPDC's Validation Checklist, applicants should submit Planning Obligations Heads of Terms as part of their planning application material, to provide clarity on how they propose to appropriately contribute to infrastructure provision identified in <u>the Local Plan and the further detail set out in OPDC's IDP.</u>	To ensure appropriate infrastructure information is contained within the Local Plan
MM/PS2/OPDC/DI/5	11.14	The Mayor of London's CIL is also chargeable in the OPDC area. At the time of this Local Plan's publication, this Mayoral CIL rate stands at <u>£6035/m<sup>2</sup> in the London Boroughs of Brent and Ealing and at £50/m<sup>2</sup> in Hammersmith &amp; Fulham</u> and in broad terms applies to all development other than for education and health facility uses	To reflect adoption of MCIL2 rates in 2019.
MINOR/PS2/OPDC/D1/2	11.20	Policy SP10 recognises the importance of timely delivery and figure 3.16 provides an overview of OPDC's indicative phasing plan, which is heavily influenced by the planned delivery of the new Old Oak Common station <u>in 2026.</u>	To recognise the change in delivery date for HS2.
MM/PS2/OPDC/DI2/1	11.21	The majority of land identified as 'deliverable', or 'developable' in 0-10 years, on which early development could commence in advance of the opening of the Old Oak Common station, is located in the Places of <u>Old Oak North (Policy P2)</u> , Scrubs Lane (Policy P10), Willesden Junction (Policy P11), Old Oak Lane and Old Oak Common Lane (Policy P8), <u>Channel Gate (Policy P9)</u> , North Acton and Acton Wells (Policy P7), and Park Royal West (Policy P4).	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, development capacity and trajectory information has been updated.
MINOR/PS2/OPDC/DI/3	11.23	Following the opening of Old Oak Common station <u>in 2026 from 2028</u> (and potentially in advance of that where feasible) sites needed to support the	To recognise the change in delivery date for HS2.

Ref.	Policy/ Para/figure	Modification	Reason																											
MM/PS2/OPDC/DI2/2	Table 11.1	<p>development of the station and other complex sites could have the potential for redevelopment.</p> <p>The following amendments have been made to homes and jobs capacities:</p> <table border="1" data-bbox="808 411 1469 1161"> <thead> <tr> <th data-bbox="808 411 1032 475">Place</th> <th data-bbox="1032 411 1249 475">Homes Capacity</th> <th data-bbox="1249 411 1469 475">Jobs capacity</th> </tr> </thead> <tbody> <tr> <td data-bbox="808 475 1032 539">Old Oak South (P1)</td> <td data-bbox="1032 475 1249 539"><del>100</del>350</td> <td data-bbox="1249 475 1469 539"><del>17,100</del> 15,200</td> </tr> <tr> <td data-bbox="808 539 1032 603">Old Oak North (P2)</td> <td data-bbox="1032 539 1249 603"><del>6,500</del> 0</td> <td data-bbox="1249 539 1469 603"><del>3,600</del> 3,300</td> </tr> <tr> <td data-bbox="808 603 1032 699">Park Royal West (P4)</td> <td data-bbox="1032 603 1249 699"><del>1,200</del> 1,575</td> <td data-bbox="1249 603 1469 699"><del>3,600</del> 3,510</td> </tr> <tr> <td data-bbox="808 699 1032 794">Park Royal Centre (P6)</td> <td data-bbox="1032 699 1249 794"><del>650</del> 800</td> <td data-bbox="1249 699 1469 794">1,400</td> </tr> <tr> <td data-bbox="808 794 1032 922">North Acton and Acton Wells (P7)</td> <td data-bbox="1032 794 1249 922"><del>6,000</del> 8,000</td> <td data-bbox="1249 794 1469 922"><del>4,600</del> 6,200</td> </tr> <tr> <td data-bbox="808 922 1032 1050">Old Oak Lane and Old Oak Common Lane (P8)</td> <td data-bbox="1032 922 1249 1050"><del>2,800</del> 750</td> <td data-bbox="1249 922 1469 1050"><del>1,600</del> 1,700</td> </tr> <tr> <td data-bbox="808 1050 1032 1114">Channel Gate (P9)</td> <td data-bbox="1032 1050 1249 1114"><del>0</del> 3,100</td> <td data-bbox="1249 1050 1469 1114"><del>7,600</del> 600</td> </tr> <tr> <td data-bbox="808 1114 1032 1161">Scrubs Lane (P10)</td> <td data-bbox="1032 1114 1249 1161"><del>2,600</del> 3,500</td> <td data-bbox="1249 1114 1469 1161"><del>1,200</del> 1,100</td> </tr> </tbody> </table>	Place	Homes Capacity	Jobs capacity	Old Oak South (P1)	<del>100</del> 350	<del>17,100</del> 15,200	Old Oak North (P2)	<del>6,500</del> 0	<del>3,600</del> 3,300	Park Royal West (P4)	<del>1,200</del> 1,575	<del>3,600</del> 3,510	Park Royal Centre (P6)	<del>650</del> 800	1,400	North Acton and Acton Wells (P7)	<del>6,000</del> 8,000	<del>4,600</del> 6,200	Old Oak Lane and Old Oak Common Lane (P8)	<del>2,800</del> 750	<del>1,600</del> 1,700	Channel Gate (P9)	<del>0</del> 3,100	<del>7,600</del> 600	Scrubs Lane (P10)	<del>2,600</del> 3,500	<del>1,200</del> 1,100	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations and mitigate its impacts to ensure General Conformity with the London Plan, development capacity and trajectory information has been updated.</p>
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MM/PS2/OPDC/DI2/3	Table 11.1	<p><del>Old Oak North is not required for HS2 construction and so early development can be supported and can make a significant contribution to OPDC's homes and jobs targets. is designated as SIL which the Local Plan continues to protect.</del></p> <p>The majority of the land in Old Oak North is in the ownership of Cargiant and the successful <del>and timely</del></p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, development site opportunities and challenges information have been updated.</p>																											

