



The Planning Inspectorate

Report to the Old Oak and Park Royal Development Corporation

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an Inspector appointed by the Secretary of State

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Old Oak and Park Royal Development Corporation Local Plan

The Plan was submitted for examination on 4 October 2018

The examination hearing sessions were held between 2 and 16 April and on 6 June and 18 July 2019 and on 11 and 12 January 2022

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Abbreviations used in this report

AA	Appropriate Assessment
AECOM	Architecture, Engineering, Construction, Operation and Management. A multinational engineering firm
BNP	Banque Nationale de Paris. BNP Paribas is a multinational banking and real estate firm
C5	Core Five. A firm of construction cost consultants
CBRE	Coldwell Banker Richard Ellis. A commercial real estate and investment company
CIL	Community Infrastructure Levy
DP9	A planning consultancy
DS2	A firm of valuers
DIFS	Development Infrastructure Funding Study
EMR	European Metal Recycling Ltd
EUV	Existing Use Value
GDV	Gross Development Value
GLA	Greater London Authority
GRIP	Governance for Railway Investment Projects
GTAA	Gypsy and Traveller Accommodation Assessment
HGV	Heavy Goods Vehicle
HIF	Housing Infrastructure Fund
HS2	High Speed Two rail line
IDP	Infrastructure Delivery Plan
IEP	Intercity Express Programme
IIA	Integrated Impact Assessment
LBHF	London Borough of Hammersmith and Fulham
LDF	Local Development Framework
LP	Local Plan
MM	Main Modification
MVHR	Mechanical Ventilation with Heat Recovery
NPPF	National Planning Policy Framework
OONDFP	Old Oak North Development Framework Principles
OOPROAF	Old Oak and Park Royal Opportunity Area Planning Framework
OPDC	Old Oak and Park Royal Development Corporation
PT	Public transport
PTAL	Public Transport Accessibility Level
RBKC	Royal Borough of Kensington and Chelsea
SEA	Strategic Environmental Assessment
SHMA	Strategic Housing Market Assessment
SIL	Strategic Industrial Location
SPG	Supplementary Planning Guidance
SuDS	Sustainable Drainage System(s)
SWMP	Surface Water Management Plan
TfL	Transport for London
TRBMP	Thames River Basin Management Plan
WPVS	Whole Plan Viability Study
WTP	W T Partnership. A construction and property consultancy

Non-Technical Summary

This report concludes that the Old Oak and Park Royal Development Corporation Local Plan (the OPDC LP) provides an appropriate basis for the planning of the development area, provided that a number of main modifications [MMs] are made to it. The Old Oak and Park Royal Development Corporation (the OPDC) has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Following the hearing sessions in 2019, the Corporation prepared schedules of the proposed modifications and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MMs were subject to public consultation over an eight-week period from 17 May 2021 to 5 July 2021. In some cases, I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Ensuring an Ordnance Survey base to the policies map and to figures within the Plan;
- Identifying superseded Plans and policies;
- Updating housing and jobs targets;
- Ensuring a positive strategy for the conservation and enjoyment of non-designated heritage assets.
- Substituting substantive requirements for process requirements;
- Producing a revised spatial strategy consequent on the deletion of a major unviable site;
- Reviewing social infrastructure requirements consequent on the revised spatial strategy;
- Resolving internal inconsistencies and omissions;
- Moving policy from supporting text into policies;
- Ensuring consistency with the Infrastructure Delivery Plan;
- Ensuring that policies of industrial intensification would be effective;
- Revising the Drainage Strategy to be effective;
- Clarifying the location of the proposed Wormwood Scrubs Street;
- Updating terminology in relation to affordable housing;
- Clarifying policy in relation to public houses;
- Removing monitoring burdens from development;
- Updating the Plan consequent on the publication of the London Plan 2021 and on changes to the Use Classes Order; and
- A number of other modifications to ensure that the Plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the Old Oak and Park Royal Development Corporation Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The revised National Planning Policy Framework (NPPF) was published in July 2018 and further revised in February 2019 and July 2021. It includes a transitional arrangement in paragraph 220¹ which indicates that, for the purpose of examining this Plan, the policies in the 2012 NPPF will apply. Similarly, where the Planning Practice Guidance (PPG) has been updated to reflect the revised NPPF, the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement. Therefore, unless stated otherwise, references in this report are to the 2012 NPPF and the versions of the PPG which were extant prior to the publication of the 2018 NPPF.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound Plan. The Old Oak and Park Royal Development Corporation Local Plan, submitted in October 2018 is the basis for my examination. It is the same document as was published for consultation in June 2018, with the addition of a schedule of Submission Proposed Minor Modifications which mostly supply clarifications and corrections.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Corporation requested that I should recommend any main modifications [**MMs**] necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs are necessary. Some modifications will have more than one justification and so may be referenced in more than one place in my report. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix. In all cases, the content, text and paragraph numbers as proposed to be modified are those of the Plan submitted for examination in October 2018, not that of the Post Submission Modified Draft Local Plan which was published by the Corporation in May 2021.
5. Following the examination hearing sessions in 2019, the Corporation prepared a schedule of proposed MMs and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MM schedule was subject to public consultation for eight weeks. I have taken account of the consultation responses and of comments and suggestions made at hearing sessions in January 2022, particularly those concerning waste, employment

¹ Of the July 2021 version

policy and clarification of tall buildings policy, in coming to my conclusions in this report. In this light I have made some amendments to the detailed wording of the main modifications (**MMs 110, 112 (final bullet), 133 (final bullet), 138, 144, 145, 337, 380 and 426 (in part)**), endorsed an amendment proposed as a Minor Modification by the OPDC (**342**) and added consequential modifications (**MMs 79A, MMs 84 (paragraph 4.32 in part), 111 (part), 135 (part), 147 (part), 168A, 185 (paragraph 4.165 in part), 210 (in part), 383A and 426 (part)**) where these are necessary for consistency or clarity or to make explicit what was otherwise implicit, as I am entitled to do. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal/habitats regulations assessment that has been undertaken. Where necessary I have highlighted these amendments in the sections of this report dealing with waste facilities, industrial intensification and locations identified as suitable for tall buildings. In one instance I have rejected modifications canvassed by the OPDC because they did not successfully address issues which had been discussed at an earlier hearing session. Further details are given in the section of this report dealing with policies for monitoring.

Policies Map

6. The Corporation must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Corporation is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the OPDC Local Plan is intended to replace, within the OPDC area, the local plans of the three authorities within which the OPDC area lies and so a new replacement policies map was included within the submission documents.
7. As originally submitted, the OPDC LP policies map did not comply with the provisions of Regulation 9(1(c))² in that it was not comprehensive in illustrating geographically the application of the policies in the proposed local plan. The Plan also contained a number of figures, some (but not all) of which appeared to have been based on an Ordnance Survey map and so could be regarded as complying with Regulation 9(1(a)) and thus comprising part of the policies map so as to make good the deficiency but there were discrepancies in the content of these figures both between various figures themselves and between the figures and the document labelled as the policies map. As submitted, the Plan was therefore not in compliance with the regulations.
8. The deficiencies in the figures contained within the text of the Plan is considered below in the section of this report dealing with the effectiveness of the Plan. However, the policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. A number of the published MMs to the Plan's policies require corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the

² Of the Town and Country Planning (Local Planning)(England) Regulations 2012

submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective. These further changes to the policies map were published for consultation alongside the MMs (Document OPDC-40D Table of figure Modifications).

9. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Corporation will need to update the adopted policies map to include all the changes proposed in the OPDC LP and the further changes published alongside the MMs incorporating any necessary amendments identified in this report. With those changes, combined with the Modifications to the figures in the text of the Plan, detailed in a later section, which make good any deficiencies in the comprehensiveness of the Policies Map itself, I am satisfied that the Plan would comply with Regulation 9(1(c)) of the Town and Country Planning (Local Planning)(England) Regulations 2012.

Context of the Plan

10. The Old Oak and Park Royal Development Corporation (OPDC) is a Mayoral Corporation established by the Mayor of London on 1 April 2015. Its aims include transforming one of London's most inaccessible areas into a well-connected, world-class transport interchange, enabling delivery of new housing and commercial development (capitalising on the delivery of Old Oak Common station on the High Speed 2 railway being constructed between London and the West Midlands), surrounded by sustainable and thriving neighbourhoods and valued open space, protecting, strengthening and intensifying Park Royal (London's largest and most successful industrial area) and now also, Old Oak North and protecting and improving Wormwood Scrubs (one of London's largest metropolitan parks).
11. The OPDC area is a part of inner west London, dissected by numerous radial and orbital rail lines, the A40 trunk road and the Grand Union Canal. To its north is the London Borough of Brent. To its west is the London Borough of Ealing. To its south is the London Borough of Hammersmith and Fulham. To its east is the Royal Borough of Kensington and Chelsea.
12. Once adopted, the Plan will form part of the statutory development plan for the OPDC area, alongside the London Plan, the West London Waste Plan and any made Neighbourhood Plans. For the OPDC area, it is intended to supersede any previously existing statutory development plans for the parts of the London Boroughs of Hammersmith and Fulham, Brent and Ealing included within the OPDC area. As originally submitted, the Plan did not make that clear and so I recommend Modification [MM1] to remedy that omission and ensure that the Plan would be effective.

Public Sector Equality Duty

13. I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included my consideration of several matters during the examination including the provision of traveller sites to meet need and accessible and adaptable housing.

Assessment of Duty to Co-operate

14. Section 20(5)(c) of the 2004 Act requires that I consider whether the Corporation complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
15. The Corporation's Supporting Document SD1 *Duty to Cooperate Statement* sets out the OPDC's governance arrangements. It is a functional body of the Greater London Authority (GLA) so both the Mayor and Assembly have oversight of its activities. To a degree, it follows that the Corporation's fulfilment of its duty to co-operate with authorities surrounding London benefits from the GLA's discharge of that duty. The three boroughs within which it lies (Brent, Ealing and Hammersmith and Fulham) have representation on its board.
16. It is clear that the Corporation participates in the standing arrangements for cooperation amongst London planning authorities. Details of its participation in the Association of London Borough Planning Officers and meetings of West London Chief Planning Officers, the West London Transport Planners Group, the London Waste Planning Forum and the West London Alliance are given.
17. Duty to Co-operate (Project Team) meetings were held every two weeks comprising representatives from the OPDC itself, the GLA, Transport for London (TfL), the three host boroughs (Brent, Ealing and Hammersmith and Fulham) and the Royal Borough of Kensington and Chelsea. Co-operation does not necessarily mean agreement, but the Corporation has worked jointly with the London Boroughs of Brent, Ealing, Harrow, Hounslow, Hillingdon and Richmond upon Thames in connection with the West London Waste Plan and with the London Boroughs of Hammersmith and Fulham, Lambeth and Wandsworth and the Royal Borough of Kensington and Chelsea in connection with their waste planning requirements.
18. Supporting Document SD1 details the co-operation arrangements entered into with the Environment Agency, Historic England, Natural England, the Civil Aviation Authority, Clinical Commissioning Groups, Highways England, the Marine Management Organisation, the Office of Rail Regulation, the London Enterprise Panel and the London Local Nature Partnership.
19. Not listed in the *Duty to Co-operate Statement* but apparent from its Appendices and other supporting documents is the Corporation's involvement with the Canal and River Trust and Thames Water Utilities (a participant, along with the OPDC itself, the GLA, the Environment Agency, the Royal Borough of Kensington and Chelsea and the London Boroughs of Brent, Hammersmith and Fulham and Ealing in the Steering Group overseeing the production of Supporting Document SD21 *the Integrated Water Management Strategy*). Also involved in Supporting Document SD25 *the Utilities Study* were UK Power Networks, Scottish and Southern Energy, the National Grid (Gas) and High Speed 2 (HS2) Limited. Supporting Document SD20 *the Environmental Standards Study* records that its vision derives from a stakeholders' workshop involving OPDC, GLA, the London Boroughs of Ealing, Brent and Hammersmith and Fulham, the Royal Borough of Kensington and Chelsea, Natural England, the Environment Agency, the London Waste/Recycling Board, Thames Water Utilities Limited, HS2 Limited and Transport for London (TfL).

20. I am satisfied that where necessary the Corporation has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.
21. The statutory duty to co-operate only applies during the preparation of the Plan (at Regulation 18 and Regulation 19 phases) up until the plan's submission. Once the Plan is submitted, there is no statutory Duty to Co-operate, but it is government policy that planning authorities continue to do so³. Details of the way the Corporation has continued to co-operate with neighbouring authorities during and after the Modification stage are set out in section 5 of the Corporation's letter to me dated 5 March 2021 (document OPDC-39) and in its Schedule of Post-Submission Engagement September 2021 (document OPDC-41C). There is no suggestion from the comments from neighbouring authorities on the Modifications that there has not been a continuing co-operation.

Assessment of Other Aspects of Legal Compliance

22. The Plan has been prepared in accordance with the Corporation's Local Development Scheme.
23. Consultation on the Plan and the MMs was carried out in compliance with the Corporation's Statement of Community Involvement.

Sustainability Appraisal

24. Sustainability Appraisal has been carried out and is adequate. In October 2019 I issued my Interim Findings on Sustainability Appraisal (published on the examination website as document ID34a and so, not repeated here).
25. In part, my Interim Findings relied on the Sustainability Appraisal of the London Plan 2016, which was found sound, to justify the Corporation's acceptance of the London Plan's minimum guidelines for housing and indicative estimates for employment capacity without the testing of alternatives through Sustainability Appraisal. The equivalent or replacement policies in the London Plan 2021, which has also been found sound and published while the OPDC LP examination was in progress, make no difference to that finding.
26. Policy SD1 B (6) of the London Plan 2021 requires Development Plans to support and sustain Strategic Industrial Locations. Their designation is made in policy E5, figure 6.1 and table 6.2 of the London Plan 2021, so there are no strategic alternatives to be considered by the OPDC through Sustainability Appraisal. Policy SD1 part B (5) in the London Plan 2021 (which applies to both development plans and decisions) requires the capacity for growth in Opportunity Areas to be established, taking account of the indicative capacity for homes and jobs in its table 2.1. Supporting text at paragraph 2.1.1. suggests that the indicative capacity figures should be used as a starting point and tested through the assessment process, not necessarily through

³ NPPF (2012) paragraph 181, NPPF (2021) paragraph 27

Sustainability Appraisal. I report on the Corporation's compliance with this London Plan requirement in a later section dealing with effectiveness.

27. Locations for development continue to be identified in Chapter 2 of the London Plan 2021, entitled Spatial Development Patterns. There is no suggestion that this spatial strategy is to be tested through the Local Plan process and so, it remains appropriate that OPDC's Sustainability Appraisal does not consider an alternative spatial strategy.
28. Nevertheless, consequent on my Interim Findings, the Industrial Land Review Addendum of 2021 (document OPDC-39 I) re-examines sites potentially available for development and redesignates some previously allocated for industrial development as mixed-use housing sites so as to arrive at what is, in effect, an alternative spatial strategy to that which was originally submitted. Nevertheless, it is not an alternative in the sense that a choice could be made between the spatial strategy of the originally submitted Plan and the spatial strategy of the modified Plan. Each spatial strategy is, in practice, the only strategy reasonably available at the time of the originally submitted Plan and the modified Plan respectively, which would meet the objectives set for the OPDC to capitalise on the expected arrival of the Old Oak HS2 and Crossrail station from 2026.
29. My Interim Findings on Sustainability concluded by noting that; "except that the Addendum dated May 2019 has not been the subject of public consultation, (a matter which can be remedied at Modifications stage), it appears to me that the Plan does comply with the law."
30. If there were any lingering doubt about the Corporation's compliance with the requirements for Sustainability Appraisal and Strategic Environmental Assessment, including the assessment of reasonable alternatives, it is dispelled by the Integrated Impact Assessment Addendum and Habitats Regulation Assessment of February 2021, produced to support the Modifications. This not only considers four reasonable alternatives to the Modifications proposed but also (in its appendix B) explains why a number of alternatives were not examined, because they were regarded as not reasonable alternatives, and, in its Appendix C, reiterates for public consultation the IIA addendum of May 2019, in compliance with the recommendation of my Interim findings.

Habitats Regulation Assessment

31. The Integrated Impact Assessment (Supporting Document SD2) also includes a Habitats Regulations Assessment setting out why an Appropriate Assessment (AA) is not necessary, explaining that none of the policies or proposals in the submitted Plan, either alone or in combination with others, would lead to any direct impact upon any designated European site, the closest of which is more than 7km from the OPDC boundary. I concur with that. The same conclusion, for the same reason, was reached in relation to the Harlesden Neighbourhood Plan dealing with an area immediately to the north of, and partly overlapping

with, the OPDC LP area.⁴ The Habitats Regulation Assessment was repeated, with the same result, for the Modifications.

Other legal requirements

32. Representations argued that the Corporation failed to comply with its duty, set out in s20(2) of the Planning and Compulsory Purchase Act 2004 by which the Corporation must not submit a plan for examination unless they think the document is ready for independent examination. My remit is set out in s20(5) and s20(7) of the Planning and Compulsory Purchase Act 2004. This requires me to examine whether the plan is sound; whether the local authority complied with s33A of the Act (the Duty to Cooperate); whether the Plan satisfies the requirements of sections 19 and 24(1) of the Act (concerning the form and content of the Plan and conformity with the London Plan); and regulations under sections 17(7) and 36 of the Act. It is no part of my remit to examine whether the local authority complied with s20(2) of the Act and so, I have not done so and I do not report on that matter.
33. Representations also argued that the extent of Modifications renders the Plan unlawful. The Modifications are extensive but, once the local authority has asked me to recommend modifications to make the Plan sound, I must do so. There is no limit placed on the extent of the modifications which I may be obliged to recommend in order to comply with my duty under Section 20(7C) of the Planning and Compulsory Purchase Act 2004. As explained in Examination Document ID-43a, placed on the examination website, there is a court judgement⁵ which confirms that "there is no limitation in the statutory language preventing a "rewrite" of the local plan (whatever that language might mean, when any change is a rewrite)" and so, I do not take the view that the extent of the Modifications renders the Plan unlawful.
34. The Development Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.
35. The Development Plan, taken as a whole, includes policies, such as SP2(b), SP7, SP8, D4 (to become D3), EU1(d(vi)), EU2, EU3, EU4, EU7, EU8, EU9, EU10, designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.
36. The Plan is in general conformity with the spatial development strategy (The London Plan).
37. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

⁴ Paragraphs 4.1 and 4.2 of Report on Harlesden Neighbourhood Plan 2018-2033 by David Hogger BA MSc MRTPI MCIHT, February 2019

⁵ IM Properties Ltd v Lichfield District Council [2015] EWHC 2077 (Admin)

Assessment of Soundness

Background

38. In London, the London Plan forms part of the development plan. Local plans are required to be in general conformity with the London Plan. The London Mayor certified that the submitted OPDC Local Plan was in general conformity with the adopted London Plan 2016. He has also certified that the Modified Plan is in general conformity with the London Plan published⁶ in 2021. The OPDC has also provided me with a Statement of General Conformity with the London Plan 2021⁷ with which I have no quarrel. To that extent therefore, the provisions of the OPDC LP are sound, since the London Plan 2021 has itself been found sound.
39. London Plan 2016 policy 2.13 provided for the preparation of planning frameworks to realise the growth potential of defined opportunity areas in the terms of Annex 1 to the London Plan. The provisions of Annex 1 were that the two opportunity areas of Park Royal and Old Oak Common should provide between them a minimum of 25,500 new homes and have an indicative employment capacity of 65,000. Other provisions included mixed use intensification at a series of gateway sites in Park Royal comprising the Eastern Gateway at Willesden Junction, the Southern Gateway around North Acton station, the Western Gateway around the Diageo First Central site and the Northern Gateway centred around the Northfields Industrial estate. For Old Oak Common, provisions in the London Plan 2016 were for a new strategic public transport infrastructure hub at Old Oak Common, an investigation of a network of new open spaces and green links connecting Old Oak Common station to North Acton, Wormwood Scrubs and the Grand Union Canal, high density development including a cluster of tall buildings around the interchange and improved access to Wormwood Scrubs.
40. Insofar as the submitted Plan did not deviate from these requirements of the London Plan 2016, unless circumstances had changed, there was no need for me to investigate the soundness of the proposals in principle because, notwithstanding the criticisms that have been made of the Integrated Impact Assessment of the Further Alterations to the London Plan in representations to this examination, the adopted London Plan 2016 has been found sound. Thus, in this current examination, there was no further examination of the soundness of the figures of 25,500 new homes and 65,000 new jobs as targets. Rather, the examination of soundness focussed on any change in circumstances which might justify a deviation from the requirements of the London Plan and on the means by which the requirements of the London Plan are to be achieved.
41. A major change in circumstance is that the London Plan of 2016 was superseded early in 2021 by the London Plan published in March 2021. This combines Old Oak/Park Royal into a single opportunity area. It omits the specific details of development to be provided for in the OPDC LP which the

⁶ In connection with the London Plan, this term has a technical meaning equivalent to "adopted" for other development plans.

⁷ Examination document OPDC-44

former Annex 1 provided. Instead, London Plan 2021 devolves much more scope to the OPDC Local Plan. London Plan 2021 policy SD1 B still requires the OPDC LP to establish the capacity for growth in the Opportunity Area, taking account of the indicative capacity for homes and jobs in Table 2.1 of the London Plan 2021 but there are few other specific requirements for the OPDC area in the London Plan 2021. For the OPDC area the indicative capacity remains set at 25,500 homes and 65,000 jobs.

42. Paragraphs 2.1.59-60 of the London Plan 2021 acknowledge that a Local Plan has been published which recognises the huge regeneration potential of the area and sets out a clear strategy for how redevelopment should help to optimise economic growth and regeneration potential, create a new town centre and bring tangible benefits for local communities and Londoners. It notes that Old Oak Common station (connecting HS2, the Elizabeth line and National Rail) is set to open by the late 2020s and that there are significant opportunities to bring forward regeneration in advance of this date around the existing and potential new rail stations in the area. This includes North Acton on the Central line and Willesden Junction on the Bakerloo line and London Overground, as well as the potential new local station at Old Oak Common Lane on the Overground⁸. Paragraph 2.1.61 of the London Plan 2021 also notes that Park Royal is a strategically-important industrial estate for the functioning of London's economy and should be protected, strengthened and intensified.
43. Other provisions of the London Plan 2021 include approximately sixty functional or process requirements which development plans within London must achieve. For the most part it is clear that the OPDC LP has fulfilled these requirements but, in response to representations, I conducted a specific hearing session in relation to the requirement to define what is considered a tall building for specific localities⁹ and determine if there are locations where tall buildings may be an appropriate form of development¹⁰. I report on this discussion separately in a later section of this report.
44. The few specific provisions from the London Plan 2021 relating to the OPDC area which the OPDC LP must take on board include a ten-year target of 13,670 net housing completions, protection for existing cultural venues, Public Houses¹¹, veteran trees, ancient woodland¹², existing allotments¹³ waterway infrastructure¹⁴ and railheads¹⁵ and safeguarding for the transport schemes outlined in London Plan table 10.1.¹⁶

⁸ Hythe Road is also mentioned as a potential new rail station but the OPDC's supporting documents to the Modifications consequent on my Interim Findings explain why the proposal is deleted.

⁹ London Plan 2021 policy D9 A

¹⁰ London plan 2021 policy D9 B

¹¹ London Plan 2021 policy HC7 A

¹² London Plan 2021 policy G7 B

¹³ London Plan 2021 policy G8 A

¹⁴ London Plan 2021 policy SI 16 A

¹⁵ London Plan 2021 policies T7 A, B and D

¹⁶ London Plan 2021 policies T3 A, B, C and D

45. Consequently, there has been no further investigation of the soundness of the figures of 25,500 new homes and 65,000 new jobs as overall targets nor of the figure of 13,670 for the ten-year housing target. As Paragraph 0.0.21 of the London Plan 2021 states; "The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their Local Plan development unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this Plan." For similar reasons, insofar as the modified Plan does not deviate from the other requirements of the London Plan 2021, unless there are specific circumstances, there is no need for me to investigate the soundness of the translated proposals in principle because the published London Plan 2021 has been found sound.

Main Issues

46. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearing sessions, I have identified 5 classes of main issues upon which the soundness of this Plan depends. Four of these classes of issues have a number of separate points, leading to a grand total of 37 issues overall. This report deals with these main issues. It does not respond to every point or issue raised in representations. Nor does it refer to every policy, policy criterion or allocation in the Plan.

Issue 1 - Whether the Plan's definition of Strategic Policies and its role envisaged for Neighbourhood Plans is consistent with National Policy

47. At the present time, opportunities for two neighbourhood plans have been identified within the OPDC area. One, at Harlesden, is largely within the London Borough of Brent but also includes pockets of land at Willesden Junction which fall within the OPDC area. Another, at Old Oak, lies entirely within the OPDC LP area.
48. Neighbourhood planning is encouraged by Government. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan as a Basic Condition. To facilitate this, local planning authorities should set out clearly their strategic policies for the area. National Guidance¹⁷ advises that the Basic Condition addresses strategic policies no matter where they appear in the development plan. It does not presume that every policy in a Local Plan is strategic or that the only policies that are strategic are labelled as such.
49. Nevertheless, paragraph 1.23 of the submitted Plan asserts that the policies contained in Chapters 3 (Strategic Policies), 4 (Places) and 11 (Delivery and Implementation) will be treated as OPDC's Strategic Policies when considering the general conformity of neighbourhood planning policies. But paragraph 4.2 of Chapter 4 itself advises that policies in this chapter provide specific guidance for each place at a greater level of detail than the Strategic Policies in Chapter 3 and the Development Management policies later in the Plan. This

¹⁷ Paragraph 075 Reference ID: 41-075-20140306

statement throws into question whether the policies of Chapter 4 are all truly strategic in nature.

50. As noted earlier, Annex 1 of the adopted London Plan 2016 set out specific tasks for the OPDC LP. These are all delivered through the three chapters in question. In particular, the definition of locations for tall buildings, required by policy D9 of the London Plan 2021, is provided through the Places chapter. This does not support the argument that its content is not strategic.
51. Paragraph 156 of the NPPF advises on the strategic priorities for local plans. These include policies to deliver homes and jobs, retail, leisure and other commercial development, the provision of infrastructure for health, security, community and cultural facilities, transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy and for climate change mitigation and adaptation and conservation and enhancement of the natural and historic environment. These are all matters which are dealt with in Chapters 3, 4 and 11 of the Plan and so I conclude that these chapters are appropriately designated as containing Strategic Policies.
52. Moreover, paragraph 157 of NPPF advises that crucially, Local Plans should, amongst other matters, indicate land use designations on a proposals map, allocate sites, provide detail on form, scale, access and quantum of development, identify areas where constraint policies will apply and contain a clear strategy for enhancing the natural, built and historic environment and supporting Nature Improvement Areas, where identified. These too are matters dealt with in Chapters 3, 4 and 11 of the Plan, which reinforces my conclusion that these chapters are appropriately designated as containing Strategic Policies.
53. National Guidance¹⁸ advises that Strategic policies will be different in each local planning authority area. Of its nature, dealing with a smaller area than many Local Plans, the scale of policies in the OPDC LP should be expected to be one of greater detail than many. Nevertheless, a role remains for Neighbourhood Plans, which is recognised in paragraphs 3.35 and 11.36 of the submitted Plan. Modification (**MM451**) is necessary to reaffirm the disputed assertion of paragraph 1.23 and to ensure the effectiveness of the Plan.
54. I conclude that the definition of Strategic Policies and the role envisaged for Neighbourhood Plans is consistent with National Policy and that in this respect the Plan as submitted is sound without other major modification.

Issue 2 - Whether the Plan has been positively prepared

a) In the light of alternative, community-led, visions

55. During the relevant hearing session, a representative of community groups acknowledged a degree of substance to the OPDC's claim that the vision prepared by the Grand Union Alliance community group has been embedded in the Plan, both in its vision as well as in certain of its policies and parts of the

¹⁸ Paragraph 076 Reference ID: 41-076-20140306

supporting text. I acknowledge that, in this embedding process, the nuances of the community's vision may have become diluted and the more bland or anodyne outcome may not resonate with the community but the resulting outcome is still positively prepared and does not lead to a finding of unsoundness requiring remedy by a modification.

b) In the absence of proposals for the Elizabeth Line (Crossrail) spur and for the redevelopment of the Elizabeth Line depot

56. Annex 1 to the adopted London Plan 2016 (now superseded) stated that the regeneration of Old Oak Common would centre on a new strategic public transport infrastructure hub which should include a new branch of Crossrail 1 (the Elizabeth Line) linking from Old Oak to the West Coast Main Line and extending via Wembley to Watford and potentially beyond. Notwithstanding the requirement to be in general conformity with the London Plan, the submitted OPDC LP does not take forward this proposed link.
57. The reason is explained in letters from the Department for Transport's Crossrail Project Director, Network Rail's Head of High Speed Rail Phase 1 and in the minutes of the High Speed Phase One Sponsor Board Meeting on 24 May 2017. Upon examination of the business case for the link, it was found to provide poor value for money. Subsequent refinements of design for turnback sidings at Old Oak Common station now preclude construction of the spur except at prohibitive cost and disruption.
58. The redevelopment of the Crossrail (Elizabeth Line) depot is not now expected during the Plan period but the aspiration has not been abandoned as policy designations still cover the site, even though no specific proposal is now included in the Plan. This is appropriate, given that the original inspiration for Old Oak as an opportunity area was the potential for capitalising on the increased accessibility of the area consequent on the HS2 and Crossrail (Elizabeth Line) station by redevelopment of immediately adjoining railway lands. In its representations on the Modifications, TfL's Commercial Development planning team comment that; "TfL have a long leasehold on the Old Oak Common Elizabeth Line Depot and TfL CD would be open to working with OPDC to enable this site to come forward for mixed use development should a suitable solution to its earlier delivery be found. It is noted that the following text has been added to paragraph 4.18: "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." The inclusion of the wording 'potential to explore' and 'if demonstrated to be feasible' are supported as any requirements for this longer term site should be based on further detailed assessment at the appropriate time."
59. For the above reasons I conclude that the omission of proposals for the Elizabeth line spur and for the redevelopment of the Elizabeth line depot do not mean that the Plan has failed to be positively prepared.

c) In terms of the need for facilities for sport, leisure and open space

60. One of the specific requirements of the now superseded London Plan 2016 was for the OPDC's LP to carry out an investigation of a network of new open spaces and green links connecting Old Oak Common station to North Acton,

Wormwood Scrubs and the Grand Union Canal. This requirement is carried forward into the London Plan 2021 as policies S4, S5, G1 C and G4 A.

61. Representations at various stages of the Plan's preparation, particularly from Sport England were concerned about the adequacy of provisions within the Plan, both for the protection of existing and the provision of new facilities but, by the time of the Plan's submission, policies SP8(a(iii)) and EU1(c) were specific about a requirement for 30% of the developable area outside the retained Strategic Industrial Location to be provided as publicly accessible open space including three new local parks of at least 2ha in size.
62. The areas of search for two of these local parks lay largely within the CarGiant allocations which, as explained in a later section, I have found to be undeliverable and so, unsound because of ineffectiveness. As a consequence of the extensive modifications resulting from this finding, an area of search for one local park within the Channel Gate allocations is included within revised figure 3.13 associated with policy SP8 and within revised policy P9 (**MMs 48 and 185 (part)**). References throughout the Plan to three new local parks are consequently amended to refer to two new local parks (**MMs 44, 46, 66, 295 and 296**) but the overall requirement for 30% of the developable area outside the retained Strategic Industrial Location to be provided as publicly accessible open space remains unaltered and so, in this respect, the Modifications do not alter the soundness of the Plan in terms of the need for facilities for sport, leisure and open space.

d) In terms of the need for facilities for social infrastructure such as education and health facilities

63. Turning to social infrastructure, a succession of studies demonstrates that the Plan has been positively prepared. As the Plan has been refined in successive iterations, so the findings of the initial Education and Health Needs Study and the Development Infrastructure Funding Study have been checked in the Social Infrastructure Needs Study of 2018 and, where necessary, adjustments have been made. Policy D9 requires the delivery of children's play space and policy TCC6 protects existing indoor and outdoor sports and leisure facilities and includes a requirement for two new public sports and leisure centres to be provided at identified locations. Figure 3.13 and the places policies within Chapter 4 of the Plan indicate their provision.
64. An earlier section relating to the Policies Map sets out a requirement for these proposals to be shown accurately on the proposals map and on the various figures within the text which show indicatively where facilities are to be provided. Further adjustments now have to be made consequent on my recommendation elsewhere to delete the CarGiant site from the proposals in the Plan because of its undeliverability and hence, ineffectiveness.
65. Those further necessary adjustments were identified through the Social Infrastructure Needs Study Addendum of February 2021 and are represented by Modifications; (**MM80**) which deletes a requirement for one community hub in Old Oak South, (**MMs 146 and 439**) which replaces a requirement for a secondary school within North Acton and Acton Wells, which can no longer be justified, by a requirement for a health hub, (**MM185 (paragraph 4.169)**) which describes the facilities needed in Channel Gate (**MM294**) which clarifies

that social infrastructure should preferably be located at ground level, (**MM406**) specifying the need for three Neighbourhood Policy facilities, (**MM409**) correcting the reference to the updated Social Infrastructure Needs Study, (**MM410**) which reduces the size of the required primary school from four to three classes of entry and deletes the requirement for a secondary school, which can no longer be justified, (**MM411**) which addresses the revised phasing requirements of the education facilities, (**MM412**) which summarises the revised requirements for health facilities and (**MM413**) which summarises the revised requirements for community hubs and police facilities.

66. With these modifications in place, all of which are needed for reasons of justification and effectiveness, I have every reason to conclude that the submitted Plan has been positively prepared in relation to social infrastructure needs.

e) In terms of a positive strategy for the conservation and enjoyment of heritage assets

67. National Planning Policy is that a local plan should set out a positive strategy for the conservation and enjoyment of the historic environment. A very thorough Heritage Strategy is one of the Plan's supporting documents (SD11). Designated and recognised but non-designated heritage assets are identified on the policies map. As submitted, policy D8 required clear and convincing justification for any harm proposed to a designated asset and its setting but in relation to non-designated assets merely required a process to be gone through in the preparation of a proposal. It did not state any substantive requirements for a proposed development to deliver. A main modification (**MM291**), prepared with the support of Historic England addresses this issue and is necessary to ensure that the Plan is positively prepared and consistent with national policy¹⁹.
68. There is insufficient recognition of the Grand Union Canal as a heritage asset. Modifications (**MMs 99, 102 and 245**) are necessary to correct that insufficiency and to ensure that the Plan is positively prepared by giving sufficient recognition to a heritage asset in accordance with government policy.

f) In terms of Air Quality

69. The whole of the OPDC area is subject to Air Quality Management designations. The cause is particularly linked to heavy goods vehicles (HGVs) and congestion on the road network. Pollution events mainly occurred when the prevailing wind was from the direction of the sites of Powerday plc, European Metal Recycling (EMR) and the locomotive depot. The Plan proposes the redevelopment of the EMR site. Modelling suggests reduced problems in the future as a result of tighter vehicle emission standards but quite a few receptors will remain within 5% of the acceptable thresholds of air quality.
70. The recommendations of the Corporation's Air Quality Study of March 2017 are largely carried through into the Local Plan, particularly policy EU4.

¹⁹ At NPPF(2012), paragraph 135.

Although there are requests from the London Borough of Hammersmith and Fulham (LBHF) to refine these policies still further by reference to World Health Organisation standards, I do not regard them as unsound as they stand, except insofar as subsections (a) and (b) of the policy are simply process requirements for applicants to produce self-assessment studies rather than requiring development to fulfil performance expectations. One of a suite of modifications (**MMs 301 and 302**) eliminating such process requirements from the Plan and substituting substantive requirements is necessary to address this issue and make the Plan effective and positively prepared.

71. Policy P2(j(ii)) within the Places Chapter 4 proposes making efficient use of Old Oak Sidings by supporting and/or enabling the site to deliver an energy from waste facility. Whereas I recognise the concerns of LBHF that such a facility could potentially exacerbate or create exceedances of the National Air Quality Objectives, I also note that policy P2(j(ii)) makes specific reference for the need for this proposal to comply with policy EU4. Policy EU4 requires development proposals not only to minimise air pollution (which could be ambiguously interpreted either to mean that additional pollution is accepted, so long as it is minimised, or to mean that existing pollution should be minimised by actual reductions in pollution) but also to make a positive contribution to overall improvement in air quality (which clarifies the ambiguity of the first part of the policy). The modifications (**MMs 301 and 302**) to replace procedural requirements by substantive requirements, together with existing provisions (d), (e), (h), (j) and (k) of policy EU4 ensure that policy EU4, if correctly applied to development proposals, would be effective in preventing the kind of outcome that LBHF fears and so, in terms of air quality would be positively prepared and therefore, sound.

g) In terms of Design

72. The Government attaches great importance to the design of the built environment in its statement of national policy. All the relevant studies carried out in support of the OPDC LP emphasise the enhanced significance of functional design in the context of the exceptionally intense development which is proposed in the OPDC area (the justification for this is discussed in a later section of this report). Two chapters of the Plan (Chapter 5, entitled Design, and Chapter 6, entitled Environment and Utilities but largely concerned with matters of functional design) are devoted to design issues. Other chapters (particularly 7, Transport and 8, Housing) also have policies which impact upon design.
73. Most of these policies are concerned with requiring developments to achieve a substantive performance characteristic. Some also contain requirements which are simply procedural, requiring applicants to submit self-assessments when making applications and so would not be effective unless translated into substantive requirements. Discussion of issue 3(a) recommends a suite of modifications to achieve this. But policy D1, Securing High Quality Design is different, in that it has no substantive content and consists entirely of a series of process requirements, including one (requiring applicants to commit to providing a financial contribution through a section 106 obligation) which is ultra vires. Its deletion is therefore necessary for the Plan to be effective (**MM271**). With this improvement in effectiveness, I have no doubts in concluding that the Plan has been positively prepared in terms of Design.

h) In terms of provision for Gypsies and Travellers

74. The Corporation's Gypsy and Traveller Accommodation Assessment (GTAA) is prepared on the basis of the national definition of Travellers contained in Annex 1 to the Government's publication *Planning policy for traveller sites* (PPTS), August 2015. The expected requirement from the London Plan to use a different definition has not materialised and so, references to that possibility should be deleted for consistency with Government policy (**MM367**). On that basis the GTAA concludes that there is a need for no additional pitches. There appears to be common acceptance that the Assessment is accurate within its terms. Thus, it can be said that the OPDC LP has been positively prepared in terms of its own area's needs.
75. But the issue goes wider than that. The OPDC sits within three London Boroughs; Brent, Ealing and Hammersmith and Fulham. These have their own Gypsy and Traveller Accommodation Needs Assessments.
76. That for Hammersmith and Fulham is prepared jointly with Kensington and Chelsea. It identifies a need for 9 additional pitches between 2016 and 2030. The two boroughs have jointly prepared a framework methodology to search for additional pitches. Kensington and Chelsea has identified opportunities for two additional pitches within its area. Hammersmith and Fulham is currently undertaking its assessment. The OPDC has applied the same methodology to its area and has found no capacity within its area. It cannot therefore be said that the OPDC has failed to participate in the positive preparation of provision for Gypsies and Travellers within the wider Hammersmith and Fulham and Kensington and Chelsea area.
77. The other two local authorities which are component to the OPDC area, Brent and Ealing, have prepared a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment as part of a West London Alliance including the additional London Boroughs of Barnet, Harrow, Hillingdon and Hounslow. Figure 10 of that Assessment, reporting in October 2018, identifies a total need for 25 pitches for the Alliance area but none arises from the two boroughs falling within the OPDC area. Thus, although the study encompasses approximately two thirds of the OPDC area, I find no reason to conclude that this more recent evidence invalidates in any way the OPDC's own GTAA. I therefore conclude that the OPDC Local Plan has been positively prepared in terms of provision for Gypsies and Travellers.

i) In relation to waste facilities

78. A Local Plan relating to waste should plan for identified waste needs, identifying how waste will be reduced in line with the principles of The Circular Economy and how remaining quantum of waste will be managed. It should ensure that suitable sites and areas for the provision of waste management facilities are identified in appropriate locations, identifying as suitable, existing waste and secondary material sites and land, SIL and safeguarded wharves with potential.²⁰

²⁰ London Plan (2021) policy SI 8 (B)

79. The evidence base notes that the extent of development proposed within the Plan could lead to a large increase in arisings. The Plan's sustainability appraisal (contained within the Integrated Impact Assessment, supporting document SD2) notes that the main issue regarding the "Thinking Big" narratives (in chapter 2 of the Plan) "revolves around the increased production of waste that would be brought about through the implementation of narratives 1, 3 and 4, consequently resulting in a negative impact against IIA objective 8, though it's worth noting that the Circular Economy aspirations may further mitigate these." Paragraph 7.9.1 of the IIA also records the likely increase in waste generated. Appendix D notes the increase in waste arisings as an issue to be dealt with in terms of IIA objective 8. Policy EU7 within the submitted Plan does indeed seek to stimulate the Circular and Sharing Economy and so address the issue of waste arisings at source in a positively prepared manner.
80. But Waste planning is normally carried out at a county-wide scale. As Appendix B (Baseline Data) of the IIA notes in relation to waste, there are no area-specific statistics for the study area and there are data gaps about waste facilities available in each borough and how to deal with apportionment.
81. In London, it is not expected that even boroughs should be a self-sufficient unit for the planning of waste, let alone an area as small as the OPDC. Through the London Plan, the household, commercial and industrial arisings from all boroughs are accumulated and then responsibility for dealing with their disposal through the provision of waste sites is apportioned to boroughs. Even then, some boroughs choose to deal with their apportionments collectively. The six boroughs of Brent, Ealing (both including parts of the OPDC area), Harrow, Hillingdon, Hounslow and Richmond have prepared and adopted the West London Waste Plan in 2015, also adopted by the OPDC. The Western Riverside authorities of Lambeth, Kensington and Chelsea, Hammersmith and Fulham and Wandsworth have prepared a joint waste technical paper but have not agreed to pool their capacity and apportionments.
82. Although the London Plan 2021 has revised these apportionments, increasing the percentage of London's waste to be disposed of by the six West London Waste Plan authorities from 19.4% of the London total to 25.4% and decreasing the percentage to be handled by the four Western Riverside authorities from 11.9% to 8.9%, the total for the ten boroughs involved in waste arrangements for the OPDC area would only increase from 31.3% of the London total to 34.3%. As the OPDC area is relatively insignificant compared to the areas of the ten boroughs combined it would be premature for the OPDC Local Plan to anticipate how those waste authorities would wish to respond to their revised apportionments or to take it upon itself to meet those apportionments in advance of any knowledge of how the boroughs may seek to meet their revised apportionments within their areas.
83. It is not intended that the OPDC LP would supersede the Boroughs' waste plans; (Modification (**MM1**) does not refer to the West London Waste Plan as one to be superseded). Nevertheless, as the most recently prepared element of the Development Plan, the OPDC LP would prevail in the event of any inconsistency with the Boroughs' waste plans. For that reason, and for the reason set out in the previous paragraph, it is incumbent upon the OPDC Plan

to be consistent with and to apply the provisions of the West London Waste Plan. Modifications (**MMs 106 and 110**) which safeguard the Twyford Waste Transfer Station, (**MMs 117 and 119**) which safeguard the Chase Road site, (**MM145**) adding justificatory text to the already safeguarded Quattro site and (**MM310**) adding explanatory text in relation to the review of the WLWP are necessary to do this and so demonstrate that the Plan has been positively prepared in terms of waste facilities.

Issue 3 – Whether the Plan would be effective

(a) In terms of substituting process for substance

84. As submitted, many of the policies in the Plan set process requirements rather than performance requirements. They require a planning application to be validated by being accompanied with certain documents rather than requiring a completed development to fulfil certain criteria. The requirement for these documents may be better expressed as part of the OPDC's registration requirements (s62(4A) of the 1990 Act and Article 11(3)(c) of the 2015 Town and Country Planning (Development Management Procedure) Order). Those requirements are not examined for their soundness as are the provisions of a Development Plan.
85. Although many of these requirements for documentation may be necessary to help the OPDC evaluate an application and some are recommended by NPPF or national Guidance, the failure to produce a document does not, of itself, make a development unacceptable. Nor does the production of a document, of itself, make a development acceptable. Such a policy does not make it clear what will or will not be permitted and where. As NPPF paragraph 154 advises, only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the Plan.
86. The inclusion of these process policies in the Plan in their submitted form obscures the substance of the OPDC's policy towards the relevant development itself. To discover the true meaning and effect of the policies, the reader must look beyond the stated requirement for an Assessment, Statement or Appraisal. Sometimes clues are found within the supporting text of the Plan. Sometimes they must be inferred from the requirement for a document to be produced. This is unclear and, because it is unclear, it is unlikely to be effective. Effectiveness is one of the tests of soundness and so I recommend modifications to policies SP3(d), SP8(d), SP10(i), D1, D3(c), D5(c) and (d), D6(a), (h(i)) and (i(i)), D7(b), D8, EU3(c) and (e), EU4(a) and (b), EU5(a), EU6(d(i)), EU7, EU9(a(iv), (v) and (vii)), EU13(e(ii)), T7(a), T8(a(i) and (ii)), E1(e), E5, TCC1(e)and (f), TCC2(b), TCC5(e), TCC8, TCC9(b), TCC10(a(ii)) and DI3(e) so as to delete process requirements and substitute substantive functional requirements (**MMs 15, 16, 45, 53, 271, 272, 278, 281, 285, 287, 289, 290, 291, 292, 298, 301, 302, 303, 305, 306, 307, 308, 311, 315, 316, 318, 321, 322, 347, 348, 349, 373, 380, 385, 386, 387, 391, 392, 395, 400, 416, 422, 425, 427 and 443**).

(b) *In terms of viability*

(i) *In general terms*

87. Viability is considered in several parts of the evidence base, including the Affordable Housing Viability Assessment by Deloitte Real Estate dated 26 May 2017, the Whole Plan Viability Study by BNP Paribas dated April 2017 and Appendices A and B of the Development Infrastructure Funding Study by Peter Brett Associates, dated March 2015. These studies are based on typologies (five in the Deloitte Study, four in the BNP Paribas study) rather than testing of individual sites but that accords with the advice of National Planning Practice Guidance (2014) that "assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable; site typologies may be used to determine viability at policy level".
88. The Deloitte study of affordable housing assumes that there would be no affordable housing grant²¹ so may be considered as erring on the side of caution. It concludes that the SP4 and H2 policy target of 50% affordable housing would be viable on 3 out of 5 of the notional sites it examined but with no allowance made for contributing to infrastructure costs. That finding implies that on 2 out of 5 of the notional sites it examined, the affordable housing policies of the Plan would make development unviable. But, it does confirm that at 35% affordable housing, all sites ought to be viable (again, with no allowance for any contribution to infrastructure costs) and that an increase in the proportion of small units would make schemes more viable.
89. The BNP Paribas study confirms that "planning contributions, accessible units, water and sustainability requirements will have an impact on the viability of schemes and in some cases the cumulative impact of these policy requirements is identified as being the tipping point for schemes' viable delivery along with affordable housing. Our appraisals identify that in some instances when these requirements are incorporated, the levels of affordable housing reduce by between 5% to 25% to accommodate them."²²
90. One of the conventional assumptions used is a benchmark land value for the acquisition of a site, consisting of the Existing Use Value (EUV) plus a premium to provide a landowner with an incentive to sell. This is consistent with advice in NPPF paragraph 173 which refers to providing a competitive return to a willing landowner. In the BNP Paribas studies, the premium used is 20%. That is the mid-point of a range of 10-30% referred to in paragraph 3.46 of the London Mayor's supplementary planning guidance (spg) "Homes for Londoners: Affordable Housing and Viability" August 2017 and so, is generally a sound figure.
91. The evidence is based on appropriate plan-wide viability studies with conventional assumptions. As such, I have no reason to find them unconvincing. But, they come with their own in-built caveats. BNP Paribas advise that the OPDC will need to apply its policies flexibly "particularly where lower sales values might be achieved, or on sites with higher existing use

²¹ Paragraph 1.3

²² Paragraph 7.8

values.”²³ “ It is important to recognise that some developments will be unviable regardless of the OPDC’s requirements. In these cases, the value of the existing building or the base costs (excluding policy requirements) will be higher than a redevelopment opportunity over the medium term.”²⁴

92. To be viable therefore, there would clearly be a trade-off between dwelling mix, affordability and infrastructure contributions. But, as policies SP4 and H2 explicitly contain the proviso “subject to viability,” and as supporting text at paragraphs 3.21 and 8.19 make it clear that viability on individual planning applications will need to be considered in detail, I do not consider that the evidence demonstrates the generality of the Plan to be unsound. In general terms, I consider it to be sound in terms of viability.

