

Local Plan Independent Examination

OPDC Response to Matter and Issue 3c

Matter 3c: 3 Whether the Plan would be effective in the light of fluidity of policies for Park Road and Old Oak Street and omission of partially formed proposals from figures or policies map (Derived from the eleventh Key Issue of table 5 of Key document 5 identified at Regulation 19(1) stage, a number of representations and Inspector's Q2, Q7, Q8, Q12, Q13, Q14, Q15, Q16 & Q17)

Notwithstanding the officers' response to my questions and to the Key Issues and representations set out in Appendices E and J to Key Document 5, a Hearing session will be required if representors exercise their right to be heard.

OPDC response:

- 1.1. OPDC considers that the Local Plan is effective in the light of the policies for Park Road and Old Oak Street, subject to the proposed modifications, and in the roles of Local Plan figures or policies map.
- 1.2. In relation to the eleventh Key Issue of Key Document 5 from the Regulation 19(1) consultation, regarding links to Willesden Junction, the London Borough of Brent's comments related to the Regulation 19(1) figure 4.50 depicting the place diagram for Willesden Junction. This figure showed the former proposed alignment of Old Oak (High) Street connecting to Harrow Road. Following the Regulation 19(1) consultation, the Old Oak North Development Framework Principles (document SD5) was developed by OPDC based on the outputs of the AECOM masterplan consortium of consultants. The consultants undertook a detailed assessment of the technical constraints of Old Oak North and Willesden Junction to identify potentially deliverable connections to surrounding areas.
- 1.3. The work undertaken to prepare the Old Oak North Development Framework Principles demonstrated that at the present time the ability to deliver an all modes route north of Park Road along Old Oak Street to Harlesden is very challenging technically and viably. Therefore, Old Oak Street is proposed to be a high quality walking and cycling route that will provide a strong connection to Station Approach, adjacent to Willesden Junction Station. This proposed connection is considered to be justified and in relation to the role of a Local Plan, addresses the London Borough of Brent's concerns regarding seeking an improved connection between Willesden Junction and Harlesden and supports the ability of any station improvements at Willesden Junction to deliver a strong frontage to Station Approach.
- 1.4. Additionally, to further clarify the connection along Old Oak Street to Harlesden, following conversations with the Harlesden Neighbourhood Forum, officers set out the below amendment within the Submission Proposed Minor Modifications:

MINOR/2/P2/5	P2, Figure 4.7	<u>Figure amendment: walking and cycling route north of Park Road will be labelled as Old Oak Street.</u>	To ensure figure 4.7 reflects information provided in the supporting text to Policy P1.
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1.5. In relation to the Inspector’s questions Q2, Q7, Q8, Q12, Q13, Q14, Q15, Q16 & Q17, documents OPDC/001, ID-01A, OPDC/001A, ID-01B, ID-01C, OPDC/001B, ID-01E, OPDC/002 set out the Inspector’s and OPDC’s written correspondence relating to the role and function of Local Plan diagrams and the Policies Map and which explain how the majority of issues raised have been addressed.

1.6. However, there are two remaining issues identified by the Inspector to be addressed to which the OPDC has responded below:

1 Whether the Place Policy diagrams are reproduced from, or based on, an Ordnance Survey map.

OPDC response: The place diagrams shown in Chapter 4 are reproduced from OS base maps to ensure the correct geographies are used when illustrating the geographical application of policies. However, due to the need to depict the spatial application of policies indicatively, the OS base maps have been removed. OPDC considers this is consistent with both the Regulation 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and National Planning Practice Guidance (NPPG) Paragraph: 002 Reference ID: 12-002-20140306. This states:

“A policies map must illustrate geographically the application of policies in a development plan. The policies map may be supported by such other information as the Local Planning Authority sees fit to best explain the spatial application of development plan policies.”