Ref.	Policy/ Para/figure	Modification	Reason
		<p><del>delivery of this site and the relocation of the existing business industrial intensification of the area</del> will require close working with this key landowner. Other key sites include a triangle of land owned by the London Borough of Hammersmith and Fulham and the European Metal Recycling site.</p> <p>The area is currently poorly connected into its surroundings and will require <del>significant</del> transport improvements to address this, including <del>new and improved public transport, streets and bridges improvements to existing access points.</del></p> <p>The Local Plan safeguards the Old Oak Sidings (Powerday) site as a waste facility to meet LBHF's waste apportionment (see policy EU6) and it is therefore not identified as contributing to OPDC's <del>homes and jobs</del> targets within this Local Plan.</p>	
MINOR/PS/Q5(28)	Table 11.1	<p>OPDC has also been engaged with the host local authorities and the Park Royal Business Group to identify infrastructure requirements in Park Royal West and these requirements are included in <u>the Local Plan and the further detail set out in</u> OPDC's IDP.</p>	To ensure appropriate infrastructure information is contained within the Local Plan
MM/PS2/OPDC/DI2/4 MINOR/PS2/OPDC/P1/1	Table 11.1	<p>The place is in mixed landownership, but Segro are a major landowner holding the freehold for the Victoria Road Industrial Estate.</p> <p>North Acton has already experienced significant redevelopment in recent years with a number of sites in the area having already progressed significantly through the planning process.</p> <p>To the south, land can be brought forward in the next 0-10 years.</p> <p>To the north of the place in Acton Wells, development is likely to be longer term. The majority of this land is required for HS2's construction and is therefore unlikely to be brought forward until <del>post-2026</del> <u>the late 2020s</u>.</p> <p>There are also significant infrastructure requirements for</p>	An update to the Social Infrastructure Needs Study has been produced to updated to identify the social infrastructure needed to meet the needs of the updated development capacity and phasing. This has resulted in changes to the location, phasing and quantity of social infrastructure across the OPDC area.