(ii) *In terms of the CarGiant site*

93. Although the OPDC carried out a Whole Plan Viability Study (WPVS) which, based on typologies, accords with the advice of National Planning Practice Guidance (2014) that “assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable; site typologies may be used to determine viability at policy level”, that same advice goes on to say that “more detailed assessment may be necessary for particular areas or key sites on which the delivery of the Plan relies.” The CarGiant site was one of these because the Plan as submitted relied on it to deliver about 25% of the total housing and employment floorspace envisaged in the Plan period. For that reason, I examined the viability of the CarGiant site in greater detail, assisted by viability studies carried out for the OPDC by BNP Paribas and also by DS2 on behalf of Old Oak Park Limited representing CarGiant, the owners of the site.
94. In Interim Findings which were conveyed to the Corporation in September 2019 I reported my conclusion that the Plan’s proposals in respect of the CarGiant site were that site allocation 2 (and, by extension, site allocations 3 and 28) was not viable and so would not be effective and so was unsound in itself. It would not be deliverable in a policy-compliant form over the Plan period and, because of its significance within the Plan as a whole, its inclusion made the Plan itself unsound. It ought to be deleted from the Plan. The arguments which led to those findings need not be repeated here.
95. The consequence of the removal of these sites would be a reduction in both the housing numbers (5,900) and employment floorspace (51,600 sq m or 2,810 jobs) capable of being delivered during the Plan period. References throughout the Plan to the delivery of 20,100 dwellings and 40,400 jobs over the next twenty years would have had to be revised downwards. In my Interim Findings, I then considered various options which might be considered as ways in which to amend the Plan so as to make it viable, effective and therefore sound whilst remaining compliant with the Mayor’s London Plan.
96. London Plan 2016 was in force at the time. Its policy 2.13 was to provide encouragement and support to the preparation and implementation of

²³ Paragraph 7.4

²⁴ Paragraph 6.11

opportunity area planning frameworks to realise these areas' growth potential in the terms of the Annex 1 of London Plan 2016. Paragraph A1.1 of Annex 1 explains that it outlines how the broad principles of policy 2.13 should be applied to specific Opportunity and Intensification Areas, including indicative estimates of employment capacity and minimum guidelines for new homes to 2031, subject to phasing. The figures for Park Royal and Old Oak Common combined are 25,500 dwellings and 65,000 jobs. Those figures remain in the London Plan 2021.

97. In my Interim Findings I did not say that the area to be deleted from SIL or that the figure of 25,500 homes and 65,000 jobs which are identified in the Mayor's London Plan and which the OPDC area is said to be capable of accommodating needed revision. I drew parallels with the way the Plan had dealt with the site of the Elizabeth Line depot. Earlier iterations of the Plan envisaged that the Elizabeth Line depot would be decked over or released so as to provide a site for about 6,500 homes. But, in fact the Elizabeth Line depot was constructed without making provision for land release or decking over and cannot now be released or retrofitted within reasonable cost. It is recognised in paragraphs OOS.3 and OOS.4 of the Plan as submitted that the site is unlikely to become available for development within the lifetime of the Plan but its capacity remains recognised and it remained included within areas designated for a major town centre/commercial centre on figures 2.2 and 3.7 and phased in years 21+ on figure 3.16.
98. In some ways this may be regarded as an intellectual sleight of hand but I have accepted it as sound because the potential of the site of the Elizabeth line depot was one of the original reasons for the designation of the OPDC area as an opportunity area and because, as noted earlier, TfL's Commercial Development planning team comment that; "TfL have a long leasehold on the Old Oak Common Elizabeth Line Depot and TfL CD would be open to working with OPDC to enable this site to come forward for mixed use development should a suitable solution to its earlier delivery be found."
99. Consequent on the present non-availability of the site of the Elizabeth Line depot, the delivery figures put forward in the submitted Plan were not 25,500 dwellings and 65,000 jobs but were 20,100 dwellings and 40,400 jobs, figures which have been certified by the Mayor for London as being in general conformity with his Plan. A similar approach could have been taken to the CarGiant operational land. I concluded that site allocations 2 and 3 could not be delivered within the Plan period. But, it is undeniable that should circumstances change to the extent that CarGiant ceased to be a flourishing business requiring relocation or extinction in order for site allocations 2 and 3 to proceed, then the viability of developing site allocations 2 and 3 would be transformed and, as a matter of fact, the sites have the development capacity that they have.
100. I therefore concluded in my Interim Findings that site allocations 2 and 3 should be deleted from the Plan (subject to adjustments consequent on the progression of phase 1a of Old Oak North); that the delivery figures of 20,100 dwellings and 40,400 jobs over the next twenty years should be reduced further to 14,200 and 37,590 respectively but that no adjustment need be made to the proposal to de-designate SIL land or to the figures which recognise the capacity of the Plan area beyond the Plan period. However, my

Interim findings also advised that I remained open to new information or factual corrections and I called on the Corporation to prepare Modifications to the Plan along the lines indicated.

101. Although the principal conclusions relating to site allocations 2 and 3 form part of the Modifications recommended in this report, other consequential Modifications are different because of subsequent work carried out by the Corporation in response to my Interim Findings.

(iii) *The Corporation's suggested modifications; a revised spatial strategy*

102. In considering the consequent adjustments needed as a result of my Interim findings, the OPDC came to the realisation that the conditions²⁵ attached to the successful HIF bid which they had made to support the delivery of a mixed use, high intensity development in Old Oak North, not just on site allocations 2 and 3 but also including site allocation 4, could not be met. Moreover, the OPDC came to the conclusion that the prospects for these sites coming forward for housing in the much longer term (beyond the Plan period), which my Interim Findings had canvassed, was now extremely unlikely.

103. The OPDC not only remains bound by the requirement in the London Plan 2016 (carried forward to the London Plan 2021 policy SD1 B) to establish the capacity for growth in the Opportunity Area, taking account of the indicative capacity for homes and jobs in Table 2.1 of the London Plan 2021 which remains at 25,500 homes and 65,000 jobs but is also bound by the target of 13,670 net housing completions in the ten-year period 2019/20-2028/29 set by London Plan 2021 policy H1 and table 4.1. This precluded it from using the device, which I had suggested, of postponing achievement of the prescribed indicative homes and jobs capacity until after the Plan period. This consideration is reinforced by the reference in the Secretary of State's letter of 13 March 2020 commenting on the Mayor of London's intention to publish the London Plan. In this letter he refers to Old Oak as a key housing delivery site for meeting London's housing needs.

104. Further studies²⁶ showed that there was a significant potential instead to achieve an uplift in industrial floorspace capacity on these sites in the Old Oak North area which my Interim Findings had concluded could not be delivered for housing. The OPDC took the view that continuation with the proposal to remove the SIL designation, which I had canvassed, would make it more challenging to set out a clear and effective policy framework which would achieve industrial retention and intensification.

105. The OPDC's further studies²⁷ also identified the potential for the three CarGiant sites on Scrubs Lane to come forward as discrete proposals for housing development, for previously identified sites such as North Pole East depot to

²⁵ The details of which were not provided in evidence to the examination

²⁶ The Old Oak North Intensification Study and the Industrial Land Review Addendum February 2021

²⁷ In particular, the Channel Gate Development Framework Principles, and the Industrial Land Review Addendum

be accelerated in their phasing and for the mix of uses on sites previously identified for development to be changed so as to emphasise housing delivery and for additional release of land from SIL.

106. The further work, described in the studies supporting the Modifications, permits a revised spatial strategy to deliver 19,850 homes and 36,350 jobs during the Plan period. I therefore recommend Modifications (**MMs 5, 9, 12, 17, 18, 19, 20, 22, 23, 61, 69, 104, 105, 109, 111, 121, 132, 136, 143, 144, 156, 164, 188, 199, 200, 203, 209, 210, 352, 353, 354, 355, 356, 357, 368, 369, 371, 380, 382, 436, 441 and 445**) which replace the capacity figures of the submitted Plan and are necessary to ensure that the Plan remains positively prepared.
107. In parallel, an extensive suite of modifications is proposed which goes beyond my Interim Findings and puts into effect the revised spatial strategy. They propose the retention of the SIL designation in the area of Old Oak North where its deletion in favour of high intensity housing development was previously proposed. In turn, this permits the deletion of the SIL policy from Channel Gate which is now proposed for high intensity housing to compensate for the consequences in terms of housing delivery of the deletion of the CarGiant site. Housing requirements are deleted from sites 2²⁸, 3 and 4 (CarGiant, the Triangle Business Centre and EMR) and replaced by proposals for industrial intensification in accordance with a retained SIL designation.
108. The principal Main Modifications are a revised table 3.1 (**MM57**) which shows the effects of the revised spatial strategy, (**MM84**) which sets out the new proposals for the Old Oak North area, (**MM185**) which sets out the new proposals for the Channel Gate area, (**MM248**) which brings forward into the Plan period a cluster of development on Scrubs Lane and a revised table 11.1 (**MMs 437, 440 and 442**) which also shows the effect of the revised spatial strategy.
109. There is a large number of related Main Modifications which are largely consequential workings-out of the revised spatial strategy. Modifications (**MMs 2, 3, 4, 7, 8, 11, 14, 21, 23, 25, 28, 30, 34, 35, 39, 100, 101, 103, 116, 120, 155, 158, 163, 166, 167, 172, 178, 180, 182, 186, 198, 231, 268, 269, 275, 276, 280, 282, 283, 284, 288, 293, 313, 323, 324, 330, 331, 336, 340, 341, 350, 351, 369, 370, 374, 375, 376, 377, 378, 381, 383, 389, 415, 417, 423, 426 (part), 429, 435, 444, 446, 447 and 448**) reinstate references to Old Oak North as SIL, remove references to SIL from the area now to be released for high density mixed use, remove references to Old Oak as the location for high density mixed use housing development and substitute references to Channel Gate or more generic references to the OPDC area as a whole, whilst offering a brief explanation of the reasons for the change in strategy (**MM197**). The function of Scrubs Lane within the revised spatial strategy is also reviewed in (**MMs 196 and 203**). In the light of its recognition as a development cluster in its own right, modification (**MM191**)

²⁸ Except for those detached elements fronting directly onto Scrubs Lane

removes references to the area now to be known as Mitre Way cluster from within the land use policy for the Scrubs Lane policy area.

110. There are consequential adjustments to transport proposals, open space, and to the network of town centre locations. Modifications (**MMs 6, 37 and 339**) remove reference to the Hythe Road station which would have served the CarGiant sites but which can no longer be justified. Modifications (**MMs 26, 27, 31, 33, 36, 39, 41, 42, 43, 64, 65, 72, 74, 77, 78, 95, 157, 159, 161, 162, 165, 169, 170, 171, 174, 176, 179, 181, 189, 192, 201, 202, 212, 215, 217, 218, 219, 220, 221, 223, 225, 226, 228, 230, 232, 233, 234, 237, 238, 239, 244, 250, 252, 254, 256, 258, 260, 261, 262, 263, 264, 277, 279, 382, 388, 390 and 439**) remove references to the new all-modes primary shopping street which would have been provided within the now deleted development proposals, add references to alternative cycle and pedestrian links, implement the consequential change to the town centre hierarchy and amend the description of the major town centre to reflect its reduced extent.
111. Modification (**MM108**) recognises the enhanced deliverability of transport links to Channel Gate consequent on the new proposals for that allocation. Modifications (**MMs 89, 242, 246 and 247**) reflect acceptance that the deletion of the CarGiant proposals means that a segregated cycle route in parallel to the southern towpath of the Grand Union canal is not now deliverable. Modifications (**MMs 204 and 270**) give effect to revised east-west connections to Scrubs Lane consequent on deletion of all-modes connections through the CarGiant sites. Modifications (**MMs 205 and 206**) reflect the consequent changes in justification for highway interventions on Scrubs Lane. (**MMs 251, 255, 265, 266 and 359**) remove potential development sites which would have been served by the new all-modes street which cannot now be delivered.
112. The revised spatial strategy will result in a different relationship between the Grand Union Canal and new development. Modifications (**MMs 92, 93, 94, 96 and 98**) are necessary to reflect this different relationship. Modifications (**MMs 32, 54, 56, 63, 73, 86, 88 and 90**) are necessary to describe accurately the new locations where development will be concentrated. Modifications (**MMs 44, 46, 79, 91, 97, 113, 168, 193, 194, 214, 222, 226, 227, 229, 257 and 296**) put into effect the reduction in the number of local parks to be provided within the proposals, deleting two within the deleted housing allocations but adding one within the compensating revised Channel Gate allocation. Modifications (**MMs 139 and 147**) make adjustments to building heights policy within North Acton and Acton Wells to reflect the greater emphasis which the new strategy places on that location and (**MM183**) recognises the justification for tall buildings provided by the Channel Gate Development Framework Principles document whilst (**MM177**) deletes an identified location for a tall building consequent on the deletion of the road into the former CarGiant development site which provided the justification for the tall building location. (**MMs 235 and 240**) provide justificatory text for an additional tall building on Scrubs Lane.
113. One of the additional studies which the Corporation has carried out in putting forward its Modifications is a Strategic Site Allocations Viability Assessment. This complies with government advice that "more detailed assessment may be

necessary for particular areas or key sites on which the delivery of the Plan relies." From my examination of the Corporation's Strategic Site Allocations Viability Assessment, I can see that its assumptions mirror several of those which I used in my Interim Findings on the viability of the CarGiant site and, in other respects, it takes a cautious view of the contributory variables involved. I am therefore satisfied that the viability of the sites put forward as allocations for development in the Modifications would not prevent the Plan from being effective and so, is not a reason to find unsound the Plan as proposed to be modified.

(c) Because of an infrastructure funding gap

114. The existence of an infrastructure funding gap of about £800m for the Plan as submitted has been noted in my Interim Findings relating to the CarGiant site and is confirmed in paragraph 1.16 of the Corporation's Development Infrastructure Funding Study (DIFS). But, as the Corporation rightly points out in its response to this matter, it is not the role of a Local Plan to develop a clear cashflow funding model for all infrastructure delivery and so, the absence of an account of how the proposals in the Plan would be funded does not necessarily make it unsound.

115. What would make it unsound would be the absence of a plausible or convincing explanation of how it is intended to close the infrastructure funding gap. The Corporation points out that it is not restricted to funding infrastructure through developer contributions alone. DIFS explores the possibilities in its paragraphs 1.22, 1.38 and 1.43 and chapter 24. They include Affordable Housing Grant (or whatever replaces it), funding from TfL or HS2, Enterprise Zone business rate capture, Transport Infrastructure Fund borrowing and Tax Increment Financing or other borrowing. Not mentioned are sources of funding such as the Housing Infrastructure Fund.

116. DIFS concludes in paragraph 30.19 with a strategy for resolving the funding gap. The first item is to prioritise infrastructure and cut where necessary. I note that an earlier paragraph within the DIFS records that £300m is assumed within these numbers for the Crossrail (Elizabeth Line) depot site to move. That is not now proposed. Consequent on my Interim Findings, the OPDC has reviewed its Infrastructure Delivery Plan (IDP), as a result of which, the funding gap is now reduced to £136-202m. Although there remains a funding gap, I am persuaded by the argument that it is proportionate to the parameters for National Infrastructure Investment considered by the National Infrastructure Commission in 2018. The infrastructure gap is not so large that there is not a reasonable prospect of the gap being bridged by the methods set out in the IDP without adverse effect on policy-compliant delivery of affordable housing. I therefore conclude that the existence of an infrastructure funding gap is not a reason to find the Plan unsound.

(d) Because of internal inconsistencies and the delegation of policies and proposals to other documents leading to a lack of clarity

117. In a previous paragraph, I have noted the confusion caused by the lack of clarity of figure 3.17 in relation to site allocation 2 and the undefined detailed boundary of what was subsequently recognised as phase 1a of the Old Oak North Place proposals. That particular instance is an example of a

characteristic which pervades the submitted Plan, namely, that its provisions need greater clarity. In that particular example, modifications are put forward which transform the proposal in any event but, had that not been the case, modifications would have been needed to make it clear not only what the boundary of site allocation 4 was, on an Ordnance Survey map base, but also that site allocation 4 would have been likely to result not only in the construction of Union Way (Park Road) and part of Old Oak Street but also Harlesden Place open space, an energy centre, utilities and several separate predominantly residential or mixed development plots.

118. There are further examples of such a lack of clarity in the submitted Plan. For example the mixed use area on figure 3.7 does not appear on the Policies Map, the provisions of figure 3.13 do not appear to be translated to the Policies Map, nor do the tall buildings provisions of figure 3.15, the Local Nature Reserve provisions of figure 6.3, the Metropolitan town centre provisions of figure 10.3 or some of the detailed provisions of figures 4.2, 4.5, 4.6, 4.7, 4.10, 4.13, 4.15, 4.17, 4.19, 4.21, 4.23, 4.25, 4.27, 4.30, 4.32, 4.34, 4.36, 4.38, 4.40, 4.42, 4.44 and 4.45. Policy P1(i)(i) refers to the provision of an Old Oak South Local Park of a minimum of 2 hectares in size but I cannot identify the location of this on figure 4.2 or indeed on the Policies Map itself (although it appears as an area of search on figure 3.13).
119. Paragraph OOS.15 refers to a need to deliver one community hub, one super-nursery and one sports centre in Old Oak South. But, these do not appear to be shown on figure 4.2 (or indeed on the Policies Map). The "vision" section of Policy P2 refers to a Grand Union Canal food and beverage quarter (also referred to later in paragraph GUC3(a)) but this does not appear to be shown on figures 4.7 or 4.10 (or indeed, the Policies Map). Paragraph OON.13 is to be deleted by other modifications in any event but included the final sentence; "Park Road should be designed for all modes but should not be delivered as a through route for private vehicles" but this did not appear as a requirement in policy P2(g)(ii). Paragraph OON.14, also to be deleted by other modifications in any event, says "Old Oak Street should be designed to be a vehicular route, where feasible but, as with Park Road, it should not be designed as a through route for private vehicles." but this did not appear as a requirement in policy P2(g)(ii).
120. Paragraph OPR.5 refers to two allocation sites but these are not shown on figure 4.17. Paragraph NA.8 notes the designation of the Quattro site within the West London Waste Plan and says proposals should accord with this designation, but that requirement does not appear in policy P7 or on figure 4.21. Paragraph NA.16 notes that the IDP identifies that there is a need for one super-nursery and an on-site 9FE secondary school. But there is no indication of this on figure 4.21 (or on the Policies Map). All of these need to be reconciled by modifications (**MMs 24, 48, 50, 60, 80, 81, 83, 84, 85, 94, 107, 114, 118, 124, 137, 141, 146, 149, 152, 160, 175, 184, 187, 213, 224, 236, 243, 259, 267, 297 and 393**) which are necessary for the effectiveness of the Plan.
121. For the avoidance of doubt, I reiterate the advice given in an earlier section of this report. Provided inconsistencies between the policies map and figures contained within the text of the Plan document are eliminated and provided that the figures contained within the text of the Plan document are

reconfigured so as to be on an ordnance survey base, then I accept that the figures contained within the text of the Plan document could be regarded as complying with Regulation 9(1(a))²⁹ and thus comprising part of the policies map. The figures within the text of the Plan would then be regarded as making good deficiencies in the policies map itself. It would assist the users of the Plan if the policies map were to indicate that it is not complete in itself but that users must also refer to the figures within the text of the Plan. The existence of, and geographical extent of relevance of, the figures within the text of the Plan could be indicated on the policies map but, as noted previously, the policies map is not defined as a development plan document and so I am not in a position to recommend any Main Modifications to the policies map so as to give effect to this suggestion.

122. In some cases, the lack of clarity is simply a presentational issue caused by the pigmentation of designations on figures not matching the pigmentation of the keys to the figures. Most of these matters can be corrected without a formal modification but the fact that the key to figure 4.5 indicates three different kinds of frontage but only one appears on the figure itself is more substantive. Modification (**MM81**) is necessary to correct this to ensure the Plan's effectiveness.
123. A number of policies in the Plan (SP10(c) § 3.89, P1C1 § OOC.3, P2 § OON.14³⁰ and OON.23³¹, P3 § GUC.15, P7 § NA.16 and NA.18, P7C2 § OCL2, EU10(f), T2(a), T3(a) and § 7.24, T5(a), T6(a) and § 7.45, TCC4 (c) and (d) and § 10.26, 10.27, 10.30-10.33 and TCC6(c)(iv)) delegate specific requirements to the OPDC's Infrastructure Delivery Plan. National Guidance (Paragraph 018 Reference ID 12-018-20140306) accepts that the detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However, Guidance is clear that the key infrastructure requirements on which delivery of the Plan depends should be contained in the Local Plan itself.
124. It is not clear to me that the Plan as submitted complies with this aspect of national Guidance. The Local Plan should make it clear what is intended to happen in the area over the life of the Plan, where and when this will occur and how it will be delivered (Guidance paragraph 002 Reference ID 12-002-20140306). Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the "what, where, when and how" questions). (Guidance paragraph 010 Reference ID: 12-010-20140306). Modifications (**MMs 38, 47, 51, 52, 80, 82, 134, 146, 207, 296, 299, 319, 320, 325, 326, 328, 329, 333, 338, 342, 344, 345, 405, 407, 408, 413, 414, 418, 419, 424, 428, 430, 431, 432, 433, 438, 450 and 452**) are necessary for effectiveness, to ensure that there is no material left to the IDP which should in fact be included in the Local Plan itself and

²⁹ Of the Town and Country Planning (Local Planning)(England) Regulations 2012

³⁰ Paragraph OON.13 is to be deleted by other modifications in any event

³¹ Paragraph OON.23 is to be deleted by other modifications in any event

indicated on the policies map (or the various figures included in the text of the Plan, if they are to count as insets to the Policies map).

125. The proposed policy towards District-wide heating and cooling systems exemplifies both types of failing towards clarity. Policy EU10(f) requires each and every major development to contribute to and or/ deliver new heat, cooling and electricity networks in terms which do not suggest that there is any doubt but that such networks are proposed. For details of such networks, it defers to the IDP. But, the only specific proposals for decentralised energy in sections 4.3 and 4.4 of the IDP are at CarGiant and Scrubs Lane. These refer to Place Areas P2 and P10. But the infrastructure section of P2 makes no suggestion that a decentralised energy system is envisaged for that Place Area and there is no infrastructure section in P10. The rest of IDP section 4.3 confirms that Place Area P7 is not appropriate for an area wide network (but no exception is made in EU10(f)) and makes only nebulous suggestions for a strategic area-wide district heat network, a strategic Area-wide District heat network extracting heat from sewers and a strategic Area-wide District heat network extracting heat from other sources, three suggestions which seem ill-defined and mutually exclusive and unlikely to be effective in advising a potential developer of a particular site what that development is expected to provide. These uncertainties need to be clarified by modification (**MM84**) to provide effectiveness. This makes clear in revised policy P2(c(ii)) what is required.

126. In a limited number of cases policy appears to be stated in supporting text rather than in the policy itself. Examples are paragraph 6.90, a substantial part of which appears to be setting out policy not stated in policy EU7 (the clue is in the frequent use of the word "should"). There is a similar use of the word "should" in paragraphs 6.95 (h) and (i) setting out requirements not stated in policy EU8. The final sentence of paragraph 7.10 ("The street network must...") sets out a policy not included in policy T1 (but is deleted by a minor modification). The first sentence of paragraph 7.25 ("Investments in...") sets out a policy not included in policy T3 but is also resolved by a minor modification. Main Modifications (**MMs 311, 312 and 314**) are needed to reconcile remaining matters and promote the effectiveness of the Plan.

(e) *Because of inaccuracies in the illustrative figure maps included within the Plan*

127. As noted in the section of this report dealing with the policies map, the Plan contains a number of figures intended to complement the policies map but there are discrepancies in the content of these figures both between various figures themselves and between the figures and the document labelled as the policies map. These discrepancies would prejudice the effectiveness of the Plan.

128. The recommendations following paragraph 7.4.1 of the Integrated Impact Assessment (Supporting Document SD2) include the observation that "it would be recommended to ensure policies and clusters are clearly depicted on legible maps and diagrams." As submitted, the OPDC LP did not appear to have followed this advice.

129. The Corporation wished to distinguish between policies and proposals where a definitive, precise boundary had been identified (and which it wished to indicate on what it labels as the policies map) and policies and proposals with limited geographic application but where a definitive precise boundary had yet to be identified (and which it wished to indicate on figures contained within the text of the local plan document). With Main Modifications (**MMs 10, 24, 29, 40, 48, 50, 55, 58, 59, 60, 81, 83, 84(part), 85, 107, 114, 118, 124, 137, 149, 152, 160, 175, 184, 187, 213, 224, 236, 243, 249, 259, 267, 297, 300, 304, 309, 327, 332, 337, 343, 346, 379, 393, 404 and 449**) to ensure an Ordnance Survey base and consistency between the figures contained in the Plan and between those figures and the document labelled as the policies map, I am satisfied that these figures would be effective and so would be sound.

(f) In increasing accessibility to Old Oak

130. Policy SP7 and paragraph OON.14 require Old Oak Street to be designed as a vehicular route where feasible but this does not appear as a requirement in policies P2(g(ii)) or P11, or in figure 4.44 so the submitted Plan is not clear about what is required. There are three evidence documents which touch upon this issue. The Willesden Junction Station Feasibility Study (2017) sets out three options for a bridge from Willesden Junction Station to Old Oak North. Two of these include vehicular links. The Public Realm and Walking and Cycling Strategy (2017) recommends two links, one of which would be a vehicular link. But the most recent Old Oak North Development Framework Principles Document (2018) (OONDFP) shows that it would be very challenging, technically and viably, to deliver a vehicular link.

131. At the time of the Hearing sessions, OONDFP provided the most up to date information for the location and form of the connection. In contrast to the information in the submitted Plan, the information is Ordnance Survey based, is clear about the degree of precision it provides and specifies the clearance height to be provided over the West Coast Main Line. It provides a model for a modification to the Plan to provide greater clarity. Since that time additional work carried out by Network Rail through a GRIP2 study has enabled the proposal to be given greater clarity which can therefore be included in the Plan as a necessary modification. The modifications consequent on my Interim Findings have led to a redefinition of the purpose of this connection as one for pedestrians and bicycles. Modification (**MM84**) to policy P2 (Public Realm and movement (a(i))) and paragraph 4.34 now proposed makes this clear and is necessary for the effectiveness of the Plan as are some of the modifications previously listed to the section of the Plan dealing with Willesden Junction (policy P11 and supporting paragraphs) (**MMs 250, 255, 256, 259, 260, 261, 262, 263, 264, 265 and 266**).

(g) In seeking industrial intensification

132. There is understandable scepticism about the ability of the Plan to deliver the additional jobs promised in the face of a substantial de-designation of Strategic Industrial Land and historic trends towards lower worker/floorspace ratios and plot ratios in new industrial and commercial development, (noted, for example, in the Industrial Land Review (supporting document SD47, paragraph 5.35)). Nevertheless, the Industrial Land Review spots an

opportunity; "Ground floor space can be freed up of larger warehouses by developing sites to include additional light industrial floorspace on upper floors." It reports theoretical studies which show that multi-storey warehousing is both feasible and viable and that business units over industrial space is viable and concludes (paragraph 5.61) that there is, admittedly a quite modest, potential for intensification over the period to 2031.

133. The executive summary of the Park Royal Intensification study of September 2018 refers to an economic imperative to intensify industrial land across Park Royal, which suggests that it might not happen if left to market forces but needs to be made to happen if the opportunity area is to deliver on expectations. Perhaps spurred on by this imperative, the Intensification Report presents not just theoretical analyses but practical case studies which identify specific sites where intensification could be brought about and it calculates the potential job creation which would result. The 2018 Addendum to the Industrial Land Review identifies these in its figure 3. The Old Oak North Intensification Study carried out in consequence of my Interim Findings adds further evidence in support of the concept.
134. There is a concern that intensification would lead to increased congestion which would be self-defeating in terms of seeking to encourage industrial and commercial growth. Measures to address this have been developed and promoted through Modifications (**MMs 112, 126, 127, 128, 129, 133, 134 and 135**) which are necessary to ensure that the policy of industrial intensification would be effective.
135. In the light of this evidence, and evidence of increasing industrial and commercial land values which would put pressure on achieving an efficient use of land, I am convinced that policy E1(b) which seeks to intensify the use of sites identified with that potential could be effective. Section (c) of the policy is already adequate to accommodate the demand resulting from the need to provide for businesses relocated from outside SIL.
136. Whilst it is true that one of the targets of the Plan is stated in terms of jobs, planning policy can only apply directly in terms of floorspace and so I require no further modification than references to floorspace capacity (**MMs 372 and 383**) to make the policy consistent with the London Plan 2021. Modifications (**MMs 380, 383A and 426**) to policy E2 and supporting text, discussed during the hearing sessions of January 2022, are necessary to make it clear that employment generation through interim uses on sites otherwise proposed for redevelopment is also needed to contribute to the jobs strategy. An addition to paragraph 9.24 (**MM384**) is necessary for the effectiveness of the Plan, so as to explain the operation of policy E3, which otherwise needs no modification.

(h) In terms of Sustainable Drainage

137. The foul and surface water drainage system serving the area is a combined one and is at capacity. The extent of development proposed within the (originally) two opportunity areas (now one) will increase the quantity of sewage effluent. To create capacity for this within the existing combined drainage network and to reduce the frequency of direct discharge of sewage into the environment from sewer overflows, rainfall needs to be diverted out of

the combined drainage system and be dealt with instead by Sustainable Drainage Systems (SuDS). The soundness of this concept is demonstrated by the calculations set out in paragraph 4.2.3.5 and preceding paragraphs of the Integrated Water Management Strategy by AECOM published in April 2017.

138. Policy EU3 is intended to give effect to this objective but the pressures on site coverage resulting from the intensity of development proposed, together with the nature of the subsoil in the area present challenges. The policy is criticised for omitting to state a figure for the greenfield run-off rate which development is expected to achieve but the reason for this is explained in paragraph 4.2.3.7 of the Integrated Water Management Strategy, which I find convincing.
139. As submitted the Plan proposed a hierarchy of solutions in which the first preference was a discharge of surface water to the Grand Union Canal, followed by attenuation on site and lastly through strategic measures such as attenuation within streets, open spaces and other public realm areas. It also required compliance with the relevant requirements of local authority Surface Water Management Plans (SWMPs) and the Thames River Basin Management Plan (TRBMP). Representations pointed out that it is likely that the solution hierarchies favoured by SWMPs and TRBMP would be inconsistent with the hierarchy favoured in policy EU3.
140. During a hearing session, OPDC explained that subsequent to the submission of the Plan, further work had established that only sites to the north of the Grand Union Canal could discharge by gravity and that use of the Canal to receive surface water run-off would require the installation of flood protection measures downstream. The Old Oak North Development Framework Principles Addendum Document shows how additional space for filtration is available within the development area. Consequently, modifications are proposed to re-prioritise the hierarchy, which I conclude are necessary for the Plan to be found sound in terms of effectiveness (**MMs 98 and 298**).

Issue 4 – Whether the Plan has been justified

(a) *In terms of the nexus between density/intensity, height and housing targets*

141. As noted earlier, the aims of the OPDC LP include transforming one of London's most inaccessible areas into a well-connected, world-class transport interchange, enabling delivery of new housing and commercial development (capitalising on the delivery of Old Oak Common station on the High Speed 2 railway being constructed between London and the West Midlands). This concept can be dubbed transit orientated development (TOD). As used in the profession of town planning in America it means to apply very high densities within 500ft of a transport node, medium intensities within 1,500 ft and then lower densities up to the edge of the TOD. Applying the concept to the OPDC area is more complex because there is not a single transport node but several, with public transport links, existing and proposed, which connect them, resulting in an extensive area with high public transport accessibility levels and so the definition in the Plan's glossary is different but based on similar principles.

Before the submitted Plan – the first spatial strategy

142. Nevertheless, as a precursor to the OPDC LP, the Old Oak and Park Royal Opportunity Area Planning Framework approximated to the purest concept of a TOD. It presumed the relocation or reconfiguration of the Crossrail (Elizabeth Line) depot and sidings which are immediately adjacent to the north of the Old Oak HS2 and Crossrail (Elizabeth Line) station. It recorded that the Mayor considered it critical to relocate all or parts of the depot and sidings in the 2020s so that development can proceed upon the opening of the proposed Old Oak Common HS2, National Rail and Crossrail stations and to unlock the comprehensive regeneration of the Old Oak area. The Crossrail (Elizabeth Line) depot and sidings were recognised then as an important site in helping to increase development value across the wider Old Oak Common Opportunity area as well as improving connectivity and permeability.

The submitted Plan – the second spatial strategy

143. As reported in March 2016, the development of the Crossrail (Elizabeth Line) depot for 12,000 homes is not now proposed within the Local Plan period³² but it is incorrect to say that the intensity of remaining proposals has been increased as a result. Focus shifted to the CarGiant site, a little further away from the HS2 and Crossrail station and potentially benefiting from improved access to Willesden Junction and from a potential new station at Hythe Road. The London Plan target for Old Oak and Park Royal remains 25,500 dwellings and 65,000 jobs but the delivery figure put forward in the submitted Plan for the next 20 years is less, at 20,100 dwellings and 40,400 jobs (amended to 19,850 dwellings and 36,350 jobs in the Modified Plan), reflecting the omission of the Crossrail depot site and the postponement of its development to a time beyond the period of the Plan.

144. The now superseded London Plan 2016 Annex 1 noted that the provision of public transport infrastructure on the scale envisaged for Old Oak in the London Plan would drive substantial development. The 2015 Development Infrastructure Funding Study emphasised that without two new Overground stations (Old Oak Common Lane and Hythe Road), the Crossrail to West Coast main line spur, pedestrian and vehicular links between the HS2 station and the Old Oak Common Lane Overground station, a bridge to Willesden Junction and station improvements there, the economic development opportunity presented by the new HS2 and Crossrail stations would be missed³³.

145. It was always envisaged that these two major contributors to the justification for the development of Old Oak Common (the new HS2 and Crossrail stations) would not be available until later phases of its development. Moreover, the scale of public transport infrastructure now envisaged is reduced by the omission of the formerly proposed Crossrail 1 (Elizabeth Line) spur towards Wembley and Watford. Nevertheless, figure 7.11 of the submitted Plan demonstrates the uplift to the highest levels of accessibility which would result

³² <https://www.standard.co.uk/news/london/old-oak-common-regeneration-scheme-risks-being-london-s-worst-cockup-in-50-years-a3194581.html>

³³ DIFS paragraph 1.6

from the public transport and connecting infrastructure proposed, which includes the addition of the Mayor's proposed West London Orbital route and the potential of a Chiltern line service towards High Wycombe. Modifications (**MMs 82, 140 and 153**) are necessary to show that the Plan has been positively prepared by including these Mayoral proposals.

The Modified Plan – the third spatial strategy

146. Modifications (**MMs 6, 37 and 339** needed for reasons explained elsewhere) now proposed consequent on my Interim findings remove the proposed Hythe Road station as the footfall now likely to result from the industrial intensification proposed in place of the mixed used development previously proposed does not justify the proposal. It would have provided a service of only 6 trains per hour on an orbital route compared with 27 trains per hour at Willesden Junction on both orbital and radial routes and 45 trains per hour on radial routes at Old Oak Common.
147. During my examination of the viability of the CarGiant site proposal I requested a re-run of figure 7.11 to test its sensitivity to the omission of the proposed Hythe Road station. In response to representations on the Modifications I also requested further re-runs of Public Transport Accessibility Level (PTAL) modelling to show the relationship between public transport investment roll-out and the progress of development.
148. The results show that by the time of the opening of the HS2 and Crossrail (Elizabeth Line) station, exceptionally high PTAL levels will have been achieved over a large swathe of the OPDC area centred on North Acton and extending north to Channel Gate, justifying the nexus between density, intensity, height and housing targets in that part of the OPDC area, notwithstanding considerable walking distances from the HS2 and Crossrail (Elizabeth Line) station and Channel Gate at the extremity of the enhanced PTAL area. Modifications are, however, necessary to ensure that the Plan remains effective by recognising revised timetables for the construction of both HS2 and the Elizabeth Line (**MMs 67, 68, 71 and 142**).
149. On the east of the OPDC area, along Scrubs Lane, public transport investment is restricted to increased bus provision and so PTAL ratings remain moderate at its southern end. Paragraph 3.4 of the Plan notes that a new Crossrail (Elizabeth Line) station at Kensal, for which RBKC is lobbying, could further increase that area's development capacity but, it has to be acknowledged that feasibility work is not currently underway and so, a modification to paragraph 3.4 is necessary (**MM13**) to ensure that the Plan is correctly justified.
150. The delivery of the Hythe Road viaduct and station may not be necessary to achieve the improved PTAL ratings on which the intensification of Old Oak North is predicated. However, the results do show that the middle and southern parts of Scrubs Lane, where four out of six clusters of high intensity housing development are proposed in the Plan's early phases, would not achieve the PTALs of four or more which paragraph 3.12 of the Corporation's Tall Buildings Statement Update uses as a yardstick for the location of tall buildings in Old Oak Lane, Old Oak Common Lane, Old Oak South, Willesden Junction, North Acton, Acton Wells and parts of Channel Gate. Without a station at Kensal, in the middle and southern parts of Scrubs Lane there would

therefore be some support for the jibe that there is a top-down approach to development capacity driven by housing targets set in the London Plan.

151. However, PTALs are not the only yardstick by which locations for intense development should be identified. Whereas London Plan 2016 links the identification of development capacity in Opportunity areas to public transport accessibility (in paragraphs 2.58, policies 6.3(D) and 7.7(C(a)) and Annex 1, table A1.1, item 27), London Plan 2021 policy D2(A(2)) refers both to PTALs and to Time Mapping (TIM) catchment analysis. The latter shows that all of Scrubs Lane is at the most well-connected level.
152. Despite the concerns of representations that the prospects for new roads and public transport infrastructure at Old Oak have diminished since earlier stages of Plan preparation, the level of public transport improvement proposed continues to justify the density and intensity of development proposed. Technical studies have identified interventions which would be effective in matching the capacity of the road network to the demands placed upon it (especially those of increased public transport) and so do not require further Modifications to ensure that the Plan would be effective.
153. The Development Capacity Study of June 2018 is frank about aspirations for optimising development within the OPDC area and so it is true to say that the delivery figure put forward in the Plan is partly driven by regionally imposed targets. The OPDC's comments in relation to the Modifications make it clear that the addition of a cluster of development at the south end of Scrubs Lane is consequent on the earlier than anticipated release of land for development. That does not make the concept of clusters along Scrubs Lane inherently unsound because it is moderated by practical considerations of achievability and deliverability demonstrated by a series of practical and pragmatic studies.
154. Documents such as the Old Oak North Development Framework Principles (June 2018), the Park Royal Development Framework Principles and the Scrubs Lane Development Framework Principles (June 2018) are stated to be based on analysis and technical feasibility studies. Although such analyses may not be apparent on the surface of the published documents which largely read as a series of inspirational and visionary assertions and proclamations, nevertheless, in places they do provide sound reasoned explanations for what is proposed, such as the explanations in the Scrubs Lane Development Framework Principles document at paragraph 4.9 for the locations of clusters and, on its page 41, of the reasons for varied heights along Scrubs Lane, for only one tall building in most clusters and for the location within each cluster of the single (two at Hythe Road) tall building proposed.
155. More convincing are other supporting documents such as; the Addendum to the Old Oak North Development Framework Principles (March 2019) which demonstrates the feasibility of the provision of utilities and SuDS and, at figure 8, the feasibility of providing 30% open space; the Energy, Overheating and Daylight in Tall Buildings Study (by Buro Happold, May 2018); the Environmental Standards Study (by Atkins, June 2017) which explores and gives answers anticipating many of the questions subsequently raised by representations made to the Old Oak and Park Royal Development Corporation Local Plan; the Waste in Tall Buildings Study (by Eunomia, June 2018) and the Precedents Study.

156. Overall, I am satisfied that there has been a thorough exploration of the nexus between density, intensity, height and housing targets which evidences no matter of unsoundness in developing at "net residential densities higher than anything ever built in London" (to quote the Cambridge/Berkeley study referenced by the St Quintin and Woodlands and Old Oak Neighbourhood Fora in their submission to the hearing session). Nevertheless, I do concur with the view that, to be effective, the Plan does need to give a better indication of the range of densities envisaged and so, Modification (**MM49**) is necessary.

157. A number of representations to the Modifications made the point that TfL finances are currently under pressure because of the effects of the coronavirus pandemic on TfL revenue. They point out that withdrawal and reductions of TfL bus services and closures of Underground lines are being canvassed as a way of dealing with these financial issues. Other representations point to a sustained change in working patterns brought about by the reaction to the pandemic to argue that a reduction in passenger demand for commuter services is likely to be permanent. Consequently, it is argued that the transport infrastructure investment included within the Plan is unlikely to come about and therefore that the Plan should be regarded as unsound.

158. These points do not cause me to conclude that the Plan would be unsound or would require a fundamental rethink. Much of the transport investment on which the Plan is predicated is already under way. It would require a positive decision to abandon the construction of HS2 which is already in hand, yet the opposite decision was taken during the pandemic, when its effects on transport funding were already known. Moreover, much investment derives from funding by developers, so the development proposed in the OPDC LP and the funding for the transport infrastructure necessary to support it go hand in hand. Thirdly, whatever adjustments will need to be made to TfL's finances to bring them into balance are likely to be made in proportion to passenger demand across London as a whole, not focussed in the OPDC area disproportionately. Fourthly, insofar as changed working patterns persist, then reduced demand for transport would mean that reduced frequencies, and perhaps reduced investment, would be needed to support the development. The two things go hand in hand, probably balancing each other out, and so no fundamental review of the OPDC's Local Plan is needed at this stage.

159. For all the reasons set out above, I conclude that, with the modifications now recommended, the nexus between density/intensity, height and housing targets is justified.

(b) In terms of the locations identified as suitable for tall buildings and compliance with London Plan policy

160. As noted above, the Scrubs Lane Development Framework Principles document provides justification for the location of tall buildings within that part of the Plan area, notwithstanding the relatively poor accessibility of the central and southern parts of the road. Other Framework Principles documents are less explicit in their reasoning though I have no reason to doubt the Corporation's assurance that they were prepared by applying the principles set out in the Tall Buildings Statement.

161. That Statement itself claims that the locations shown on its figure 2 are derived from supporting studies considering the visual, functional, environmental and cumulative impacts of tall buildings, their potential contribution to new homes, economic growth and regeneration and public transport connectivity as required by the London Plan. These supporting studies are not identified in the evidence base and so I have not examined them but there is no contrary evidence to indicate that the locations identified as suitable for tall buildings are unjustified. The evidence submitted in the representations express worry, anxiety and concern about the unprecedented heights of tall buildings proposed, matters considered under issue 4a, rather than evidence indicating that their locations are ill-chosen.
162. The London Plan 2016 under which the OPDC LP was prepared required only in respect of LDF preparation that "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks. These areas should be consistent with the criteria above and the place shaping and heritage policies of this Plan." There was little question that the submitted Plan complied with this requirement.
163. In 2021 a new London Plan was published (adopted) which brought new requirements for London Local Plans; to define what is considered a tall building for specific localities, with a default position of not less than 6 storeys or 18 metres; to determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan and identify these on maps in Development Plans.
164. The definition of a tall building within the OPDC area is found in paragraph 5.39 of the Plan (to become 5.41). Consequently, I find that the submitted Plan complies with part A of the new London Plan policy without the need for modification.
165. As submitted, the Plan complied with the London Plan 2016's requirement to identify areas appropriate for tall buildings. The London Plan 2021 changed this to a requirement for the identification of locations, rather than areas. Representations argued that this implied specific locations rather than generalised localities. Consultation with a number of dictionaries confirmed that the meaning of the word "location" tended to mean a specific site but there are also examples of usage in which the word signified a wider area e.g "the location of the town was ideal".
166. In many cases within the submitted Plan, the location identified for tall buildings is a specific point but, in some cases a whole site allocation may be identified, which is more extensive. Nevertheless, I am satisfied that these fall within the dictionary definition of "location". Appropriate locations for tall buildings are shown on figure 3.15 and described at numerous points within the text (e.g policy P3(n), P6(n), paragraph PRC.11 (to become 4.100), policy P8C1, policy P9 (as modified by **MM185**), policy P10, table 4.2, policy P10C2, paragraph LLC7 (to become 4.200), policy P10C3, paragraph HC.6 (to become 4.207), new policy P10C5 and supporting new paragraph 4.220 (**MM248**). I therefore conclude that the submitted Plan complies with that part of the revised London Plan requirement without further modification.

167. The Corporation had already promoted and consulted on a modification to stipulate the height threshold to be taken into account within the safeguarding zone surrounding RAF Northolt (**MM286**), which is necessary for the Plan to be effective. The requirement in B(2) for "appropriate tall building heights" to be identified on maps in development Plans is a matter with which the submitted OPDC LP does not comply, and modifications did not anticipate, in common with the majority of other local plans in London. Representations pointed out that the combination of site area and indicative capacities set out in Table 3.1 of the Plan implied the heights of tall buildings. These implied heights could be spelt out within the Plan for the benefit of public and developers alike. This point was reiterated during the Hearing sessions of January 2022.

168. The explicit statement of figures which could be deduced from information already contained within the Plan would not represent a substantive modification to the Plan requiring further consultation and so could be introduced through my discretion to make further non-substantive modifications without additional public consultation. At my request, the OPDC made such calculations and provided me with figures which can be included as explanatory text within the Plan (**MMs 79A, 84 (paragraph 4.32), 111, 135, 147, 168A, 185 (paragraph 4.165) and 210**), not as policies, which could be misinterpreted so as to apply as a minimum policy requirement over the full extent of what are, in some cases, extensive allocations. As the text of the modifications points out, in practice, other policies continue to apply which will lead to variation in heights across allocations in response to the circumstances of each particular site and may possibly produce a different outcome to that which the explanatory figures imply, a fact recognised in modifications (**MM195 and 208**) which the Corporation has previously advertised and which I endorse as necessary to the effectiveness of the Plan.

169. Even with these modifications, it remains the case that the Plan does not technically conform to a specific requirement of the London Plan 2021 for these heights to be shown on maps. Nevertheless, I do not consider that this renders the whole Plan unsound. It is a small matter in relation to the Plan as a whole. The Mayor of London has accepted that the Plan as proposed to be modified would be in general conformity to the London Plan. In a Statement of Common Ground, the Mayor and the OPDC have agreed that figures for appropriate tall building heights will be introduced into the Plan at its first review.

170. That to me seems a sound way forward to deal with a matter that has only arisen at a late stage in an already protracted examination of the OPDC LP and which would be further delayed were I to seek resolution now. I therefore conclude that, with the Modifications set out above, the locations which the Plan identifies as suitable for tall buildings are justified and sufficiently compliant with London Plan policy.

(c) In terms of the effects of proposals on Wormwood Scrubs

171. Wormwood Scrubs is presently designated a Metropolitan Park and is Metropolitan Open Land, a status which the London Plan makes equivalent to Green Belt within London. The Wormwood Scrubs Act of 1879 which established the open space provides that it should be held "upon trust for the

perpetual use thereof of the inhabitants of the metropolis for exercise and recreation." It also serves a local role but, both in statute and in planning policy, it clearly is intended to serve a Metropolitan, not just a local role.

172. It is therefore unthinkable that it should not be expected to serve the needs of those who will be living and working in the development proposed within the OPDC Local Plan along with those in the rest of London and unrealistic to expect that it should be insulated from the effects of that development. Views from the Scrubs of tall buildings in surrounding developed areas are already a characteristic of the open space, as the photograph (figure 4.46) on page 115 of the submitted Plan demonstrates. Insofar as the development of the Old Oak and Park Royal opportunity areas has been sanctioned by the London Plan then, in principle, the effects of that development on Wormwood Scrubs should no longer be in question.
173. Having said that, it also stands to reason, that policies in the Plan can either accentuate or moderate the inevitable effects of the development area upon the Scrubs. The Scrubs is intended to serve a Metropolitan function. Public transport improvements, not least in the form of the Crossrail station, will enable a greater proportion of the Metropolitan users of the Scrubs to arrive by train instead of by car. Existing residents in the area to the south of the Scrubs will want to access the new station on foot. It is therefore necessary and justified that there be access from the station to the Scrubs and also from the new development north of the station to the Scrubs as sought by Policy P12 (g).
174. The resilience of the Scrubs to increased use will inevitably need reinforcement. The Corporation has carried out a Wormwood Scrubs Survey which provides part of the evidence base to justify enhancements. The evidence base also demonstrates that the Scrubs presently suffers from poor drainage, which currently affects the availability, quality and durability of the sports pitches which the Scrubs provides. It is therefore justified for Policy P12(c) and (f) to seek enhancements.
175. Paragraph 5.12.1.2 of the Integrated Water Management Strategy which underpins policy EU3 as submitted canvasses Wormwood Scrubs as a location for stormwater harvesting and recycling, a possibility which is countenanced in the specific policy P12(f) for Wormwood Scrubs. This provoked some consternation leading to representations about the effects of the Plan's proposals on Wormwood Scrubs but it was pointed out during a hearing session that it is difficult to get drainage from the north across the railway lines to reach Wormwood Scrubs and that supporting paragraph WS5 makes it clear that any contribution that Wormwood Scrubs would make to the strategic drainage of the OPDC area overall would be ancillary to the enhancements needed to improve the present poor drainage of the Scrubs.
176. In common with other elements of the Plan, discussed in issue 3 above, there are internal inconsistencies and a lack of clarity relating to Wormwood Scrubs, more particularly expounded in the Grand Union Alliance's submissions to the Hearing sessions. Some of these will require modifications to render the Plan effective, in particular, making it clear that the proposed Wormwood Scrubs Street would lie outside Wormwood Scrubs itself (**MMs 75, 76, 78, 187, 204,**

248 and 267) but these points do not affect the justification for the effect of proposals on Wormwood Scrubs.