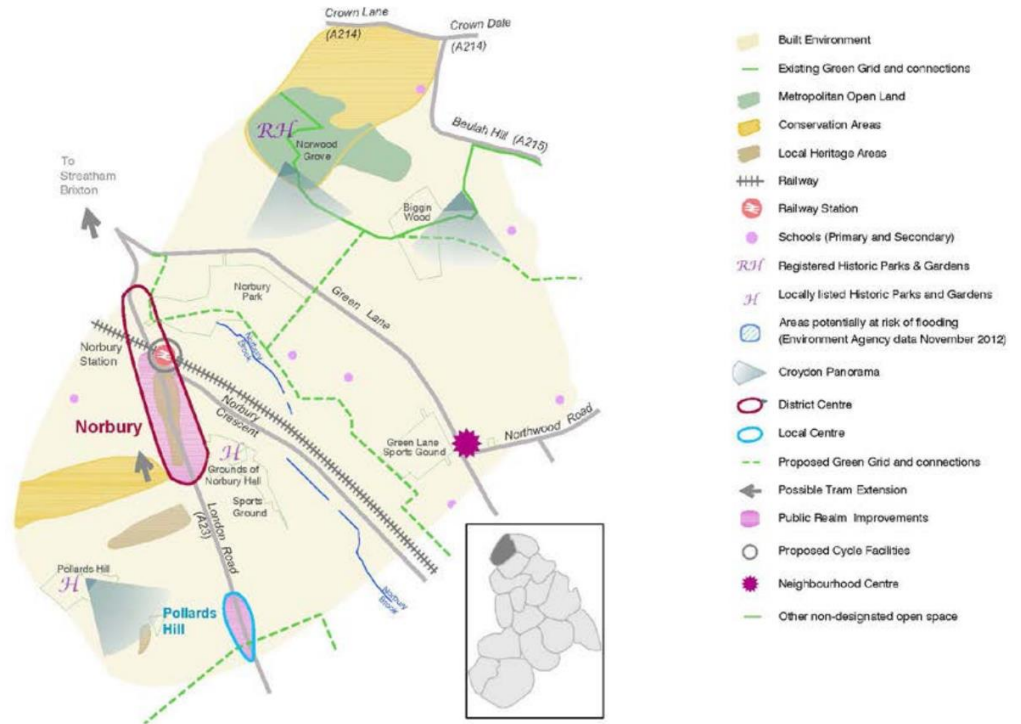
OPDC considers this is an appropriate and sound approach that has been utilised in other Local Plans that have been found sound. Examples are shown below:

London Legacy Development Corporation Local Plan (2015):



London Borough of Croydon Local Plan (2018):

Figure 11.9: Norbury



2 Whether there are discrepancies between the Local Plan diagrams (i.e. the OPDC area wide diagrams, the Place diagrams and the Cluster diagrams) and between these diagrams and the Policies Map

OPDC response: Officers have reviewed the Policies Map and the OPDC area wide, Place and Cluster diagrams and note as follows:

- Local Plan diagrams and Policies Map: Following the proposed modifications to remove indicative designations from the Policies Map, there is no overlap of content between the Local Plan diagrams and the Policies Map aside from the Strategic Industrial Location.
- Between the Local Plan diagrams at each spatial scale: The OPDC area wide diagrams are consistent due to their content. However, between Place diagrams, adjustments have been made in each Place diagram to reflect the focus of each diagram on each specific place. Each Cluster diagram has a distinct geographic area. Therefore, there are no overlaps between Cluster diagrams.
- Between diagrams at different spatial scales: There are differences between the diagrams depicted at different spatial scales (e.g. between Place and Cluster diagrams or OPDC area wide and Place diagrams) reflecting the need to ensure any particular image is sufficiently clear and relevant to the policy at the scale shown. For example, the proposed connections in figure 3.10 at an OPDC area scale are depicted in less detail than those in the Place diagrams in Chapter 4, which illustrate indicative spatial implementation of the Place Policies. The need to refer to different figures is set out in paragraph A1.26 currently within the Local Plan Appendix. It is proposed that this paragraph is included in the Local Plan introduction (refer to MINOR/General1 in the Submitted Proposed Minor Modifications). OPDC proposes to further expand this text to set out the function of, and relationship between, the Policies Map, the indicative OPDC-area-wide diagrams, the indicative Place diagrams and

the indicative Cluster diagrams in relation to the implementation of policies. This will be set out in the schedule of post-submission proposed modifications.

- 1.7. Specifically, in relation to the fluidity of policies for Park Road and Old Oak Street, OPDC officers have agreed to include policies for Park Road and Old Oak Street (see document OPDC/002) within each Place Policy where those streets are present to ensure the Local Plan is effective in delivering clear policy guidance.