Ref.	Policy/ Para/figure	Modification	Reason
		<p>these sites, including a new access to North Acton station, a new London Overground station at Old Oak Common Lane and the need for infrastructure associated with the West London Orbital Route. <del>The Acton Wells sites North Acton and Acton Wells is are</del> also identified <u>as an area of search</u> for the delivery of a new <u>secondary school, which will provide for the early and medium term on-site secondary school place requirements resulting from development in the area; health hub.</u></p>	
MM/PS2/OPDC/DI2/5	Table 11.1	<p>Channel Gate is currently in mixed land ownership, but is being acquired through the High Speed Rail (London – West Midlands) Act 2017 for the construction of the HS2 route and station at Old Oak Common. The area is unlikely to be brought forward for development until the land is no longer required to support construction of the Old Oak Common station, which is currently programmed to open <del>in 2026</del><u>from 2028 after 2028; however earlier development opportunities will be supported.</u> OPDC’s Place policy <del>identifies-allocates the majority of Channel Gate for residential led mixed use development</del><u>that the majority of the area is safeguarded as Strategic Industrial Location (SIL) and this land use will be retained.</u> <del>There is the potential for an optimised and comprehensive approach to the longer term delivery of new SIL compliant employment development on this land. The place has the potential to contribute significantly to OPDC’s jobs target and deliver high density, high quality innovative industrial uses.</del> To support the optimised delivery of this site, new infrastructure will be required, particularly new roads links into the site and new bridge links over the Grand Union Canal.</p>	To respond to the Inspector’s Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, development site opportunities and challenges information have been updated.
MM/PS2/OPDC/DI2/6	Table 11.1	<p><del>Scrubs Lane is in mixed land ownership, although Cargiant own three sites. OPDC is in active discussions</del></p>	To respond to the Inspector’s Interim Findings and mitigate loss of housing capacity, Channel Gate and

Ref.	Policy/ Para/figure	Modification	Reason
		<p><del>with several landowners along Scrubs Lane about the early delivery of development sites in this place. Scrubs Lane is in mixed land ownership, although Cargiant own three sites. OPDC is in active discussions with several landowners along Scrubs Lane about the early delivery of development sites in this place. The area is relatively unencumbered by infrastructure and is not directly impacted by HS2's construction so is largely available for redevelopment in the first 0-5 years of the Plan period. The western side of the place has a direct relation to the Old Oak North place and will require a coordinated approach between landowners to ensure that development is delivered in a timely fashion, is optimised and that infrastructure requirements are appropriately planned for and delivered.</del></p>	<p>other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect that Old Oak North will no longer be delivered for comprehensive mixed use development, consequent to the inspector's interim findings.</p>
MM/PS2/OPDC/DI2/7	Table 11.1	<p>There are some smaller development opportunities on land around the station, whereby there may be opportunities for early development. Upgrading Willesden Junction station in terms of capacity, interchange, and legibility will be a key requirement to the future success of this place and the wider <u>OPDC</u> area <del>of Old Oak</del>.</p> <p>Network Rail own the majority of land in Willesden Junction. OPDC will work closely with Network Rail to help support an optimised approach to development capacity and ensure the timely delivery of upgrades to Willesden Junction Station.</p> <p>Connecting this Place into both Harlesden and Old Oak North will be challenging but will be important to improve connectivity and reduce severance. <del>This will also help to increase public transport accessibility levels on surrounding development sites. Larger scale development opportunities to the east of the station around the Willesden Train Maintenance Depot will be dependent on resolving how existing land is used for transport functions.</del> Some sites may be</p>	<p>To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate and other locations will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, development site opportunities and challenges information have been updated.</p>