(d) In terms of car parking policies

177. Both the Old Oak Strategic Transport Study and the Park Royal Transport Study make it clear that unless a significant shift in the choice of travel mode is brought about, the capacity of the road network would be unable to cope with (and so would place severe limitations on) the quantity of development proposed in the opportunity area. The latter study records that in order to limit congestion to reasonable levels, the Old Oak study found mode shares similar to Canary Wharf would be required (i.e. approximately 5% of employees travel to work by car). It also recognises that Park Royal would never achieve such mode share targets owing to specific freight and employee needs but that existing capacity constraints will not allow anything more than relatively modest growth in traffic.³⁴
178. Parking provision is a strong influence on the choice of travel mode, so it follows from the findings of these studies that severe limitations on the supply of parking provision within new development are necessary. The Plan's proposed policy T4 is therefore fully justified, though needs to be complemented by on-street parking controls (which are outside the remit of the OPDC and the Plan) and by policies T2, T3, T5 and T6 to support and provide walking, cycling and public transport facilities.
179. Both the London Plan 2016 (policy 6.13(E)) and its 2021 replacement (policy T6.1) require provision for electric vehicle charging points to be provided in a percentage of parking spaces. Modifications (**MMs 334 and 335**) are necessary to ensure that the OPDC LP is positively prepared by compliance with this requirement, but this deficiency does not prevent me from concluding that the Plan's car parking policies in general are justified.

(e) In terms of Affordable Housing policies

In relation to the overall target

180. The London Plan 2016 did not set a target for the proportion of new housing to be delivered as affordable housing. Instead, it required boroughs to set an overall target in LDFs for the amount of affordable housing provision needed over the Plan period in their areas and to seek to maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London over the term of the Plan. During the lifetime of this examination into the OPDC LP, the London Plan 2016 was superseded by the London Plan 2021 which does state a strategic target for 50% of all new homes delivered across London to be genuinely affordable. The qualification "delivered across London" means that 50% is not required on each and every site but, obviously, for every site which falls below that average, the average on remaining sites will need to be higher in order to achieve the overall average target. Policy H5 of the London Plan 2021 elaborates on the

³⁴ Park Royal Transport Study by Steer Davies Gleave, January 2016, paragraphs 1.35, 1.36 and 3.31

requirement of 50% delivered across London by requiring a threshold of a minimum of 35% with higher percentages required in certain circumstances and encouraged by the introduction of a Fast Track approach to approval of development meeting certain criteria.

181. The submitted OPDC Local Plan anticipated the publication of London Plan 2021 by setting a target of 50% affordable housing but adding the proviso, subject to viability. In an earlier section of this report considering the effectiveness of the Plan in the light of doubts about its viability I have already concluded that this is a sound approach. I am therefore content that the overall target is sound.

In relation to tenure mix

182. London Plan 2016 was ambiguous. On the one hand, it required that in order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. On the other hand, it required Boroughs to set their own separate targets for social/affordable rented and for intermediate housing needed over the plan period in their areas. By contrast, the London Plan 2021 offers little discretion to local plans. Its policy H6 requires a minimum of 30% low-cost rented homes (either London Affordable Rent, or Social Rent), a minimum of 30% intermediate products (including London Living Rent and London Shared Ownership). Only the remaining 40% falls to local discretion and can be provided as low-cost rented homes or as intermediate products.

183. The target ratio between social rented and intermediate rent or sale set in the submitted Plan³⁵, (a minimum of 30% social rent level housing and the remainder as a range of social rent level housing, intermediate housing and London Shared Ownership), is the reverse of that specified in the London Plan 2016. Like the overall target, it anticipated the provisions of the now published London Plan 2021.

184. But, as representations from the London Mayor (although he has certified the overall consistency of the Plan with the London Plan), and the boroughs of Brent, Ealing and Hammersmith and Fulham make clear, that ratio does not reflect local need determined locally. Local Plan policies in Ealing and Hammersmith and Fulham currently set the ratio at 60:40 in favour of social rent. In Brent the ratio is set at 70:30 in favour of social rent. The OPDC's Strategic Housing Market Assessment shows an acute need for social/affordable rent compared with intermediate provision in the ratio of 86:14.

185. Nevertheless, although the terminology has to be updated to refer to new tenure types not invented when the Plan was submitted (**MMs 200, 358,**

³⁵ As submitted with what the OPDC regarded as minor modifications. However, because these substantially altered policy so as to comply more with the emerging London Plan, I regard them as Main Modifications. The OPDC consulted on them as such and they are included as such in my Appendix because without them, my findings of soundness would be different.

360, 361, 362, 363, 364, 365 and 366), so that the Plan can be effective, I find the basic approach of submitted policy towards tenure mix sound for two reasons. Firstly, I have no reason to reject the analysis included within the Affordable Housing Viability Assessment by Deloitte Real Estate dated 26 May 2017 that, if the overall target is to be 50%, then the ratio must be skewed away from social rent and towards intermediate housing. Representations criticise this choice for preferring quantity to quality but that choice aligns with the requirement of the London Plan to maximise provision.

186. Secondly, I am persuaded by the argument contained within the SHMA and summarised at paragraph 8.7 of the submitted Plan. Based on the area's current population of 7,000 people and 2,800 households, OPDC's SHMA (2017) identifies a need for 1,200 new homes over the Local Plan period. A 50% affordable homes target would mean 600 new affordable homes over the plan period. Even if provision were skewed towards social rent following the Brent policy (70:30), 420 new social rent affordable homes would meet the need arising from the OPDC area itself.

187. Yet in practice, as a part of meeting London's wider needs, development in the OPDC area would result in a far greater quantity of housing than arises from the area's own needs. At the figures which would result from the Modifications now recommended, a target of 50% to be provided as affordable housing would result in 9,925 affordable dwellings over the plan period. Even if the outturn were to fall as low as 35% (and the OPDC provides evidence to show that outturn is in practice higher than that), 6,948 affordable dwellings would be provided. The submitted plan's proposed tenure mix would require 30% of those to be social rent, a total of 2,084 dwellings over the plan period. This would be considerably in excess of the 420 required arising from the area's own needs established by the SHMA and would contribute to provide the social rented housing needed in a wider area. I therefore conclude that the Plan's affordable housing policies are justified.

(f) In terms of the provision of family housing

188. Similar arguments to those for affordable housing convince me that the policies for the provision of family housing are sound. Based on the area's current population of 7,000 people and 2,800 households, OPDC's SHMA(2017) identifies a need for 1,200 new homes to meet the requirements of the Local Plan area over the Local Plan period. The SHMA indicates that 50-60% of these would need to be for family housing.

189. Because the OPDC area has the capacity for a far greater quantity of housing than necessary to meet the area's own needs, only a small proportion of that capacity need be family housing in order to meet the area's own needs. As a result, the vast majority of the area's capacity can be devoted to development of smaller units not needing family sized amenity space, thus providing an opportunity for development of the scale and intensity examined earlier.

190. Provision of small units indirectly aids the provision of housing for families because it reduces the pressure on the market for the conversion of family-sized houses to smaller flats and from people who would otherwise share the occupancy of a family dwelling. But a predominance of one size of dwelling unit would produce an unbalanced community. Although the type of

development which is likely to result from the intensity and scale of development envisaged in the OPDC area is often inimical and unsuited to family housing, design studies commissioned by the OPDC show how family sized units can be provided at lower levels of high rise developments with access to family-sized amenity space at ground level or on the roof levels of lower elements of a scheme.

191. Viability is also a consideration. The OPDC's various viability studies show how an increase in the average number of bedrooms in a unit decreases the viability of a development, not by adding to costs but by reducing values per square metre. There is therefore a balancing exercise to be undertaken between dwelling numbers, social mix, viability and suitability for family use. A lack of evidence to the contrary convinces me that the balance which has been struck in the submitted plan is sound.

(g) In terms of the provision of student housing

192. Many representations were concerned with avoiding an overconcentration of student housing in any one area. The submitted plan has a policy, (H10(a(v))), against overconcentration in any one specific location but no criterion by which to judge when overconcentration would occur. At my request, the OPDC reviewed recent evidence from elsewhere to establish whether an appropriate definition of overconcentration can be defined. This research, looking at authorities both within and without London (Brighton and Hove, Cambridge, Newcastle, Sunderland, Brent, Camden and Southwark), found that there is no ready formula or percentage of concentration from which OPDC can determine whether or not there is an overconcentration in its area.

193. Rather, the other authorities contacted set out the policy levers required to manage student accommodation appropriately, for example by planning for growth where it is required and providing tools to manage the impact of a concentration of students on the living conditions of other residents. This is already provided for by other aspects of policy H10. Nevertheless, although overconcentration cannot be quantitatively defined and must be a matter of judgement, the justification for the policy set out in paragraph 8.82 remains convincing, requiring only Modification (**MM368**) to bring the argument providing the general justification for the policy up to date.

(h) In terms of the inclusion or exclusion of land from SIL

194. A number of specific suggestions for de-designation or re-designation of individual sites are made but I find that the evidence of the Industrial Land Review and even more so, that of the Industrial Land Review Addendum, which gives individual consideration to a number of the individual sites the subject of representations, is convincing. No modification is necessary to remedy any lack of justification for the inclusion or exclusion of specific sites from SIL either within the spatial strategy of the Plan as submitted or within the revised spatial strategy resulting from the modified Plan necessitated by the non-viability and hence ineffectiveness of the CarGiant site discussed in an earlier section. For clarity and hence, effectiveness, it is, however, necessary to make a clear distinction between the Twyford Waste Transfer Station and the nearby site at 100 Twyford Abbey Road (**MM110**).

195. The latter has the benefit of a lawful development certificate for B2 uses and so the case for its retention as a site predominantly managing construction, demolition and excavation waste may have already been decided but that does not provide sufficient evidence for me to conclude that its continued inclusion within SIL would be unsound. It faces residential development on one side and part of a second but across roads whereas it is directly contiguous with SIL compatible uses on other sides and so its particular site context does not support a case for exclusion from SIL.

196. In relation to the land at Abbey Road, also known as the Twyford Tip site, I agree with the OPDC that, notwithstanding the technical commencement of a planning permission granted over 25 years ago, the failure to progress that development over such a long period indicates that realistically, it is open to the OPDC to consider its future afresh. The Land at Abbey Road Development Options Appraisal Report by CBRE dated March 2018 took account of the level and contamination and site clearance costs. It found that, in the absence of any additional enabling funding, no land use or scale of development appears to be viable. Nevertheless, it concluded that, having undertaken the appraisal, an industrial use seems most likely to occur. If industrial land values continue to move in the direction evidenced at the time of the hearing sessions, those findings are likely to be reaffirmed. At any rate, I have no reason to disagree with its conclusions which are more recent than those of Colliers International, dated December 2017 submitted in support of representations from the landowner. I therefore conclude as indicated above.

(i) In terms of town centre uses and impacts

197. As submitted, figure 10.3 of the Plan appears to indicate a Metropolitan Town Centre extending between the Grand Union Canal and Wormwood Scrubs and between Old Oak Common Lane and the eastern end of the HS2 station but, on figure 3.7 this area is referred to as a Commercial Centre, a term not used in the key to figure 10.3 but used in the text of policies SP5 and P1. In the modified figure 10.3 (**MM393**) the key refers to it as a Commercial Centre. It is shown to abut a Neighbourhood Town Centre at Atlas Junction. In the submitted Plan a Major Town Centre covers the same area as the Commercial Centre but additionally extends northwards to Willesden Junction to abut the Harlesden District Town Centre and westwards from Old Oak Common Lane in a linear extension to North Acton, abutting the Neighbourhood Town Centre there. Another Neighbourhood Town Centre is designated at Park Royal Centre. There is also a series of nine clusters of development superimposed on this network of town centre uses.

198. The Crossrail depot site lies at the heart of the proposed Commercial and Major Town Centre areas. I have already commented on the deferral of its development to a period outside the timescale of the plan. The same is also true of the Intercity Express Programme (IEP) depot forming the southern part of the area of the Commercial and Major Town Centre area. My Interim Findings in respect of the CarGiant site would have put the extent of the Major Town Centre north of the Grand Union Canal into a similar post-plan period, except that, in response to my Interim Findings, the OPDC has concluded that such development of Old Oak north of the Grand Union Canal is now most unlikely to come about.

199. The consequential amendments which the OPDC puts forward as a result of my Interim findings in relation to the CarGiant site mean that the aspiration to develop the land between the Grand Union Canal and Willesden Junction as part of a Major Town Centre is deleted. In accordance with the town centre network set out in table A1.1 of the London Plan 2021, land at Channel Gate and Atlas Junction is designated as part of the Major town centre which would extend from there, through the Crossrail depot and the Old Oak station site and, in an extended dog-leg across Old Oak Common Lane and Victoria Road, to North Acton station.
200. There is scepticism about the deliverability of such a dispersed town centre. Scepticism may be healthy, but it does not prove unsoundness. The fact is that the public transport, pedestrian and cycle investments proposed would have the effect of raising PTALs to an exceptionally high level over a wide area. The epicentre of this area may be unavailable for development as a result of the decision to locate the Crossrail (Elizabeth Line) depot there but the more peripheral areas would still remain highly accessible and so would justify their continued designation as a Major town centre, even though the OPDC accepts that it will not be until the later part of the Plan period that a critical mass of town centre uses will be delivered for it to function as such. For clarity, modifications to define the nature of a town centre (**MM461**) and the uses which might be found in it (**MM464**) are necessary for the effectiveness of the Plan, but I do not doubt the overall justification for the town centre hierarchy proposed either in the submitted Plan or in the revised spatial strategy of the Plan as modified.
201. Although, in deference to their undoubted locational potential and theoretical capacity, the Crossrail depot site, and Old Oak Common station site would continue to be designated as areas for Major Town Centre uses, in practice, the absence of specific proposals for the development of the Crossrail depot site would mean that, for the lifetime of the Plan, there would be, not a single major town centre, but two, largely disconnected, parts.
202. Neither would have the critical mass which has been evaluated in the Retail and Leisure Needs Study which provides much of the evidence base for these policies. Even with that critical mass, the Retail and Leisure Needs Study concluded that the effects on Harlesden District Centre would be largely beneficial as a result of the increase in available expenditure within the study area from housing development, which the Harlesden District Centre could capture. I would expect the reduced critical mass resulting from the dispersed nature of the Old Oak town centre now proposed to have less adverse effect on Harlesden than would the beneficial effects of the greater expenditure available from the housing development. The connection between Old Oak North and Harlesden through Willesden junction which would have been necessary for Harlesden to benefit from the household expenditure of the development previously proposed in Old Oak north would not be necessary for Harlesden to benefit from the household expenditure of development in Channel Gate and so, I conclude that, as modified, the general thrust of the plan's policies towards town centre uses and their impact on Harlesden town centre would remain robust and sound.
203. Representations question the application of a requirement for an impact statement for developments of more than 5,000 sq m within the Major Town

Centre Area and consider that the NPPF threshold of 2,500 sq m should be used. As the Major Town Centre is defined as such, and its impact on surrounding centres has been analysed in the Retail and Leisure Needs Study, I would normally see no need for requiring retail impact assessments at all, since they are normally only required for developments outside town centres. But, as the Retail and Leisure Needs Study has argued for the imposition of retail impact assessments, even for developments within the designated Major Town Centre Area, their imposition in this case would be sound.

(j) In terms of the protection of public houses

204. NPPF paragraph 70 recognises public houses as a community facility the unnecessary loss of which planning policies should guard against. The policy does little more than apply that advice with criteria that are in common use in other plans and which represent standard practice but to be fully justified needs the addition of an objective evaluation method (**MM420**).

205. There were only three public houses existing within the OPDC area. Given the scale of population growth identified in the OPDC local plan, it is likely that new bars and similar licensed premises will be developed which could have some, if not all, of the attributes of a public house. The specific use of the term public house in the title and wording of this policy may not make it clear that this policy should apply not just to the three historic public houses but to any new equivalent facility which is developed in the area. Modifications (**MMs 421 and 459**) are therefore necessary for the effectiveness of the Plan.

(k) In terms of policies for monitoring

206. Section 8.2 of the Energy, Overheating and Daylighting in Tall Buildings Study by Buro Happold reports the phenomenon known as the performance gap; "Numerous building performance evaluations have shown that buildings use significantly more energy in-use than predicted by their designers; 2.6 times more in the case of dwellings, and 3.6 times for non-domestic buildings. Buildings that prioritise passive energy measures have a smaller performance gap than those relying more on mechanical solutions or active energy efficiency measures, i.e. MVHR and boiler improvements." I can therefore understand why the OPDC would wish to adopt a policy of ensuring that developments deliver upon their promises, as policy EU13 does for the remediation of land contamination.

207. Unfortunately, policies EU9(a(iv)) (for carbon reduction measures) and DI3(e) (for performance in general) as submitted would not do that. In an exchange of correspondence, OPDC confirms that policy DI3(e) is not intended to require developers to undertake remedial action but is instead intended to gather together information which will help to review the local plan.

208. NPPF paragraph 154 sets out the purposes of a local plan. A Local Plan should set out the opportunities for development and set clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Although it is important for a planning authority to monitor the success of a local plan, the acceptability or otherwise of a development has no relationship to a developer's willingness to gather data to help a local planning authority discharge its monitoring duties and so policies

which seek to do so are unjustified. These points were discussed during the 2019 hearing sessions but the subsequent modifications proposed by the OPDC, on which it consulted, neither make the policies effective in securing remediation, nor justify the policies in terms of making development acceptable and so I cannot recommend their adoption. I conclude that these two policies are neither justified nor effective and should be deleted from the Plan (**MMs 273, 274, 315 and 443**) and supporting text modified accordingly (**MM317**).

Issue 5 – The passage of time

209. One of the tests of soundness is whether the Plan is consistent with national policy. The examination of this plan has taken nearly three and a half years. During that time, events happen which may make the Plan, as submitted, unsound. The effects of the publication of the London Plan 2021 have already been reported upon. Another matter that occurred during the examination has been the evolution of the Use Classes Order. This has required a re-examination of aspects of policies towards industrial retention and intensification and also towards policies governing changes within town centres. Modifications are necessary to comply with these emerging national policies. Modifications (**MMs 62, 70, 87, 138, 148, 150, 151, 154, 171, 173, 190, 211, 216, 231(part), 241, 253, 394, 396, 399, 454, 455, 456, 457, 458, 460, 462 and 463**) respond to the new E class of development. Modification (**MM125**) clarifies the facilities to be provided in Park Royal Centre. Modifications (**MMs 115, 122, 123, 130, 131, 397, 398, 401, 402, 403, 453 and 463**) respond to the abolition of the former class A. Modification (**MM434**) is also necessary for the effectiveness of the Plan so as to accommodate changes to the Mayoral CIL rate resulting from the passage of time.

Overall Conclusion and Recommendation

210. The Plan has a number of deficiencies in respect of soundness and/or legal compliance for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

211. The Corporation has requested that I recommend MMs to make the Plan sound and/or legally compliant and capable of adoption. I conclude that the duty to co-operate has been met and that with the recommended main modifications set out in the Appendix the Old Oak and Park Royal Development Corporation Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

P.W. Clark

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the text and paragraph numbers of the Plan submitted for examination in October 2018, not those of the Post Submission Modified Draft Local Plan which was published by the Corporation in May 2021, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	7	To follow paragraph 1.18	<p><i>Add new paragraph;</i></p> <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><u>London Borough of Brent</u></p> <ul style="list-style-type: none"> • <u>Core Strategy</u> • <u>Site Specific Allocation DPD</u> • <u>Draft Development Management Policies DPD</u> • <u>Saved UDP Policies</u> • <u>Policies Map</u> <p><u>London Borough of Ealing</u></p> <ul style="list-style-type: none"> • <u>Development (Core Strategy) DPD</u> • <u>Development Management DPD</u> • <u>Development Sites DPD</u> • <u>Draft Planning for Schools DPD</u> • <u>Policies Map</u> <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>
MM2	10	Our Spatial Vision	<p><i>Amend second paragraph:</i></p> <p>It will comprise a network of places including an innovative industrial area in Park Royal and a high-density new vibrant part of London at Old Oak.</p>
MM3	10	Thinking Big	<p><i>Amend point 2:</i></p> <p>2. Old Oak <u>The OPDC area</u> will become a major new London centre providing high-density mixed use development, that will shape west London and support London's continued growth.</p>
MM4	10	Thinking Big	<p><i>Amend point 7:</i></p> <p>7. <u>Park Royal and Old Oak North</u> will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial</p>

Ref	Page	Policy/ Paragraph	Main Modification
			Location to support London's economy with opportunities for intensification and innovative growth.
MM5	12	Figure 2.1	<i>Amend Economic Growth box;</i> Alongside a protected and strengthened Park Royal, The area has the capacity to deliver 7,600 36,350 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
MM6	12	Figure 2.1	<i>Amend Transit Orientated Development box;</i> The new Old Oak Common station will provide the impetus for this, but other <u>potential</u> new (Hythe Road and Old Oak Common Lane) and improved rail stations (such as <u>as</u> Willesden Junction and North Acton) and new and improved walking and cycling connections, (<i>then as original</i>)
MM7	12	Figure 2.1	<i>Amend final sentence of Grand Union Canal and Wormwood Scrubs box;</i> Development in Old Oak 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.
MM8	13	Figure 2.1	<i>Amend Park Royal box;</i> <u>Park Royal Industry</u> The Park Royal Industrial Estate <u>industrial land within OPDC's boundary</u> is a vital cog in the London economy and OPDC will work to protect, strengthen and intensify <u>the Strategic Industrial Location in Park Royal and Old Oak North.</u> the role of Park Royal as a Strategic Industrial Location. 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 Old Oak <u>the OPDC area</u> presents a dichotomy for the estate <u>industry</u> . <u>Park Royal Industry</u> can serve to support the needs of development in Old Oak , by providing ancillary services. This includes the potential for a circular economy, looking at ways that things used in Old Oak can be recycled and repurposed by businesses in Park Royal . However, regeneration in Old Oak could result in rent increases and increased pressure on infrastructure which if not managed could undermine what <u>makes the Old Oak and Park Royal area</u> a success.
MM9	13	Figure 2.1	<i>Amend first sentence of diversity of housing box;</i> The OPDC area is capable of accommodating an <u>minimum indicative</u> capacity of 26,500 homes, of which

Ref	Page	Policy/ Paragraph	Main Modification
			a minimum 20,100 <u>19,850</u> could be delivered in the next 20 years.
MM10	14	Figure 2.2	<i>Delete and replace by figure annexed to this Schedule</i>
MM11	16	3.1	<i>Amend second sentence;</i> The station will support the wider Old Oak <u>and Park Royal</u> area in becoming a new strategic destination - 10 minutes from Heathrow and the West End.
MM12	16	3.3	<i>Amend third sentence;</i> 20,100 <u>19,850</u> of these homes and 40,400 <u>36,350</u> of these jobs can be delivered within the next 20 years of this Local Plan by 2038 (see policies SP4 and SP5).
MM13	18	3.4	<i>Amend first sentence of Kensal Canalside Opportunity Area sub-paragraph;</i> 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 2,000</u> new jobs and a minimum of 3,500 new homes. <i>Amend third sentence of Kensal Canalside Opportunity Area sub-paragraph;</i> The station's delivery is not yet committed but feasibility work is underway <u>is safeguarded within the royal Borough of Kensington and Chelsea's Local Plan.</u>
MM14	20	3.8	<i>Amend final sentence;</i> High density development in Park Royal SIL will be different to <u>mixed use development in Old Oak</u> , but OPDC's Park Royal Intensification Study <u>and Old Oak North Intensification Study</u> demonstrates how the Park Royal Industrial Estate SIL could be regenerated to increase <u>industrial</u> floorspace and provide additional jobs, to support Mayoral targets to deliver an additional 10,000 jobs in Park Royal.
MM15	22	SP3	<i>Delete clause (d)</i>
MM16	22	3.19	<i>Amend first sentence;</i> 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.
MM17	23	SP4	<i>Amend clause (a)(ii);</i> delivering at least 20,100 <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.
MM18	23	3.20	<i>Amend second sentence;</i>

Ref	Page	Policy/ Paragraph	Main Modification
			The London Plan identifies that the Old Oak and Park Royal Opportunity Areas have the capacity to deliver an <u>indicative minimum</u> of 25,500 new homes.
MM19	23	3.20	<i>Amend third sentence;</i> OPDC's Development Capacity Study demonstrates that <u>this target can be achieved over the total development period in the next 30 years, that at least 20,100 19,850 new homes are deliverable within the Local Plan period (2018-38) and that at least 13,670 new homes are deliverable within the London Plan 0- 10 year period (2019-29).</u>
MM20	25	SP5	<i>Amend clause (a);</i> a) support the delivery of 40,400 <u>36,350</u> new jobs between 2018-38;
MM21	25	SP5	<i>Amend clause (b);</i> b) protect, strengthen and intensify the Strategic Industrial Location (SIL) in <u>Old Oak North and Park Royal;</u>
MM22	25	3.25	<i>Amend second sentence;</i> The area has the capacity to accommodate 60,700 <u>56,250</u> new jobs over the total development period in the next 30 years and, 40,400 <u>36,350</u> new jobs over the next 20 years <u>Local Plan period (2018- 38).</u>
MM23	25	3.26	<i>Amend;</i> The diversity of character across the OPDC area will support the delivery of a range of employment opportunities. <u>Park Royal and Old Oak North is form London's largest industrial area estate and is are designated as a Strategic Industrial Location (SIL) in the London Plan. Protecting the SIL in Park Royal is vital to the London economy and opportunities should be taken to intensify its use where feasible (see Policy E1). 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 colocation 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.</u>
MM24	27	Figure 3.7	<i>Replace by figure annexed below</i>
MM25	28	SP6	<i>Amend clause (a)(iii);</i> supports the creation of a new Cultural Quarter in Old Oak;
MM26	28	SP6	<i>Amend clause (b)(i);</i> Old Oak – a major town centre across Old Oak, that delivers a wide range of town centre and community

Ref	Page	Policy/ Paragraph	Main Modification
			uses. The policy requirements for this centre can be found in policies P1, P2 P3, P7, P8 and P911;
MM27	28	SP6	<i>Delete sub clause (b)(iv)</i>
MM28	28	3.36	<i>Amend first sentence;</i> The comprehensive redevelopment of Development in Old Oak and intensification of Park Royal will take many years.
MM29	29	Figure 3.8	<i>Replace by figure annexed below</i>
MM30	30	3.39	<i>Amend;</i> OPDC's Cultural Principles document sets out how the OPDC area and in particular Old Oak , 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 Cultural Quarter in Old Oak that can complement nearby cultural clusters and contribute to London's wider cultural offer.
MM31	30	3.40	<i>Amend;</i> 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 four <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 three <u>two</u> neighbourhood town centres: two <u>one</u> new centres at North Acton and Atlas Junction and 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.
MM32	30	3.42	<i>Amend first sentence;</i> Early development phases to the north <u>west of Old Oak South</u> of the Grand Union Canal will be expected to accord with this designation.
MM33	30	3.43	<i>Amend;</i> OPDC has also designated neighbourhood centres in North Acton and , Park Royal and Atlas Junction , to serve the local communities of workers and residents in and around these locations. Similarly to Old Oak, the North Acton and Atlas Junction centres are <u>is</u> not yet established <u>as a</u> 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

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			<p>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):</p> <p>a) Old Oak (Policies P1, P1C1, P2, P3, P7, P7C2, P8, P8C1 and P9 P11);</p> <p>b) North Acton (P7 and P7C1); and</p> <p>c) Park Royal Centre (P6); and</p> <p>d) Atlas Junction (P8 and P8C1).</p>
MM34	31	SP7	<p><i>Amend clause (b)(vi);</i></p> <p>supporting the successful functioning and operation of the Park Royal Industrial Estate <u>Strategic Industrial Location (SIL)</u>, by implementing carefully planned servicing arrangements;</p>
MM35	31	SP7	<p><i>Amend clause (e)(ii);</i></p> <p>ii. a new movement network across Old Oak comprised of the key routes as shown in figure 3.10;</p>
MM36	31	SP7	<p><i>Amend clause (g);</i></p> <p>g) supports delivery of Old Oak Street and Union Way Park Road:</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 and primary shopping areas at the intersections with other key routes and around rail stations; and</p>
MM37	31	3.46	<p><i>Amend fifth and sixth sentences;</i></p> <p>Existing and potential London Overground stations at Willesden Junction, Hythe Road and Old Oak Common Lane and enhancements to London Underground stations within the area, will further supplement this, providing connections to Acton, White City, Richmond, Clapham Junction and Stratford. <u>These</u> transport enhancements in Old Oak should need to enable parts of the Old Oak area to achieve a PTAL of 6b to support an optimised approach to development (see policies P1 and P2).</p>
MM38	32	3.49	<p><i>Amend final sentence;</i></p> <p>Further details <u>Information</u> can be found in the <u>Places chapter and Transport chapter</u> and with further detail in OPDC's Infrastructure Delivery Plan (IDP).</p>
MM39	32	3.53	<p><i>Amend fourth fifth and sixth sentences;</i></p> <p>In Park Royal <u>Strategic Industrial Location (SIL)s</u>, the focus will be on enhancing the function of the streets for</p>

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			all modes and improving their environment. In Old Oak, 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. An new <u>enhanced</u> street network should be arranged to connect to these existing streets together and provide improved connectivity, focussed on the 2 <u>3</u> new key routes of Old Oak Street, Union Way Park Road and Wormwood Scrubs Street.
MM40	33	Figure 3.10	<i>Replace by figure annexed below</i>
MM41	34	3.54	<i>Delete second and third sentences.</i>
MM42	34	3.55	<i>Delete first, fourth, seventh and eighth sentences</i>
MM43	34	3.56	<i>Delete paragraph</i>
MM44	35	SP8	<i>Amend clause (a)(iii);</i> 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 2 <u>3</u> new local parks in Old Oak , each of at least 2ha;
MM45	35	SP8	<i>Delete clause (d)</i>
MM46	36	3.64 (to become 3.63)	<i>Amend third sentence;</i> The priority within this should be the delivery of three <u>two</u> new local parks of at least 2ha, <u>within</u> across the Old Oak North and Old Oak South and Channel Gate places.
MM47	36	3.64 (to become 3.63)	<i>Amend fifth sentence;</i> Further details on Information for the requirements for open space provision can be found in the places chapter, in Policy EU1 (Open Space) and with further details in OPDC's Infrastructure Delivery Plan (IDP).
MM48	37	Figure 3.13	<i>Replace by figure annexed below</i>
MM49	40	3.79 (to become 3.78)	<i>Following second sentence, insert;</i> <u>The indicative density range is 300 to 600 units per hectare.</u>
MM50	41	Figure 3.15	<i>Replace by figure annexed below</i>
MM51	42	SP10	<i>Amend clause (c);</i> c) contributes appropriately and proportionately towards required infrastructure identified in <u>the Local Plan and the further detail in the OPDC's Infrastructure Delivery</u>

Ref	Page	Policy/ Paragraph	Main Modification
			Plan (IDP), at a rate and scale sufficient to support the area's development and growth;
MM52	42	SP10	<i>Amend clause (e);</i> e) safeguards land required to deliver area-wide and site-specific infrastructure identified in OPDC's IDP and/or policies in the Local Plan <u>and the further detail in the IDP;</u>
MM53	42	SP10	<i>Delete clause (i)</i>
MM54	42	3.81 (to become 3.80)	<i>Amend second sentence;</i> Within the Old Oak area, a <u>A</u> number of large-scale operations need to be relocated, reconfigured and/or decked over.
MM55	43	Figure 3.16	<i>Replace by figure annexed below</i>
MM56	44	3.85 (to become 3.84)	<i>Amend second sentence;</i> 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 and to the north of the Grand Union Canal in Old Oak North , along Scrubs Lane and on some sites along Old Oak Lane and Old Oak Common Lane.
MM57	46	Table 3.1	<i>Replace by table annexed below</i>
MM58	47	Figure 3.17	<i>Replace by figure annexed below</i>
MM59	51	Figure 4.1	<i>Replace by figure annexed below</i>
MM60	52	Figure 4.2	<i>Replace by figure annexed below</i>
MM61	53	P1	<i>Amend clause (c);</i> Supporting the creation of a thriving mixed use, high-density place that contributes to the delivery of: i) a) 15,200 <u>17,100</u> new jobs and a minimum of 350 <u>100</u> new homes in the plan period; and ii) b) 34,000 <u>35,700</u> new jobs and a minimum of 4,100 <u>3,700</u> new homes for the full development period.
MM62	53	P1	<i>Amend clause (d);</i> Establishing a commercial centre around Old Oak Common Station, that supports London's growth, by delivering a significant amount of Use Class B1a <u>E</u> floorspace <u>that is appropriately designed and serviced to support the commercial centre;</u>
MM63	53	P1	<i>Amend clause (f);</i> Contributing to the activation of this place and creation of a Cultural Quarter in Old Oak , delivering cultural and catalyst uses within Old Oak South;
MM64	53	P1	<i>Amend clause (g);</i> 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</u>

Ref	Page	Policy/ Paragraph	Main Modification
			<u>modes route and a walking and cycling route from Old Oak Common Station to Scrubs Lane. which is access only for private vehicles</u>
MM65	53	P1	<i>Amend clause (h);</i> 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;
MM66	53	P1	<i>delete clause (i)(ii) and substitute;</i> <u>Canalside spaces</u>
MM67	54	OOS.1 (to become 4.6)	<i>Amend fourth sentence;</i> Old Oak Common Station is set to open in 2026 <u>after 2028</u> and will make Old Oak South one of the best connected locations in London.
MM68	54	OOS.3 (to become 4.8)	<i>Amend;</i> 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 in 2026 and development on the Elizabeth Line depot and sidings and IEP depot is not envisaged to commence until beyond the Local Plan period.
MM69	54	OOS.4 (to become 4.9)	<i>Amend first three sentences;</i> The excellent public transport access created by the new Old Oak Common Station provides the opportunity to deliver a minimum of 350 <u>100</u> new homes during the plan period ¹ within high density mixed use development across the area in a range of building heights. Old Oak South also has capacity to deliver 15,200 <u>17,100</u> new jobs ² across new commercial, retail and leisure uses, within the plan period. 4,100 <u>3,700</u> new homes 34,000 <u>and 35,700</u> new jobs are also currently envisaged to be <u>be</u> delivered during the full development period.
MM70	54	OOS.5 (to become 4.10)	<i>Amend third and fourth sentences;</i> 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 ⁴ . To support this, new development should enable delivery of a significant amount of new flexible B1a <u>Use Class E</u> employment space <u>that supports the functioning of the commercial centre.</u>
MM71	54	OOS.6 (to become 4.11)	<i>Amend first sentence;</i> This commercial centre will likely be delivered following the opening of Old Oak Common station (2026) .
MM72	54	OOS.7 (to become 4.12)	<i>Amend;</i> Old Oak South will also be home to part of the new Old Oak major town centre. Town centre uses should be

Ref	Page	Policy/ Paragraph	Main Modification
			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 Old Oak North (P2) <u>Old Oak Lane and Old Oak Common Lane (P8)</u> , Channel Gate (P9) and North Acton and Acton Wells (P7).
MM73	54	OOS.8 (to become 4.13)	<i>Amend;</i> Cultural, meanwhile and catalyst uses can play an important role in supporting the development of this new major town centre destination and Cultural Quarter in Old Oak (see Policy SP6).
MM74	54	OOS.10 (to become 4.15)	<i>Amend fourth sentence;</i> The key routes within the new movement network to be delivered during the plan period are <u>is</u> Old Oak Street (including the bridge to Wormwood Scrubs), and Park Road.
MM75	54	OOS.10 (to become 4.15)	<i>Amend fifth sentence;</i> 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.
MM76	54	OOS.10 (to become 4.15)	<i>Amend sixth sentence;</i> Although outside of the plan period, development proposals should appropriately <u>safeguard for and if relevant and appropriate, contribute to and / or deliver</u> Wormwood Scrubs Street's future delivery.
MM77	54	OOS.11 (to become 4.16)	<i>Amend;</i> 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. Connections to Old Oak North will be particularly important after the opening of the station to enable people to reach Old Oak Common Station. 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 Scrubs Lane.</u>
MM78	55	OOS.12 (to become 4.17)	<i>Amend;</i> 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, Old Oak Common Station should not preclude a connection to <u>Wormwood Scrubs the south</u> in the future <u>and development should safeguard for and if relevant and appropriate, contribute to and / or deliver a bridge to Wormwood Scrubs.</u> Any connection will need to consider how it will cross and provide passive provision for future development on the IEP Depot.

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MM79	55	OOS.13 (to become 4.18)	<i>Amend second sentence and insert additional sentence;</i> 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 (as part of the Grand Union Canal Local Park – see Policy P3) and a range of other spaces. <u>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.</u>
MM79A	55	OOS.14 (to become 4.19)	<i>After third sentence, insert;</i> <u>Based on the development capacities proposed for Old Oak South, it is expected that tall buildings will predominantly be in the range of 20-30 storeys, with taller buildings up to 45 storeys close to the Old Oak Common Station. Tall building proposals will be considered against all relevant development plan policies and material considerations.</u>
MM80	55	OOS.15 (to become 4.20)	<i>Amend;</i> The creation of a new commercial centre, major town centre and high density mixed use neighbourhoods will necessitate the provision of a substantial amount of infrastructure. Local Plan policies and OPDC's IDP identifies the likely requirements for infrastructure in the area, <u>detailed further in OPDC's IDP</u> . A significant amount of social infrastructure will be required. Current population and child yield projections indicate that there is a need to deliver one community hub , one super nursery and one sports centre in Old Oak South. These requirements are 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 <u>Local Plan and the further detail set out in the IDP</u> , in accordance with Policy SP10.
MM81	56	Figure 4.5	<i>Replace by figure annexed below</i>
MM82	57	OOC.3 (to become 4.23)	<i>Replace final sentence;</i> Please see OPDC's IDP for up to date requirements for safeguarding. <u>Development proposals should also safeguard land for the potential delivery of the Chiltern Line to Old Oak Common Station.</u>
MM83	58	Figure 4.6	<i>Replace by figure annexed below</i>
MM84	59-63	P2	<i>Delete figure 4.7 and replace by figure annexed below. Delete policy P2 and supporting text OON.1 – OON.25 and replace with following;</i> POLICY P2 Old Oak North VISION

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			<p><u>A high quality, intensively used and vibrant industrial area, which is better connected to surrounding neighbourhoods. Redevelopment with new multi storey intensified industrial typologies will respond sensitively to the area's heritage, including the Canal and the Rolls Royce Building. High density industrial activities will be supported by better connections and ancillary facilities as well as canal side open spaces that can support businesses, employees and visitors, making Old Oak North a vibrant industrial location that people will want to work in, visit and pass through.</u></p> <p>POLICY</p> <p><u>Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:</u></p> <p>Land uses</p> <p><u>a) Delivering a minimum 212,500 sqm non-residential floorspace and an indicative 3,300 new jobs by taking opportunities to intensify sites for SIL compliant broad industrial type activities in line with the identified site allocations;</u></p> <p><u>b) Delivering ancillary services and facilities where they support place-making and activate key routes.</u></p> <p>Public Realm and movement</p> <p><u>a) Contributing towards and / or delivering improvements to the function and quality of the transport network for all users by:</u></p> <p><u>i. Improving the existing pedestrian and cycle route from Old Oak North to Willesden Junction station</u></p> <p><u>ii. Delivering a new, high quality inclusive access pedestrian and cycle bridge over the canal to replace and relocate Bulls Bridge and to connect into Oaklands or, if this is not feasible or agreeable with landowners, upgrading the existing bridge to ensure inclusive access for all users;</u></p> <p><u>iii. Delivering enhanced pedestrian and cycle infrastructure along key routes, including segregated cycle lanes where feasible, where this does not have a significant adverse impact on the functioning of the highway;</u></p> <p><u>iv. enhancing the highways capacity of routes into and through Old Oak North necessary to support industrial intensification;</u></p> <p><u>v. safeguarding for and, if relevant and appropriate, contributing to Laundry Lane Bridge, a new vehicular connection from Scrubs Lane into Old Oak North;</u></p> <p><u>b) Contributing towards and / or delivering improvements to the function and quality of the public realm for all users through:</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>i. <u>Enhanced street greening and public realm along all key routes</u></p> <p>ii. <u>Ensuring industrial uses support the activation of the public realm by delivering positive frontages along;</u></p> <ul style="list-style-type: none"> • <u>the Grand Union Canal;</u> • <u>Hythe Road</u> • <u>Salter Street</u> <p>iii. <u>Ensuring ancillary uses support the activation of the public realm by delivering active frontages, particularly around Bulls bridge canal crossing and to aid navigation along key routes;</u></p> <p>iv. <u>improved wayfinding, signage and lighting, prioritising routes to/from Willesden Junction station, Scrubs Lane and the Grand Union Canal. Green infrastructure and the environment;</u></p> <p>c) <u>Making efficient use of Old Oak Sidings by:</u></p> <p>i. <u>safeguarding the site for continued use as a waste management site;</u></p> <p>ii. <u>supporting and/or enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area, where this accords with other relevant policies including Policy EU4; and</u></p> <p>iii. <u>supporting the delivery of an integrated utility hub on the site. Contributing towards and/or delivering new publicly accessible open spaces, including:</u></p> <p>d) <u>new canalside public open spaces where compatible with existing and/or proposed industrial operational requirements. Heritage and Character</u></p> <p>e) <u>Strengthening local identity and character by:</u></p> <p>i. <u>conserving and enhancing heritage assets including the Grand Union Canal Conservation Area, Grade I Listed Kensal Green Cemetery Registered Park and Garden, the Rolls Royce Building and their settings;</u></p> <p>ii. <u>ensuring character is informed by the area’s existing heritage including the railways, Grand Union Canal and industrial heritage. Building heights and massing</u></p> <p>f) <u>delivering increased building heights and multi storey industrial typologies where this will deliver industrial intensification and SIL compliant broad industrial type activities</u></p> <p>g) <u>Appropriately responding to the Grand Union Canal Conservation Area.</u></p> <p>SUPPORTING TEXT</p> <p><u>4.31 Old Oak North is home to a series of business operations primarily comprising of a large car processing and sales plant, but there are also light industrial uses,</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>creative industries, waste management operations and residential moorings.</u></p> <p><u>4.32 Multi-storey intensification of the area will provide an uplift in industrial floorspace and help meet increasing demand from industrial sectors, support economic growth and innovation. The area benefits from having a semi-consolidated land ownership with a limited number of landowners enabling a comprehensive and coordinated approach to be taken to the redevelopment of the area which will ensure an optimised approach to intensification. Based on the development capacity modelling and precedents set out in the Old Oak North Intensification Study, development in Old Oak North is expected to predominantly be in the range of 2 to 5 industrial storeys; however, heights could exceed this range to deliver tall buildings dependent on the type and form of industrial uses proposed. Tall building proposals will be considered against all relevant development plan policies and material considerations.</u></p> <p><u>4.33 New ancillary uses will provide amenities to support employees, visitors and the existing mooring communities and deliver active frontages to the street and canal to enhance the vibrancy of area. These activities should be focussed around navigation points, such as bridge crossings and/or along Hythe Road, and could include ancillary front-of-house spaces for industrial uses alongside other ancillary uses. All other industrial frontages should provide positive frontages onto key routes and to the canal.</u></p> <p><u>4.34 Existing walking and cycling connections from Old Oak North to surrounding public transport services and other amenities are of poor quality. In particular, the existing walking access from Old Oak North to Willesden Junction should be enhanced to deliver a safer and more legible connection to this important public transport hub. New and improved connections are needed to support multistorey intensification and ensure that Old Oak North is connected into surrounding places. This will ensure that Old Oak North has high quality walking and cycling access to public transport services at Scrubs Lane, Willesden Junction, Old Oak Lane and Old Oak Common and access to the Grand Union Canal.</u></p> <p><u>4.35 To the south-west of Old Oak North, Bulls Bridge is the only crossing point from Old Oak North to the southern towpath. The current bridge does not provide inclusive access and its position would not result in the most direct desire line towards Old Oak South and access to Old Oak Common station. Relocating the bridge towards the west would mean that the route would directly connect into the new mixed use residential led Oaklands North development.</u></p>

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			<p>4.36 There are two existing vehicular routes serving Old Oak North: Hythe Road/Salter Street and Haul Road. These offer reasonable vehicular access into the area and may be sufficient to support increased business traffic associated with the proposed level of industrial intensification. However, more detailed transport assessments will be required as part of future planning applications in order to test and understand the impacts of development proposals. There is the possibility that these assessments may highlight the need for an additional vehicular connection. Therefore, to facilitate this, the policy has identified a potential future northern vehicular connection (Laundry Lane Bridge) providing access directly from Scrubs Lane into Old Oak North. This will likely need to allow for HGVs and other large business vehicles to service the area, so land is required to be safeguarded accordingly for this purpose (see also P10).</p> <p>4.37 Old Oak North has historically been a location for industrial and railway infrastructure⁴. This history should continue to inform the character of the area as it is redeveloped. A number of heritage assets and positive elements of character have been lost during the evolution of the area but a number remain, including the Rolls Royce Building. This building provides a key anchor for local heritage and identity; its original features can help to provide a local character reference to inform the design of new intensified industrial typologies that would sit alongside it.</p> <p>4.38 There is potential for the Old Oak Sidings waste site to significantly increase its waste throughput capacity. The site is capable of meeting Hammersmith and Fulham’s waste apportionment targets for the London Plan period up to 2036, and if it was fully optimised this could generate surplus capacity. To help LBHF meet their waste apportionment targets, the Local Plan safeguards this site and OPDC will work closely with the site operator to explore ways it can be assisted to expand its markets in order to increase its use. The infrastructure improvements that may be required to support the wider industrial intensification of Old Oak North will help to support the ongoing and enhanced operation of the Old Oak Sidings site. Old Oak OON.9. Sidings also has the potential to support the management of waste during the construction of development in the OPDC area and potentially play a more significant role in OPDC’s future waste, energy and utilities network. Other waste operations in Old Oak North could be retained and re-provided on site as part of future development or if they were redeveloped for a non-waste use then compensatory provision would need to be made, in line with the London Plan Policy SI9 and Local Plan Policy EU6. As referenced above, the Old Oak</p>

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			<u>Sidings waste site has significant potential to increase its waste throughput capacity and it is therefore likely that compensatory provision will be demonstrable through the potential for increase in throughput on this site.</u>
MM85	64	Figure 4.10	<i>Replace by figure annexed below</i>
MM86	64	P3	<i>Amend clause (a);</i> Supporting the activation of the Grand Union Canal and canalside spaces within Old Oak <u>Channel Gate</u> by delivering:
MM87	64	P3	<i>Amend clause (a)(i);</i> permanent and meanwhile town centre, leisure, commercial employment , community and canal-related uses with active frontages in areas of higher activity including at publicly accessible open spaces and crossings of key routes; and
MM88	64	P3	<i>Amend clause (b);</i> Supporting overlooking, security and safety along the canal and canalside spaces within Park Royal and Channel Gate Old Oak North by delivering positive frontages;
MM89	65	P3	<i>Amend clause (g)(i);</i> delivering a segregated cycling route where feasible and where not, delivering a high quality shared walking and cycling route;
MM90	65	P3	<i>Amend clause (h);</i> Supporting local connectivity by contributing to and/or delivering a continuous local walking and cycling route along the northern side of the canal within Old Oak <u>Channel Gate</u> ;
MM91	65	P3	<i>Amend clause (j);</i> i) the Grand Union Canal Local Park within Old Oak North and Old Oak South of at least 2 hectares in size, including the Birchwood Nature Reserve and Canal Park <u>Channel Gate Local Park</u> ; ii) other smaller open spaces iii) improvements to existing open spaces including <u>Birchwood Nature Reserve</u> , Mary Seacole Gardens and Barretts Green; and iv) multifunctional new basins and waterspaces
MM92	65	P3	<i>Amend clause (n);</i> n) Contributing to a variety of building heights that respond to the canal's heritage, character, biodiversity and amenity roles by delivering heights and massing that support the functioning, designations, amenity and character of the canal and canalside spaces by:

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			<p>i. <u>Subject to the impact on the heritage, character, biodiversity and amenity of the Grand Union Canal, within Old Oak Channel Gate, 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 Old Oak Channel Gate Street, Park Road, Old Oak Lane and Scrubs Lane; and</u></p> <p>ii. <u>within Park Royal and Old Oak North, delivering appropriate heights that balance the need to conserve and enhance the heritage, character, biodiversity and amenity of the Grand Union Canal with to support the functioning and intensification of the Strategic Industrial Location.</u></p>
MM93	66	GUC.1 (to become 4.39)	<p><i>Amend fifth sentence;</i> The development of Old Oak and intensification of Park Royal (including Channel Gate) <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.</p>
MM94	66	GUC.3 (to become 4.41)	<p><i>Amend second sentence;</i> 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> <ul style="list-style-type: none"> a) the Old Oak North food and beverage quarter <u>Channel Gate Local Park;</u> b) the Atlas Junction Cluster; c) Birchwood Nature Reserve; d) Rolls Royce Yard; e) Mitre Canalside Cluster; and f) Other canalside spaces including basins and locations adjacent to crossings
MM95	66	GUC.6 (to become 4.44)	<p><i>Amend first sentence;</i> New bridges will play a critical role in supporting movement between Old Oak North and Old Oak South, supporting locally distinctive place-making and helping to activate canalside spaces.</p>
MM96	66	GUC.7 (to become 4.45)	<p><i>Amend;</i> The northern canalside route in Old Oak also provides an opportunity for areas within Old Oak North <u>Channel Gate</u> and <u>Old Oak Lane 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.</p>
MM97	66	GUC.10 (to become 4.48)	<p><i>Amend fourth to seventh sentences;</i> 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</p>

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			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. <u>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.</u>
MM98	67	GUC.11 (to become 4.49)	<i>Amend first two sentences;</i> The development of Old Oak Channel Gate 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 and must help to address drainage issues across Old Oak.
MM99	67	GUC.14 (to become 4.52)	<i>Amend first three sentences;</i> 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 ⁵ . 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>
MM100	67	GUC.14 (to become 4.52)	<i>Amend final sentence;</i> Within Park Royal <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 ⁶ while continuing to conserve and enhance the canal in terms of its heritage and ecology designations.
MM101	67	GUC.15 (to become 4.53)	<i>Amend first sentence;</i> Unlocking the comprehensive redevelopment of Old Oak areas will necessitate the provision of a substantial amount of new and improved physical infrastructure along and across the Grand Union Canal.
MM102	67	GUC.15 (to become 4.53)	<i>Amend second sentence;</i> 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>

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MM103	67	GUC.16 (to become 4.54)	<i>Amend first sentence;</i> In addition to its roles in managing flooding, the canal also provides an opportunity to generate localised heat and cooling for development in Old Oak 7 .
MM104	68	P4	<i>Amend clause (a);</i> Delivering 3,540 <u>3,390</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;
MM105	68	P4	<i>Amend clause (b);</i> Delivering 60 120 new jobs and a minimum 1,200 <u>1,575</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, and First Central and <u>Lakeside Drive</u> site allocations.
MM106	68	P4	<i>Add new clause following clause (b);</i> <u>(c) Safeguarding Twyford Waste Transfer Station site in accordance with the West London Waste Plan. Redesignate subsequent clauses</u>
MM107	68	Figure 4.13	<i>Replace by figure annexed below</i>
MM108	69	P4	<i>Amend clause (e)(i) (to become (f) (i));</i> <u>Supporting safeguarding for and if relevant and appropriate, contributing to and/or delivering a new vehicular, pedestrian and cycle route to link Park Royal to Channel Gate;</u>
MM109	69	PRW.3 (to become 4.58)	<i>Amend third sentence;</i> It demonstrates that, overall, an uplift of around 3,500 <u>3,390</u> jobs could be achieved, although this figure is indicative and is dependent on site specific constraints.
MM110	69	PRW.3 (to become 4.58)	<i>Amend final sentence and add new final sentence;</i> The site is adjacent to the Twyford Waste and Recycling centre <u>Transfer Station</u> which is safeguarded for waste apportionment purposes through the West London Waste Plan 2016 (see Policy EU6). <u>If the Twyford Waste Transfer Station 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. 100 Twyford Abbey Road is also a safeguarded site through the West London waste Plan (2015). If 100 Twyford Abbey Road 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>
MM111	69	PRW.4 (to become 4.59)	<i>Amend;</i> There are a number of non SIL sites within Park Royal West, including First Central, <u>Lakeside Drive</u> and

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			<p>surrounding sites, and the Bashley Road Gypsy and Traveller site. Further information on First Central and surrounding sites <u>are</u> is set out in the <u>First Central and Lakeside Drive</u> site allocations and Brewery Cluster (Policy P4C1). <u>Based on the residential development capacities proposed for Park Royal West, it is expected that tall buildings here will predominantly be in the range of 20 to 30 storeys. Tall building proposals will be considered against all relevant development plan policies and material considerations.</u> Provision for Gypsy and Traveller accommodation is addressed in the Housing chapter (Policy H8).</p>
MM112	70	PRW.6 (to become 4.61)	<p><i>Amend;</i></p> <p>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 length³. <u>There is also a significant amount of 'rat-running' through the estate. These travel patterns contribute to high levels of traffic and congestion, particularly along the Big X; affecting bus journey times/reliability and they are also likely to exacerbate environmental issues such as noise, dust and poor air quality. There is an opportunity to support deliver changes to that address these issues and that, this travel behaviour to help address these issues and improve the functioning of the road network and ensure timely business operations and deliveries. The modal shift from private car trips to public transport, walking and cycling can be achieved by:</u></p> <ul style="list-style-type: none"> 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. <p><u>The interventions proposed to address this include</u></p> <ul style="list-style-type: none"> • <u>removing through traffic on the Big X;</u> • <u>supporting fast and reliable bus services and increasing capacity, including the potential for a complementary night shuttle bus service for shift workers;</u> • <u>removing and rationalising car parking;</u> • <u>supporting more efficient freight movements;</u> • <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>

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			<ul style="list-style-type: none"> • <u>creating new public spaces and support street greening within the town centre;</u> • <u>creating and upgrading pedestrian and cycle facilities to deliver a joined up, accessible walking and cycle route network</u>
MM113	70	PRW.10 (to become 4.65)	<p><i>Amend second sentence;</i></p> <p>Opportunities must also be taken to provide new spaces along the Grand Union Canal, within the Brewery Cluster and First Central <u>as part of Site Allocations</u> and to ensure public access into open spaces and/or providing additional greening and tree cover where possible.</p>
MM114	72	Figure 4.15	<i>Replace by figure annexed below</i>
MM115	73	B.6 (to become 4.73)	<p><i>Amend;</i></p> <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' A-class town centre <u>uses</u>, 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 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 D5<u>6</u> and E1.</p>
MM116	75	P5	<p><i>Amend final sentence of Vision;</i></p> <p>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 Old Oak and Park Royal West <u>industrial and mixed use areas.</u></p>
MM117	75	P5	<p><i>Add new clause following clause (b);</i></p> <p><u>Safeguarding Chase Road site in accordance with the West London Waste Plan. Redesignate subsequent clauses</u></p>
MM118	75	Figure 4.17	<i>Replace by figure annexed below</i>
MM119	76	OPR.5 (to become 4.86)	<p><i>Add, following final sentence;</i></p> <p><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></p>
MM120	77	OPR.7 (to become 4.88)	<i>Amend first two sentences;</i>

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			Old Park Royal is sandwiched between the wider industrial area of Park Royal West where change will be incremental and Old Oak where change will be transformational , <u>Old Oak North, where industrial intensification is also being planned for and other mixed use areas</u> . As a consequence, Old Park Royal will have a pivotal role to play as a transition area between both these areas and become a key route between Old Oak and Park Royal in the future.
MM121	78	P6	<i>Amend clause (a);</i> Supporting the delivery of a thriving mixed use neighbourhood centre by contributing to the delivery of 1,400 new jobs and a minimum of 650 800 new homes to support OPDC's 0-10 year housing supply;
MM122	78	P6	<i>Amend clause (b);</i> Delivering and maintaining a quantum and mix of A-class town centre floorspace with ground floor active frontages that are appropriately designed and serviced to support the town centre , including smaller units, to meet anticipated future demand in the most up to date Retail and Leisure Needs Study;
MM123	78	P6	<i>Amend clause (d)(i);</i> delivers a mix of town centre use floorspace, including small A-class units, as ground floor active frontages facing onto Park Royal Road and Coronation Road;
MM124	78	Figure 4.19	<i>Replace by figure annexed below</i>
MM125	78	P6	<i>Amend clause (e);</i> Diversifying the services, amenities, D-class and other appropriate town centre uses within <u>Delivering social infrastructure appropriate to the Neighbourhood Centre and to supporting new and existing industrial, health and residential uses;</u>
MM126	78	P6	<i>Amend clause (h)(i);</i> i) continuous two-way cycle lanes in both directions , particularly <u>along</u> on Coronation Road, Park Royal Road, Abbey Road and Acton Lane; and
MM127	79	P6	<i>Amend clause (k);</i> k) Contributing to, enabling and/or delivering a major realignment of the <u>improvements to Coronation Road/Park Royal Road/Abbey Road/Acton Lane junction that remove through traffic and improve their function for local business related freight, public transport, walking and cycling.</u>
MM128	79	P6	<i>Amend clause (l)(ii);</i> ii) within the ASDA site and in association with the realignment of the Coronation Road/ Park Royal Road/ Abbey Road/Acton Lane junction

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MM129	79	P6	<i>Amend clause (n);</i> 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 and where this facilitates the delivery of the realigned road junction.
MM130	79	PRC.1 (to become 4.91)	<i>Amend third sentence;</i> Other uses include supported housing and smaller services such as banks and cafes which help provide facilities for local employees, residents and visitors but there are still gaps in local provision for business focused services, such as meeting spaces, and an identified need for an additional 3,000sqm of additional A use class floorspace within Park Royal Centre in OPDC's most recent Retail and Leisure Needs Study 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.
MM131	79	PRC.4 (to become 4.94)	<i>Amend second sentence;</i> A mix of town centre uses <u>that can support local workers, residents and the industrial estate, primarily focused on the delivery of new A use class floorspace</u> can be delivered here, alongside complementary residential, social infrastructure and industrial uses.
MM132	79	PRC.5 (to become 4.95)	<i>Amend first sentence;</i> The target of 650 <u>800</u> 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.
MM133	79	PRC.6 and PRC.7	<i>Delete and insert to follow PRC8 (to become 4.96);</i> <u>4.97 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>

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			<ul style="list-style-type: none"> • <u>removing through traffic on the Big X;</u> • <u>supporting fast and reliable bus services and increasing capacity, including the potential for a complementary night shuttle bus service for shift workers;</u> • <u>removing and rationalising car parking;</u> • <u>supporting more efficient freight movements;</u> • <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> • <u>creating new public spaces and support street greening within the town centre;</u> • <u>creating and upgrading pedestrian and cycle facilities to deliver a joined up accessible walking and cycle route network</u>
MM134	80	PRC.10 (to become 4.99)	<p><i>Amend;</i></p> <p>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 realigned 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.</p>
MM135	80	PRC.11 (to become 4.100)	<p><i>Amend;</i></p> <p>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 principle¹ on the north east corner of the ASDA site in this location where it would support the viability of delivering improvements to the road junction Big X , including its realignment and new publicly accessible open space. <u>Based on the development capacities proposed for Park Royal Centre, it is expected that tall buildings will predominantly be in the range of 15 to 25 storeys. Tall building proposals will be considered against all relevant development plan policies and material considerations.</u></p>
MM136	81	P7	<p><i>Amend clause (c)(i);</i></p> <p>i. contributing to the delivery of 4,600 <u>6,200</u> new jobs and a minimum of 6,000 <u>8,000</u> new homes, including early delivery of a minimum of 3,200 <u>5,250</u> new homes to support OPDC's 0-10 year housing supply;</p>
MM137	81	Figure 4.21	<p><i>Replace by figure annexed below</i></p>

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MM138	81	P7	<i>Amend clause (d);</i> Focusing town centre, employment , <u>social infrastructure</u> community , cultural and catalyst uses <u>and Use Classes E, B2 and B8 uses that are appropriately designed and serviced to support the within</u> North Acton Neighbourhood Town Centre <u>within the town centre and along Old Oak Street;</u>
MM139	82	P7	<i>Amend clause (l)(i);</i> i. 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
MM140	82	P7	<i>Amend clause (m);</i> Safeguarding <u>for and if appropriate, contribute to and / or deliver the proposed Old Oak Common Lane Station and</u> land for the delivery of the West London Orbital Line station and services within Acton Wells;
MM141	82	P7	<i>Add clause (o);</i> <u>Safeguarding Quattro site in accordance with the West London Waste Plan.</u>
MM142	82	NA.4 (to become 4.104)	<i>Amend;</i> 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 in 2026 , when the sites are no longer required for construction purposes.
MM143	83	NA.5 (to become 4.105)	<i>Amend first sentence;</i> North Acton and Acton Wells have the capacity to deliver a minimum of 6,000 <u>8,000</u> new homes during the plan period1.
MM144	83	NA.6 (to become 4.106)	<i>Amend second sentence;</i> The area has the capacity to deliver 4,300 <u>6,200</u> new jobs during the plan period2 delivered arrange of town centre, B1 , B2 and B8 uses, <u>Use Class E</u> and community and cultural uses.
MM145	83	NA.8 (to become 4.108)	<i>Add two final sentences;</i> <u>If the site were redeveloped for a non-waste use then compensatory provision would need to have been made in line with the London Plan Policy SI9, WLWP and Local Plan Policy EU6. The waste site ceased operation in November 2018 when the site was first used by HS2 Ltd and its waste use has been relocated by Quattro to other sites elsewhere in West London.</u>
MM146	84	NA.16 (to become 4.116)	<i>Amend;</i> The development of high density mixed use areas will necessitate the provision of a substantial amount of

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			social and physical infrastructure. Within <u>North Acton and Acton Wells</u> , OPDC's IDP <u>the Local Plan</u> identifies that there is a need for one super nursery and an on-site secondary school <u>one health hub</u> . Based on current phasing and population yield assumptions, the study identifies the need for 9 forms of entry within this facility. Further details on the specification and the approach to the provision of this facility (including alternative arrangements) <u>phasing</u> are set out in the IDP. In accordance with Policy SP10, an equitable equalisation mechanism will be applied to the delivery of the secondary school <u>any onsite social infrastructure</u> , to ensure even sharing of the costs of delivering the facility <u>ies</u> .
MM147	84	Table 4.1	<i>Amend top left-hand box;</i> Tall buildings across <u>North Acton 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. <u>Based on the development capacities proposed for North Acton and Acton Wells and existing planning approvals, it is expected that tall buildings south of the Central Line will predominantly be in the range of 20 to 55 storeys and tall buildings north of the Central Line will predominantly be in the range of 20 to 35 storeys. Tall building proposals will be considered against all relevant development plan policies and material considerations.</u>
MM148	85	P7C1	<i>Amend clause (a);</i> Supporting the delivery of a neighbourhood town centre by clustering a range of permanent and meanwhile town centre uses and employment Use Class E uses, that are <u>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;
MM149	85	Figure 4.23	<i>Replace by figure annexed below</i>
MM150	86	NAT.2 (to become 4.122)	<i>Amend;</i> North Acton neighbourhood town centre has been designated to provide local services to existing and new communities ¹ . Active meanwhile and permanent town centre and employment Use Class E uses <u>will be supported within this new centre 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.
MM151	87	P7C2	<i>Amend clause (a);</i>

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			Supporting the delivery of Old Oak major town centre by clustering permanent and meanwhile town centre and employment <u>Use Class E uses, that are appropriately designed and serviced to support the town centre,</u> along Old Oak Street with residential above.
MM152	87	Figure 4.25	<i>Replace by figure annexed below</i>
MM153	88	OCL.1 (to become 4.128)	<i>Add;</i> <u>The station is not currently considered to be needed to support the quantum of development envisaged in this plan; however, it is identified in the London Plan as a scheme that Local Plans should support and to support strategic transport needs, development should safeguard for and if appropriate, contribute to and / or deliver the station. Particularly given the station's important strategic function for wider transport connectivity and its strong business case, OPDC strongly supports the delivery of this rail station and will be working proactively with TfL, Network Rail and other relevant stakeholders to secure its delivery.</u>
MM154	88	OCL.3 (to become 4.130)	<i>Amend final sentence;</i> By clustering active town centre and employment <u>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.
MM155	89	P8	<i>Amend vision;</i> 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 the comprehensive <u>mixed use</u> redevelopment of Old Oak and the industrial intensification in Park Royal and Channel Gate.
MM156	89	P8	<i>Amend clause (a)(i);</i> contributing to the delivery of 1,600 <u>1,700</u> new jobs and a minimum of 2,800 <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
MM157	89	P8	<i>Amend clause (a)(ii);</i> delivering ground floor town centre uses within Atlas Junction neighbourhood town centre <u>Old Oak major town centre.</u>
MM158	89	P8	<i>Delete clause (b)</i>
MM159	89	P8	<i>Amend clause (d) (to become clause (c));</i> Supporting the delivery of a mixed use neighbourhood within the Westway Estate and adjacent sites facing on to Wormwood Scrubs by; i. delivering a mix of housing and compatible employment <u>industrial and/or town centre</u>

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			<p>floorspace, including space for small businesses, to make use of the close proximity to Old Oak Common Station in accordance with policy E2; and</p> <p>ii. delivering employment town centre uses, <u>social infrastructure</u> and/or <u>community uses facilities</u> on the ground floor with residential above directly facing Wormwood Scrubs</p>
MM160	89	Figure 4.27	<i>Replace by figure annexed below</i>
MM161	90	P8	<i>Amend clause (g)(iv) (to become clause (f)(iv));</i> new and improved spaces within Atlas Junction neighbourhood <u>Old Oak major town centre</u> ; and
MM162	91	OOL.1 (to become 4.133)	<i>Amend second and third sentences;</i> Positioned between Old Oak and Park Royal mixed use areas and Strategic Industrial Locations (SIL), it is a place of transition in terms of land use, built form and character and will play an important role in integrating Old Oak the OPDC area with surrounding areas locations. This transition is reflected by its diverse mix of employment and residential uses including Strategic Industrial Locations (SIL), other employment floorspace and the four established residential neighbourhoods of the Island Triangle, Shaftesbury Gardens, Midland Terrace and Wells House Road.
MM163	91	OOL.2 (to become 4.134)	<i>Amend final two sentences;</i> 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 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.
MM164	91	OOL.4 (to become 4.136)	<i>Amend first sentence;</i> Old Oak Lane and Old Oak Common Lane is identified to have the capacity to deliver a minimum of 2,600 <u>2,750</u> new homes and a capacity of 1,100 <u>1,700</u> new jobs during the plan period ¹ .
MM165	91	OOL.4 (to become 4.136)	<i>Amend final sentence;</i> 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 the Old Oak major a new neighbourhood <u>town centre</u> to be established at Atlas Junction.
MM166	91	OOL.5 (to become 4.137)	<i>Amend first two sentences;</i> The Willesden Junction Bus Garage and areas directly to the south of the Island Triangle neighbourhood are is

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			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 these <u>this</u> locations.
MM167	91	OOL.7 (to become 4.139)	<i>Amend third sentence;</i> 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.
MM168	92	OOL.9 (to become 4.141)	<i>Amend clause (b);</i> b) Old Oak Community Gardens – enhanced and expanded to support the amenity of the Island Triangle neighbourhood <u>and Channel Gate;</u>
MM168A	92	OOL.12 (to become 4.144)	<i>After first sentence, insert;</i> <u>Based on the development capacities proposed for Old Oak Lane and Old Oak Common Lane, it is expected that tall buildings will predominantly be in the range of 20 to 25 storeys. Tall building proposals will be considered against all relevant development plan policies and material considerations.</u>
MM169	93	P8C1	<i>Amend title;</i> Atlas Junction Town Centre Cluster
MM170	93	P8C1	<i>Amend Vision;</i> This neighbourhood town centre <u>As part of Old Oak Major Town Centre, Atlas Junction will provide local services for communities centred on an improved Atlas Junction and Union Way Park Road that provides a key route into Old Oak. Active uses will sit beside high quality canalside spaces helping to establish this stretch of the canal as a place to visit and enjoy.</u>
MM171	93	P8C1	<i>Amend clause (a);</i> Supporting the delivery of the neighbourhood <u>this portion of the Old Oak major town centre</u> by clustering active town centre and employment <u>Use Class E uses,</u> that are appropriately designed and serviced to support <u>the town centre,</u> along existing streets and new routes shown in figure 4.30 <u>outside of SIL</u> on ground and lower floors with residential above;
MM172	93	P8C1	<i>Delete clause (b)</i>
MM173	93	P8C1	<i>Amend clause (c)(i) (to become clause (b)(i));</i> leisure, eating and drinking <u>Use Class E, uses, that deliver high levels of activation,</u> fronting on to the Grand Union Canal;
MM174	93	P8C1	<i>Amend clause (c)(iii) (to become clause (b)(iii));</i> meanwhile uses within the neighbourhood town centre and Oaklands North

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MM175	93	Figure 4.30	<i>Replace by figure annexed below</i>
MM176	94	P8C1	<i>Amend clause (d)(i) (to become clause (c)(i));</i> Park Road <u>Union Way</u> as an all modes access route providing walking and cycling access to the Grand Union Canal towpath; and
MM177	94	P8C1	<i>Amend clause (h)(ii) (to become clause (g)(ii));</i> 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> Park Road with an opportunity for a tall building onto <u>Park Road</u> that defines its role as a key north-south route and canal crossing point; and
MM178	94	P8C1	<i>Amend clause (h)(iii) (to become (g)(iii));</i> at Rowan House on the western corner of Atlas Junction, heights of generally 8 to 10 storeys.
MM179	94	AJ.2 (to become 4.147)	<i>Amend;</i> 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, a neighbourhood town centre has been designated <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 new neighbourhood <u>part of the major town centre.</u>
MM180	94	AJ.3	<i>Delete</i>
MM181	94	AJ.6 (to become 4.150)	<i>Amend second sentence;</i> To support local people reaching their destinations, development should contribute to the delivery of <u>Union Way</u> Park Road and its associated bridge across the canal <u>walking and cycling connection to the southern towpath</u> and to a new/enhanced pedestrian/cycle bridge into Old Oak North.
MM182	94	AJ.7 (to become 4.151)	<i>Amend;</i> 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, <u>and wider Old Oak</u> and to allow for the continuing functioning of Park Royal as a successful industrial estate.
MM183	95	AJ.9 (to become 4.153)	<i>Amend;</i> Across Old Oak Lane and Old Oak Common Lane there are a range of building heights. The current tallest

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			<p>building is The Collective adjacent to the Grand Union Canal. Development sites provide the opportunity to help support local legibility to stations and both Atlas Junction and Old Oak town centres 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 and Channel Gate Development Framework Principles 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. On the east and west corners of Atlas Junction, building heights provide the opportunity to help define the junction with Rowan House on the western corner of the <u>junction</u> providing 8 to 10 storeys to create a suitable enclosure to the junction and along Victoria Road.</p>
MM184	96	Figure 4.32	<i>Replace by figure annexed below</i>
MM185	96-98	P9	<p><i>Delete policy and supporting text CG1 – CG11 and substitute;</i></p> <p><u>VISION</u></p> <p><u>Channel Gate will be a high quality residential led neighbourhood centred on the Grand Union Canal. A new Local Park, town centre and community uses and linkages with the adjacent existing neighbourhoods will ensure that Channel Gate is a vibrant new place.</u></p> <p><u>POLICY</u></p> <p><u>Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant the following:</u></p> <p><u>Development and Phasing</u></p> <p><u>a) Supporting the use of the area to facilitate High Speed 2 construction activities as secured by the High Speed London – West Midlands Act (2017);</u></p> <p><u>b) Supporting the early delivery of development on lands not required to facilitate High Speed 2 construction activities.</u></p> <p><u>Land Uses</u></p> <p><u>c) Supporting the creation of a thriving, residential led mixed use neighbourhood that contributes to the delivery of a minimum of 3,100 new homes and 600 new jobs during the plan period.</u></p> <p><u>d) Contributing to the delivery of the Old Oak major town centre by delivering vibrant town centre uses, appropriately designed and serviced to support the town centre, at Atlas Junction, Channel Gate Street and along the Grand Union Canal;</u></p>

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			<p>e) <u>Contributing to the activation of this place and creation of a Cultural Quarter, delivering cultural and catalyst uses.</u></p> <p>f) <u>Supporting the local economy by delivering a range of employment workspaces across Channel Gate, including: a. within the Old Oak major town centre; b. along Victoria Road; c. in areas of transition between primarily residential character and primarily industrial character;</u></p> <p>g) <u>Supporting the retention or potential relocation/reincorporation of the Willesden Freight Terminal and Park Royal Bus Depot.</u></p> <p>h) <u>Ensuring that industrial uses deliver an appropriate level of amenity for residential neighbourhoods and activate the public realm by delivering appropriate uses, positive, and where possible, active frontages at ground and lower floors and high quality façade design: i. adjacent to residential led development and existing residential neighbourhoods; ii. facing the Grand Union Canal; and iii. along existing and enhanced key routes and pedestrian and cycle routes.</u></p> <p><u>Public realm and movement</u></p> <p>i) <u>Contributing to, and enabling, the delivery of a high quality, legible, permeable, inclusive and accessible street network by: i. contributing to, and enabling, the delivery of the new street network shown in figure 4.9A; ii. delivering new and improved walking and cycling routes throughout Channel Gate, including new accesses to Old Oak Lane and Victoria Road; iii. ensuring permeability through the site along Channel Gate Street for all transport modes, including for double decker buses; iv. safeguarding for and if relevant and appropriate, contributing to and / or delivering potential future connections to Park Royal in the west, and to Old Oak Lane in the north; and v. retaining existing and /or providing sufficient alternative access capacity to the Willesden Freight Terminal and Park Royal Bus Depot; and vi. supporting opportunities for freight consolidation;</u></p> <p><u>Green infrastructure and the environment</u></p> <p>j) <u>Contributing to and/or delivering an integrated network of high quality, multi-functional publicly accessible open spaces and green infrastructure across Channel Gate. This should include: a. Channel Gate Local Park of a minimum 2 hectares in size; b. supporting the amenity of existing residential communities by delivering and /or contributing to the expansion and enhancement of Old Oak Community Gardens, and other spaces adjacent to the Island Triangle area; c. delivering other new areas of publicly accessible open space across Channel Gate, including</u></p>

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			<p><u>new canalside spaces, and spaces to support new community uses.</u></p> <p><u>k) Locating sensitive uses away from pollution sources and mitigating the impacts of noise and air pollution generated by rail and road transport or other industrial activities;</u></p> <p><u>l) Supporting and/or enabling opportunities for heat recovery from adjacent industrial activities that could contribute to a decentralised energy network within Channel Gate and the wider area.</u></p> <p><u>Heritage and character</u></p> <p><u>m) Strengthening local identity and character by conserving and enhancing the Grand Union Canal Conservation Area, the adjacent Old Oak Lane Conservation Area and their settings.</u></p> <p><u>n) Ensuring future local character is informed by the areas existing heritage, including the Grand Union Canal and the industrial heritage of the area. Building heights</u></p> <p><u>o) Contributing to a variety of building heights across Channel Gate that respond to sensitive locations and optimise development capacity by delivering: i. generally, 6 to 10 storeys along Victoria Road; ii. generally, 6 to 8 storeys fronting the Grand Union Canal; iii. lower heights and appropriate massing adjacent to the Island Triangle; iv. increased heights and massing adjacent to rail lines and freight activity to mitigate impact on residential amenity; v. tall buildings at appropriate locations throughout Channel Gate in accordance with Policies SP9 and D4; and vi. heights appropriate to support intensified industrial uses on the Willesden Junction Depot.</u></p> <p><u>SUPPORTING TEXT</u></p> <p><u>4.155 Channel Gate sits to the northern and southern edges of the Grand Union Canal to the west Old Oak Lane and Victoria Road, and east of Park Royal. The majority of the site either side of the canal is required by HS2 Ltd to support the construction of Old Oak Common Station, though the site also includes other industrial uses which are not directly impacted by HS2 construction activities.</u></p> <p><u>4.156 Channel Gate has the potential to play a key role in the regeneration of Old Oak and Park Royal. The size of the area, coupled with the arrangement of land ownership, its location near to existing neighbourhoods, Harlesden town centre, Willesden Junction and the future Old Oak Common station, access to existing key routes and setting on the Grand Union Canal will help deliver a major new residential led, mixed use community in the heart of the OPDC area.</u></p> <p><u>4.157 The Channel Gate Development Framework Principles (CGDFP) identifies that the area has the</u></p>

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			<p>capacity to deliver a minimum 3,100 new homes and 600 new jobs during the plan period, alongside the retained or reincorporated Park Royal Bus Depot and Willesden Freight Depot Terminal, which could also be rationalised subject to operational requirements. Given the size of the Channel Gate area and links to Old Oak Common Station, Willesden Junction and North Acton, there is the potential for these minimum homes and jobs targets to be exceeded through a co-ordinated and comprehensive approach to redevelopment of the site.</p> <p>4.158 While the majority of the area will be required by HS2 Ltd as a construction site for the Old Oak Common station, there is the potential for earlier delivery of development on other sites within Channel Gate, particularly along Victoria Road and within the Atlas Junction cluster. This will provide early place making opportunities by helping to establish the Old Oak major town centre and providing improved connections to surrounding areas. Early delivery of development within Channel Gate will need to mitigate the impacts from HS2 construction activity and should support a comprehensive approach to redevelopment of the area in later years.</p> <p>4.159 New town centre uses will be needed to support new communities in Channel Gate and surrounding areas, and development should help deliver the Old Oak major town centre. The town centre within Channel Gate should primarily be focused within the Atlas Junction cluster, where the intersection of key routes, Grand Union Canal and new Channel Gate Local Park provide the opportunity to deliver a vibrant new quarter for leisure, eating and drinking uses.</p> <p>4.160 During the use of Channel Gate for HS2 construction activities, there may be opportunities to deliver meanwhile uses which provide natural surveillance and support the early activation of the area in conjunction with the early delivery of new development. OPDC will work closely with HS2 Ltd and other relevant stakeholders to deliver this aspiration.</p> <p>4.161 Channel Gate will require a new high quality movement network that provides access into and through the area, and supporting and/or safeguarding access to surrounding areas. This new network will be underpinned by Channel Gate Street, a new key route, allowing all modes access through the site from Atlas Junction to Old Oak Lane, including a bridge crossing of the Grand Union Canal. In addition to Channel Gate Street, a series of new local streets and pedestrian and cycle routes will be required to ensure permeability within the site, and to nearby destinations including Old Oak Common, Willesden Junction, Harlesden town centre and North Acton. The movement network should deliver the requirements for Healthy Streets by</p>

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			<p>prioritising walking and cycling and integrating urban greening with the streetscape. While not currently envisioned to be delivered within the plan period, proposals should also safeguard land for a future crossing of the Dudding Hill Line, connecting Channel Gate to Park Royal in the West.</p> <p><u>4.162 The Grand Union Canal runs directly through Channel Gate and will be a key defining feature in the character and function of the area. Proposals should help to deliver improvements to the canalside environment in line with Policy P3, particularly widening of the canal towpath to support its importance as a walking and cycling corridor. Careful consideration should be given to how level differences are managed to support activation of the canal, particularly where town centres uses are being delivered. Where industrial uses are retained adjacent to the canal, natural surveillance should be provided through active and positive frontages along the length of the canal.</u></p> <p><u>4.163 Proposals will need to carefully consider the relationship between new and existing residential neighbourhoods and retained industrial uses, particularly in relation to the Willesden Freight Terminal. Community, leisure or light industrial uses could assist in providing an effective transition from areas of a primarily residential character to those of a primarily industrial character. The impacts of freight operations on the Island Triangle neighbourhood and surrounding areas will need to be effectively mitigated to deliver a high quality environment in accordance with Policy D5.</u></p> <p><u>4.164 Within Channel Gate, 30% of the area brought forward for mixed use development should be provided as publicly accessible open space. This should include the delivery of the new Channel Gate Local Park, of a minimum 2 hectares in size, located either side of the Grand Union Canal. Careful consideration will need to be given to how the park interacts with the canal towpath and how passive surveillance over both spaces can be provided. An area of search is currently identified for this Local Park recognising that further detailed work is required to define its precise boundaries. If appropriate, OPDC will seek to apply an equitable equalisation mechanism to ensure delivery of the Local Park is not constrained by site ownership boundaries. The new Local Park should be supported by a network of smaller open spaces across the area, and by embedding green infrastructure into the street network (see Policies SP9 and EU1). Proposals should support the expansion and enhancement of the existing Old Oak Community Gardens to help to provide a buffer between industrial activities on the Willesden Freight Terminal and deliver an appropriate level for existing residents.</u></p>

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			<p>4.165 A range of building heights and typologies will be needed to deliver the spatial vision for Channel Gate. Proposals should respond appropriately to The Island Triangle and Grand Union Canal which are identified as sensitive locations (see Policy SP9 and figure 3.15), while heights along Victoria Road should provide an appropriate sense of enclosure to the street while responding to existing residential areas to the south. Canalside level changes will also need to be appropriately considered in building heights and massing. In less sensitive locations, there is the scale and opportunity for development to establish a new context where higher densities and heights may be delivered, particularly adjacent to areas of industrial or freight activity. Based on the development capacities proposed for Channel Gate, it is expected that tall buildings will predominantly be in the range of 20 to 30 storeys. Tall building proposals will be considered against all relevant development plan policies and material considerations.</p> <p>4.166 Channel Gate benefits from a number of adjacent heritage assets including the Grand Union Canal and the Old Oak Lane Conservation Area. The wider industrial heritage, canal and railway heritage are identified as heritage themes in the OPDC Heritage Strategy. OPDC's Character Areas Study also identifies positive elements of industrial character. Together these elements should be used to inform the design of new development in Channel Gate to help deliver a locally distinctive neighbourhood.</p> <p>4.167 Within the northern part of Channel Gate, the Willesden Freight Terminal provides a valuable opportunity to increase levels of sustainable rail freight transport with access to regional and national networks. Proposals should support its continuing operation and development adjacent to it should support its functioning as a terminal in terms of its design, land use and access. OPDC would support opportunities for freight consolidation users on the site, subject to agreement of terminal operators and other stakeholders. OPDC would also support use of the terminal as a means of moving goods and construction material to and from the area with a goal of removing additional vehicle traffic from the street network.</p> <p>4.168 To the south, OPDC will support the retention and effective operation of the Park Royal Bus Depot. A comprehensive approach to the redevelopment of Channel Gate would allow for the relocation of the bus depot within the site and optimise the delivery of mixed use development in a coordinated manner. Subject to the agreement of Transport for London, should the bus depot no longer be required or is located to a suitable alternative site outside of Channel Gate, then OPDC</p>

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			<p>would support delivery of the site for mixed use development. OPDC would also support proposals for the co-location of the bus garage with mixed use development where this is in accordance with other relevant policies.</p> <p><u>4.169 The development of high density mixed use areas will necessitate the provision of social and physical infrastructure. Within Channel Gate, the Local Plan identifies that there is a need for one super nursery, one community hub and one sports centre. Further details on the phasing are set out in the IDP. These requirements are 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 TCC3). Proposals should appropriately safeguard land for and contribute to and/or deliver these and other infrastructure requirements set out in the Local Plan, in accordance with Policy SP10. An equitable equalisation mechanism will be applied to the delivery of the secondary school, to ensure even sharing of the costs of delivering the facility. OPDC will also employ a retrospective pooling contribution mechanism, to provide additional planning contributions towards delivery of the facility from other appropriate developments (see Policy SP10).</u></p>
MM186	99	P10	<p><i>Amend vision;</i></p> <p>Scrubs Lane will be a characterful and well connected street <u>neighbourhood</u> sitting as a hinge between east and west helping to integrate Old Oak with surrounding areas. Development will continue its employment heritage and will integrate space for living, creating and working.</p>
MM187	99	Figure 4.34	<p><i>Replace by figure annexed below</i></p>
MM188	100	P10	<p><i>Amend clause (a);</i></p> <p>Supporting the delivery of a range of <u>residential-led</u> mixed use development along Scrubs Lane by contributing to the delivery of 1,200 <u>1,100</u> new jobs and a minimum of 2,600 <u>3,500</u> new homes including 1,950 <u>2,450</u> new homes within the first 0-10 years;</p>
MM189	100	P10	<p><i>Following clause (a), insert new clause;</i></p> <p><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></p>
MM190	100	P10	<p><i>Amend clause (b) (to become clause (c));</i></p> <p>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 small business</u></p>

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			units for B1a, B1e, B2, and B8 <u>and E</u> uses along its length;
MM191	100	P10	<i>Amend clause (c) (to become clause (d));</i> Supporting residential amenity by locating housing: <ul style="list-style-type: none"> i. above the ground and lower floors onto Scrubs Lane and railway lines; <u>and</u> ii. at the ground floor away from Scrubs Lane where appropriate.; <u>and</u> iii. in a residential-led area south of the canal to the east of Scrubs Lane.
MM192	100	P10	<i>Amend clause (d)(v) (to become clause (e)(v));</i> improving existing, <u>safeguarding for</u> and creating new east-west routes at each cluster and along Wormwood Scrubs Street that provide access to Old Oak North, Old Oak south, the Grand Union canal, St Mary's Cemetery and Kensal Canalside Opportunity Area;
MM193	100	P10	<i>Delete clause (e)(iii)</i>
MM194	100	P10	<i>Amend clause (e)(iv) (to become clause (f)(iii));</i> yards as open spaces to the north of the canal <u>along Scrubs Lane</u> to support employment uses and as communal or private open spaces for housing.
MM195	100	P10	<i>Amend clause (g)(v) (to become clause (h) (v));</i> <u>within clusters, a variety of building heights including generally a single tall building</u> in each cluster; <u>and;</u>
MM196	100	SL.1	<i>Delete and substitute;</i> <u>Scrubs Lane sits as a hinge between a series of surrounding neighbourhoods that are undergoing 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.</u>

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MM197	100	To follow SL.2 (to become 4.171)	<p><i>Insert new paragraph 4.172 and footnote;</i></p> <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 Street¹. Equally, development proposals to support the intensified operational use of these sites will be supported.</u></p> <p><u>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.</u></p>
MM198	100	SL.3 (to become 4.173)	<p><i>Amend;</i></p> <p>OPDC has produced a Scrubs Lane Development Framework Principles (ONSSLDFP) 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. 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.</p>
MM199	101	SL.4 (to become 4.174)	<p><i>Amend;</i></p> <p>A significant proportion of early development will be seen on Scrubs Lane. Scrubs Lane has the capacity to deliver a minimum of 2,600 <u>3,500</u> new homes and 1,200 <u>1,100</u> new jobs in the plan period.</p>
MM200	101	SL.4 (to become 4.174)	<p><i>Add;</i></p> <p><u>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.</u></p>
MM201	101	SL.5 (to become 4.175)	<p><i>Amend;</i></p> <p>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</p>

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			<p>Lane, <u>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 places where Scrubs Lane is crossed by east-west movement routes. The clusters will 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.</u></p>
MM202	101	SL.6 (to become 4.176)	<p><i>Amend first two sentences and insert additional third sentence;</i></p> <p>These active <u>Town centre</u> 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>
MM203	101	SL.7 (to become 4.177)	<p><i>Amend;</i></p> <p>To deliver Scrubs Lane's employment capacity and continue to enhance its industrial character, sites fronting onto Scrubs Lane will be expected to re-provide compatible broad industrial type activities <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>
MM204	101	SL.8 (to become 4.178)	<p><i>Amend;</i></p> <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 connections are proposed at Ellisland Way, Park Road Laundry Lane, <u>Hythe Road, and along both sides of the Grand Union Canal southern towpath and through the delivery of Wormwood Scrubs Street.</u> Pproviding</p>

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			improved access to Kensal Canalside Opportunity Area will also be facilitated by improved connections to the east.
MM205	101	SL.9 (to become 4.179)	<i>Amend first two sentences;</i> Scrub Lane will <u>may</u> need to accommodate increased vehicular movement generated by the construction and operation of new development. However, as industrial uses are replaced with mixed use development in Old Oak, HGV freight traffic will decrease. This provides opportunities <u>To address the impacts of this, there is an opportunity to introduce:</u>
MM206	101	SL.9 (to become 4.179)	<i>Amend clause (b);</i> 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;
MM207	101	SL.12 (to become 4.182)	<i>Amend second sentence;</i> Further <u>Requirements for these publicly accessible open spaces can be found in the proceeding cluster policies and with further detail in OPDC's Infrastructure Delivery Plan (IDP).</u>
MM208	102	SL.15 (to become 4.185)	<i>Amend second sentence;</i> New development needs to be delivered in a way that supports the achievement of homes and jobs targets, and <u>responds appropriately to sensitive locations and delivers an appropriate sense of enclosure to the street avoiding a canyon effect.</u>
MM209	102	SL.16	<i>Delete</i>
MM210	102	Table 4.2	<i>Amend sixth row left hand column;</i> A single tall building in each cluster identified in P10(b) <u>Within clusters, a variety of building heights including generally a single tall building</u> <i>Amend sixth row right hand column;</i> Generally, a <u>A single tall building within each cluster is considered to be more appropriate than the</u> <ul style="list-style-type: none"> • uncoordinated delivery of tall buildings along Scrubs Lane; • delivery of increased heights and massing along the length of Scrubs Lane; <u>The exception to this approach is the Hythe Road cluster where additional tall buildings are considered to be 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> These four <u>six</u> <u>locations for</u> tall buildings will support legibility at key east-west intersections with the street,

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			<p>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> <p><u>Based on the development capacities proposed for Scrubs Lane, it is expected that tall buildings will predominantly be in the range of 20 to 25 storeys. Tall building proposals will be considered against all relevant development plan policies and material considerations.</u></p> <p>The definition of tall buildings is stated in Policy D54.</p>
MM211	103	P10C1	<p><i>Amend clause (a)(i);</i> clustering active employment <u>Use Class, B2 B8 and E uses</u>, that are <u>appropriately designed and serviced for small business units</u>, and community uses along Harrow Road and Ellisland Way;</p>
MM212	103	P10C1	<p><i>Amend clause (b);</i> Supporting local connectivity by delivering Ellisland Way as a new walking and cycling route providing a <u>and safeguarding a long-term</u> new route to the new connection to Willesden Junction Station;</p>
MM213	103	Figure 4.36	<i>Replace by figure annexed below</i>
MM214	103	P10C1	<i>Delete clause (e)(ii)</i>
MM215	104	HRC.1 (to become 4.186)	<p><i>Amend;</i> The Harrow Road cluster sits at the busy junction of Harrow Road, <u>and Scrubs Lane</u> and the proposed new connection to Willesden Junction and Old Oak North.</p>
MM216	104	HRC.2 (to become 4.187)	<p><i>Amend first sentence;</i> 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 B2, B8 and E uses</u>) and community uses with a good street presence are required on both streets.</p>
MM217	104	HRC.4 (to become 4.189)	<p><i>Amend first two sentences;</i> Harrow Road will continue to be a heavily trafficked road connecting with <u>an improved new</u> route to Willesden Junction and Old Oak North. <u>In the long term and if demonstrated to be feasible,</u> t<u>o</u> create a high quality walking and cycling environment, Ellisland Way should provide an additional choice for walking and cycling between the new route to Willesden Junction and Scrubs Lane²</p>
MM218	104	HRC.7 (to become 4.192)	<p><i>Amend second sentence;</i> This location is considered to support wayfinding to the retained community uses, Old Oak Street and Harlesden town centre.</p>

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MM219	105	P10C2	<i>Amend title;</i> Laundry <u>Lane</u> Cluster
MM220	105	P10C2	<i>Amend vision;</i> A key new route mediating complex ground levels to deliver connections into Old Oak North. 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.
MM221	105	P10C2	<i>Amend clause (b);</i> Supporting local connectivity by: i. delivering Park Road safeguarding for and if relevant and appropriate, contributing to and / or delivering Laundry Lane access road and bridge, connecting Old Oak South North to Scrubs Lane, as a high quality all modes vehicular route as a priority, or a walking and cycling connection if this is demonstrated not to be feasible; ii) 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; iii) <u>ii)</u> delivering a high quality crossing across Scrubs Lane and safeguarding land to deliver improved access into St Mary's cemetery ; and iv) <u>iii)</u> delivering active frontages along <u>Park Road Laundry Lane</u> and the western side of Scrubs Lane
MM222	105	P10C2	<i>Amend clause (c);</i> Supporting health and well-being and resilience to climate change by contributing towards publicly accessible open space at the junction of Scrubs Lane and Park Road, that to and / or delivering: i. addresses level changes in its design 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 ii. mitigates impacts of noise and air quality generated by Park Road and Scrubs Lane.
MM223	105	P10C2	<i>Amend clause (e);</i> Contributing to a variety of building heights including locating a single tall building on the northern side of Park Road Laundry Lane to support local legibility.
MM224	105	Figure 4.38	<i>Replace by figure annexed below</i>
MM225	106	LLC.1 (to become 4.194)	<i>Amend;</i> The Laundry <u>Lane</u> cluster is located on the former site of the Willesden Laundry which is reflected by ghost signage located at 26-30 Scrubs Lane.