Ref.	Policy/ Para/figure	Modification	Reason
		particularly challenging to bring forward as they may involve decking over live railway tracks and/or transport depots and/or relocation.	
MM/PS/OPDC M13	DI3(e)	DI3(e) requiring developers and/or management companies of major development proposals to undertake a post-occupancy survey to: i. <u>ensure relevant policies are successfully implemented;</u> and ii. <u>identify appropriate mitigation measures should survey information demonstrate relevant policies are not being successfully implemented;</u>	To clarify appropriate mitigation measures should relevant policies not be implemented.
MM/PS2/OPDC/DI3/1	11.27	Across <u>the OPDC area, Old Oak outside of SIL</u> approximately 70% of the developable land is currently within public sector ownership.	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, references to Park Royal as the sole industrial area and references to Old Oak as the only mixed use area have been removed and associated considerations have been amended.
MM/PS2/OPDC/DI3/2	11.27	Across <del>Old Oak</del> <u>the OPDC area outside of SIL</u> approximately 70% of the developable land is currently within public sector ownership. This public sector land has the capacity to accommodate approximately <del>10,300</del> <u>9,800</u> homes and <del>45,900</del> <u>40,400</u> jobs, of which <del>4,500</del> <u>6,800</u> homes and <del>26,300</del> <u>21,150</u> jobs could be delivered within this Local Plan period (2018-38).	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, development capacity and trajectory information has been updated.
MM/PS2/OPDC/DI3/3	11.27	To achieve this it will be important for the public sector to work collaboratively. The remaining developable land <u>for mixed use development in Old Oak</u> is in a mixture of different private ownerships <u>of which Cargiant is the largest single landowner at 15%.</u>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, development capacity and trajectory information has been updated.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/DI3/4	11.28 and 11.29	Across <del>Park Royal</del> <u>the Strategic Industrial Location</u> , land ownership is predominantly privately owned and is more piecemeal. <del>The homes and jobs targets in Park Royal are much lower than in Old Oak but</del> <u>Therefore,</u> there is <del>still</del> a clear need to work with developers and landowners in the area to ensure that development is optimised and that a coordinated approach to development and infrastructure is taken. To facilitate this and to support the coordinated delivery of development <del>in Old Oak,</del>	To respond to the Inspector's Interim Findings and mitigate loss of housing capacity, Channel Gate will be released from SIL for mixed use development and Old Oak North will be retained as SIL. To reflect this change in land use designations, clarity has been provided for how OPDC will work with developers and landowners across the OPDC area.
MINOR/PS/Q5(26)	11.33(b) (two references)	Social infrastructure: Education, health and emergency service providers have been closely involved in the production of the Social Infrastructure Needs Study, which is informing the education, health and emergency service facility requirements set out in this Local Plan and <del>for the further detail set out in</del> the IDP.... <del>OPDC is also has also</del> <u>work</u> <del>ed</del> <u>ing</u> with the local authorities and other social infrastructure service providers to identify the other social infrastructure requirements associated with development in the area and these requirements are set out in this Local Plan <u>and with further detail provided</u> in the IDP;	To ensure appropriate infrastructure information is contained within the Local Plan
MINOR/2/G43	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 the Harlesden and Old Oak neighbourhood forums within the OPDC area who are progressing the development of their neighbourhood plans.</u> Further details on <u>how OPDC</u>	To reflect existing neighbourhood forums and areas.

Ref.	Policy/ Para/figure	Modification	Reason
		<u>supports neighbourhood planning</u> <del>this</del> can be found in OPDC's SCI.	
MM/PS/OPDC M1	11.37	<u>Chapters 3, 4 and 11 will be treated as OPDC's strategic policies when considering the general conformity of neighbourhood planning policies. Beyond this, there is extensive scope and flexibility for neighbourhood plans in the OPDC area to bring forward policies and guidance. Examples of what could be covered include development management policy matters, design codes, specific areas and/or neighbourhoods guidance, site specific guidance in particular consideration of how to shape development in accordance with housing targets, and priorities for the use of Neighbourhood Community Infrastructure Levy spending.</u>	To clarify potential role for neighbourhood plans
MINOR/PS/Q3ab and MINOR/PS/OPDC M17(2)	11.39	Paragraph 11.39 (a) <del>highlight any immediate teething problems that can be addressed and solved;</del> <u>highlight any immediate teething problems that can be addressed and solved by management companies outside of the planning process regarding the performance of the relevant building or development;</u>	To clarify the role of the policy to help OPDC monitor whether policies are achieving their stated aims.
MINOR/PS/OPDC M17(3)	11.40	...OPDC will also publish a Supplementary Planning Document providing further guidance <u>to identify which specific policy objectives will be subject to post occupancy evaluation.</u>	To clarify the role of post occupancy surveys. See also proposed change MINOR/PS/OPDCM17(1) and (2).
MINOR/PS/Q5(27)	11.51	c) supporting the delivery of infrastructure identified in <u>the Local Plan and further detailed in</u> OPDC's Infrastructure Delivery Plan (IDP), and the creation of development opportunities arising from the provision of that infrastructure.	To ensure appropriate infrastructure information is contained within the Local Plan