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MM226	106	LLC.2 (to become 4.195)	<i>Amend;</i> It is located at the point where the proposed <u>potential</u> key route of Park Road <u>Laundry Lane</u> will <u>would</u> join Scrubs Lane, providing an east-west connection across <u>to Old Oak North</u> if required to support industrial intensification, <u>to Old Oak Common Lane</u> . Proposals should support and/or contribute to the delivery of this key route <u>safeguard for and if relevant and appropriate, contribute to and / or deliver Laundry Lane as part of the Cumberland Business Park site allocation and ensure level changes are addressed in its design. Current evidence shows that this connection is likely to need to be designed as an all-modes route. 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.</u>
MM227	106	LLC.3 (to become 4.196)	<i>Amend second sentence;</i> Active ground floor uses, such as town centre and employment uses, will support the activation of Park Road <u>the public open space/ route into Old Oak North and Scrubs Lane</u> .
MM228	106	LLC.4 (to become 4.197) and LLC.5 (to become 4.198)	<i>Amend;</i> 4.197 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 Park Road <u>Laundry Lane</u> . Any improved access to the cemetery will be explored in discussion with the management company for St. Mary's Cemetery. 4.198 Publicly accessible open space should be delivered within this cluster to support the strategic target to deliver 30% publicly accessible open space (see Policy SP8), help to mediate the level changes required along Park Road <u>Laundry lane</u> to bridge over rail infrastructure and support the delivery of east-west walking and cycling connections between Old Oak North, Scrubs Lane and St Mary's Cemetery.
MM229	106	LLC.7 (to become 4.200)	<i>Amend;</i> Delivering a single tall building to the east of the railway and north of Park Road <u>Laundry Lane</u> is considered to be appropriate in principle, subject to detailed assessment of its impacts in accordance with all relevant policy and guidance. This location is considered to support wayfinding to Park Road <u>Laundry Lane</u> as both a <u>publicly accessible open space</u> and, a key route into Old Oak North .
MM230	107	P10C3	<i>Amend vision;</i>

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			This cluster will provide new and improved walking, cycling and vehicular access into Old Oak North.
MM231	107	P10C3	<i>Amend clause (a)(i);</i> Clustering <u>these</u> active uses at the junction of Hythe Road, Scrubs Lane and any other access routes required into Old Oak North; and <i>Delete clause (a)(ii)</i>
MM232	107	P10C3	<i>Amend clause (b)(i);</i> enhancing Hythe Road as an all modes key route, with significant enhancements to the walking and cycling environment, into Old Oak North, that is successfully integrated with the Rolls Royce Building, adjacent railway structures and associated spaces
MM233	107	P10C3	<i>Delete clause (b)(iii)</i>
MM234	107	P10C3	<i>Amend clause (b)(iv) (to become (b)(iii));</i> in the long term, support the potential relocation of the vehicular access to Old Oak Sidings and, if operational, EMR sites in accordance with Policy P10C2Bii, to release the existing route for publicly accessible open space and/or yard space.
MM235	107	P10C3	<i>Amend clause (e);</i> Contributing to a variety of building heights including locating a single <u>two tall</u> buildings at the south-western corner of the Scrubs Lane and Hythe Road junction.
MM236	107	Figure 4.40	<i>Replace by figure annexed below</i>
MM237	108	HC.1 (to become 4.202)	<i>Amend;</i> The Hythe Road cluster is located at the current main access point into Old Oak North along Hythe Road. 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.
MM238	108	HC.2 (to become 4.203)	<i>Amend;</i> To support the access and functioning of these routes, <u>To 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 high quality and robust public realm. This should include small-scale 'walk-to' uses to complement the wider town centre hierarchy. The collection of routes also supports the delivery of active meanwhile uses to help draw

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			people into Old Oak North and the nearby meanwhile uses within and around the Rolls Royce Building.
MM239	108	HC.4 (to become 4.205)	<i>Amend second sentence;</i> 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 off of Park Road to the north and remove the existing access route through Mitre Yard.
MM240	108	HC.6 (to become 4.207)	<i>Amend;</i> Delivering a single <u>two tall buildings, one on either side on the south</u> 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.</u> Any tall buildings will <u>be subject to detailed assessments of its their impacts</u> 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. 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 Cemetery and <u>managesing</u> impacts on surrounding heritage assets.
MM241	109	P10C4	<i>Amend clause (a)(i);</i> clustering publicly accessible active community, leisure and eating/drinking and Use Class E uses, that deliver <u>high levels of activation,</u> facing on to Mary Seacole Gardens, the Grand Union Canal and at the junction between 115-129 Scrubs Lane and Mitre Wharf; and
MM242	109	P10C4	<i>Amend clause (b)(i);</i> i. contributing to the improvement of walking and cycling access from Mitre Bridge to the southern canal towpath and along the north of the canal to Old Oak; and
MM243	109	Figure 4.42	<i>Replace by figure annexed below</i>
MM244	110	MC.2 (to become 4.210)	<i>Amend;</i> 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 new and improved Mary Seacole Gardens and development on Mitre Wharf east-west canalside routes.
MM245	110	MC.3 (to become 4.211)	<i>Amend second sentence;</i> To support these roles, existing and new permanent and temporary moorings should be delivered in agreement

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			with the Canal and River Trust, other relevant canal-side <u>landowners</u> and local residential mooring associations ² .
MM246	110	MC.4 (to become 4.212)	<i>Delete first sentence</i>
MM247	110	MC.6	<i>Delete</i>
MM248	After 110	Following P10C4	<p><i>Insert new policy P10C5;</i></p> <p><u>POLICY P10C5: Mitre Way Cluster</u></p> <p><u>VISION</u> A residential-led neighbourhood centred on Wormwood Scrubs Street.</p> <p><u>POLICY</u> <u>Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:</u></p> <p><u>Land uses</u></p> <p>a) <u>Supporting the delivery of a mixed use cluster by:</u></p> <p>i. <u>Focusing Use Class E uses, that are appropriately designed and serviced for small business units small scale walk to town centre uses at ground floor levels; and</u></p> <p>ii. <u>delivering residential uses above Use Class E and town centre uses;</u></p> <p><u>Public realm and movement</u></p> <p>g) <u>Supporting local connectivity by:</u></p> <p>iii. <u>contributing to and / or delivering Wormwood Scrubs Street;</u></p> <p>iv. <u>iv. contributing to and / or delivering a new walking and cycling route from Wormwood Scrubs Street to Scrubs Lane;</u></p> <p>v. <u>v. Safeguarding land for the longer-term delivery of the western portion of Wormwood Scrubs Street;</u></p> <p>vi. <u>vi. Safeguarding land for the longer-term delivery of an all modes connection from Mitre Way to Scrubs Lane;</u></p> <p>vii. <u>vii. delivering new streets including walking and cycling routes to Little Wormwood Scrubs;</u></p> <p>viii. <u>viii. locating active frontages on Scrubs Lane, Wormwood Scrubs Street and Mitre Way.</u></p> <p><u>Green infrastructure and the environment</u></p> <p>h) <u>Supporting health and well-being and resilience to climate change by contributing to the delivery of a new publicly accessible open space in the east of the cluster to support walking and cycling access from Scrubs Lane to Wormwood Scrubs Street;</u></p>

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			<p><u>Heritage and character</u></p> <p>i) <u>Enhancing local character by:</u></p> <p>a. <u>delivering views from Scrubs Lane along Wormwood Scrubs Street;</u></p> <p>b. <u>positively responding to the Historic Scrubland and Open Space heritage theme;</u></p> <p><u>Building heights</u></p> <p>i) <u>Contributing to a variety of building heights including locating a single tall building on the North Pole East Depot at the junction of Mitre Way and Wormwood Scrubs Street;</u></p> <p><u>SUPPORTING TEXT</u></p> <p><u>4.217 The Mitre Way Cluster will be where the existing Scrubs Lane and future Wormwood Scrubs Street meet, providing a key navigation point for these north-south and east-west routes.</u></p> <p><u>4.218 The cluster of small-scale walk-to town centre and Use Class E uses will frame this meeting point and will be well-served by bus routes and walking and cycling routes. A new walking and cycling route will navigate differences in ground levels to connect Wormwood Scrubs Street to Scrubs Lane, providing access to bus routes and TfL's Cycle Future Route 23. In the longer-term, a potential new all modes route will connect Mitre Way to Scrubs Lane further improving access. Wormwood Scrubs Street itself will provide new bus services to Kensal Canalside Opportunity Area and in the longer term to Old Oak Common Station. This will bring the amenities of Harlesden, White City, Old Oak South, Kensal Canalside, Ladbroke Grove, Wormwood Scrubs and Little Wormwood Scrubs within easy reach of residents and employees within and around the Mitre Way cluster.</u></p> <p><u>4.219 New and enhanced routes within the cluster will benefit from active frontages, helping people to navigate to their destinations. A popular local destination is Little Wormwood Scrubs. Located in the London Borough of Hammersmith and Fulham, Little Wormwood Scrubs is outside of the OPDC area but will be on the doorstep of the Mitre Way cluster and surrounding residential areas. Providing new sensitive access points to Little Wormwood Scrubs and ensuring its character informs the character of new development across the Mitre Way cluster will be important for integrating Mitre Way with this open space.</u></p> <p><u>4.220 Delivering a single tall building at the junction of Mitre Way and Wormwood Scrubs Street is considered to be appropriate in principle, subject to detailed assessment of its impacts in accordance with all relevant</u></p>

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			<p><u>policy and guidance. This location is considered to support wayfinding to the new east-west connection to Kensal Canalside in the short- to medium-term and to Old Oak Common Station in the longer-term.</u></p> <p><u>4.221 The Mitre Way Cluster boundary is shown in figure 4.44. Portions of site allocations 40 (North Pole East Depot), 32 (Big Yellow) and 34 (Mitre Industrial Estate) fall within the cluster boundary.</u></p>
MM249	After 110	Following P10C4	<i>Insert new figure 4.44 (annexed below) and renumber subsequent figures</i>
MM250	111	P11	<p><i>Amend second sentence of vision;</i></p> <p>An enhanced station will provide better public transport connections and new and/or enhanced routes will <u>improve connectivity</u> to Harlesden and to Old Oak.</p>
MM251	111	P11	<i>Delete clause (a)(ii)</i>
MM252	111	P11	<p><i>Amend clause (a)(iii) (to become clause (a)(ii));</i></p> <p>supporting development on the western side of Willesden Junction station that contributes to a coordinated delivery of Willesden Junction Station upgrades and, the enhancement of Station Approach and delivery of Old Oak Street.</p>
MM253	111	P11	<p><i>Amend clause (b);</i></p> <p>b) Delivering a range of high quality B1 workspaces and employment and/or town centre uses across Willesden Junction where residential uses are less appropriate;</p>
MM254	111	P11	<p><i>Amend clause (c);</i></p> <p>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, Old Oak Street, the connection to Harrow Road and around Willesden Junction Station.</p>
MM255	111	P11	<p><i>Amend clause (d);</i></p> <p>Ensuring station upgrades are delivered in a phased and co-ordinated manner to best facilitate a comprehensive station redevelopment. Upgrades should also not result in reduced access to public transport services provided by the station for areas to the north of Willesden Junction.</p>
MM256	111	P11	<p><i>Amend clause (e);</i></p> <p>Contributing to and/or delivering a permeable, inclusive and accessible movement network as shown in figure 4.44 including Old Oak Street as a walking and cycling route north of Park Road to Willesden Junction Station;</p>
MM257	111	P11	<i>Delete clause (f)(i)</i>
MM258	111	P11	<i>Amend clause (f)(ii) (to become clause (f)(i));</i>

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			embedding green infrastructure along Old Oak Street , Station Approach and within other streets.
MM259	111	Figure 4.44 (to become figure 4.45)	<i>Replace by figure annexed below</i>
MM260	112	WJ.3 (to become 4.224)	<i>Amend final sentence;</i> It is critical that high quality walking and cycling routes are provided that connect Old Oak <u>North</u> with Willesden Junction and Harlesden so that surrounding residents and businesses can access and benefit from the regeneration opportunities at Old Oak <u>employees and visitors can access industrial uses.</u>
MM261	112	WJ.4 (to become 4.225)	<i>Amend first sentence;</i> In the future, there will be an increasing number of people wanting to directly access Old Oak from <u>making use of</u> this station.
MM262	112	WJ.7 (to become 4.228)	<i>Insert after first sentence;</i> <u>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.</u>
MM263	112-3	WJ.8 WJ.9 and WJ.10	<i>Delete</i>
MM264	113	WJ.11 (to become 4.229)	<i>Amend first sentence;</i> 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 Old Oak Street <u>the station.</u>
MM265	113	WJ.12 (to become 4.230)	<i>Amend;</i> 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, t <u>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.</u>
MM266	113	WJ.15 (to become 4.233)	<i>Amend third sentence and insert additional sentence following;</i> Station upgrades <u>will need to be agreed with stakeholders including TfL and Network Rail and should</u>

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			be delivered in a phased manner to best facilitate the comprehensive <u>coordinated</u> redevelopment of the station and surrounds whilst ensuring that the station can continue to function and serve the local community.
MM267	114	Figure 4.45 (to become figure 4.46)	<i>Replace by figure annexed below</i>
MM268	116	WS.4 (to become 4.239)	<i>Amend final two sentences;</i> Wormwood Scrubs' character as a publicly accessible open space that is more wild than tamed, will inform how the regeneration of <u>the area Old Oak</u> relates to Wormwood Scrubs. 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> .
MM269	116	WS.6 (to become 4.242)	<i>Amend second sentence;</i> As such, existing communities and proposed new communities <u>in 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.
MM270	116	WS.6 (to become 4.242)	<i>Amend final sentence;</i> The following key walking and cycling routes and enhancements are proposed: a) from Old Oak Common Station and surrounds; b) from Old Oak Street <u>a potential route east of Old Oak Common Station</u> via a high quality bridge; c) from Scrubs Lane via new and improved sensitively designed points of access; d) from Old Oak Common Lane via a widened footpath and segregated cycling lane; and e) from Wormwood Scrubs Street running parallel to the northern boundary of the Scrubs.
MM271	119	D1	<i>Delete policy and substitute following text to follow paragraph 5.3 and renumber subsequent policies and paragraphs;</i> <u>5.4 The chapter comprises a series of Principles for securing high quality design and design policies.</u> <u>Principles for securing high quality design</u> <u>5.5 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 the following design principles have been developed to help guide development.</u>

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			<p><u>1. For all development proposals, they should, where relevant and appropriate:</u></p> <p><u>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;</u></p> <p><u>ii. make use of the OPDC Place Review Group and OPDC Community Review Group; and</u></p> <p><u>iii. engage positively and proactively with OPDC and relevant statutory consultees as early as possible in the design process.</u></p> <p><u>2. For major development proposals, they should, where relevant and appropriate:</u></p> <p><u>i. demonstrate use of best practice in developing project briefs;</u></p> <p><u>ii. clearly demonstrate how different options for site development have been considered as part of the pre - application process;</u></p> <p><u>iii. undertake proactive engagement with the community and potential end users to inform design in line with OPDC's Statement of Community Involvement (SCI);</u></p> <p><u>iv. consider committing to providing a Section 106 monitoring contribution if the original design team is not retained for the detailed design stage; and</u></p> <p><u>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.</u></p> <p><u>3. For proposals referable to the Mayor, they 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.</u></p>
MM272	119	5.4 (to become 5.6)	<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. These policies' requirements The principles for securing high quality design 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>
MM273	119	5.7 (to become 5.9)	<p><i>Delete final sentence</i></p>
MM274	119	5.8 (to become 5.10)	<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>

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			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. Contributions will need to be agreed on a case-by-case basis depending on the site specific circumstances.
MM275	121	5.12 (to become 5.14)	<i>Amend first sentence;</i> The long term development of Old Oak and ongoing protection and intensification of Park Royal <u>the OPDC area</u> requires careful consideration of how the design, delivery and management of new and improved public realm is coordinated.
MM276	121	5.14 (to become 5.16)	<i>Amend third sentence;</i> Within Old Oak t Temporary materials may need to be utilised during the construction phase and be coordinated with adjacent permanent areas of public realm.
MM277	122	5.19 (to become 5.21)	<i>Amend first sentence;</i> The development of a new <u>and improved</u> street and public realm network within Old Oak and improved walking and cycling connections in Park Royal will require privately owned land to be provided for public access and use.
MM278	123	D3(c) (to become D2(c))	<i>Amend;</i> c) <u>demonstrate whether engagement</u> with relevant stakeholders <u>has to informed</u> the design of proposals at the earliest opportunity.
MM279	123	5.22 (to become 5.24)	<i>Amend first sentence;</i> The comprehensive redevelopment of Old Oak and Park Royal represents an unparalleled opportunity to deliver a new part of London that is accessible and inclusive for all sections of the community.
MM280	123	5.24 (to become 5.26)	<i>Amend first sentence;</i> The existing transport infrastructure, and level changes within Old Oak, along with <u>and</u> the poor quality congested environment within Park Royal restrict accessibility across the area.
MM281	123	5.25 (to become 5.27)	<i>Amend;</i> Applicants will be required to work with a range of stakeholders to achieve this aspiration <u>and demonstrate whether this engagement has informed the design of</u>

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			development within proposals' Design and Access Statements. Stakeholders 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 process in accordance with Policy D1 as set out in the Principles for Securing High Quality Design
MM282	124	5.28 (to become 5.30)	<i>Amend third sentence;</i> This will be critical during the long term development of Old Oak and evolution of Park Royal <u>the OPDC area.</u>
MM283	124	5.30 (to become 5.32)	<i>Amend second and third sentences;</i> The high density environment of Old Oak and industrial nature of Park Royal <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 Old Oak <u>schemes</u> where temporary materials may need to be utilised during the construction phase.
MM284	125	5.35 (to become 5.37)	<i>Amend first sentence;</i> The amount of New <u>high density development in Old Oak</u> will provide an extensive area of roof space alongside the existing roof space in Park Royal.
MM285	126	D5 (to become D4)	<i>Amend clauses (c) and (d);</i> c) demonstrate whether <u>undertake</u> proactive engagement with the community and other relevant stakeholders, including the Greater London Authority and Historic England <u>has informed the design of proposals;</u> and d) accord with relevant guidance for RAF Northolt safeguarding zones including consulting with the Defence Infrastructure Organisation on any proposals of 91.4m above ground level.
MM286	126	5.44 (to become 5.46)	<i>Amend;</i> 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 <u>of 91.4m above ground level.</u>
MM287	127	D6 (to become D5)	<i>Delete clause (a) and redesignate subsequent clauses Amend clause (h) (to become clause (g));</i> minimising the effects of the urban heat island effect <u>including by:</u> i) requiring proposals referable to the Mayor of London to undertake modelling to identify potential impacts on the urban heat island effect; and

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			<p>ii) mitigating overheating of <u>buildings and the public realm</u> where impacts are identified by utilising appropriate mitigation measures.</p> <p><i>Amend clause (i) (to become clause (h));</i></p> <p>i) minimising excessive wind speeds generated by development by:</p> <p>i) requiring proposals referable to the Mayor of London to undertake wind tunnel modelling early in the design process; and</p> <p>ii) mitigating negative impacts on buildings and the public realm where identified including through the use of green infrastructure.</p>
MM288	127	5.50 (to become 5.52)	<p><i>Amend first sentence;</i></p> <p>Apartments will comprise the majority of housing in the <u>the OPDC area</u>.</p>
MM289	129	5.52 (to become 5.54)	<p><i>Amend final sentence;</i></p> <p>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>
MM290	130	D7 (to become D6)	<p><i>Delete clause (b)</i></p>
MM291	132	D8 (to become D7)	<p><i>Delete clauses (c), (d) and (e) and substitute;</i></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></p> <p><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></p> <p><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>
MM292	132	5.62(to become 5.64)	<p><i>Amend first sentence</i></p> <p>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></p>
MM293	134	5.72 (to become 5.74)	<p><i>Amend first sentence;</i></p>

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			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> .
MM294	134	5.74 (to become 5.76)	<i>Amend;</i> 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> , podiums, terraces or roofs .
MM295	137	EU1(c)(i)	<i>Amend;</i> contributing towards and/or delivering <u>2</u> 3 new local parks that are each at least 2ha in size, in the locations identified in the places chapter;
MM296	138	6.12	<i>Amend;</i> An important element of the publicly accessible open space network is Local Parks. OPDC's Environmental Standards Study identifies that three <u>Two</u> local parks of at least 2ha should be incorporated into the development area at Old Oak . One local park is proposed in Old Oak South near to the Old Oak Common station. Another is proposed in Old Oak North <u>Channel Gate adjacent to the Grand Union Canal</u> , whilst the third local park is proposed by the Grand Union Canal, with contributions towards its delivery from development in both the Old Oak South and Old Oak North places . Further details on these local parks can be found in the Old Oak South (P1), Old Oak North (P2) and Grand Union Canal (P3) and Channel Gate (P9) 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 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 or <u>any further detail in the IDP</u> .
MM297	141	Figure 6.3	<i>Replace by figure annexed below</i>
MM298	142	EU3	<i>Delete clause b(i)</i> <i>Add new clauses b(iii) and (iv) to follow existing clause b(iii) (renumbered as b(ii));</i> <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</u>

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			<p><u>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><i>Amend clause (c);</i></p> <p>c) ensure sufficient capacity within the sewerage network by, as part of applicants' Water Efficiency, SuDS and Drainage Statement, 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><i>delete clause (e)</i></p> <p><i>Amend clause (i(i)) (to become (h(i)));</i></p> <p>(i) maximise the efficient use of potable water by:</p> <p>i) delivering on-site water recycling technologies particularly in non-residential developments, including rainwater harvesting and/or greywater recycling, where these are shown to be viable;</p>
MM299	142	6.34	<p><i>Amend final sentence;</i></p> <p>The recommendations from the IWMS have been embedded into this policy, the relevant Place policies and the infrastructure requirements in the Infrastructure Delivery Plan (IDP).</p>
MM300	143	Figure 6.4	<p><i>Replace by figure annexed below</i></p>
MM301	145	EU4	<p><i>Delete clauses (a) and (b) and amend introduction and clause (c) (to become (a)), redesignating subsequent clauses;</i></p> <p>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:</p> <p>e) a) ensuring the Air Quality Assessment required under a) identifies delivering mitigation measures to be implemented to reduceing;</p> <p>i) emissions, particularly of nitrogen oxide and particulate matter, including PM10 and PM2, to meet the Air Quality Positive objective; and</p> <p>ii) exposure to acceptable levels;</p>
MM302	145	6.44	<p><i>Amend;</i></p> <p>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</p>

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			reduce life expectancy and contribute to a number of illnesses like asthma.
MM303	145	6.45	<p><i>Following second sentence, insert;</i></p> <p><u>Air Quality Assessments should be submitted:</u></p> <ul style="list-style-type: none"> • <u>for all major planning applications; and/or</u> • <u>where the proposed development includes new uses or buildings that have the potential to generate air pollution; and/or</u> • <u>where a sensitive use is proposed in close proximity to an existing source of air pollution.</u>
MM304	147	Figure 6.6	<i>Replace by figure annexed below</i>
MM305	149	EU5	<p><i>Amend clause (a) and redesignate subsequent clauses;</i></p> <p>Development proposals will be supported where they:</p> <p>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:</p> <p>i) avoid significant adverse impacts of noise and vibration on health and quality of life as a result of <u>both the construction and operational phases of new development;</u></p> <p>b) ii) demonstrate development complies <u>comply</u> with the most relevant and current building standards (BS); and</p> <p>c) iii) identify unacceptable impacts and secure the appropriate delivery of mitigation <u>measures to address unacceptable impacts;</u></p>
MM306	149	6.61	<p><i>Amend;</i></p> <p>The NVA should demonstrate that development proposals will comply with the most up-to-date British Standards Institution's (BSI's) Building Standards (BS), 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.</u></p>
MM307	150	EU6	<p><i>Amend clause (d(i));</i></p> <p>d) Major development proposals will be supported where they demonstrate:</p> <p>i) through a Site Waste Management Plan, that their waste will be managed, both during construction and operation, as high up the waste hierarchy as possible;</p>
MM308	150	6.66	<i>Add to final sentence;</i>

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			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>
MM309	151	Figure 6.7	<i>Replace by figure annexed below</i>
MM310	152	6.69	<i>Amend final sentence and add;</i> The WLWP and the safeguarding of these sites provided sufficient capacity to meet the current 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>
MM311	154	EU7	<i>Amend;</i> Major development proposals will be <u>supported where required to submit a Circular and Sharing Economy Statement, demonstrating:</u> a) how 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; b) where , so far as is possible, the circular and sharing economy has been promoted through leasing or rental arrangements for building systems, products and materials; c) how sharing economy principles have been adopted in the design, construction and on-going operation of the development; and d) how circular economy principles have informed the design and implementation of energy (including heating and cooling), water and waste infrastructure.
MM312	154	6.90	<i>Delete final word of second sentence and add;</i> <u>including. The following list includes some examples of these opportunities:</u> <i>Amend final sentence of clause (a);</i> The process <u>can</u> should be applied to the whole supply chain so that waste is reduced at the point of supply (see Policies P4 and P5). <i>Amend second sentence of clause (d);</i> Materials that can easily be recovered at the end of their life should <u>can</u> be used and assembly of materials and products (whether in buildings or white goods etc.) should <u>can also</u> be designed for disassembly (see Policy EU8). <i>Amend second, third and fourth sentences of clause (e);</i> <u>There is an opportunity for</u> light weighting of buildings and buildings , that can be disassembled and reused , should <u>to</u> be embedded in the design process. Building

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			<p>facades and other elements that will be replaced or repaired over their life have the potential to <u>should</u> be designed so they enable repair, reuse or refurbishment at low cost. Leasing of short and medium life products should <u>can also</u> be considered (see Policies SP2 and EU8).</p> <p><i>Amend clause (f);</i></p> <p>Mobility: <u>Promotion of</u> Walking and cycling should be promoted as the preferred choice where possible and practical; <u>promotion of</u> low carbon and zero emission vehicles should be promoted that provide energy storage when not in use to the power network (see Policy T4); and <u>design of</u> new mobility services should be designed to maximise asset utilisation. These should <u>can</u> be supported by sensor networks, predictive analytics and user -facing digital services to help optimise use of system and deliver a high quality user experience.</p> <p><i>Amend clause (g);</i></p> <p>Transport: <u>Promotion of</u> Measures such as car clubs should be promoted, in accordance with (see Policy T4) that are. These should be accompanied by suitable electric vehicle charging infrastructure which should be designed to limit excessive peaks in electrical demand and where possible, utilise locally generated renewable energy.</p> <p><i>Amend first sentence of clause (k);</i></p> <p>Logistics: <u>Consolidation of</u> Movement of goods should be consolidated, smart technology used to optimise use of vehicles; last mile deliveries should be by clean vehicles and 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.</p> <p><i>Amend clause (l);</i></p> <p>Flexible design: In accordance with Policy SP2, buildings and public space should be <u>Designed buildings and spaces</u> so that they are <u>to be</u> highly adaptable to economic, demographic/social, technical and commercial and environmental change. They should be designed for flexibility, interoperability, disassembly and reuse. Consideration should be given to <u>Sharing</u> and leasing of space over different timescales to optimise use. This could include sharing spaces between different uses at different times of the day and night. Maker space, for example, could be rented out for different periods of time and by the desk, room or whole facility.</p> <p><i>Amend clause (m);</i></p> <p>m) Digital platforms: These should be <u>Provided</u> to help communities connect and share space, resources, time,</p>

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			<p>experience and skills and enable. Community ownership of assets (energy, mobility, shared space, social and cultural infrastructure, goods and services) should be enabled and supported (see Policies EU11 and DI3).</p> <p><i>Amend clause (n);</i></p> <p>Waste: There are opportunities should be maximised 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)</p>
MM313	156	6.91	<p><i>Amend first sentence;</i></p> <p>The high density and industrial environment of Old Oak and industrial nature of Park Royal will require the use of materials that are hard-wearing and adaptable, and that will last and weather well.</p>
MM314	157	6.95	<p><i>Amend first sentence of clause (h);</i></p> <p>Innovation in the use of rapidly renewable materials should also be promoted.</p> <p><i>Amend first sentence of clause (i);</i></p> <p>Responsible sourcing of materials. <u>This</u> is encouraged by the London Plan and required by BREEAM.</p> <p><i>Delete final two sentences of clause (i) and substitute;</i></p> <p><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 EcoManagement and Audit Scheme (EMAS) standards can be delivered at no additional cost.</u></p>
MM315	158	EU9	<p><i>Delete clause (a(iv))</i></p> <p><i>Delete final two sentences of clause (a(v)) and substitute;</i></p> <p><u>and accord with the Mayor's cooling hierarchy; and</u></p> <p><i>Delete clause (a(vii))</i></p>
MM316	158	6.97	<p><i>Add;</i></p> <p><u>To demonstrate how proposals accord with this policy, an Energy Statement should be included in submitted Sustainability Statements.</u></p>
MM317	158	6.102	<p><i>Amend;</i></p> <p>Studies have shown that buildings do not perform as well in operation as anticipated when they were being designed. Post-construction Undertaking audits and testing will help identify and rectify causes of the performance gap resulting from the <u>planning, construction and commissioning of the building.</u> <u>Where possible the OPDC would expect this information to be</u></p>

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			<u>used by developers and management companies to address any issues; and</u>
MM318	159	6.104	<i>Add;</i> <u>Modelling should take account of predicted risks of climate change.</u>
MM319	160	EU10	<i>Amend clause (f);</i> contribute to and/or deliver new heat, cooling and electricity networks <u>and infrastructure</u> to accord with the specification requirements set out in OPDC's Infrastructure Delivery Plan (IDP) <u>the policies of this plan.</u>
MM320	160	6.110	<i>Amend final sentence;</i> Any heat network would need to accord with guidance <u>the specification requirements set out in OPDC's Infrastructure Delivery Plan (IDP).</u>
MM321	165	EU13	<i>Delete clause (e)</i>
MM322	165	6.133	<i>Amend;</i> Where land is <u>suspected</u> , 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, including submitting a Preliminary Risk Assessment and Site Investigation Scheme as part of planning applications, <u>including submitting a Preliminary Risk Assessment and Site Investigation Scheme as part of planning applications.</u>
M323	168	7.1	<i>Amend first sentence;</i> Transport is the catalyst for the comprehensive regeneration of <u>the OPDC area</u> Old Oak <u>and plays an integral role in protecting, strengthening and intensifying the Park Royal industrial estate.</u>
M324	169	7.8	<i>Amend first sentence;</i> In Old Oak <u>Measures to prioritise bus movement, provide segregated facilities for cyclists and create pedestrianised areas will be supported.</u> <i>(The words "Outside of designated Strategic Industrial Location areas," in substitution for "In Old Oak" were proposed to be inserted as a Main Modification and were consulted upon in May-July 2021 but were withdrawn by the Corporation as a Minor Modification, in August 2021).</i> <i>Amend third sentence;</i> In Park Royal <u>SIL</u> , the road network will need to support the movement of freight to facilitate business growth by implementing measures to address existing congestion issues.
M325	171	T2	<i>Amend clause (a);</i>

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			Development proposals will be supported where they: a) deliver or contribute to new and enhanced walking infrastructure, in line with Policy SP7 on connections and figure 7.5 the walking interventions identified within the Infrastructure Delivery Plan (IDP);
M326	171	7.14	<i>Amend;</i> 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. 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. Figure 7.5 shows the indicative future key walking routes in Old Oak and Park Royal. In Old Oak, 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 walking environment. These interventions must also be supported by a high quality on-site walking environment.</u>
MM327	172	Figure 7.5	<i>Replace by figure annexed below</i>
MM328	173	T3	<i>Amend clause (a);</i> 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>
MM329	173	7.21	<i>Amend third sentence;</i> 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>
MM330	173	7.21	<i>Amend fourth sentence;</i> In Old Oak, in addition to the key cycle routes identified, other local streets would also contribute towards the cycle network.
MM331	173	7.22	<i>Amend;</i> In Old Oak, r 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.
MM332	174	Figure 7.7	<i>Replace by figure annexed below</i>
MM333	175	7.24	<i>Amend first sentence;</i>

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			New and enhanced bridges and underpasses, <u>are depicted in the place policies and are identified within OPDC's IDP.</u>
MM334	176	T4	<i>Amend clause (c(i));</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>
MM335	176	7.33	<i>Amend first two sentences and insert new third sentence;</i> 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 parking spaces have active provision for electric vehicles and the remaining 80% of all new residential parking spaces have passive provision for electric vehicles. 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>
MM336	177	7.35	<i>Amend sixth sentence;</i> 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.
MM337	178-9	Figures 7.10 and 7.11	<i>Replace by figures annexed below</i>
MM338	180	T5	<i>Amend clause (a);</i> Development proposals will be supported where they; a) deliver/contribute towards rail infrastructure and capacity, 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;
MM339	180	7.37	<i>Amend;</i> Three <u>Two</u> 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 and Hythe Road.
MM340	180	7.38	<i>Amend first sentence;</i> Old Oak <u>The OPDC area</u> will become one of the most connected places in the UK once <u>Old Oak Common</u> the proposed new stations are opened.
MM341	180	7.41	<i>Amend first sentence;</i> New rail stations and rail lines should support Old Oak <u>the OPDC area</u> becoming a major new commercial and

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			high- density residential centre by optimising development opportunities on and/ or adjacent to stations and tracks.
MM342	180	Following 7.42	<i>Insert additional sentence;</i> <u>Interventions aimed at enhancing rail capacity within Old Oak and Park Royal are identified in place policies and further details are set out in OPDC's Infrastructure Delivery Plan (IDP).</u>
MM343	181	Figure 7.12	<i>Replace by figure annexed below</i>
MM344	182	T6	<i>Amend clause (a);</i> 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 and the IDP</u> , 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;
MM345	182	7.45	<i>Amend first sentence;</i> 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>).
MM346	183	Figure 7.14	<i>Replace by figure annexed below</i>
MM347	184	T7	<i>Amend clause (a);</i> Development proposals will be supported where they: a) provide measures to coordinate and reduce freight, servicing and delivery trips by: i) <u>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> ii) producing and implementing a Delivery and Servicing Plan; and iii) utilising freight consolidation centres where feasible and appropriate;
MM348	184	7.51	<i>Insert new clause (a) and redesignate subsequent clauses;</i> <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>
MM349	185	T8	<i>Amend clauses (a(i) and (ii));</i> Development proposals will be supported where they: a) provide measures to reduce construction trips by: i) providing forecast vehicle trip information;

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			ii) producing and implementing a Construction Logistics Plan and Construction Code of Practice, consistent with TfL guidance;
MM350	185	7.58	<i>Amend;</i> Redevelopment in Old Oak <u>the OPDC area</u> 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.
MM351	185	7.65	<i>Amend second sentence;</i> 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 Old Oak <u>the OPDC area</u> .
MM352	189	H1	<i>Amend first sentence;</i> OPDC will support delivery of a minimum of 20,100 <u>19,850</u> new homes during the Plan period.
MM353	189	H1	<i>Amend clause (a);</i> supporting proposals that contribute to the delivery of a minimum annual housing target of 1,005 <u>993</u> homes, where these accord with other Local Plan policies;
MM354	189	H1	<i>Amend clause (c);</i> delivering a minimum of 18,500 <u>18,900</u> homes on Site Allocations, supporting the achievement of the housing targets identified within the Place policies
MM355	189	8.8	<i>Amend first two sentences;</i> OPDC's Development Capacity Study (DCS) identifies that over the next 20 years of this Local Plan, 20,100 <u>19,850</u> homes can be delivered. This constitutes an annual housing target of 1,005 <u>993</u> .
MM356	190	Table 8.1	<i>Amend;</i> 0 to 5 years 6 to 10 years 11 to 20 years 21+ years 4,000 <u>4,600</u> 7,000 <u>6,950</u> 9,100 , <u>8,300</u> 6,400 <u>6,150</u>
MM357	190	8.10	<i>Amend second, third and fourth sentences;</i> The current (2021) 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 1,359 <u>80</u> homes per annum over this period. However, OPDC will undertake the following strategies to seek to support the attainment of this Mayoral target, including:
MM358	191	H2	<i>Amend clauses (b) and (c) (to become (b), (c) and (d)) and redesignate subsequent clauses;</i>

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			<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 London Affordable Rent</u>, where development viability improves;</p> <p>c) providing <u>a minimum of 30%</u> of affordable housing as <u>either social rent or London Affordable Rent</u> and <u>the remainder 70%</u> as a range of <u>social rent or London Affordable Rent</u>, Intermediate housing, including London Living Rent and London Shared Ownership (except for Build to Rent, see Policy H6);</p> <p>d) and ensuring intermediate homes are affordable to households on <u>average median</u> incomes in the host local authorities;</p>
MM359	191	8.19	<p><i>Amend sixth sentence;</i></p> <p>This will particularly be the case on sites that require significant infrastructure to unlock development, such as within Old Oak South and Old Oak North (see chapter 4).</p>
MM360	192	8.21	<p><i>Amend;</i></p> <p>OPDC's SHMA has identified that there is an 86% need for <u>social rent or London Affordable Rent or equivalent housing</u> 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</u>. These households would additionally need to <u>This does not necessarily mean that these households would qualify for social rent level or London Affordable Rent housing through their council and this is determined under a number of factors under the Housing Act 1996 and other relevant homelessness legislation.</u> but is a consequence of the high cost of private renting or buying a home in the area.</p>
MM361	192	8.22	<p><i>Amend;</i></p> <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.</u> <u>The AHVA demonstrates that</u> Delivering social rent or London Affordable Rent housing has the greatest impact on viability given the high cost of delivering housing at this level of discount on the market value. Delivering intermediate housing (including London Living Rent and London Shared Ownership) helps to improve the overall viability of delivering affordable housing. Further evidence on tenure, housing need and development viability is available in the supporting Housing Evidence Statement.</p>
MM362	192	8.23	<p><i>Amend;</i></p> <p>In order to create inclusive new communities at Old Oak and Park Royal that are mixed and balanced by housing</p>

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			<p>tenure and household income, OPDC's target ratio for affordable housing is <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> <p>a) <u>A minimum of 30% either social rent level housing or London Affordable Rent;</u></p> <p>b) <u>70% mix of the remainder a range of either social rent or London Affordable Rent, intermediate housing including London Shared Ownership and London Living Rent.</u></p>
MM363	193	Following 8.23	<p><i>Insert two new paragraphs and renumber subsequent paragraphs;</i></p> <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> <p>a) <u>prioritising the delivery of either social rent or London Affordable Rent where early, mid and or late stage review mechanisms secured in Section 106 agreements identify that there is a surplus;</u></p> <p>b) <u>seeking to exceed 30% either social rent or London Affordable Rent on schemes that do not meet the Mayor's threshold approach to viability; and</u></p> <p>c) <u>prioritising the provision of the social rent or London Affordable Rent homes through housing grant.</u></p> <p><u>OPDC will revisit this policy and its associated viability evidence within five years of the adoption of the Local Plan to ensure that any increased development value can maximise the delivery of social rent or London Affordable Rent homes.</u></p>
MM364	193	Table 8.2	<p><i>Amend title of first column;</i></p> <p><u>Social Rent Housing or London Affordable Rent</u></p>
MM365	194	H3	<p><i>Amend clause (b);</i></p> <p>b) providing either <u>social rent or London Affordable Rent</u> homes in a mix of sizes that accords with OPDC's most up to date Strategic Housing Market Assessment.</p>
MM366	194	8.34 (to become 8.36)	<p><i>Amend second sentence;</i></p> <p>The overall housing mix should include delivering the size mix for <u>social rent or London Affordable Rent</u> that is set out in the latest SHMA.</p>
MM367	199	8.67 (to become 8.69)	<p><i>Delete final two sentences</i></p>
MM368	202	8.79 (to become 8.81)	<p><i>Amend;</i></p> <p>The Mayor's Academic Forum has provided projections for the growth of full time students in London from 2011/12 to 2026/27 and the required additional</p>

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			purpose-built student accommodation that this growth generates. These projections estimate 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.
MM369	204	9.2	<i>Amend first sentence;</i> The development of a new major commercial centre in Old Oak over the next 30 years alongside the protection, strengthening and intensification of <u>Park Royal Strategic Industrial Locations</u> represent opportunities to retain, grow, innovate and diversify the economic base. <i>Amend third sentence;</i> Additional space will be created to support more businesses and jobs – an additional 40,400 <u>36,350</u> new jobs over the next 20 years
MM370	204	9.3	<i>Amend first sentence;</i> This chapter sets out how new developments will protect, strengthen and intensify the Park Royal industrial areas estate and support new employment growth across a variety of sectors in Old Oak <u>other locations</u> .
MM371	205	E1	<i>Amend clause (a);</i> a) are comprised of uses suitable for broad industrial type activities, as defined in line with Mayoral policy and/or guidance, that contribute to meeting the strategic target of 40,400 <u>36,350</u> new jobs in Policy SP5 and the relevant place jobs targets in chapter 4;
MM372	205	E1	<i>Amend clause (b);</i> 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 Intensification Studies</u> ;
MM373	205	E1	<i>Amend clause (e);</i> e) demonstrate through a Design and Access Statement that they 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.
MM374	205	9.5	<i>Amend;</i> <u>Together, Park Royal and Old Oak North are</u> is the largest reservoir of industrial land in London, and is <u>are</u> designated as a Strategic Industrial Location (SIL) (see figure 9.4). Large industrial estates such as Park Royal

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			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.
MM375	205	9.6	<i>Amend;</i> Park Royal <u>The OPDC area</u> has a long history of economic innovation and growth. Today, Park Royal <u>it</u> 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 ¹ , 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 Park Royal <u>SIL within the OPDC area</u> (see Figure 9.2). Across Park Royal <u>SIL</u> there is capacity to deliver 7,600 <u>8,350</u> new jobs.
MM376	205	9.7	<i>Amend;</i> The release of SIL in Old Oak (see Figure 9.4) and The 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.
MM377	206	9.8	<i>Amend;</i> The Mayor's London Plan requires the OPDC area to <u>could</u> achieve an overall increase in floorspace suitable for broad industrial type activities and intensification in Park Royal <u>SIL</u> will be key to achieving this ² . This intensification could be achieved through a number of interventions such <u>as</u> 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.
MM378	206	9.10	<i>Amend first two sentences;</i> There are an array of different space types and sizes across the Park Royal <u>SIL</u> , which helps to make it a competitive and attractive business location ³ . It is important that proposals in Park Royal <u>SIL</u> are well designed and support the effective function of businesses across a wide range of sectors ⁴ and business sizes.
MM379	207	Figure 9.4	<i>Replace by figure annexed below</i>
MM380	208	E2	<i>Amend clause (a(i));</i> Outside of SIL, OPDC will support proposals that: a) deliver employment floorspace that:

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			<p>i) contributes to meeting the strategic jobs target of 40,400 <u>36,350</u> in Policy SP5 and the place jobs targets in chapter 4;</p> <p><i>Amend clause (a(ii));</i></p> <p>Is well designed for their intended purpose having regard to providing flexibility for a range of appropriate identified future employment growth sectors, as demonstrated through an applicant's Design and Access Statement; and</p> <p><i>Add clause (e);</i></p> <p><u>e) provide "meanwhile" uses in accordance with policy TCC9 (to be renumbered TCC8)</u></p>
MM381	208	9.13	<p><i>Amend;</i></p> <p>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.</p>
MM382	208	9.14	<p><i>Amend;</i></p> <p>On sites outside of the SIL designation, there is capacity to deliver 27,600 <u>28,150</u> new jobs, across a range of economic sectors¹. 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 and Atlas Junction Neighbourhood Town Centre), 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 supported that contribute to this target and the relevant place targets (see chapter 4) and Site Allocation targets (see Policy SP10).</p>
MM383	208	9.15	<p><i>Amend;</i></p> <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. There is approximately 87 ha of industrial land and 255,835 sqm of industrial floorspace in the de-designated SIL area in Old Oak². OPDC will seek to re-provide this 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. This <u>Any</u> reprovision, along with the industrial intensification in Park Royal SIL (see Policy</p>

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			<p>E1) will help deliver an overall net gain of floorspace suitable for broad industrial type activities across the OPDC area, as required by the Mayor's London Plan. <u>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.</u> 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>
MM383A	209	9.19	<p><i>Add;</i></p> <p><u>Conversely, given the long-term phasing of certain sites outside of SIL, there is potential for premises and sites to stay in productive use as interim employment uses prior to their planned redevelopment for mixed use in line with Table 3.1. Any proposals to support the effective functioning of these uses ahead of the sites' comprehensive development would be assessed against policy TCC9 (to become TCC8) (Meanwhile Uses) and other relevant planning policies.</u></p>
MM384	210	9.24	<p><i>Add;</i></p> <p><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></p>
MM385	213	E5	<p><i>Amend;</i></p> <p>For major development proposals, a Local Labour, Skills and Employment Strategy and Management Plan will be required secured. 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. This will enable them to demonstrate how they:</p> <p><u>a) maximise the use of local labour;</u></p> <p><u>b) provide construction apprenticeships and vocational training; and</u></p> <p><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>
MM386	213	9.34	<p><i>Amend introduction;</i></p> <p><u>To ensure proposals for major developments are meeting OPDC's socio-economic regeneration priorities and the requirements of policies SP5 and E5, a Local Labour, Skills and Employment Strategy and</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			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 LLESMP should be included within applicant's Socio-Economic Statements and should cover the following key areas:
MM387	217	TCC1	<p><i>Delete clause (e)</i></p> <p><i>Following TCC1(d) insert two new clauses and redesignate subsequent clauses;</i></p> <p><u>e) be delivered in phases, in accordance with demand created by the delivery of homes and jobs;</u></p> <p><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></p> <p><i>Amend clause (f) (to become clause (g));</i></p> <p>f) g) -should be supported <u>deliver mitigation measures, where identified by an impact assessment, in accordance with the NPPF and NPPG, where proposals are providing retail, leisure or office development that exceeds the thresholds in e)i. and ii. set out in paragraph 10.9 (to become 10.11); and</u></p> <p><i>Amend clause (g) (to become clause (h));</i></p> <p>g h) 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 in e)i. and ii. set out in paragraph 10.9 (to become 10.11).</p>
MM388	217	10.4	<p><i>Amend second sentence;</i></p> <p>The town centre hierarchy looks to focus town centre uses into four <u>three</u> principale locations</p> <p><i>Amend clause (b);</i></p> <p>three <u>two</u> neighbourhood centres at North Acton <u>and</u> Park Royal Centre and Atlas Junction.</p>
MM389	217	10.7	<p><i>Amend first sentence;</i></p> <p>OPDC acknowledges that small-scale walk-to town centre uses can help manufacturing businesses in Park Royal <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.</p>
MM390	217	Following 10.8	<p><i>Insert new paragraphs and renumber subsequent paragraphs;</i></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</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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.</p> <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>
MM391	218	10.9 (to become 10.11)	<p><i>Amend first two sentences;</i></p> <p>The OPDC area is relatively unique in that the designated town centres at Old Oak and, 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 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</u> meet the relevant thresholds to include within their Planning Statement a Town Centre Uses Statement.</p>
MM392	218	10.10 (to become 10.12)	<p><i>Amend third sentence;</i></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> are caught by the relevant threshold in the policy.</p>
MM393	219	Figure 10.3	<p><i>Replace by figure annexed below</i></p>
MM394	220	TCC2	<p><i>Amend clause (a);</i></p> <p>a) Applications for town centre uses will be supported where they:</p> <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; and</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>ii. support flexibility and adaptability so that uses can expand and/or change between use classes subject to demand and appropriate permissions/agreements; and</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>
MM395	220	TCC2	<p><i>Amend clause (b);</i></p> <p>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. Any proposals for event space and/or street markets would need to be accompanied by a management plan;</p>
MM396	220	TCC2	<p><i>Following clause (b), insert additional clause (c) and redesignate subsequent clauses;</i></p> <p>c) Existing town centre uses should be protected, unless:</p> <p>i. <u>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></p> <p>ii. <u>the facility can be appropriately replaced or provided elsewhere in the locality; or</u></p> <p>iii. <u>the facility is located within Park Royal SIL and exceeds the floorspace threshold in Policy TCC1 c) ii; or</u></p> <p>iv. <u>It is demonstrated that reprovision would compromise the delivery of housing and job targets particularly within Site Allocations.</u></p>
MM397	220	TCC2	<p><i>Amend clause (d(iv)) (to become clause (e(iv)));</i></p> <p>v. result in no less than two non-A5 <u>other</u> units between hot food takeaways;</p>
MM398	220	10.12 (to become 10.14)	<p><i>Amend final sentence and add additional sentence;</i></p> <p>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, particularly when considering the design of A-class uses in designated town centres. <u>Where existing uses remain viable, OPDC will look to protect existing town centre facilities, or require their replacement within the locality.</u></p>
MM399	220	Following 10.13 (to become 10.15)	<p><i>Insert new paragraph;</i></p> <p><u>10.16 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,</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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.</p>
MM400	220	10.14 (to become 10.17)	<p><i>Amend;</i> 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</u> 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. <u>A management plan for Event spaces will also require a management plan regarding</u> types of events, frequency of use, noise levels, advertising, servicing and pedestrian transport impacts.</p>
MM401	220	10.16 (to become 10.19)	<p><i>Amend first sentence;</i> OPDC's Healthy Town Centres Study also identifies the growing concerns about the growth in hot food takeaways (Class A5 uses) and their impact on health, in particular, regarding the proximity of takeaways to schools and the impact that this has on childhood obesity.</p> <p><i>Amend fourth sentence;</i> In addition, OPDC will resist proposals that would result in the clustering of A5 uses <u>hot food takeaways</u> to the detriment of the character and function or vitality and viability of a designated centre.</p>
MM402	221	10.17 (to become 10.20)	<p><i>Amend third sentence;</i> OPDC will condition all permitted applications involving A5 uses <u>hot food takeaways</u> to require the operator to achieve, and operate in compliance with, the Healthier Catering Commitment standard.</p> <p><i>Amend fifth sentence;</i></p>

Ref	Page	Policy/ Paragraph	Main Modification
			In accordance with OPDC's and the Mayor's Good Growth aspirations, OPDC will condition all A5 <u>uses hot food takeaways</u> to ensure operators are complying with these standards.
MM403	222-223	TCC3 and 10.18-23 (would have become 10.21-26)	<i>Delete policy TCC3 and supporting text, table 10.1, paragraphs 10.18-10.23 (would have become 10.21-26) and figure 10.5. Renumber subsequent paragraphs, tables and figures.</i>
MM404	Following 223	Accompanying TCC4 (to become TCC3)	<i>Insert new figure (to become figure 10.6)</i>
MM405	224	TCC4 (to become TCC3)	<i>Amend clause (c);</i> 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 OPDC's Infrastructure Delivery Plan (IDP)</u> , unless otherwise agreed by OPDC and the relevant service provider; <i>Amend clause (d(i));</i> i. in locations identified in the Places chapter <u>shown in Figure 10.5 and/or OPDC's IDP</u> , 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; <i>Amend clause (d(iii));</i> iii. health facilities and community facilities within or in close proximity to designated town centres or clusters;
MM406	224	TCC4 (to become TCC3)	<i>Insert additional clause (e) to follow clause (d) and redesignate subsequent clauses;</i> <u>securing the delivery of, or contributions towards 3 Neighbourhood Police Facilities within the OPDC area;</u>
MM407	224	10.26 (to become 10.23)	<i>Amend fourth sentence;</i> These requirements are set out in <u>the following paragraphs and place policies and further details are set out in</u> OPDC's Infrastructure Delivery Plan (IDP).
MM408	224	10.27 (to become 10.24)	<i>Amend first sentence and add additional sentence;</i> <u>Figure 10.6, ¶the place policies and the IDP identifies the specific places required to deliver education, health, community and sports and leisure facilities. Further details on the specification requirements are set out in OPDC's IDP.</u>
MM409	225	10.28 (to become 10.25)	<i>Amend first sentence;</i> OPDC's Social Infrastructure Needs Study (2021 18) outlines the current approach to the provision of

Ref	Page	Policy/ Paragraph	Main Modification
			education, health, community and emergency service facilities in the OPDC area.
MM410	225	10.30 (to become 10.27)	<p><i>Amend;</i></p> <p>In respect of education, current modelling shows the need for on-site provision of:</p> <ul style="list-style-type: none"> a) a 4 3 form entry (FE) primary school, including early years provision; b) a 9FE secondary school, including further education provision; and c) four super nurseries.
MM411		10.31 (to become 10.28)	<p><i>Amend second and subsequent sentences;</i></p> <p>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> The four super nurseries should be spread across the OPDC area, with one each in Old Oak South (P1), Old Oak North (P2) and North Acton and Acton Wells (P7) and Channel Gate (P9) with the location of the fourth nursery to be kept under review.</p>
MM412		10.32 (to become 10.29)	<p><i>Amend;</i></p> <p>In respect of health, <u>the modelling undertaken by the Clinical Commissioning Groups (CCGs) shows the need for 1,564sqm of on-site health facility space within the Local Plan period supported by expansions to existing facilities in the area.</u> The Local Authorities and Clinical Commissioning Groups (CCGs) have confirmed that the preferred approach for the delivery of this <u>the on-site</u> floorspace is within one building, which allows the provision of health services at scale and provides for cost efficiencies. <u>However, requirements will need to be kept under review, including the potential for a second facility in the longer-term.</u> The Social Infrastructure Needs Study has assessed the on-site needs for this facility, which shows the need for this facility within the Cargiant site allocation <u>different site options for the new facility and identifies North Acton and Acton Wells as the preferred option,</u> based on current projections.</p>
MM413	226	10.33 (to become 10.30)	<p><i>Amend;</i></p> <p>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</p>

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			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 Old Oak North (P2) Channel Gate (P9) and the <u>location of the other hub should be kept under review in Old Oak South (P1).</u> The Social Infrastructure Needs Study also identifies a need for on-site emergency service provision and <u>expansion of existing facilities.</u> In relation to on-site provision, <u>current modelling shows 3 Neighbourhood Police Facilities are required which can be co-located with other social infrastructure across the OPDC area.</u> see the IDP for further details. Requirements for sports and leisure facilities are set out in further detail in Policy TCC6.
MM414	226	10.37 (to become 10.34)	<i>Amend first sentence;</i> When providing new social infrastructure facilities, OPDC will require that health and community facilities are within or in close proximity to designated town centres, where they will easiest to access. <i>Amend sixth sentence;</i> 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> OPDC's IDP, would also be considered against the criteria in the catalyst uses policy (see Policy TCC8).
MM415	227	TCC5 (to become TCC4)	<i>Amend first sentence;</i> OPDC will support the provision of a high quality cultural offer in the OPDC area and Cultural Quarter in Old Oak by:
MM416	227	TCC5 (to become TCC4)	<i>Delete clause (e)</i>
MM417	227	10.47 (to become 10.44)	<i>Amend clause (b);</i> b) proposed activities and projects that will support the creation of a cultural quarter in Old Oak;
MM418	228	TCC6 (to become TCC5)	<i>Amend clause (c(iv));</i> delivers new public sports and leisure centres in locations identified in <u>place policies, supporting text and</u> the Infrastructure Delivery Plan (IDP).
MM419	228	10.50 (to become 10.47)	<i>Amend fourth sentence;</i> Specific large-scale public access facilities should be provided in the locations identified in <u>place policies, supporting text and</u> OPDC's Infrastructure Delivery Plan (IDP).
MM420	229	TCC7 (to become TCC6)	<i>Amend clause (a) and insert new clause to follow (a), redesignating subsequent clauses;</i> a) the public house has been competitively marketed:

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			<p>i) for 24 months as a public house and for an alternative local community facility;</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 or as a community facility; and</p> <p>v) with no interest in either the freehold or leasehold either as a public house or as a community facility falling within the 'D1' use class;</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>
MM421	229	10.53 (to become 10.50)	<p><i>Amend second sentence and insert an additional third sentence;</i></p> <p>They provide <u>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 to all existing and future drinking establishments including those that exhibit these qualities including public houses and wine bars.</u></p>
MM422	230	TCC8 (to become TCC7)	<p><i>Delete clause (a) and amend clause (b);</i></p> <p>b) The Catalyst Uses Statement should demonstrate how the proposal performs <u>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:</u></p> <p>i) a) Is part of a holistic offer;</p> <p>ii) b) Is financially sustainable;</p> <p>iii) c) Complements the wider environment;</p> <p>iv) d) Generates momentum in delivering the comprehensive redevelopment of the area; and</p> <p>v) e) Leverages HS2 and Crossrail.</p>
MM423	230	10.56 (to become 10.53)	<p><i>Amend first sentence;</i></p> <p>Regeneration of the OPDC area and in particular Old Oak will result in large-scale development of brownfield land in a location that will be well connected.</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM424	230	10.61 (to become 10.58)	<i>Amend final sentence;</i> 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 OPDC's IDP</u> , which are necessary to meet the needs of development, such as a school or primary care centre.
MM425	232	TCC9 (to become TCC8)	<i>Delete clause (b)</i>
MM426	232	10.63 (to become 10.60)	<i>Amend;</i> Meanwhile uses are likely to play a huge role in early place making in the OPDC area, particularly in Old Oak , where there will be many temporarily vacant land parcels awaiting development in the longer term and where meanwhile uses can help provide facilities to support its designation as a Cultural Quarter (see Policy SP6). <u>Meanwhile uses can also support the effective use of land, in advance of comprehensive development, through the provision of interim employment uses.</u>
MM427	233	TCC10 (to become TCC9)	<i>Delete clause (a(ii))</i>
MM428	237	DI1	<i>Amend clause (b) introduction;</i> 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/or <u>in the further detail set out</u> in the Infrastructure Delivery Plan (IDP) by:
MM429	237	11.2	<i>Amend first sentence;</i> The redevelopment <u>regeneration</u> of Old Oak and the regeneration of Park Royal has ve the potential to deliver a significant number of new homes and jobs to help meet local and London-wide needs.
MM430	238	11.7	<i>Amend first sentence;</i> OPDC's Infrastructure Delivery Plan (IDP) identifies <u>sets out further details on</u> the key infrastructure required to unlock the comprehensive regeneration of the area. <i>and add additional final sentence;</i> <u>This information will be used to update the Local Plan.</u>
MM431	238	11.8	<i>Amend;</i> The scale of infrastructure required to support the regeneration of the OPDC area is significant. OPDC's Development Infrastructure Funding Study (2015) 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</u>

Ref	Page	Policy/ Paragraph	Main Modification																																			
			<u>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>																																			
MM432	238	11.9	<i>Amend first sentence;</i> The priority for securing funding will be securing appropriate contributions from developments in the form of Section 106 agreements and Community Infrastructure Levy payments, but this alone will not be able to pay for all the <u>essential</u> infrastructure required . <i>and add additional clause to final sentence;</i> <u>and are also outlined in further detail in OPDC's IDP.</u>																																			
MM433	238	11.11.	<i>Amend final sentence;</i> 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>																																			
MM434	239	11.14	<i>Amend;</i> 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 £60 35 /m ² in the London Boroughs of Brent and Ealing and at £50/m² in Hammersmith & Fulham and in broad terms applies to all development other than for education and health facility uses.																																			
MM435	240	11.21	<i>Amend final sentence;</i> 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 Old Oak North (Policy P2) , 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)																																			
MM436	241-3	Table 11.1	<i>Amend "Homes capacity" and "jobs capacity" columns;</i> <table border="1"> <thead> <tr> <th>Place</th> <th colspan="2">Homes Capacity</th> <th colspan="2">Jobs capacity</th> </tr> </thead> <tbody> <tr> <td>Old Oak South (P1)</td> <td><u>100</u></td> <td>350</td> <td><u>17,100</u></td> <td>15,200</td> </tr> <tr> <td>Old Oak North (P2)</td> <td>6,500</td> <td>0</td> <td><u>3,600</u></td> <td><u>3,300</u></td> </tr> <tr> <td>Park Royal West (P4)</td> <td>1,200</td> <td><u>1,575</u></td> <td><u>3,600</u></td> <td><u>3,510</u></td> </tr> <tr> <td>Park Royal Centre (P6)</td> <td>650</td> <td><u>800</u></td> <td>1,400</td> <td></td> </tr> <tr> <td>North Acton and Acton Wells (P7)</td> <td>6,000</td> <td><u>8,000</u></td> <td><u>4,600</u></td> <td><u>6,200</u></td> </tr> <tr> <td>Old Oak Lane and Old</td> <td>2,800</td> <td><u>2,750</u></td> <td><u>1,600</u></td> <td><u>1,700</u></td> </tr> </tbody> </table>	Place	Homes Capacity		Jobs capacity		Old Oak South (P1)	<u>100</u>	350	<u>17,100</u>	15,200	Old Oak North (P2)	6,500	0	<u>3,600</u>	<u>3,300</u>	Park Royal West (P4)	1,200	<u>1,575</u>	<u>3,600</u>	<u>3,510</u>	Park Royal Centre (P6)	650	<u>800</u>	1,400		North Acton and Acton Wells (P7)	6,000	<u>8,000</u>	<u>4,600</u>	<u>6,200</u>	Old Oak Lane and Old	2,800	<u>2,750</u>	<u>1,600</u>	<u>1,700</u>
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			Oak Common Lane (P8) Channel Gate (P9) \ominus <u>3,100</u> 7,600 <u>600</u> Scrubs Lane (P10) 2,600 <u>3,500</u> 1,200 <u>1,100</u>
MM437	241	Table 11.1	<p><i>Amend justification column for Old Oak North (P2) row;</i></p> <ul style="list-style-type: none"> • 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. <u>designated as SIL which the Local Plan continues to protect.</u> • The majority of the land in Old Oak North is in the ownership of Cargiant and the successful and timely delivery of this site and the relocation of the existing business <u>industrial intensification of the area</u> 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. • The area is currently poorly connected into its surroundings and will require <u>significant transport improvements to address this, including new and improved public transport, streets and bridges. improvements to existing access points.</u> • 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 homes and jobs targets within this Local Plan.
MM438	242	Table 11.1	<p><i>Amend 3rd bullet in justification column for Park Royal West (P4) row;</i></p> <ul style="list-style-type: none"> • 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 <u>in the Local Plan and the further detail set out in</u> OPDC's IDP
MM439	242	Table 11.1	<p><i>Amend 4th bullet in justification column for North Acton and Acton Wells (P7) row;</i></p> <ul style="list-style-type: none"> • 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 post 2026 <u>the late 2020s.</u> There are also significant infrastructure requirements for these sites, including a new access to North Acton station, a <u>new proposed</u> London Overground station at Old Oak Common Lane and the need for infrastructure associated

Ref	Page	Policy/ Paragraph	Main Modification
			<p>with the West London Orbital Route. The Acton Wells sites are <u>North Acton and Acton Wells is also identified as an area of search</u> for the delivery of a new secondary school, which will provide for the early and medium term on site secondary school place requirements resulting from development in the area. <u>health hub.</u></p>
MM440	243	Table 11.1	<p><i>Amend justification column for Channel Gate (P9) row;</i></p> <ul style="list-style-type: none"> • Channel Gate is currently in mixed land ownership, but is being <u>and portions have been</u> 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 in 2026 <u>after 2028; however earlier development opportunities will be supported.</u> • OPDC's Place policy identifies that the majority of the area is safeguarded as Strategic Industrial Location (SIL) and this land use will be retained <u>allocates the majority of Channel Gate for residential led mixed use development.</u> • 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. • 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.
MM441	243	Table 11.1	<p><i>Delete entry in justification column for Scrubs Lane (P10) row and substitute;</i></p> <p><u>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.</u></p>
MM442	243	Table 11.1	<p><i>Amend justification column for Willesden Junction (P11) row;</i></p> <ul style="list-style-type: none"> • 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 of Old Oak.

Ref	Page	Policy/ Paragraph	Main Modification
			<ul style="list-style-type: none"> • 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. • Connecting this Place into both Harlesden and Old Oak North will be challenging but will be important to improve connectivity and reduce severance. 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. Some sites may be particularly challenging to bring forward as they may involve decking over live railway tracks and/or transport depots and/or relocation.
MM443	244	DI3 and paragraphs 11.38 and 11.39	Delete clause (e) of policy and paragraphs 11.38 and 11.39 of supporting text.
MM444	244	11.27	Amend first sentence; Across Old Oak <u>the OPDC area outside of SIL</u> approximately 70% of the developable land is currently within public sector ownership.
MM445	244	11.27	Amend second sentence; This public sector land has the capacity to accommodate approximately 10,300 <u>9,800</u> homes and 45,900 <u>40,400</u> jobs, of which 4,500 <u>6,800</u> homes and 26,300 <u>21,150</u> ± jobs could be delivered within this Local Plan period (2018-38).
MM446	244	11.27	Amend fifth sentence; The remaining developable land <u>for mixed use development in Old Oak</u> is in a mixture of different private ownerships of which Cargiant is the largest single landowner at 15%.
MM447	244	11.28	Amend; Across Park Royal <u>the Strategic Industrial Location</u> , land ownership is predominantly privately owned and is more piecemeal. The homes and jobs targets in Park Royal are much lower than in Old Oak but <u>Therefore</u> , there is still 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.
MM448	244	11.29	Amend first sentence;

Ref	Page	Policy/ Paragraph	Main Modification
			To facilitate this and to support the coordinated delivery of development in Old Oak , OPDC has established a Developer Forum, which convenes to share information, and discuss cross-site infrastructure requirements.
MM449	245	Figure 11.3	<i>Replace by figure annexed below</i>
MM450	246	11.33	<i>Amend clause (b);</i> 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 or the further detail set out in the IDP . In respect of health, OPDC has been also <u>worked</u> ing with the local Clinical Commissioning Groups (CCGs), local authority public health departments, North West London Health Trust and NHS England to derive the appropriate healthcare provision for the area and OPDC will continue to work with these groups to secure the appropriate delivery of healthcare infrastructure. In respect of education, OPDC has worked closely with the Local Education Authorities (LEAs) and the Education and Skills Funding Agency to identify education facility requirements. OPDC is has <u>also worked</u> ing 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 and with further detail provided in the IDP;
MM451	246	To follow 11.36	<i>Insert additional paragraph and renumber subsequent paragraphs;</i> <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>
MM452	248	11.50 (to become 11.49)	<i>Amend clause (c);</i> 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.
MM453	250	A-class uses	<i>Delete</i>

Ref	Page	Policy/ Paragraph	Main Modification
MM454	251	B Use Class Employment Floorspace or Premises	<i>Delete</i>
MM455	251	B Use Class Employment Uses	<i>Delete</i>
MM456	252	Broad Industrial Type Activities.	<i>Delete definition and substitute;</i> <u>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.</u>
MM457	252	Following "Circular Economy"	<i>Insert;</i> <u>Class E use/floorspace:</u> <u>Class E uses includes:</u> <ul style="list-style-type: none"> • <u>Display or retail sale of goods, other than hot food, sale of food and drink for consumption (mostly) on the premises</u> • <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> • <u>Indoor sport, recreation or fitness (not involving motorised vehicles or firearms)</u> • <u>Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)</u> • <u>Creche, day nursery or day centre (not including a residential use)</u> • <u>Uses which can be carried out in a residential area without detriment to its amenity:</u> <ul style="list-style-type: none"> o <u>Offices to carry out any operational or administrative functions,</u> o <u>Research and development of products or processes</u> o <u>Industrial processes</u>
MM458	254	Employment uses	<i>Amend;</i> Uses which directly generate B use class employment through business activities.
MM459	262	Following "Private Open Space"	<i>Insert;</i> <u>Public houses:</u> <ul style="list-style-type: none"> • <u>Are licensed drinking establishments which exhibit qualities of a social space; and</u> • <u>may include expanded food provision; and</u>

Ref	Page	Policy/ Paragraph	Main Modification
			<ul style="list-style-type: none"> • <u>are open to and welcome the general public without requiring membership or residency and without charge for admission; and</u> • <u>allow drinking without requiring food to be consumed and have at least one indoor area not laid out for meals; and</u> • <u>allow drinks to be bought at a bar</u> <p><u>This definition includes all licensed drinking premises including wine bars</u></p>
MM460	264	Social Infrastructure	<p><i>Delete and substitute;</i> <u>Includes some uses within:</u></p> <ul style="list-style-type: none"> • <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> • <u>Class F1 (Learning and non-residential institutions not including residential use, that covers: 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> • <u>Class F2 (Halls or meeting places for the principal use of the local community)</u> • <u>Other community facilities; cultural uses; children and young people’s play and informal recreation facilities.</u> <p><u>This list is not intended to be exhaustive and other facilities can be included as social infrastructure. 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>
MM461	265	Following “Through Routes”	<p><i>Insert;</i> <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></p>
MM462	266	Town Centre Uses;	<p><i>Delete definition and substitute;</i></p> <ul style="list-style-type: none"> • <u>uses within Class E (see separate definition)</u> • <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</u>

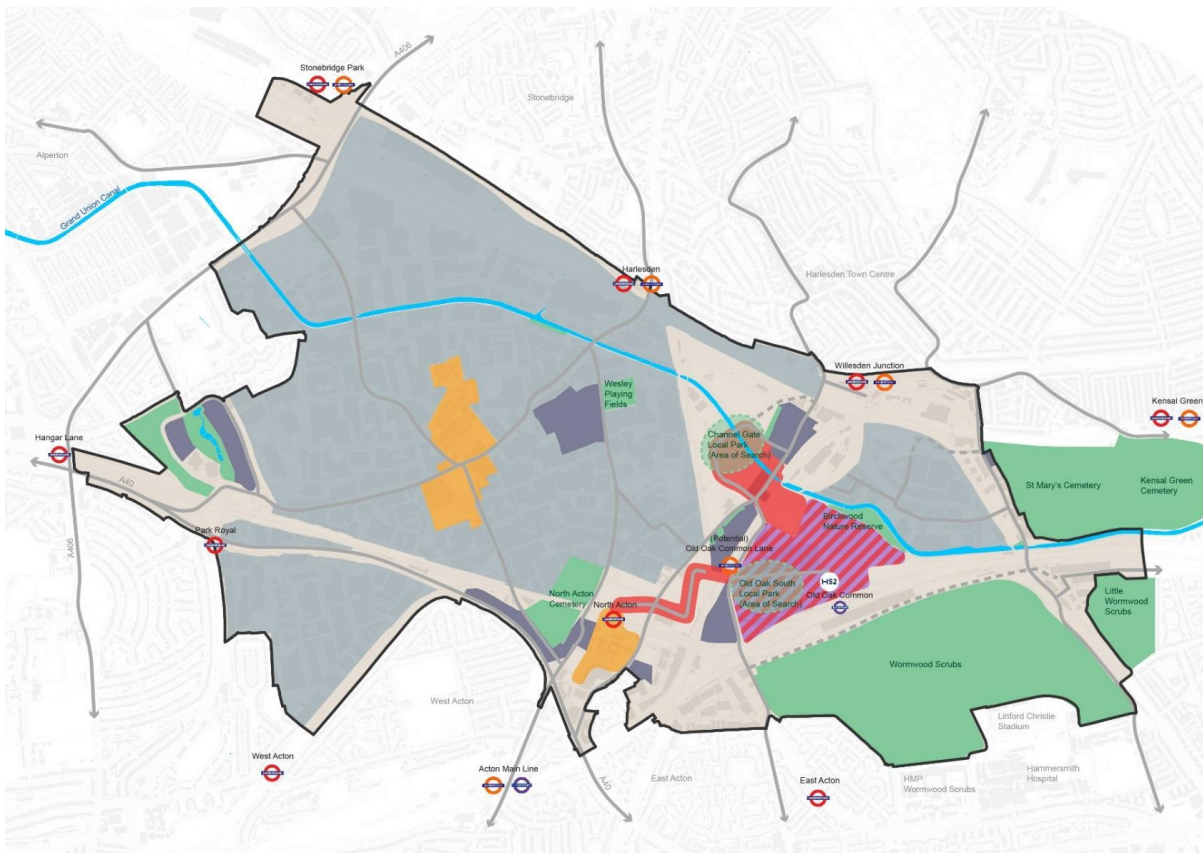
Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>halls); and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</u></p> <p><u>They typically need to be sited in locations that are well connected to public transport and active travel networks and are able to provide active ground floor frontages onto streets and spaces</u></p>
MM463	267	Use class	<p><i>Amend definition;</i></p> <p>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: • A use class shops (A1); financial and professional services (A2); food and drink(A3); drinking establishments (A4); and hot food takeaways (A5). • B use class business (B1); general industry (B2); and storage or distribution (B3). • C use class hotels (C1); residential institutions (C2); dwelling houses (C3); and houses of multiple occupation (C4). • D use class non-residential institutions (D1); and assembly and leisure (D2). Sui Generis uses which do not fall within other use classes.</p>
MM464	267	Following "Vacant Building Credit"	<p><i>Insert;</i></p> <p><u>Walk to services:</u></p> <p><u>Small units, up to and not exceeding 80sqm that provide active ground floor frontages and serve visiting members of the public.</u></p>

Annex 1

Replacement figure 2.2

Key

-  OPDC Boundary
-  Major Town Centre
-  Major Town Centre / Commercial Centre
-  Neighbourhood Town Centre
-  Strategic Industrial Location (SIL)
-  Mixed use area
-  Existing residential area
-  New and enhanced publicly accessible open space
-  Areas of search for new Local Park
-  New and enhanced routes
-  Potential future new routes

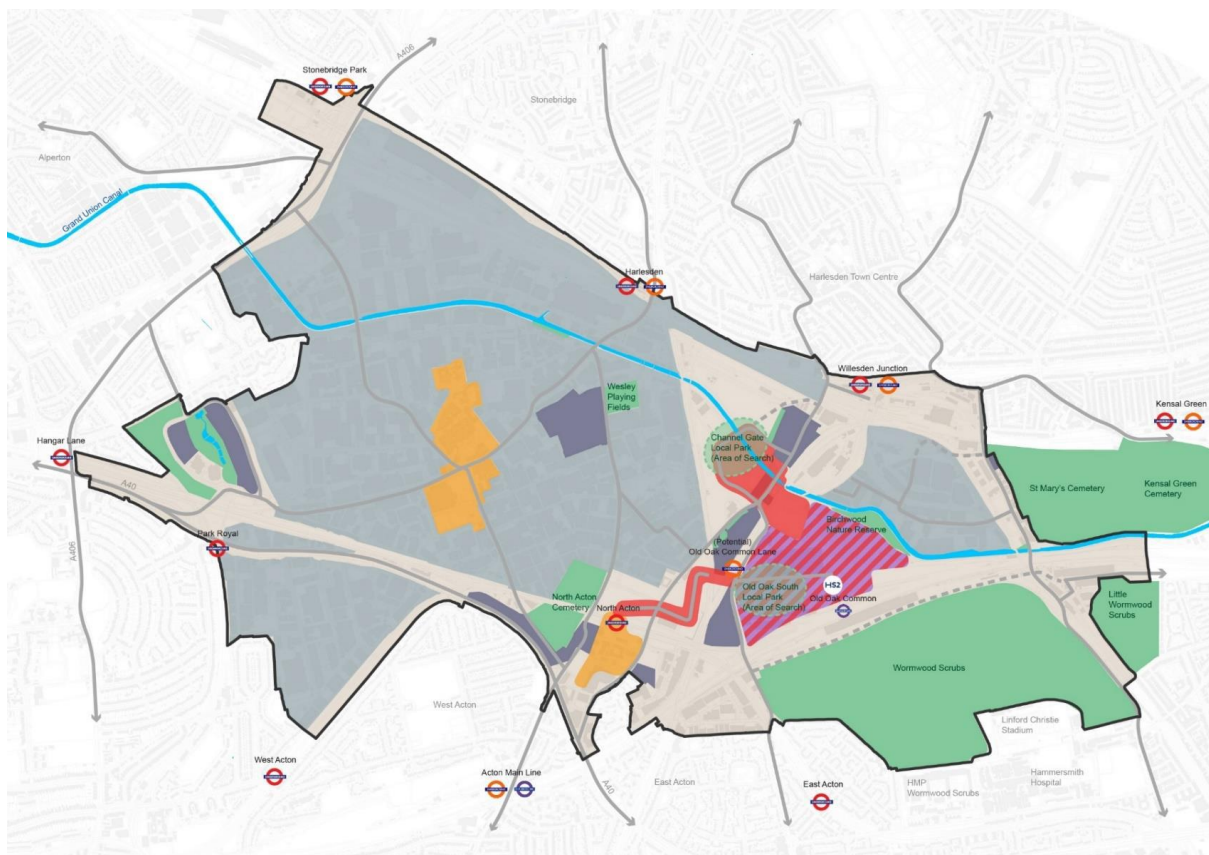


Annex 2

Replacement figure 3.7

Key

-  OPDC Boundary
-  Major Town Centre
-  Major Town Centre / Commercial Centre
-  Neighbourhood Town Centre
-  Strategic Industrial Location (SIL)
-  Mixed use area
-  Existing residential area
-  New and enhanced publicly accessible open space
-  Areas of search for new Local Park
-  New and enhanced routes
-  Potential future new routes



Annex 3

Replacement figure 3.8

Key

□ OPDC Boundary

Places

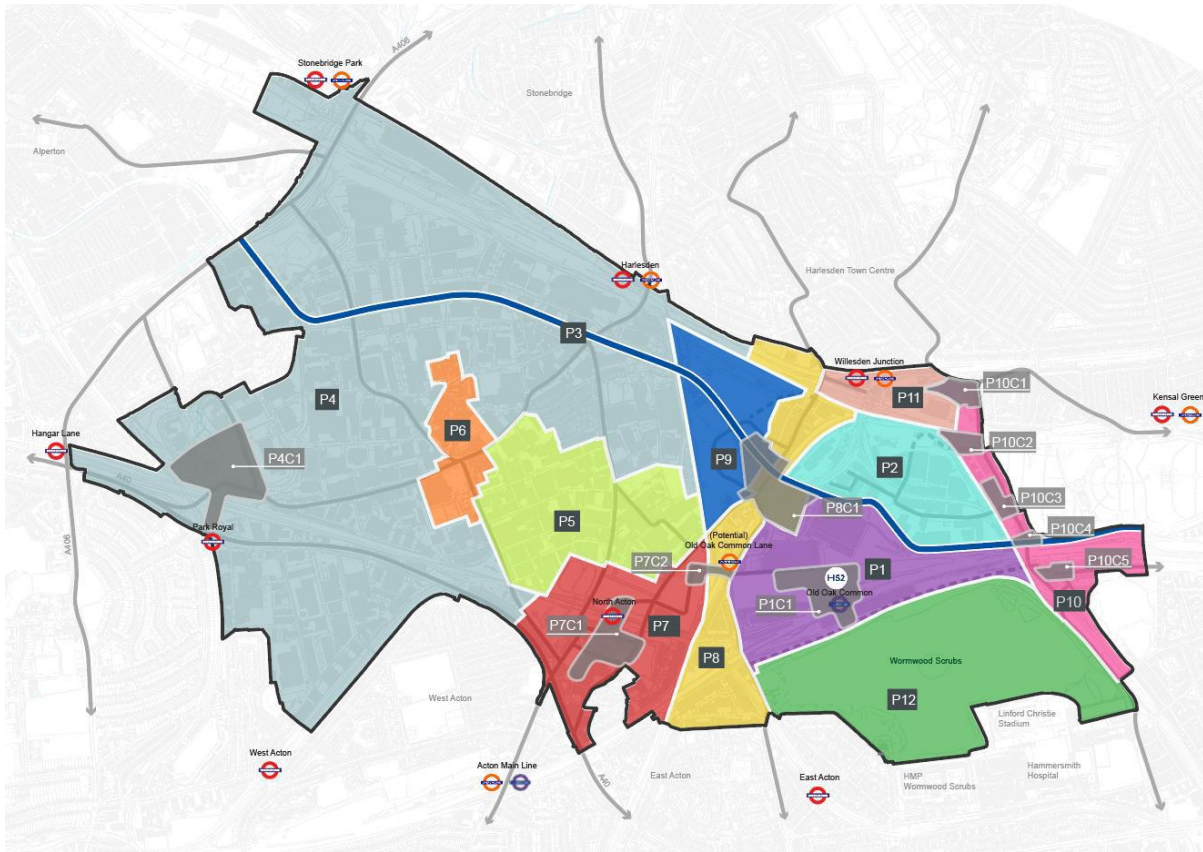
- P1: Old Oak South
- P2: Old Oak North
- P3: Grand Union Canal
- P4: Park Royal West
- P5: Old Park Royal
- P6: Park Royal Centre
- P7: North Acton and Acton Wells
- P8: Old Oak Lane and Old Oak Common Lane
- P9: Channel Gate
- P10: Scrubs Lane
- P11: Willesden junction
- P12: Wormwood Scrubs

Clusters

- P1C1: Old Oak Common Station Cluster
- P4C1: Brewery Cluster
- P7C1: North Acton town centre Cluster
- P7C2: Old Oak Common Lane Station Cluster
- P8C1: Atlas Junction town centre Cluster
- P10C1: Harrow Road Cluster
- P10C2: Laundry Lane Cluster
- P10C3: Hythe Road Cluster
- P10C4: Mitre Canalside Cluster
- P10C5: Mitre Way Cluster

↔ New and enhanced routes

... Potential future new routes

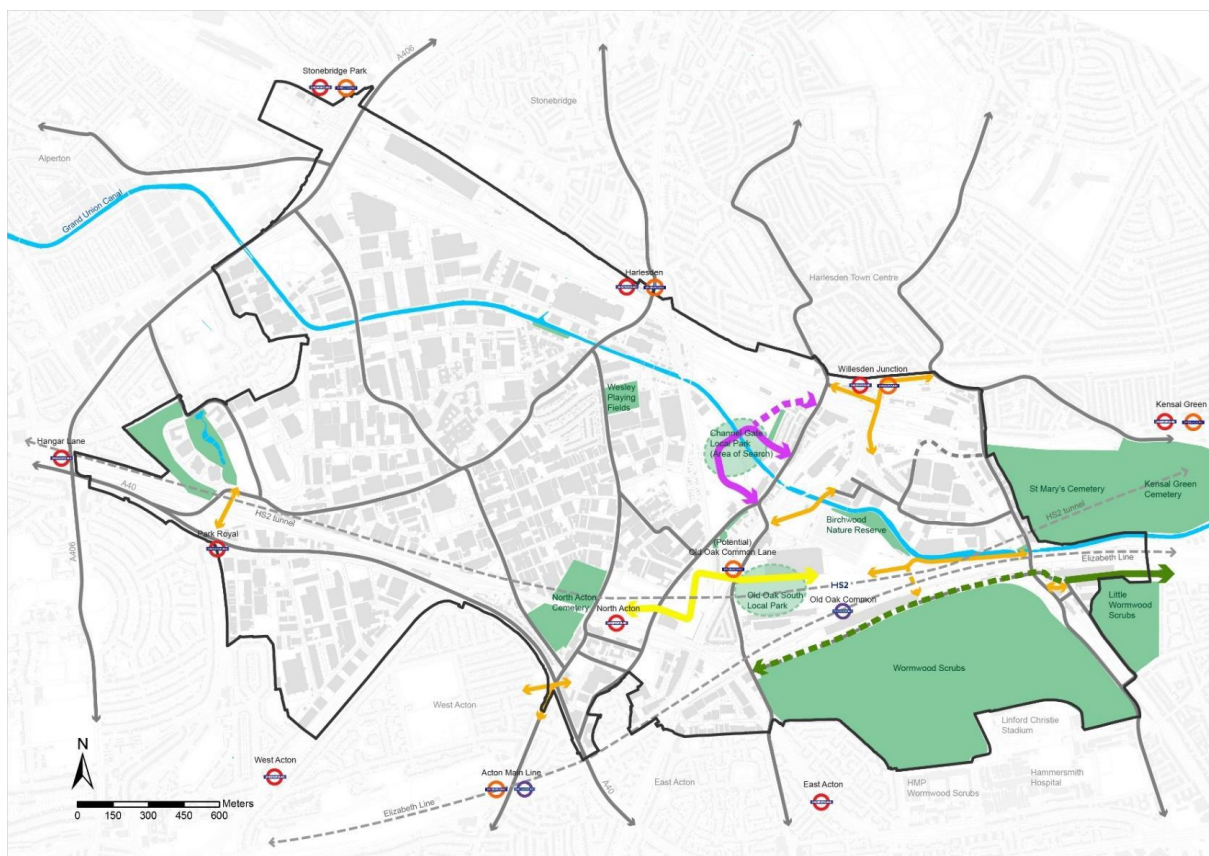


Annex 4

Replacement figure 3.10

Key

- OPDC Boundary
- Old Oak Street
- Channel Gate Street
- Channel Gate Street (beyond plan period)
- Wormwood Scrubs Street
- Wormwood Scrubs Street (beyond plan period)
- New and enhanced pedestrian and cycle connections
- New pedestrian and cycle connection (beyond plan period)
- Enhanced existing routes
- ... Potential future new routes
- HS2 and Elizabeth Line

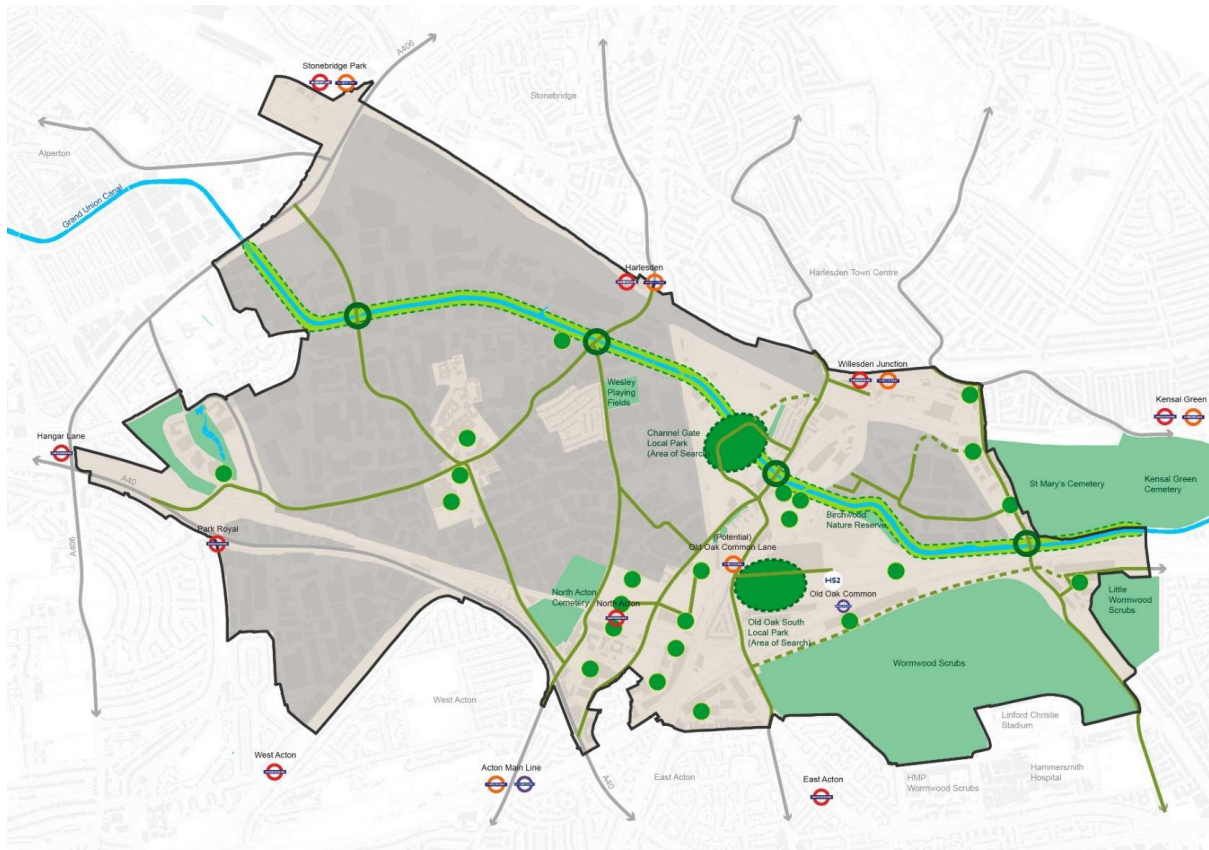


Annex 5

Replacement figure 3.13












Key

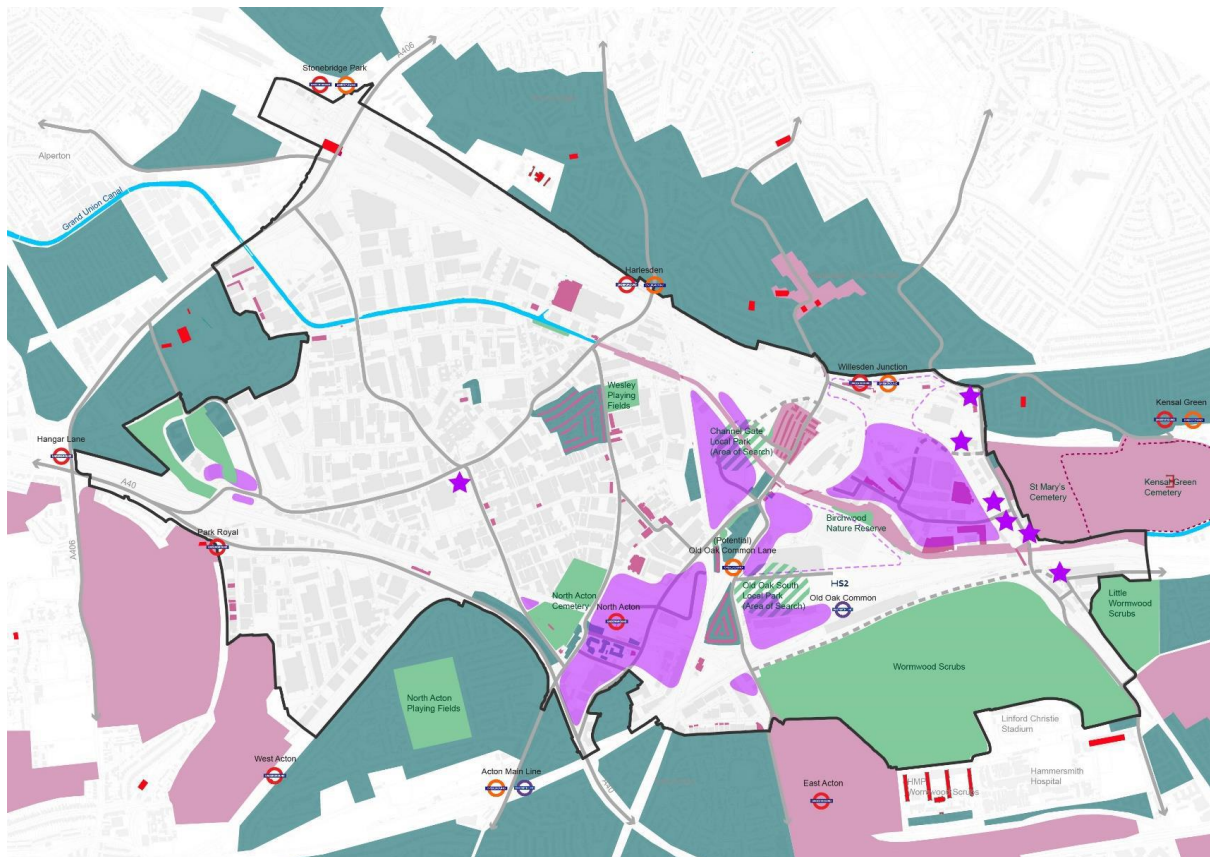
-  OPDC Boundary
-  Existing and enhanced publicly accessible open space
-  Area of Search for New Local Park
-  Locations of new smaller publicly accessible open space
-  Publicly accessible open spaces along Grand Union Canal
-  Publicly accessible open spaces at bridges
-  Areas for provision of green streets
-  Strategic Industrial Land (SIL)
-  Urban greening corridors
-  Urban greening corridors (beyond plan period)



Annex 6

Replacement figure 3.15

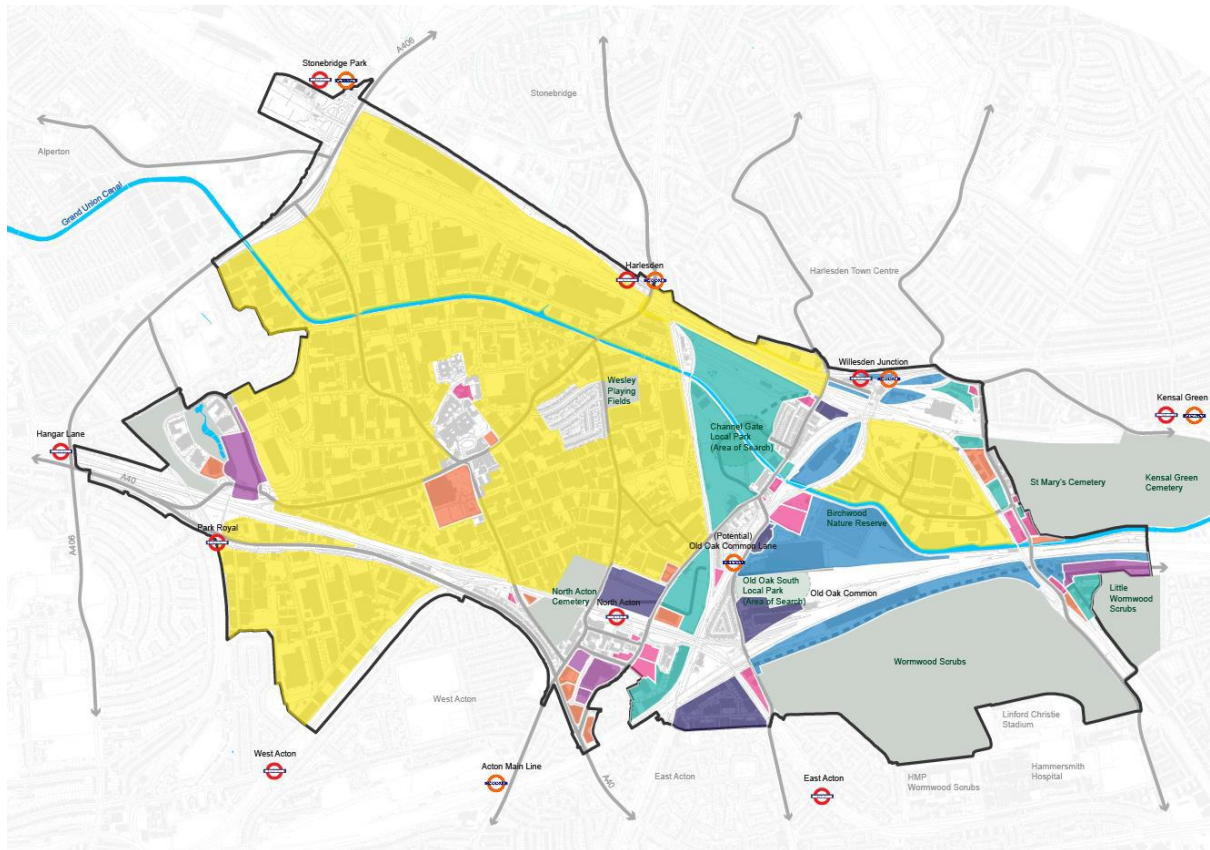
-  OPDC Boundary
-  Areas where tall buildings are appropriate
-  Areas where tall buildings are appropriate beyond the plan period
-  Specific locations where tall buildings are an appropriate form of development
-  Residential areas
-  Existing publicly accessible open space
-  Local Park area of search
-  Statutory Listing Building
-  Kensal Green Cemetery Registered Park and Garden
-  Conservation Area
-  Local Heritage Listing



Annex 7

Replacement figure 3.16

- OPDC Boundary
- SIL - 0 to 20 years
- 0 to 5 years
- 0 to 10 years
- 6 to 10 years
- 6 to 20 years
- 11 to 20 years
- 21+ years



Annex 8 Replacement table 3.1







Table 3.1: Site Allocations

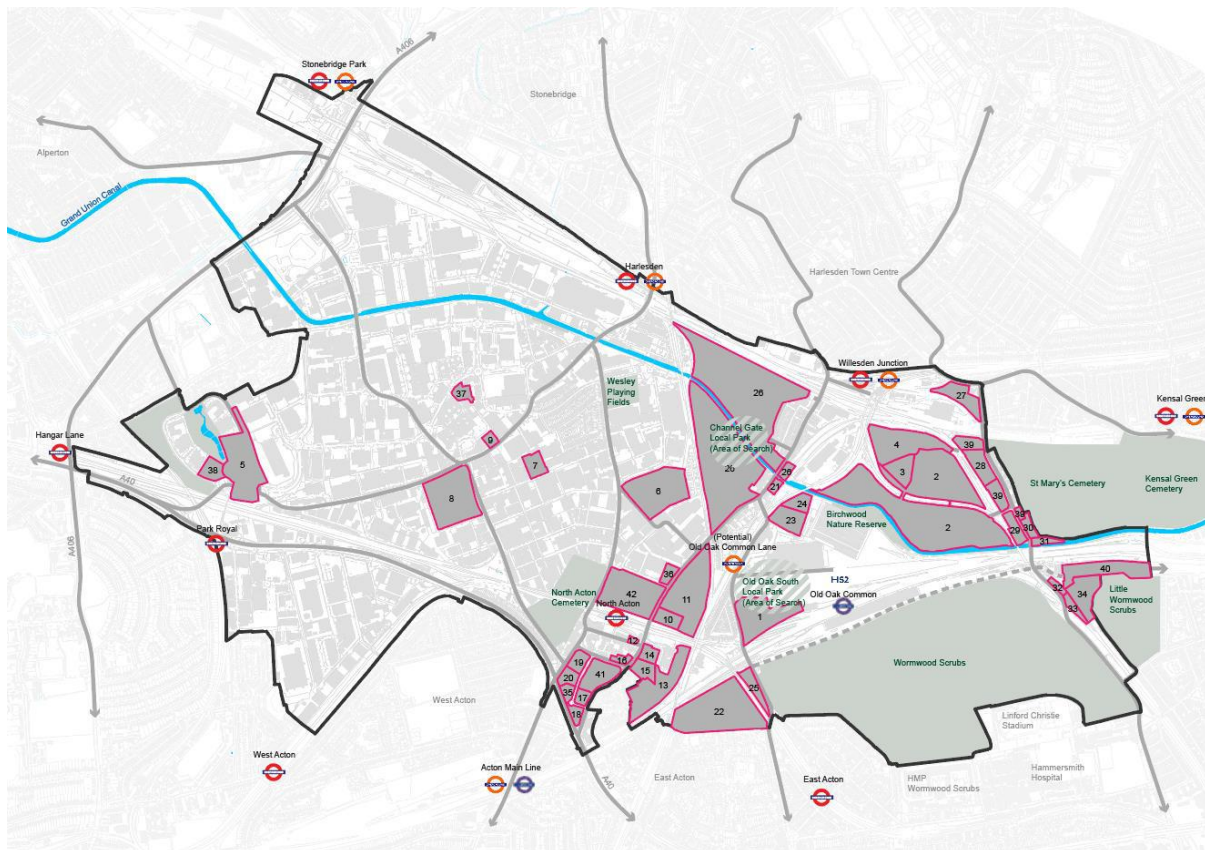
The housing and commercial or industrial floorspace targets are expressed as minimums and jobs figures are indicative.		Place Policy	Net additional housing units over the first ten years of the plan period	Net additional housing units during the 11 to 20 years of the plan period	Minimum commercial or industrial floorspace over the plan period	New jobs resulting from the provision of commercial or industrial floorspace over plan period
1	Old Oak Common Station and surroundings	P1	0	100	200,500	17,100
2	Cargiant	P2	0	0	170,800	2,600
3	The Triangle Business Centre	P2	0	0	20,500	350
4	EMR	P2	0	0	21,200	300
5	First Central and surroundings	P4	1,200	0	1,200	60
6	Bashley Road Metal Refinery	P5	0	0	30,100	500
7	32-36 & 38-42 Minerva Road	P5	0	0	12,300	700
8	Park Royal ASDA	P6	500	0	23,000	1,400
9	Land East of the Victoria Centre	P6	141	0	0	0
10	Boden House	P7	250	50	7,600	600
11	Acton Wells East	P7	1,650		8,000	700
12	Holbrook House	P7	280	0	100	5
13	Victoria Industrial Estate	P7	400	700	6,500	400
14	Perfume Factory North	P7	300	0	1,400	87
15	Perfume Factory South	P7	326	0	4,970	430
16	The Portal	P7	350	0	550	50
17	2 Portal Way	P7	380	0	5,300	300
18	3 Portal Way	P7	100	0	3,600	230
19	Portal West	P7	651	0	3,200	200
20	Algerian Embassy	P7	200	0	3,600	300
21	Willesden Junction Maintenance Depot	P8	100	0	400	30
22	Westway Estate	P8	0	1,000	4,800	300
23	Oaklands	P8	605	0	3,500	200

24	Oaklands North	P8	200	0	1,000	90
25	Old Oak Common Lane sites	P8	200	0	2,800	180
26	Channel Gate	P9	3,100		10,700	600
27	Harrow Road	P10	200	500	8,100	400
28	Cumberland Business Park	P10	300	0	1,800	110
29	Mitre Yard	P10	241	0	1,123	66
30	North Kensington Gate South	P10	206	0	750	50
31	Mitre Wharf	P10	100	0	420	20
32	Big Yellow Storage (Scrubs Lane)	P10	150	0	1100	60
33	Tea Crate	P10	150	0	1100	60
34	Mitre Industrial Estate	P10	100	100	1100	60
35	4 Portal Way	P7	702	0	1,946	140
36	3 School Road / 99 Victoria Road	P7	250	0	800	40
37	Central Middlesex Hospital North East site	P6	158	0	0	0
38	1 Lakeside Drive	P4	300	0	500	40
39	Cargiant Scrubs Lane	P10	600		2,400	120
40	North Pole East Depot	P10	750	0	500	40
41	1 Portal Way (Carphone Warehouse)	P7	764	0	3,500	200
42	Acton Wells West	P7	0	555	30,000	2,500

Annex 9

Replacement figure 3.17

-  OPDC Boundary
-  Site allocation
-  New and enhanced publicly accessible open space
-  Local Park area of search
-  New and enhanced routes
-  Potential future new routes



Annex 10

Replacement figure 4.1

Key

□ OPDC Boundary

Places

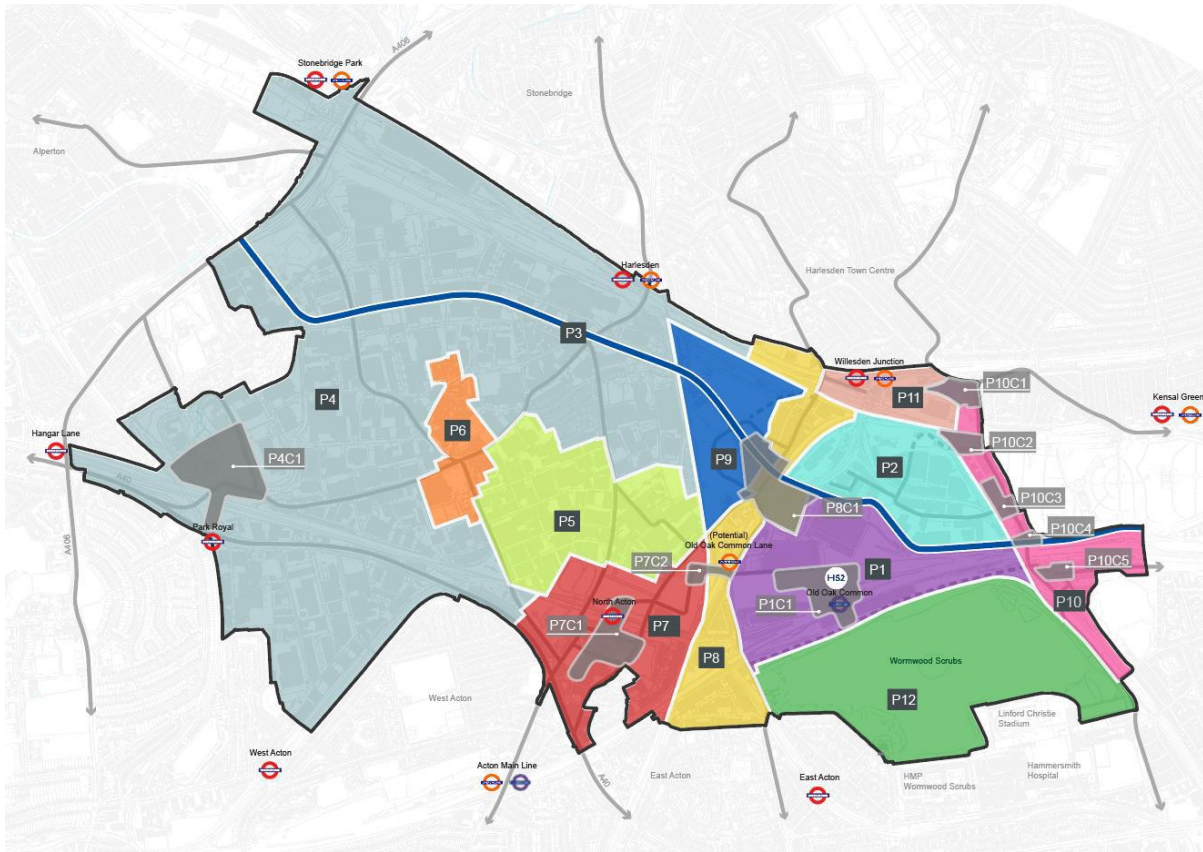
- P1: Old Oak South
- P2: Old Oak North
- P3: Grand Union Canal
- P4: Park Royal West
- P5: Old Park Royal
- P6: Park Royal Centre
- P7: North Acton and Acton Wells
- P8: Old Oak Lane and Old Oak Common Lane
- P9: Channel Gate
- P10: Scrubs Lane
- P11: Willesden junction
- P12: Wormwood Scrubs