## Glossary

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/G/1	Glossary	Delete definition for A class uses	To respond to changes in the Use Class Order.

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/G/2	Glossary	Delete B Use Class Employment Floorspace or Premises	To respond to changes in the Use Class Order.
MM/PS2/OPDC/G/3	Glossary	Delete B Use Class Employment Uses	To respond to changes in the Use Class Order.
MM/PS2/OPDC/G/4	Glossary	<p><del>Typically land uses within the B1c, B2 and B8 Use Classes, but may include other Uses which that fall within the following descriptions:</del></p> <p><del>general industrial;</del></p> <p><del>light industrial;</del></p> <p><del>storage and logistics/distribution;</del></p> <p><del>other industrial type functions, services and activities including secondary materials, and waste management and aggregates;</del></p> <p><del>utilities infrastructure;</del></p> <p><del>land for transport related functions and wholesale markets</del></p> <p><del>industrial related sectors</del></p> <p><del>research and development of industrial and related products or processes.</del></p> <p><del>Flexible B1c/B2/B8 premises suitable for occupation by SMEs</del></p> <p><del>Small-scale 'walk to' services for industrial occupiers such as workplace creches or cafes.</del></p> <p><del>Broad industrial type activities/industrial uses: Uses that are exclusively and permanently industrial in nature and therefore are appropriate within Strategic Industrial Locations (SIL). Typical uses include B2 and B8, and other industrial uses identified in Mayoral policy and/or guidance.</del></p>	To provide updated definitions for Broad Industrial Type Activities.
MM/PS2/OPDC/G/5	Glossary	<p><u>Class E use/floorspace: Class E uses includes:</u></p> <ul style="list-style-type: none"> <li><u>Display or retail sale of goods, other than hot food, sale of food and drink for consumption (mostly) on the premises</u></li> </ul>	To respond to changes in the Use Class Order.

Ref.	Policy/ Para/figure	Modification	Reason
		<ul style="list-style-type: none"> <li>• <u>Provision of: Financial services, Professional services (other than health or medical services), or Other appropriate services in a commercial, business or service locality</u></li> <li>• <u>Indoor sport, recreation or fitness (not involving motorised vehicles or firearms)</u></li> <li>• <u>Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)</u></li> <li>• <u>Creche, day nursery or day centre (not including a residential use)</u></li> <li>• <u>Uses which can be carried out in a residential area without detriment to its amenity:</u> <ul style="list-style-type: none"> <li>○ <u>Offices to carry out any operational or administrative functions,</u></li> <li>○ <u>Research and development of products or processes</u></li> <li>○ <u>Industrial processes</u></li> </ul> </li> </ul>	
MINOR/PS2/OPDC/G/1	Glossary	Community facilities/ <u>uses</u> : Facilities such as libraries, places of worship, halls for hire, youth space and training and meeting space. This list is not exhaustive and other uses can be included.	To correct typographical error
MINOR/PS2/OPDC/G/2	Glossary	A <del>Competitive</del> <u>Competitive</u> Marketing Strategy	To correct typographical error
MM/PS2/OPDC/G/6	Glossary	Employment uses: Uses which directly generate <del>B-use class employment through business activities</del> <u>employment through business activities.</u>	To respond to changes in the Use Class Order.
MINOR/PS/OPDC M12	Glossary	The rate of rainwater runoff which takes place before a site is developed. <u>It is calculated as the peak rate of run-off for a specific return period due to rainfall falling on a given area of vegetated land. OPDC's Integrated Water Management Strategy identifies that a greenfield run off rate for a central location in the OPDC area is 12.5 litres per second per hectare (L/s/ha). However, it recognises that this may vary significantly across the</u>	To provide an expanded definition of Greenfield run off rates and define the rate specific to OPDC area.

Ref.	Policy/ Para/figure	Modification	Reason
		<u>OPDC area and runoff rates should be confirmed at a site specific scale.</u>	
MINOR/General15	Glossary	<del>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).</del>	To remove an old reference in the Glossary which was replaced by the term: Broad Industrial Type Activities.
MINOR/PS/OPDC M17	Glossary: Life Chances	<del>An approach that promotes bringing residents together rather than dividing them, enabling people to realise their potential and aspirations and make a full contribution to the economic success of their city. It aims to achieve equal life chances for all. The opportunities that each person has to improve their quality of life and how likely it is that their life will turn out a certain way. How societies operate can positively or negatively affect a person's life chances. A person's life chances can be limited if discrimination, exclusion and disadvantage (a lack of equal opportunities) exists.</del>	To clarify the definition
MINOR/2/G13	Glossary	<u>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.</u>  Sites of Metropolitan Importance are selected on a London-wide basis <u>reflecting their strategically-important conservation sites for London</u>	To ensure consistency with London Plan definitions.
MM/PS2/OPDC/G/7	Glossary	<del>Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities,</del>	To respond to changes in the Use Class Order.



Ref.	Policy/ Para/figure	Modification	Reason
		<p><del>places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.</del></p> <p>Social infrastructure: <u>Includes some uses within:</u></p> <ul style="list-style-type: none"> <li>• <u>Class E (Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner); Creche, day nursery or day centre (not including a residential use)</u></li> <li>• <u>Class F1 (<b>Learning and non-residential institutions not including residential use, that covers:</b> Provision of education, Display of works of art (otherwise than for sale or hire), Museums, Public libraries or public reading rooms, Public halls or exhibition halls, Public worship or religious instruction (or in connection with such use), Law courts)</u></li> <li>• <u>Class F2 (Halls or meeting places for the principal use of the local community)</u></li> <li>• <u>Other community facilities; cultural uses; children and young people's play and informal recreation facilities.</u></li> </ul> <p><u>This list is not intended to be exhaustive and other facilities can be included as social infrastructure.</u></p> <p><u>As they serve visiting members of the public, they are typically sited in locations that are well connected to public and active travel networks and can provide active frontages onto streets and spaces.</u></p>	
MINOR/General14	Glossary	<u>Social rent (including London Affordable Rent)</u>	To ensure consistency with London Plan definitions.

Ref.	Policy/ Para/figure	Modification	Reason
		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.	
MM/PS2/OPDC/G/8	Glossary	<u>Town centre: Provides access to goods and services for people, corresponding to their role and function in the town centre hierarchy set out in the Mayor's London Plan. They are accessible by public transport, walking and cycling. The ground floor uses provide active frontages onto busy streets and spaces and there can be a range of unit sizes to cater to different business needs.</u>	To respond to changes in the Use Class Order.
MM/PS2/OPDC/G/9	Glossary	<p><del>Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities; the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</del></p> <ul style="list-style-type: none"> <li>• <u>uses within Class E (see separate definition)</u></li> <li>• <u>other appropriate uses where they serve visiting members of the public (where they serve visiting members of the public such as other retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and recreation uses (including cinemas, bars and pubs, nightclubs, casinos and bingo halls); and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</u></li> </ul>	To respond to changes in the Use Class Order.