Clusters

- P1C1: Old Oak Common Station Cluster
- P4C1: Brewery Cluster
- P7C1: North Acton town centre Cluster
- P7C2: Old Oak Common Lane Station Cluster
- P8C1: Atlas Junction town centre Cluster
- P10C1: Harrow Road Cluster
- P10C2: Laundry Lane Cluster
- P10C3: Hythe Road Cluster
- P10C4: Mitre Canalside Cluster
- P10C5: Mitre Way Cluster

↔ New and enhanced routes

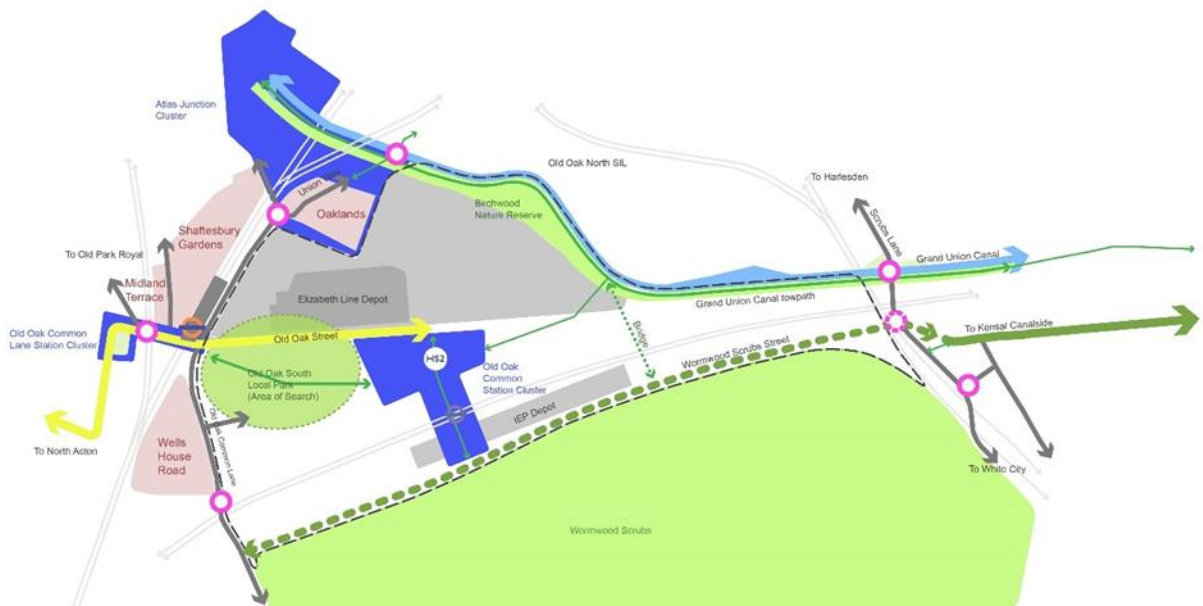
... Potential future new routes



Annex 11

Replacement figure 4.2

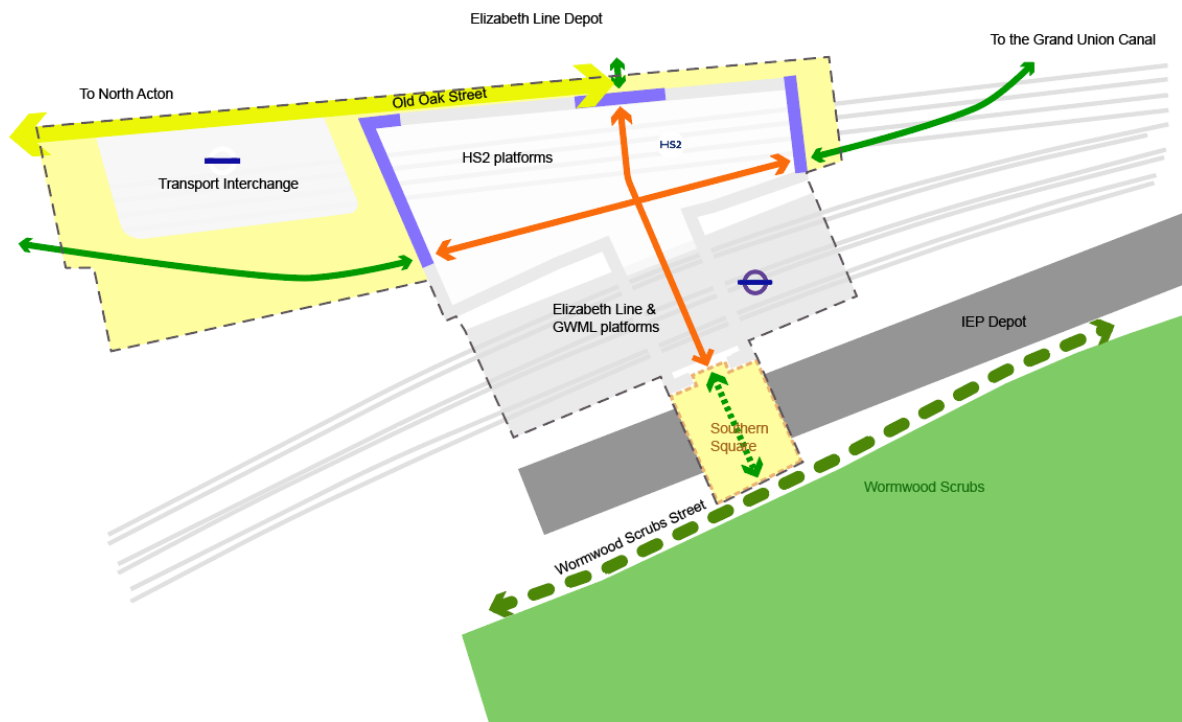
- Clusters
- Place boundary
- Old Oak Street
- Wormwood Scrubs Street (beyond plan period)
- Wormwood Scrubs Street
- New and enhanced routes
- Walking and cycling routes
- Potential walking and cycling route
- Railway lines
- Old Oak South Local Park Area of Search
- New and enhanced publicly accessible open space
- Rail depot
- Potential London Overground Station
- Existing residential neighbourhood
- New or improved junction / bridge / underpass
- ✱ New underpass (beyond plan period)



Annex 12

Replacement figure 4.5

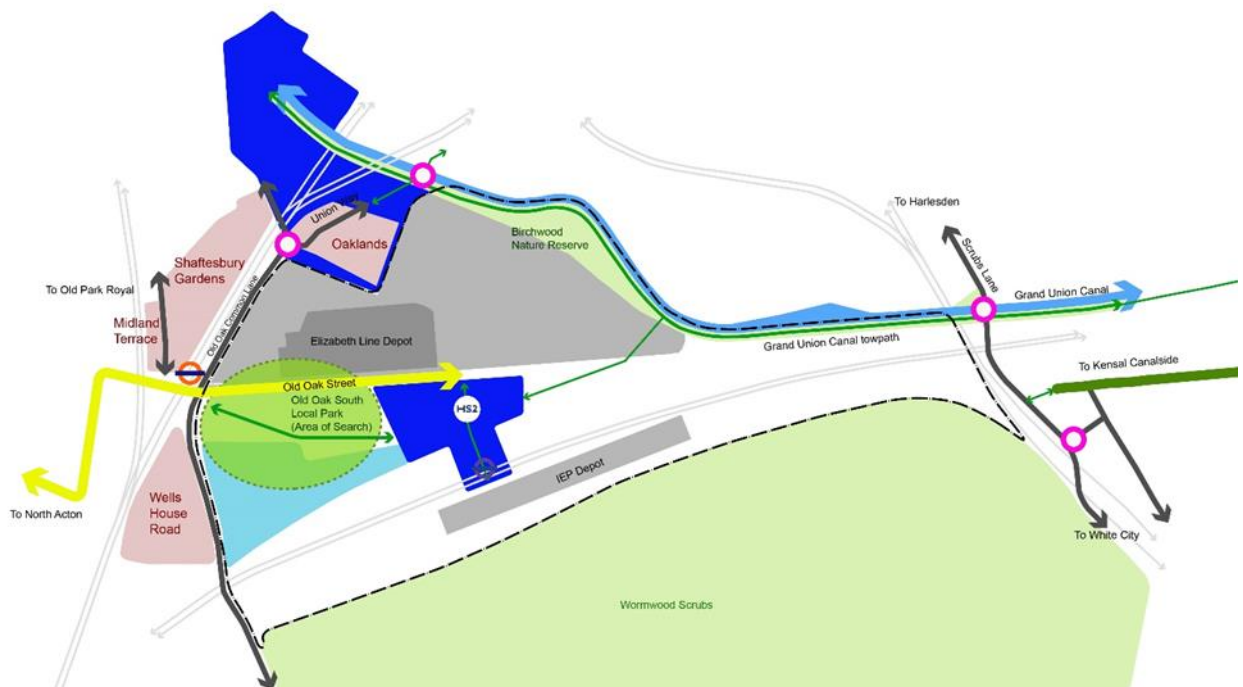
- Old Oak Street
- Wormwood Scrubs Street (beyond plan period)
- Walking / cycling route
- Potential walking / cycling route (beyond plan period)
- High Speed Rail Act Station routes
- New publicly accessible open space
- Potential publicly accessible open space (beyond plan period)
- Railway lines
- Wormwood Scrubs
- IEP Depot
- Station entrance
- Transport interchange
- Cluster boundary



Annex 13

Replacement figure 4.6

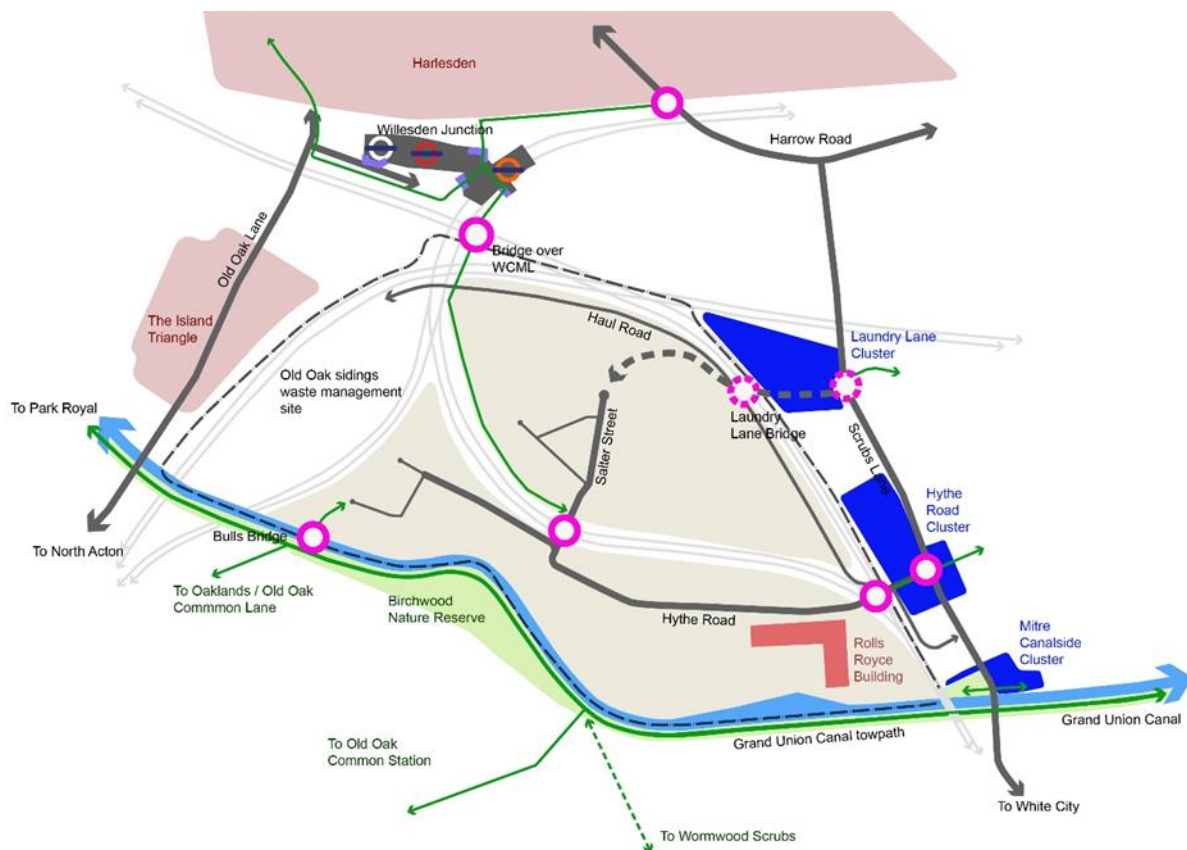
- Clusters
- Place boundary
- Old Oak Street
- New and enhanced routes
- Walking and cycling routes
- Railway lines
- Old Oak South Local Park Area of Search
- New and enhanced publicly accessible open space
- Rail depot
- Meanwhile uses
- Existing residential neighbourhood
- New or improved junction / bridge / underpass



Annex 14

Replacement figure 4.7

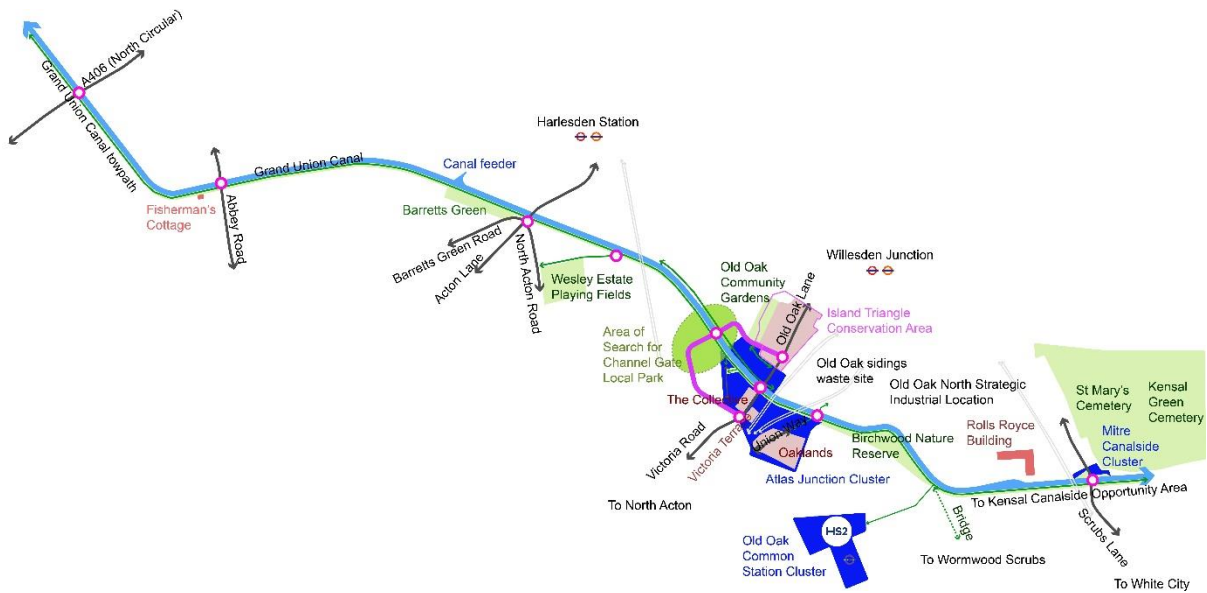
- Clusters
- Place boundary
- ➔ Existing and enhanced routes
- ➔ Potential new access road
- ➔ New / enhanced walking and cycling routes
- ➔ Railway lines
- New and enhanced publicly accessible open space
- Station
- Strategic Industrial Location (SIL)
- Existing residential neighbourhood
- Local Heritage Listings
- New and improved junction / bridge / underpass
- ⊗ Potential new junction / bridge / underpass



Annex 15

Replacement figure 4.10

- Clusters
- ➔ Channel Gate Street
- ➔ New and enhanced routes
- ➔ Walking and cycling routes
- ➔ Railway lines
- Area of search for Local Park
- New and enhanced publicly accessible open space
- Existing residential neighbourhood
- Local Heritage Listings
- New or Improved junction / bridge / underpass



Annex 16









Replacement figure 4.13

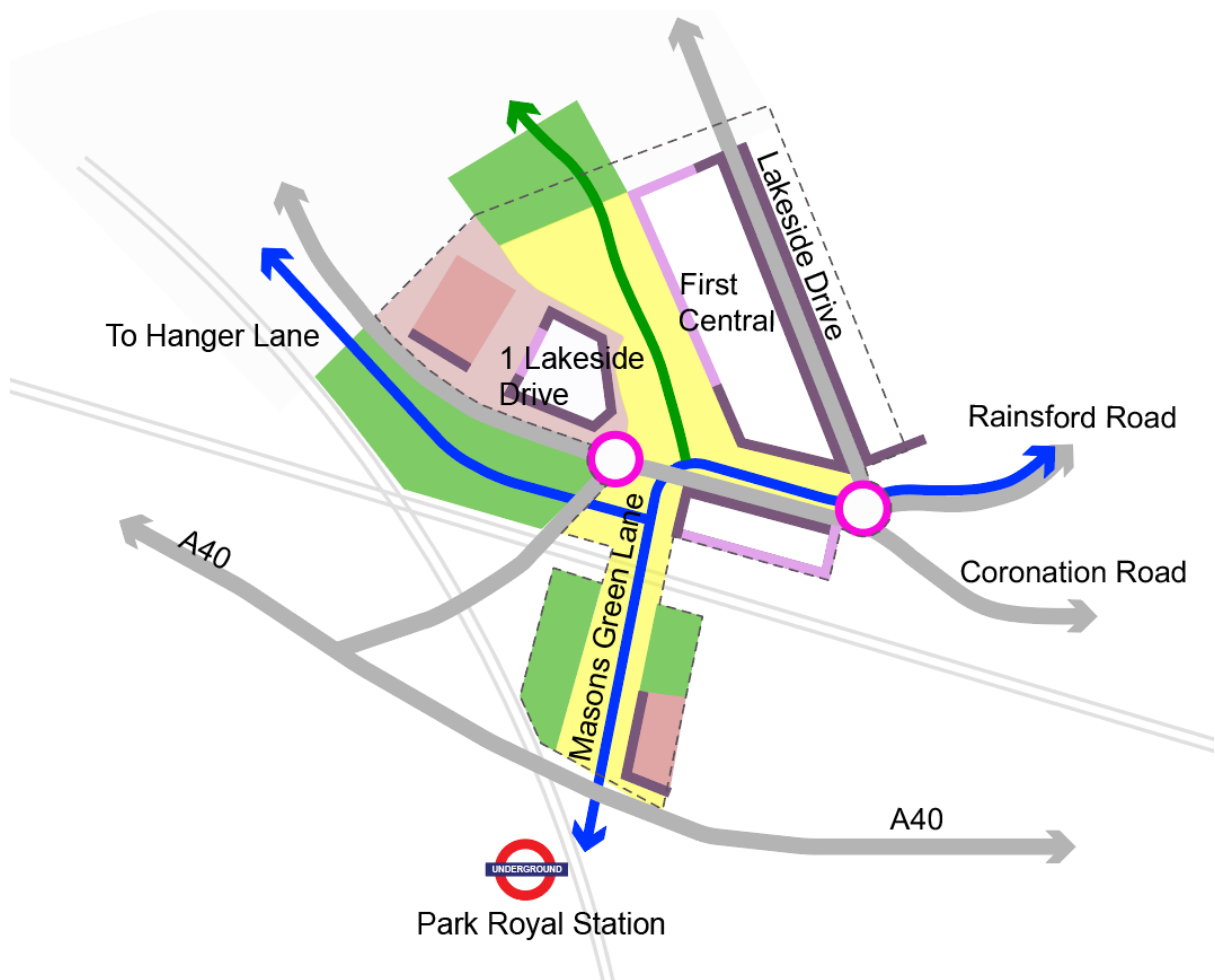
- Clusters
- Place boundary
- ➔ Existing and enhanced key routes
- ➔ Old Oak Street
- ➔ Walking and cycling routes (on street and off street)
- ➔ Railway lines
- Enhanced publicly accessible open space
- London Overground / Underground Station
- Existing residential neighbourhood
- Strategic Industrial Location (SIL)
- New and improved junction / bridge / underpass
- ⊙ Safeguarded waste site



Annex 17

Replacement figure 4.15

-  Road network
-  Segregated cycle lane
-  Walking and cycling routes
-  Publicly accessible open space
-  Existing buildings
-  Existing green open space
-  Active frontage
-  Positive frontage
-  Improved junction and crossings
-  Rail lines
-  Cluster boundary



Annex 18

Replacement figure 4.17

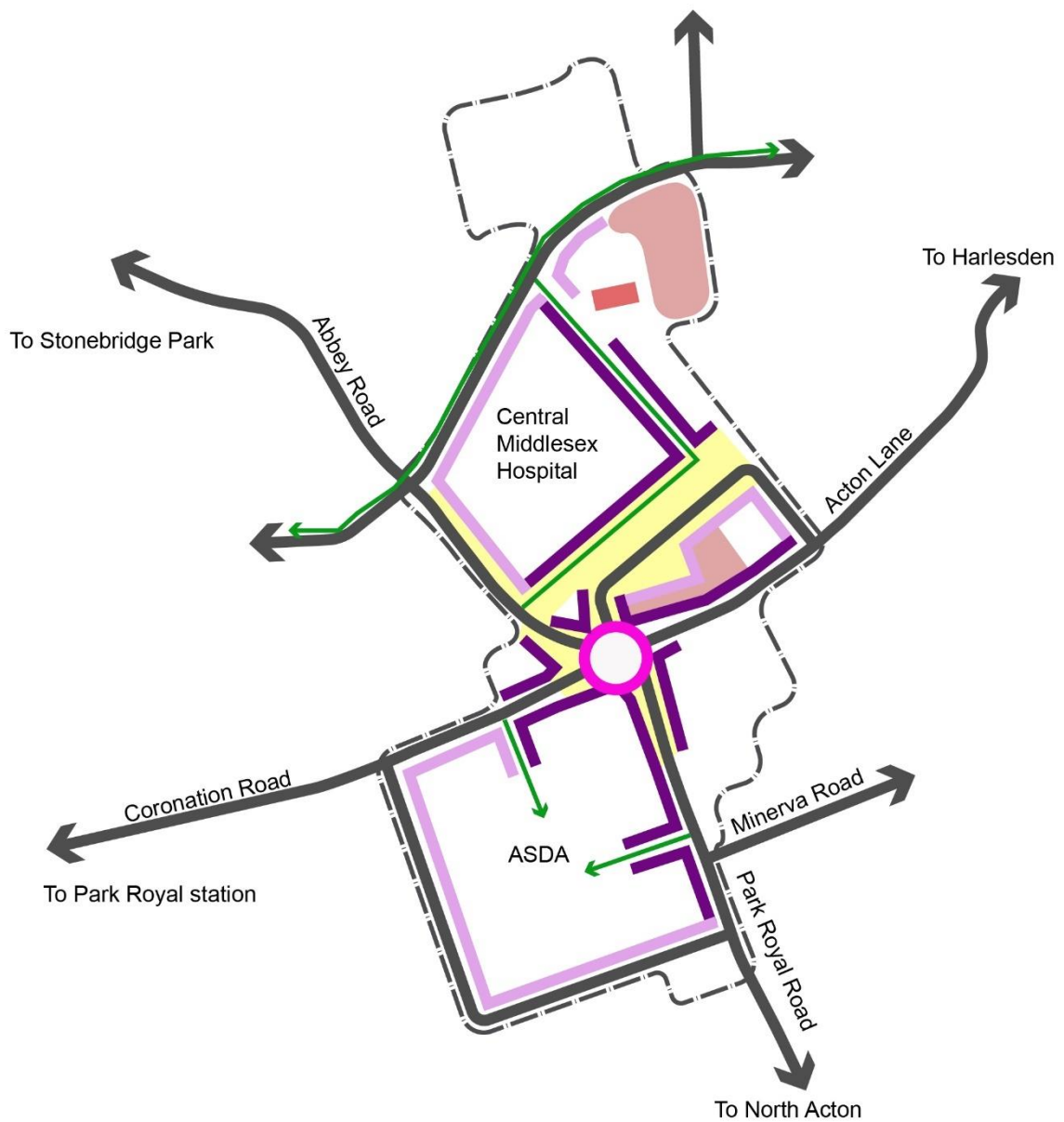
- Clusters
- Place boundary
- ➔ Existing and enhanced key routes
- ➔ Walking and cycling route
- Other routes
- ➔ Railway lines
- New or enhanced publicly accessible open space
- London Overground / Underground Station
- Existing residential neighbourhood
- Strategic Industrial Location (SIL)
- Site allocation
- New or improved junction / bridge / underpass
- ⊗ Safeguarded waste site



Annex 19

Replacement figure 4.19

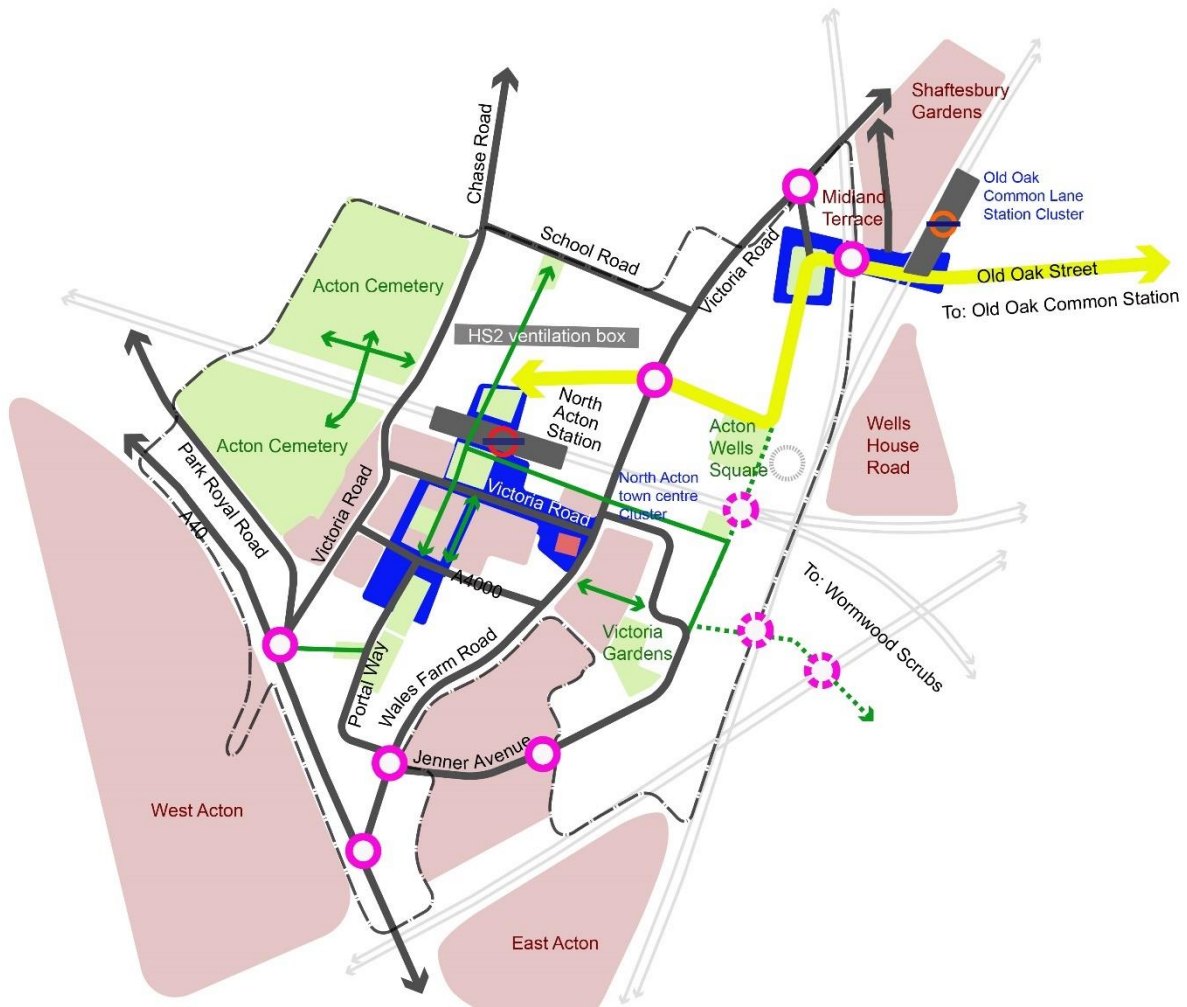
- Place boundary
- Existing and enhanced key routes
- Walking and cycling route
- New or enhanced publicly accessible open space
- Existing residential development
- Local Heritage Listing
- Active frontage
- Positive frontage
- Improved junction



Annex 20













Replacement figure 4.21

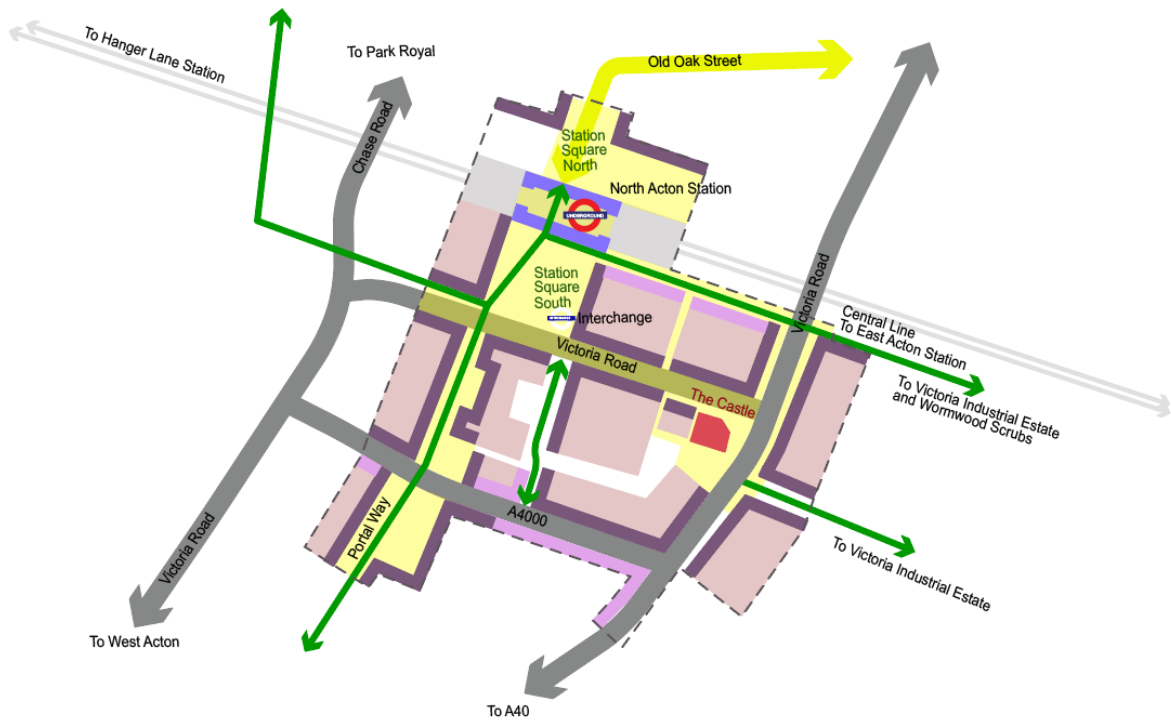
- Clusters
- Place boundary
- Old Oak Street
- New and enhanced routes
- Walking and cycling routes
- - - - - Potential walking and cycling routes
- Railway lines
- New or enhanced publicly accessible open space
- Existing waste management site
- London Overground / Underground Station
- Existing residential neighbourhood
- New or improved junction / bridge / underpass
- ✱ Potential new bridge / underpass



Annex 21

Replacement figure 4.23

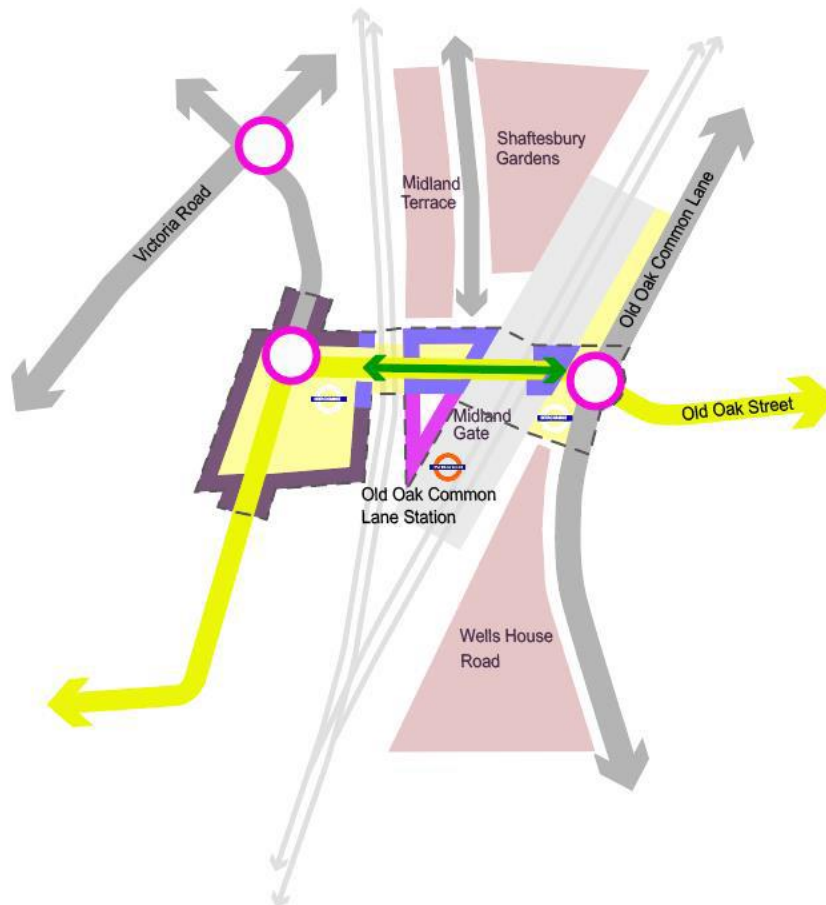
-  Old Oak Street
-  Existing and enhanced key routes
-  Walking / cycling routes
-  New or improved publicly accessible open space and improved public realm
-  Existing residential development
-  Local Heritage Listing
-  Active frontage
-  Positive frontage
-  Station entrance
-  Station platforms
-  Transport interchange
-  Cluster boundary



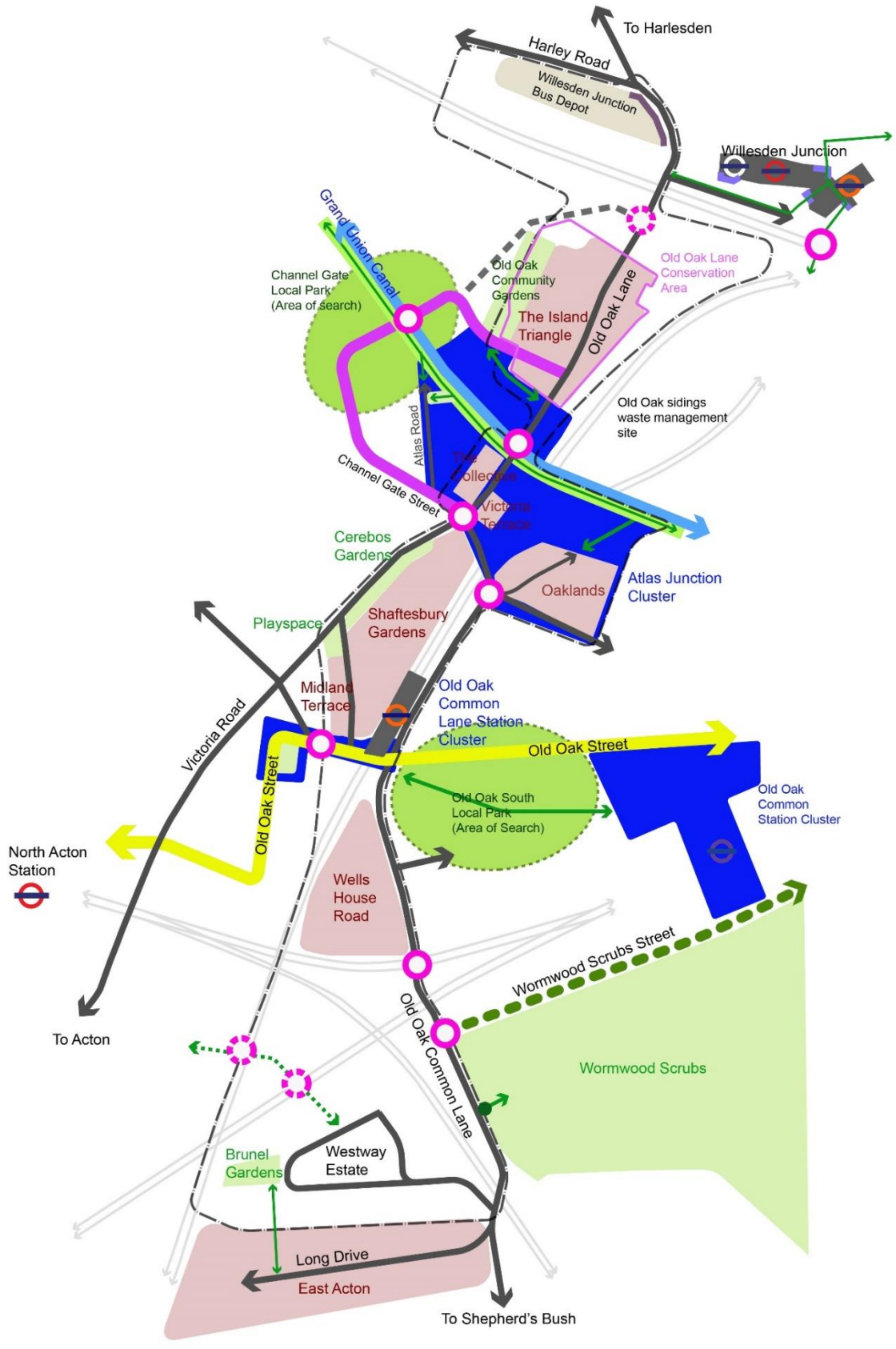
Annex 22

Replacement figure 4.25

-  Old Oak Street
-  Existing and enhanced key routes
-  Walking / cycling routes
-  New publicly accessible open space
-  Existing residential neighbourhoods
-  Active frontage
-  Positive frontage
-  Station entrance
-  Station platforms
-  New or improved crossings
-  Transport interchange
-  Cluster boundary













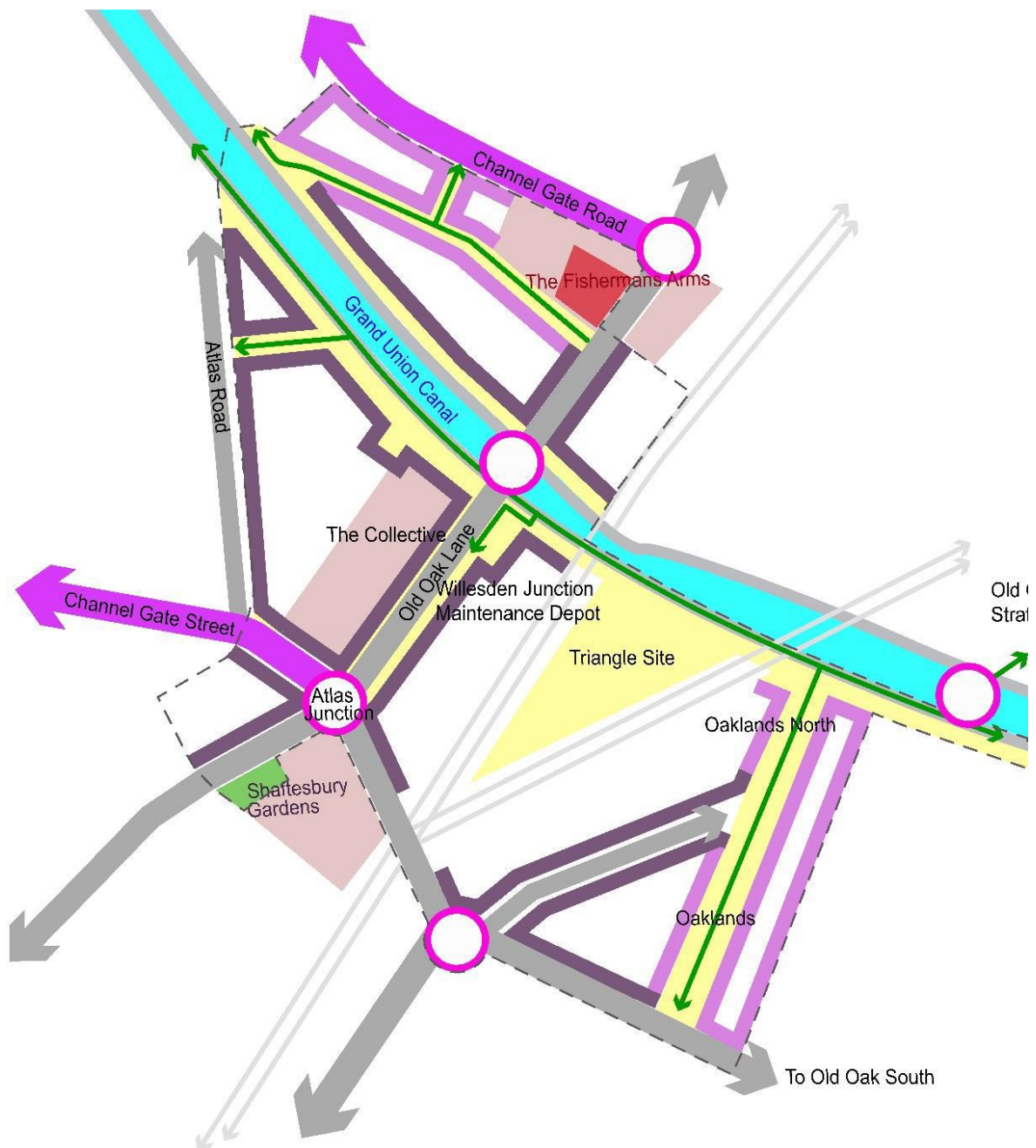
Annex 23 Replacement figure 4.27



Annex 24

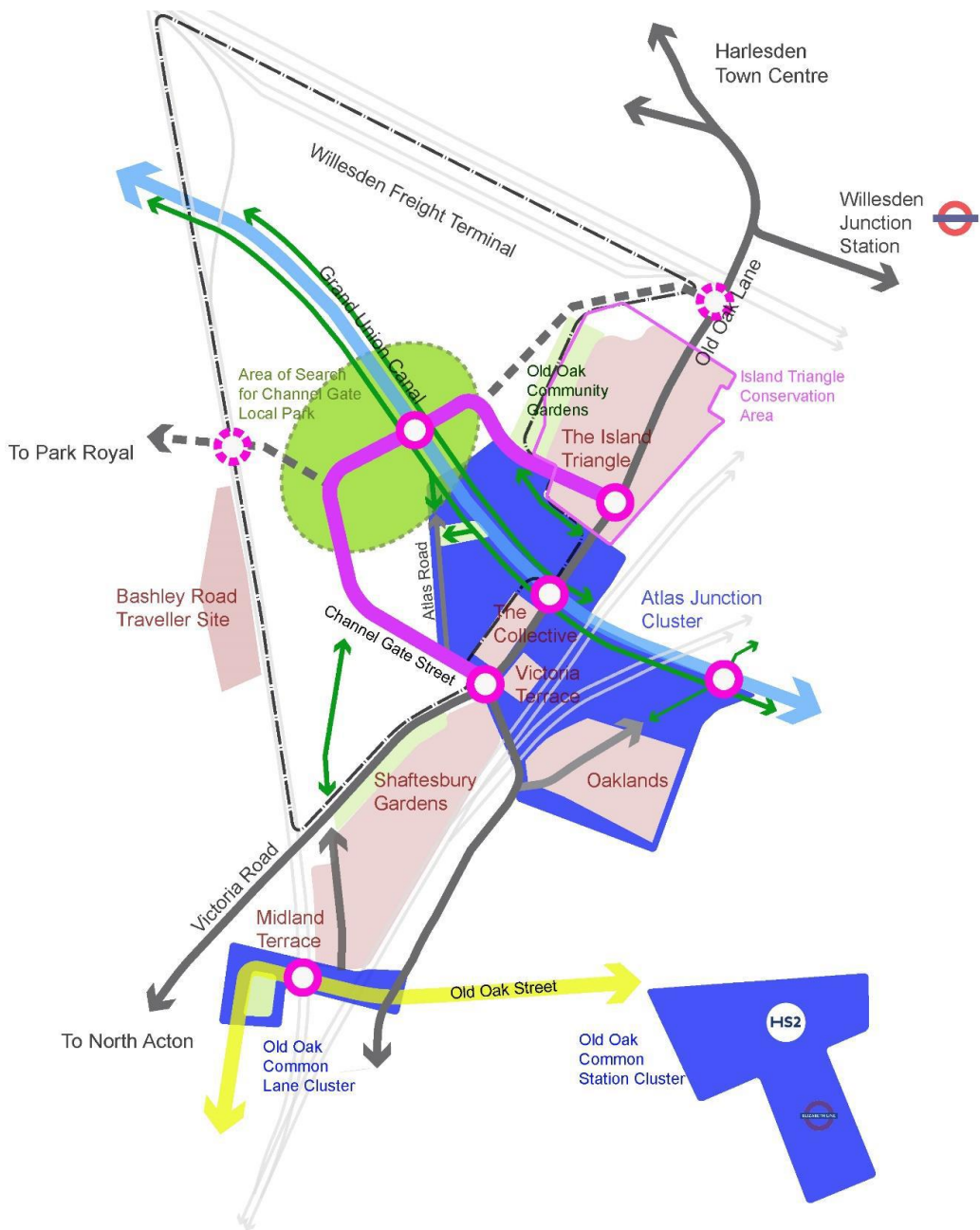
Replacement figure 4.30

-  Channel Gate Road
-  Other existing enhanced key roads
-  Walking / cycling routes
-  New or enhanced publicly accessible open space / public realm
-  Existing neighbourhoods
-  Local Heritage Listing
-  Grand Union Canal
-  Active frontage
-  Positive frontage
-  New or improved junction / bridge / underpass



Annex 25 Replacement figure 4.32

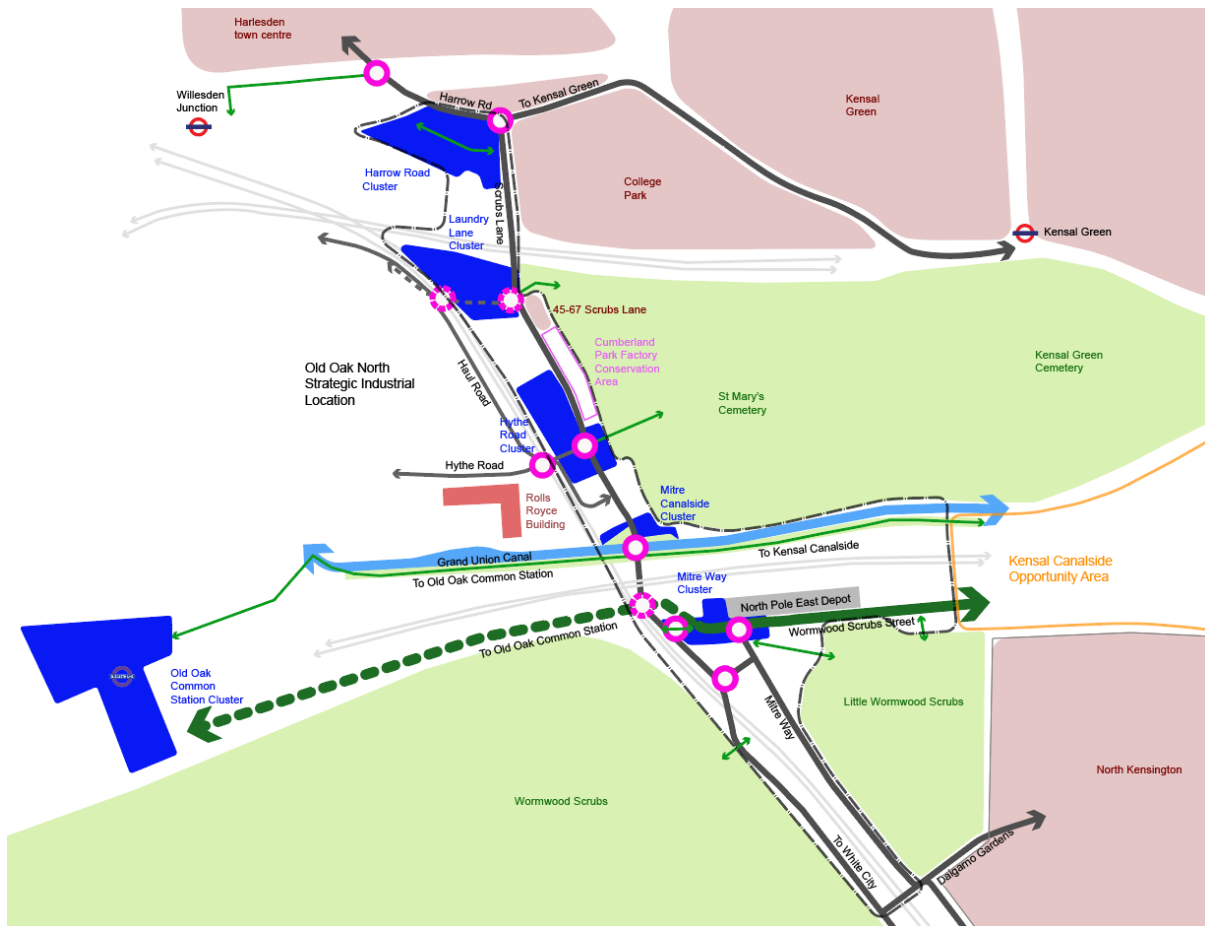
- Clusters
- Place boundary
- Channel Gate Street
- New and enhanced routes
- Walking and cycling routes
- Railway lines
- New and enhanced publicly accessible open space
- Area of search for Channel Gate Local Park
- Existing residential neighbourhood
- Island Triangle Conservation area
- New improved junction / bridge / underpass