Ref.	Policy/ Para/figure	Modification	Reason
		<u>They typically need to be sited in locations that are well connected to public transport and active travel networks and are able to provide active ground floor frontages onto streets and spaces.</u>	
MM/PS2/OPDC/G/10	Glossary	<p>Use Class: Uses of buildings/land are categorised for planning purposes, these categories are known as use classes. A range of uses may fall within each use class. (as sub-categories), as follows:</p> <ul style="list-style-type: none"> <li>• A use class — shops (A1); financial and professional services (A2); food and drink (A3); drinking establishments (A4); and hot food takeaways (A5).</li> <li>• B use class — business (B1); general industry (B2); and storage or distribution (B3).</li> <li>• C use class — hotels (C1); residential institutions (C2); dwelling houses (C3); and houses of multiple occupation (C4).</li> <li>• D use class — non-residential institutions (D1); and assembly and leisure (D2).</li> </ul> <p>Sui-Generis — uses which do not fall within other use classes.</p>	To respond to changes in the Use Class Order.
MINOR/PS/Q1e	Glossary	Provide a definition of place as: <u>“The result of a complex interplay of different elements, e.g. the cultural and social factors which have combined to create identity, the physical or built elements that make up the place and the people associated with it through memories, association and activity. Also referred to as ‘sense of place’.”</u>	To correct a desktop publishing error.
MM/PS2/OPDC/G/11	Glossary	<u>Walk to services: Small units, up to and not exceeding 80sqm that provide active ground floor frontages and serve visiting members of the public.</u>	To clarify the definition for smaller units

## Appendix

Ref.	Policy/ Para/figure	Modification	Reason
MM/PS2/OPDC/AP/1	A1.6	Delete	To reflect the current stage of plan process
MINOR/PS2/OPDC/AP/1	A1.28	Route, Infrastructure <del>ur</del> ue and Place Names	To correct typographical error
MM/PS2/OPDC/AP/2	A1.29	All the supporting studies are available to view <u>in line with the Statement of Community Involvement, which includes temporary arrangements to ensure effective and safe community engagement in the planning process while restrictions on social interaction remain in place and steps to support those without internet access</u> <del>online or hard copies can be viewed at identified locations. As part of the Regulation 19 consultation, representations can be made on these studies.</del> Where appropriate and relevant, supporting studies may be updated. Updates to supporting studies will be provided on OPDC's website.	To reflect the updated Statement of Community Involvement and current stage of plan process
MM/PS2/OPDC/AP/3	A1.30	As per the other supporting evidence documents, the IIA can be viewed <u>online or in hard copy at identified locations in line with the Statement of Community Involvement, which includes temporary arrangements to ensure effective and safe community engagement in the planning process while restrictions on social interaction remain in place and steps to support those without internet access.</u> <del>online or in hard copy at identified locations.</del>	To reflect the updated Statement of Community Involvement
MM/PS2/OPDC/AP/4	A1.31	As per the other supporting evidence documents, the IIA can be viewed <u>in line with the Statement of Community Involvement, which includes temporary arrangements to ensure effective and safe community engagement in the planning process while restrictions on social interaction remain in place and steps to support those without internet access</u> <del>online or in hard copy at identified locations.</del>	To reflect the updated Statement of Community Involvement
MM/PS2/OPDC/AP/5	A1.35	The new station at Old Oak Common, along with other transport infrastructure improvements including <del>two</del> potential new London Overground stations <del>s</del> will place the	To reflect the current status of the station.

Ref.	Policy/ Para/figure	Modification	Reason
		Old Oak and Park Royal as key transport hubs that will offer exceptional connectivity to many of west London's key locations for growth.	
MM/PS2/OPDC/AP/6	A1.39	Harlesden Town Centre is a designated District Town Centre, providing much needed town centre facilities for people living in the area. The centre and its surroundings currently suffer from economic deprivation, falling within the top 10% most deprived wards nationally when measured against the Index of Multiple Deprivation (2015 <sup>9</sup> ). Improved connections between it and the OPDC area provide significant opportunities for residents and businesses in Harlesden to benefit from regeneration. OPDC and Brent Council have established a Harlesden sub-group to coordinate projects and strategies for the area;	To reflect more recently published Indices of Multiple deprivation