Annex 26








Replacement figure 4.34

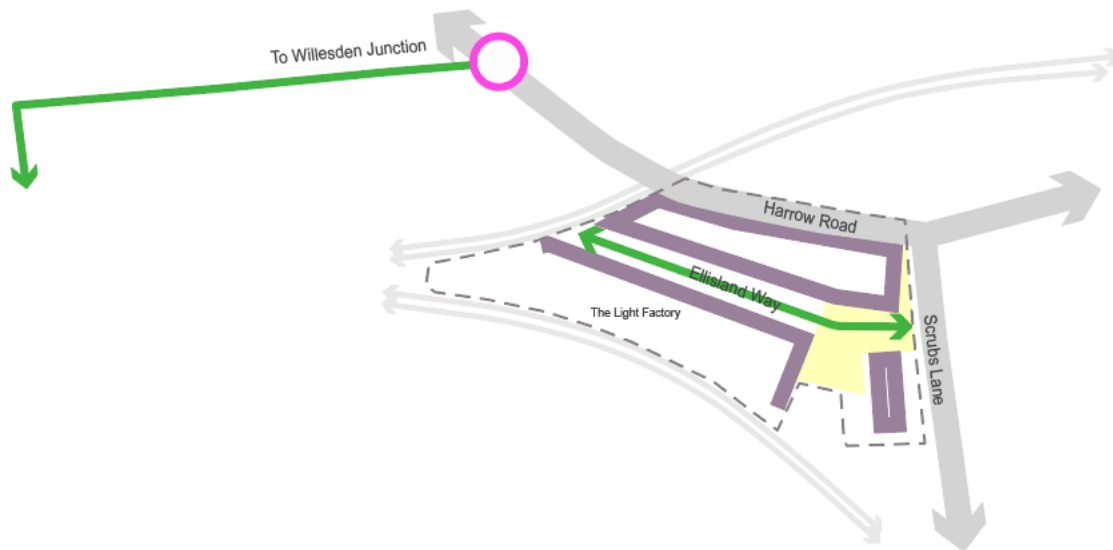
- Clusters
- Place boundary
- ➔ Wormwood Scrubs Street
- - - Wormwood Scrubs Street (beyond the plan period)
- ➔ New and enhanced routes
- ➔ Potential new access road
- ➔ Walking and cycling routes
- ➔ Railway lines
- Publicly accessible open space
- Rail depot
- Existing residential neighbourhood
- Local Heritage Listings
- Conservation area
- New and improved junction / bridge / underpass
- ✱ Potential new bridge / underpass



Annex 27










Replacement figure 4.36

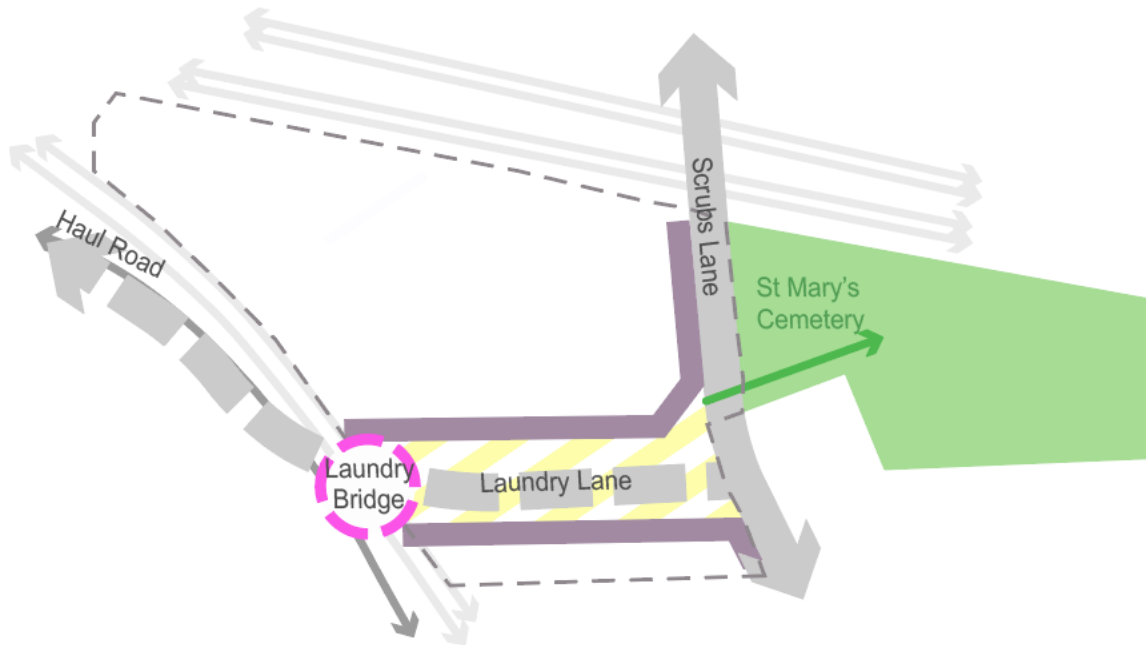
-  Harrow Road and Scrubs Lane
-  Walking and cycling route
-  New junction
-  New publicly accessible open space
-  Active frontage
-  Railway line
-  Cluster boundary



Annex 28

Replacement figure 4.38

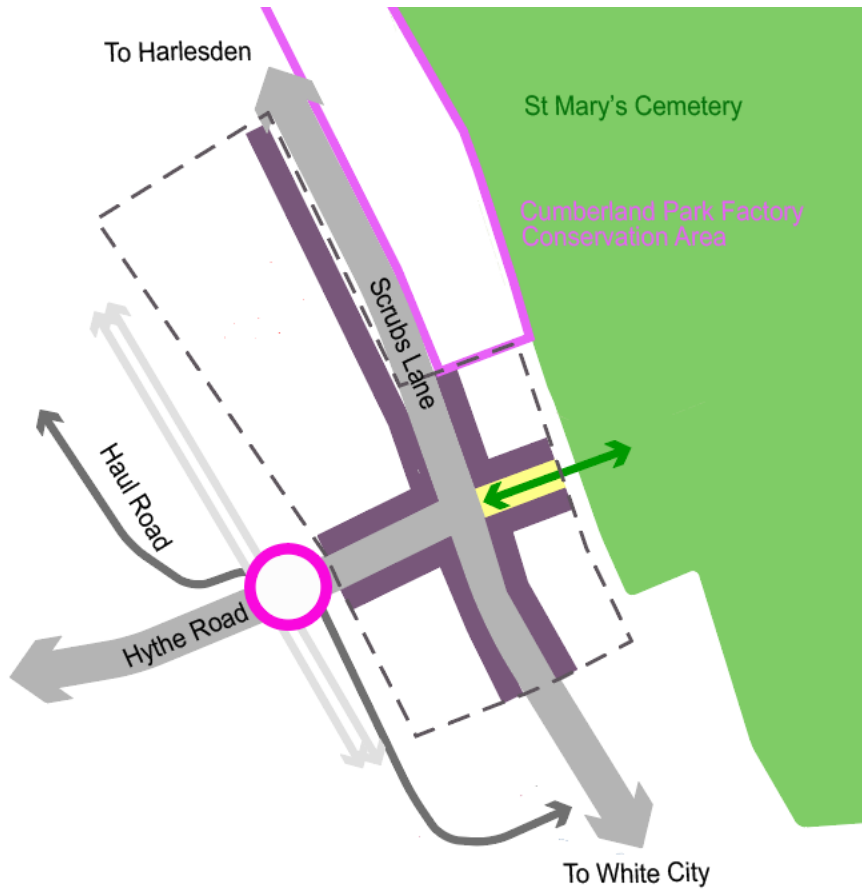
-  Potential new route (Laundry Lane)
-  Scrubs Lane
-  Enhanced walking route
-  New publicly accessible open space
-  St Mary's Cemetery
-  Active frontage
-  Potential new bridge
-  Railway line
-  Cluster boundary



Annex 29

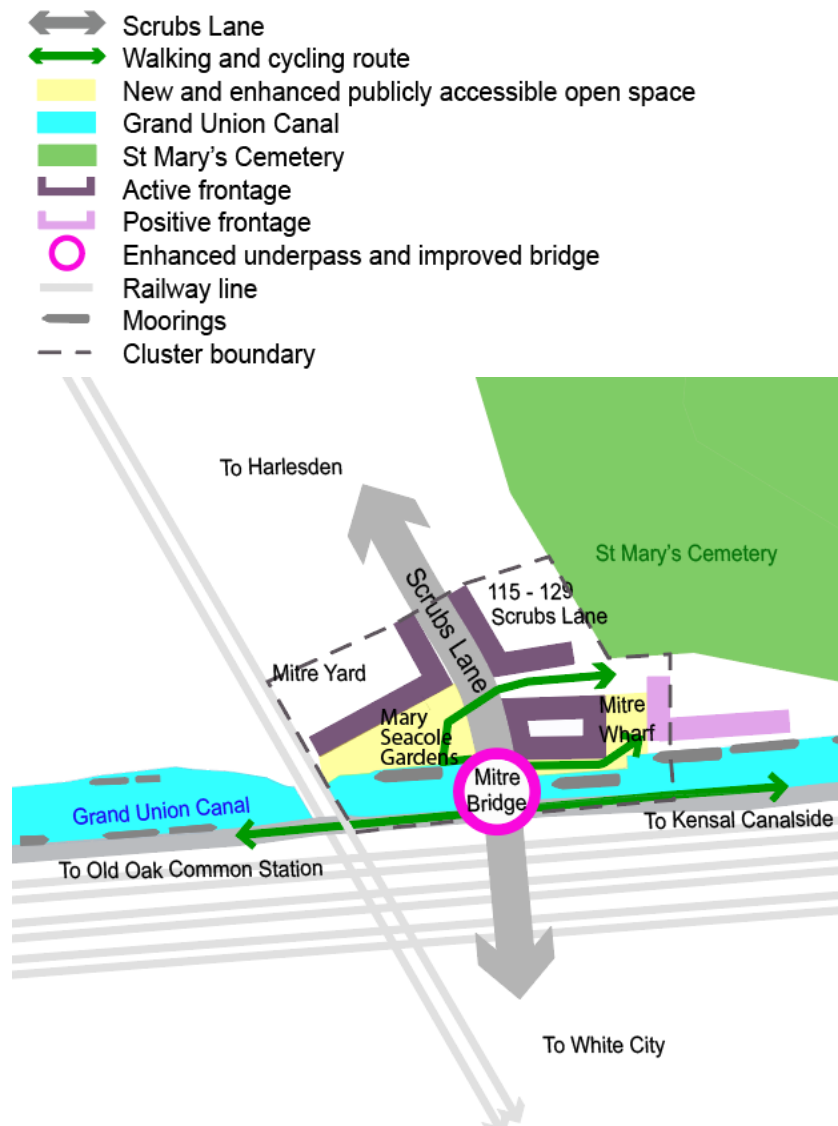
Replacement figure 4.40

-  Hythe Road / Scrubs Lane
-  New walking route
-  New publicly accessible open space
-  Conservation area
-  Existing publicly accessible open space
-  Active frontage
-  Improved underpass
-  Railway line
-  Cluster boundary












Annex 30

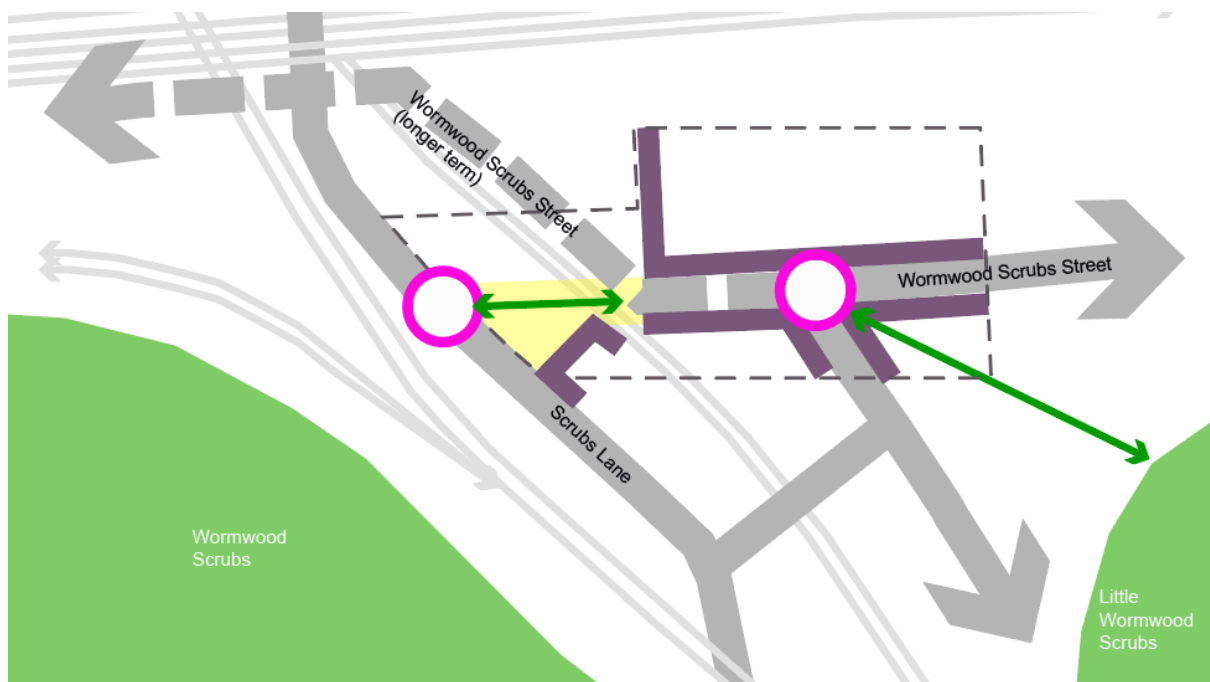
Replacement figure 4.42



Annex 31

New figure 4.44

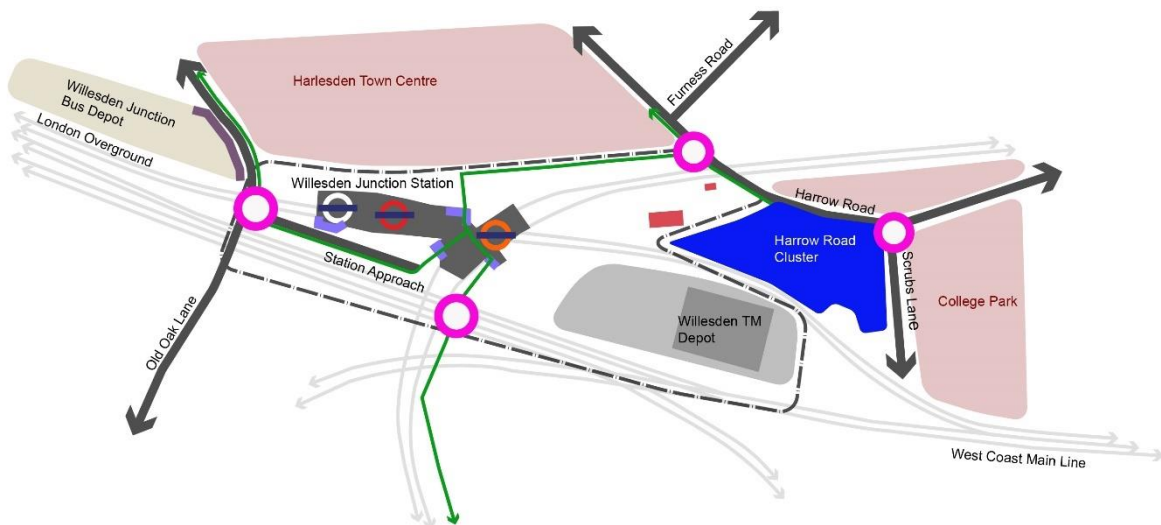
-  All modes route
-  Longer term / potential all modes route
-  Walking and cycling route
-  New publicly accessible open space
-  Wormwood Scrubs and Little Wormwood Scrubs
-  Active frontage
-  New and improved junction
-  Railway line
-  Cluster boundary



Annex 32

Replacement figure 4.44 (to become figure 4.45)

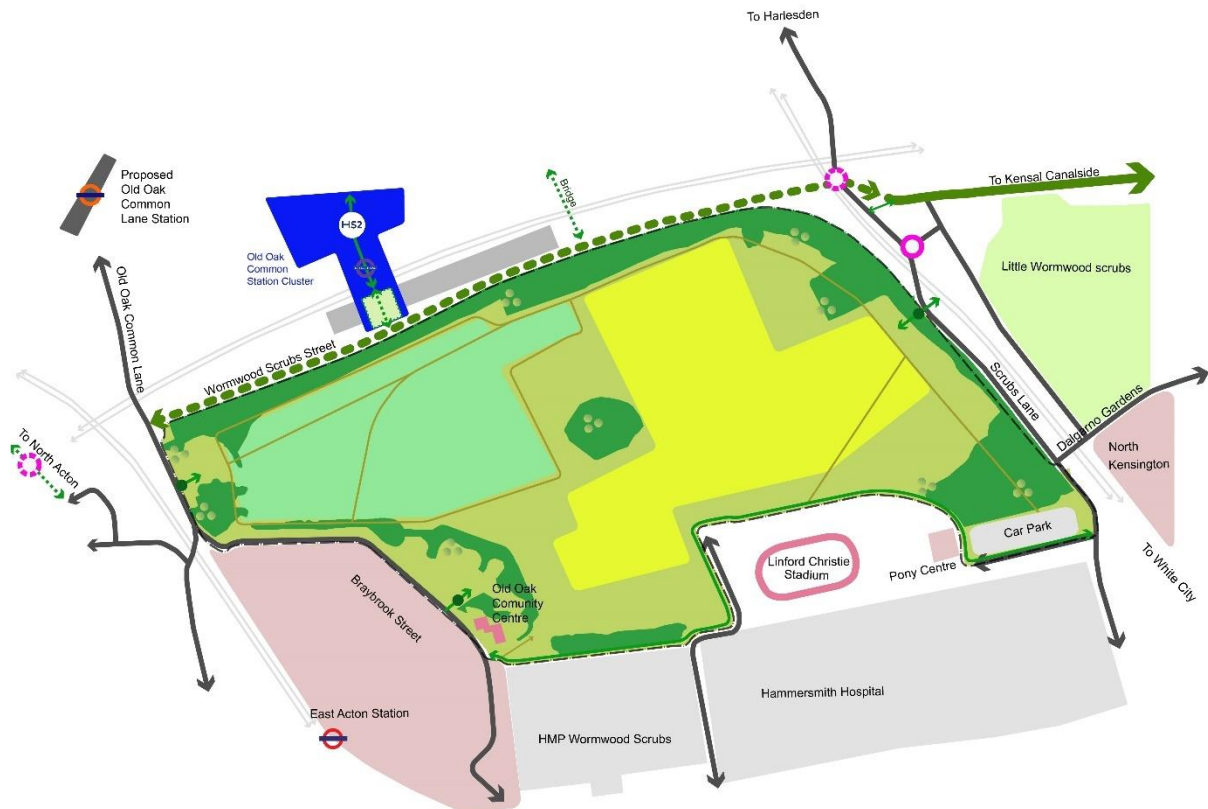
- Clusters
- Place boundary
- ➔ Existing and enhanced routes
- ➔ New or enhanced walking and cycling routes
- ➔ Railway lines
- New or enhanced publicly accessible open space
- Rail Depot
- London Overground and Underground Station
- Existing residential neighbourhood
- Local Heritage Lising
- Strategic Industrial Location (SIL)
- Station entrance
- Active frontage
- New and Improved junction / bridge / underpass
- Transport interchange



Annex 33

Replacement figure 4.45 (to become figure 4.46)










- Clusters
- Place boundary
- ➔ Existing and enhanced key routes
- ➔ Wormwood Scrubs Street
- ➔➔ Wormwood Scrubs Street (beyond plan period)
- ↔ New or improved walking and cycling access points
- ↔ Existing walking and cycling route
- ↔ Potential walking and cycling route
- ➔ Existing walking routes
- ➔ Railway lines
- Local nature reserve
- Long grass meadow
- Sports pitches
- Publicly accessible open space
- ⋯ Future publicly accessible open space (beyond plan period)
- Rail depot
- Existing residential neighbourhood
- HMP Wormwood Scrubs / Hammersmith Hospital
- London Overground Station
- New or improved junction / underpass
- ✱ New potential underpass and/or beyond plan period



Annex 34

Replacement figure 6.3

Key









-  OPDC Boundary
-  Metropolitan Importance
-  Local Nature Reserve
-  Borough Importance - Grade I
-  Borough Importance - Grade II
-  Local Importance
-  Other Green Areas
-  New and enhanced routes
-  Potential future new routes

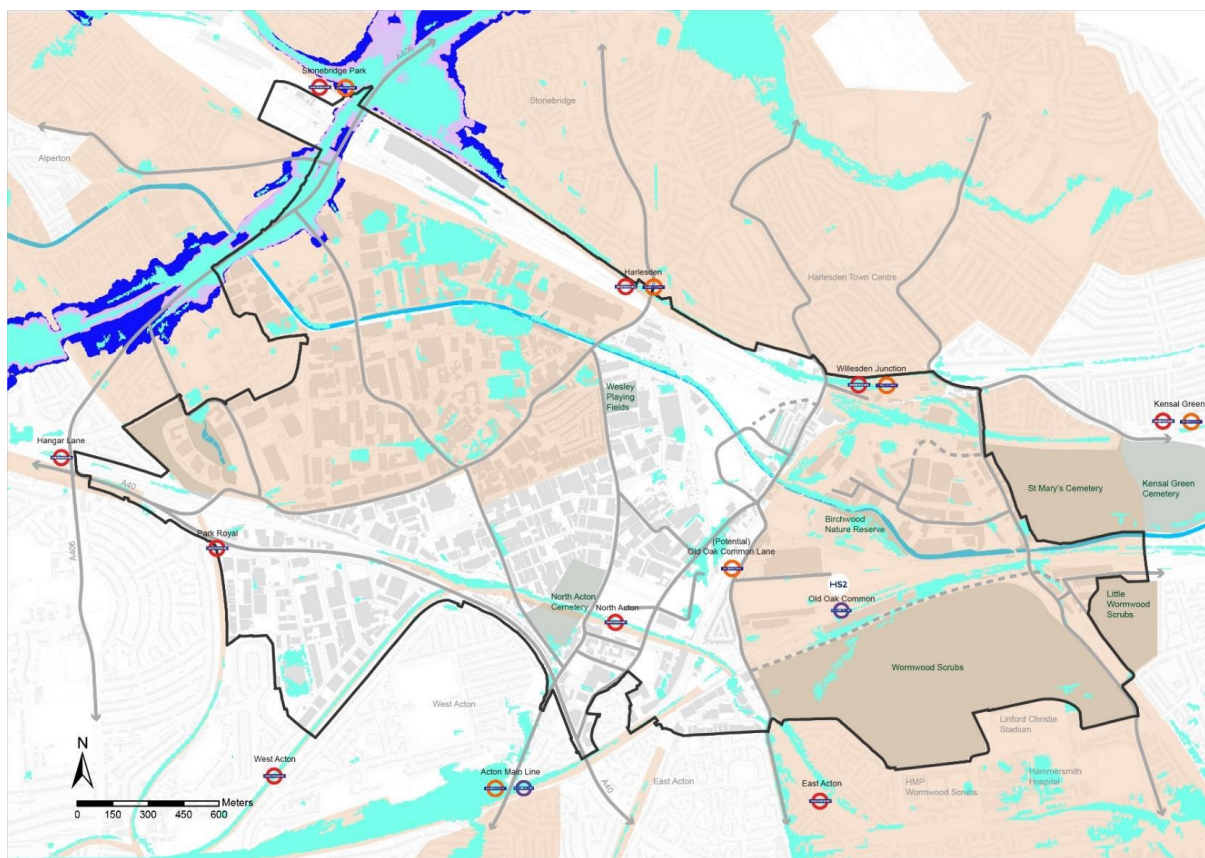


Annex 35

Replacement figure 6.4

Key

-  OPDC Boundary
-  Critical Drainage Area (CDA)
-  Flood Risk Zone 2
-  Flood Risk Zone 3
-  Surface Water Flood Risk
-  Canal
-  New and enhanced routes
-  Potential future new routes

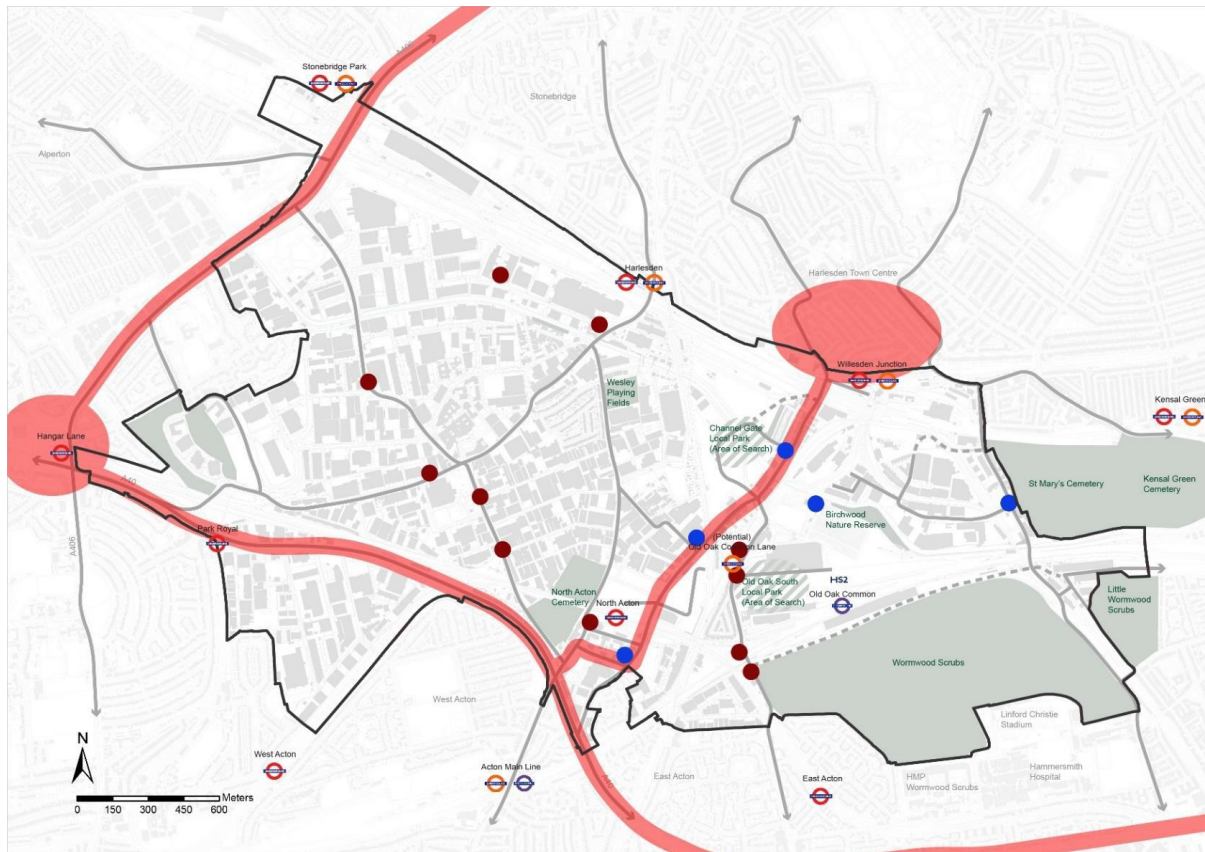


Annex 36

Replacement figure 6.6

Key

- OPDC Boundary
- Air quality focus area
- Recommended automatic monitoring station
- Recommended diffusion tube location
- ↔ New and enhanced routes
- ⋯ Potential future new routes



Annex 37

Replacement figure 6.7

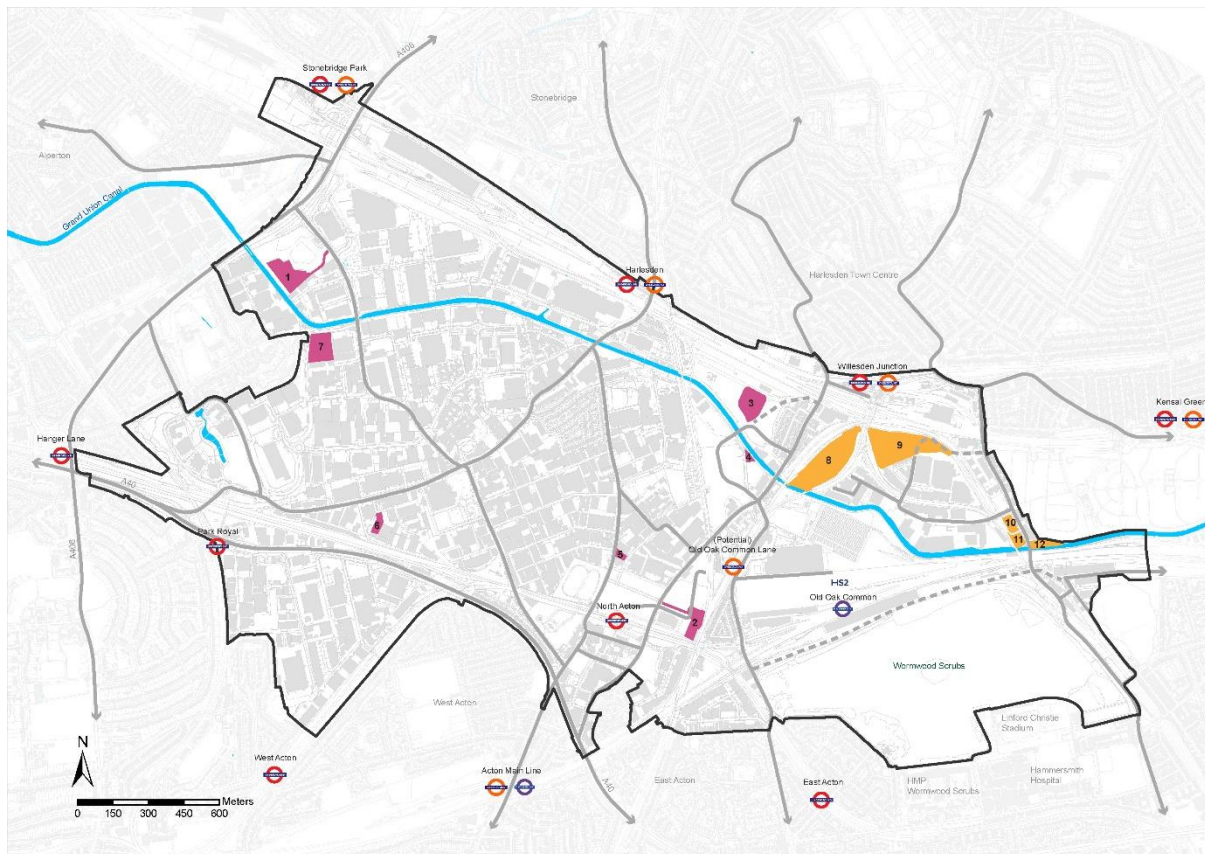
Key

□ OPDC Boundary

- West London Waste Plan waste sites
 - 1: Twyford Waste Transfer Station
 - 2: Quattro, Victoria Road
 - 3: Willesden Freight Terminal
 - 4: Atlas Wharf
 - 5: Chase Road
 - 6: OCS Group Ltd, Sovereign Park
 - 7: 100 Twyford Abbey Road

- Waste sites in LB Hammersmith & Fulham
 - 8: Powerday
 - 9: European Metal Recycling
 - 10: Capital Waste
 - 11: O' Donovans
 - 12: UK Tyre Exporter Ltd.




- ↔ New and enhanced routes
- Potential future new routes

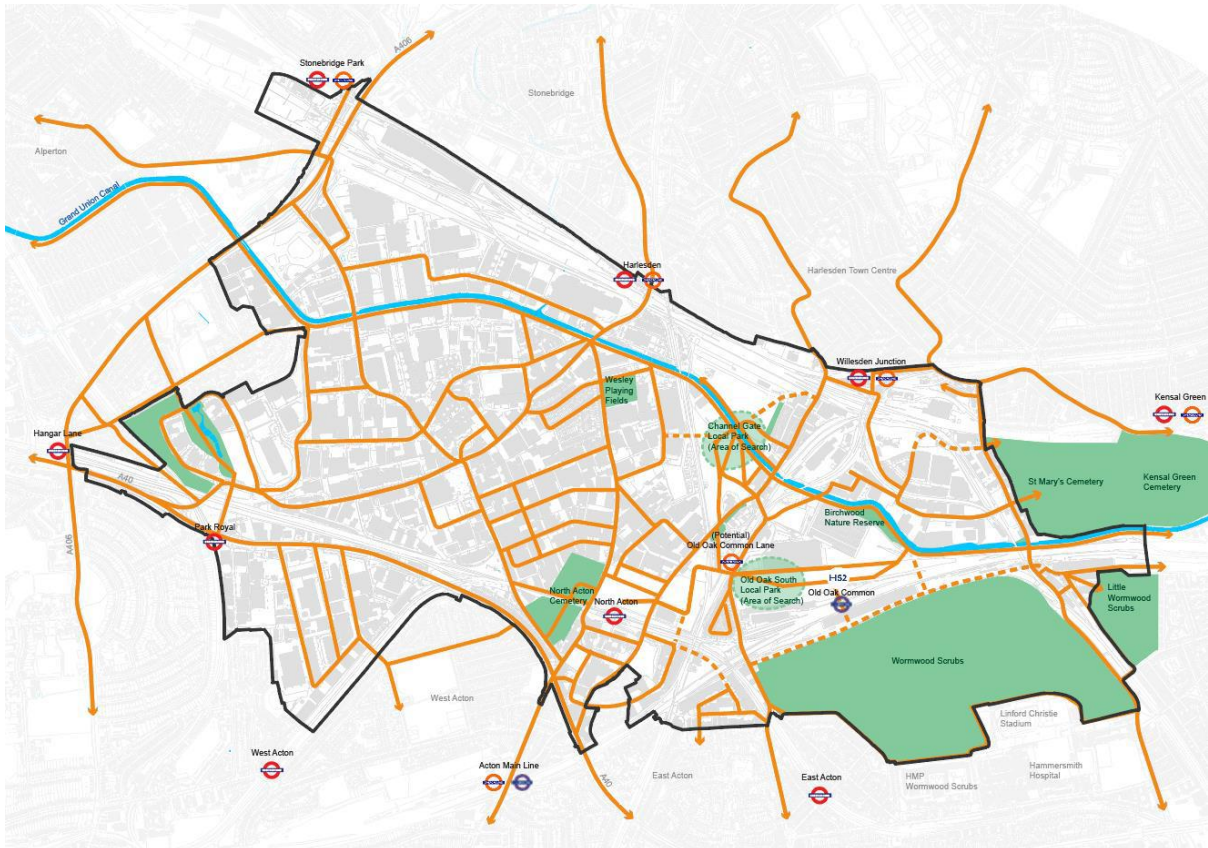


Annex 38

Replacement figure 7.5

Key







-  OPDC Boundary
-  Walking Network
-  Potential Future Routes

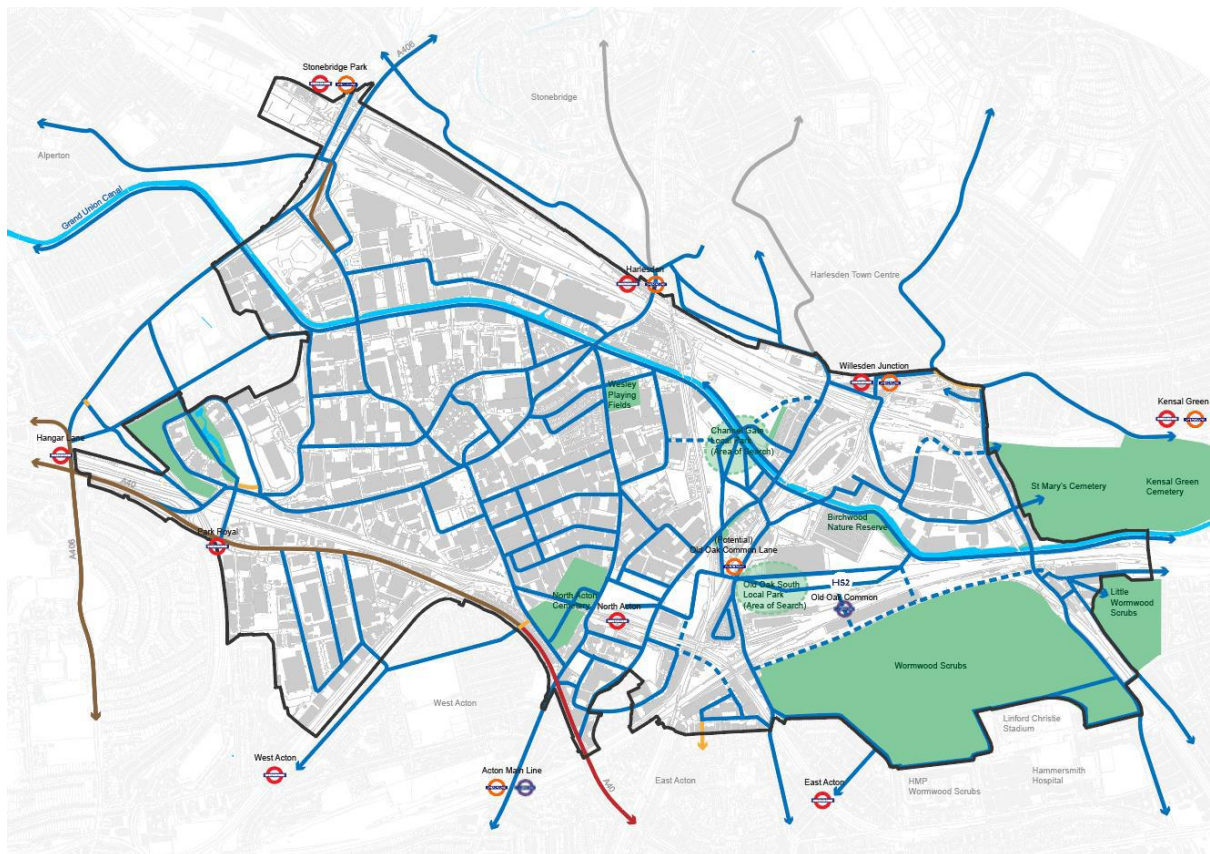


Annex 39

Replacement figure 7.7

Key

-  OPDC Boundary
-  Cycle Super Highway
(previous proposed alignment)
-  New, existing or enhanced routes
-  Potential longer term routes
-  Off road
-  Pedestrian links (dismount)

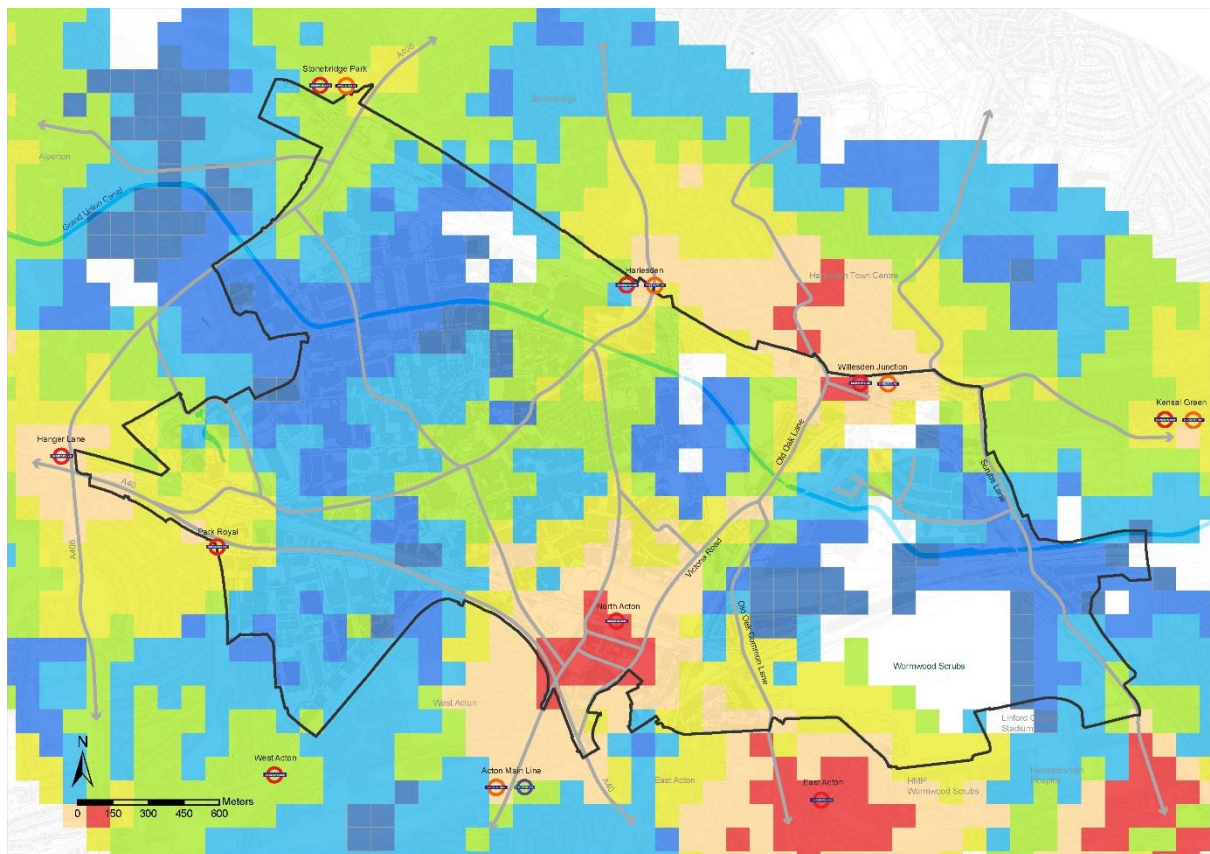


Annex 40

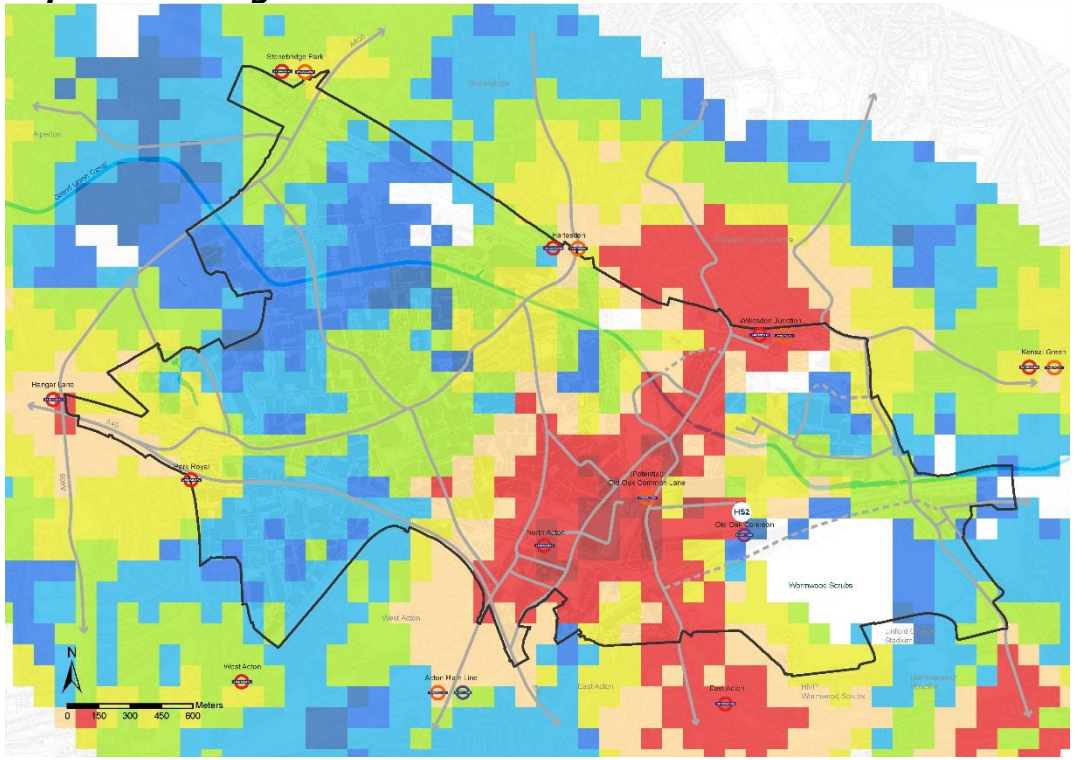
Replacement figure 7.10

Key

- OPDC Boundary
- PTAL
- 0 (Worst)
- 1A
- 1B
- 2
- 3
- 4
- 5
- 6a (Best)
- ↔ Existing routes














Replacement figure 7.11

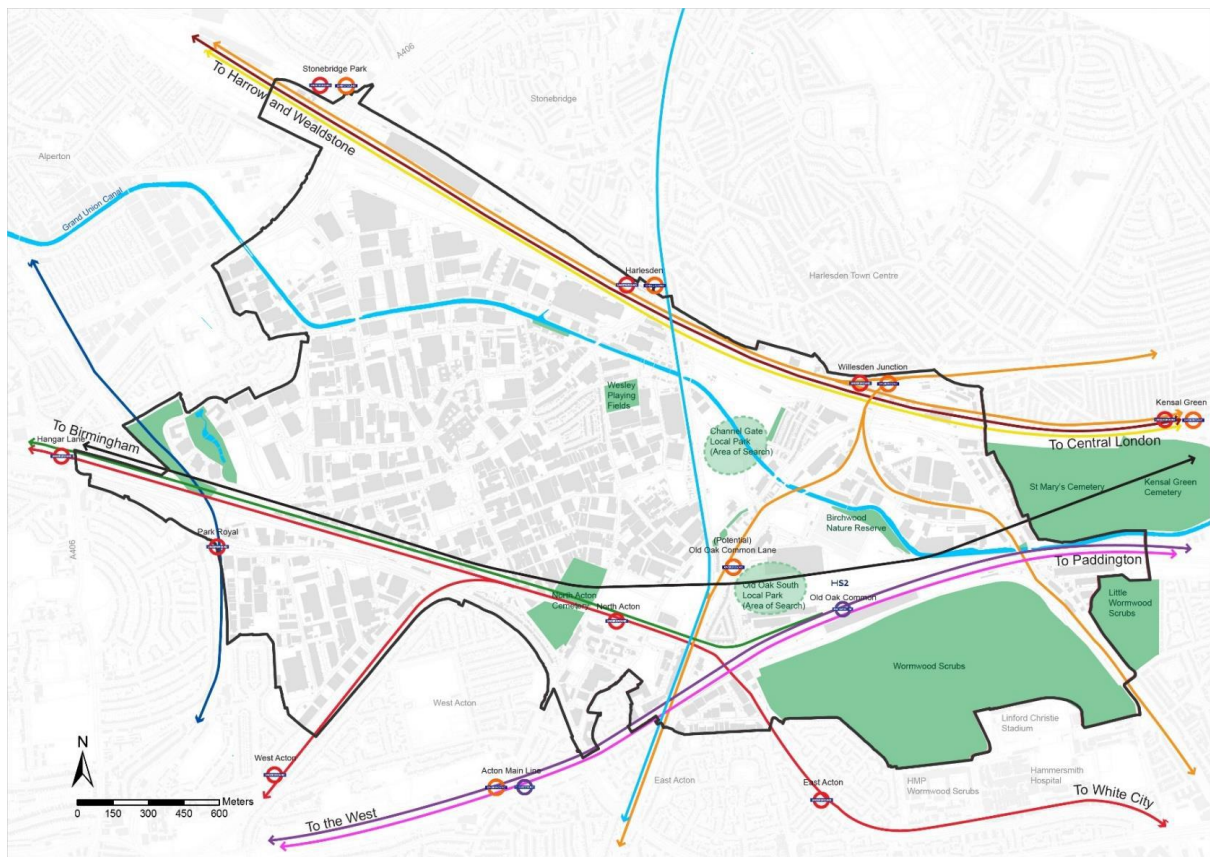


Annex 41

Replacement figure 7.12

Key

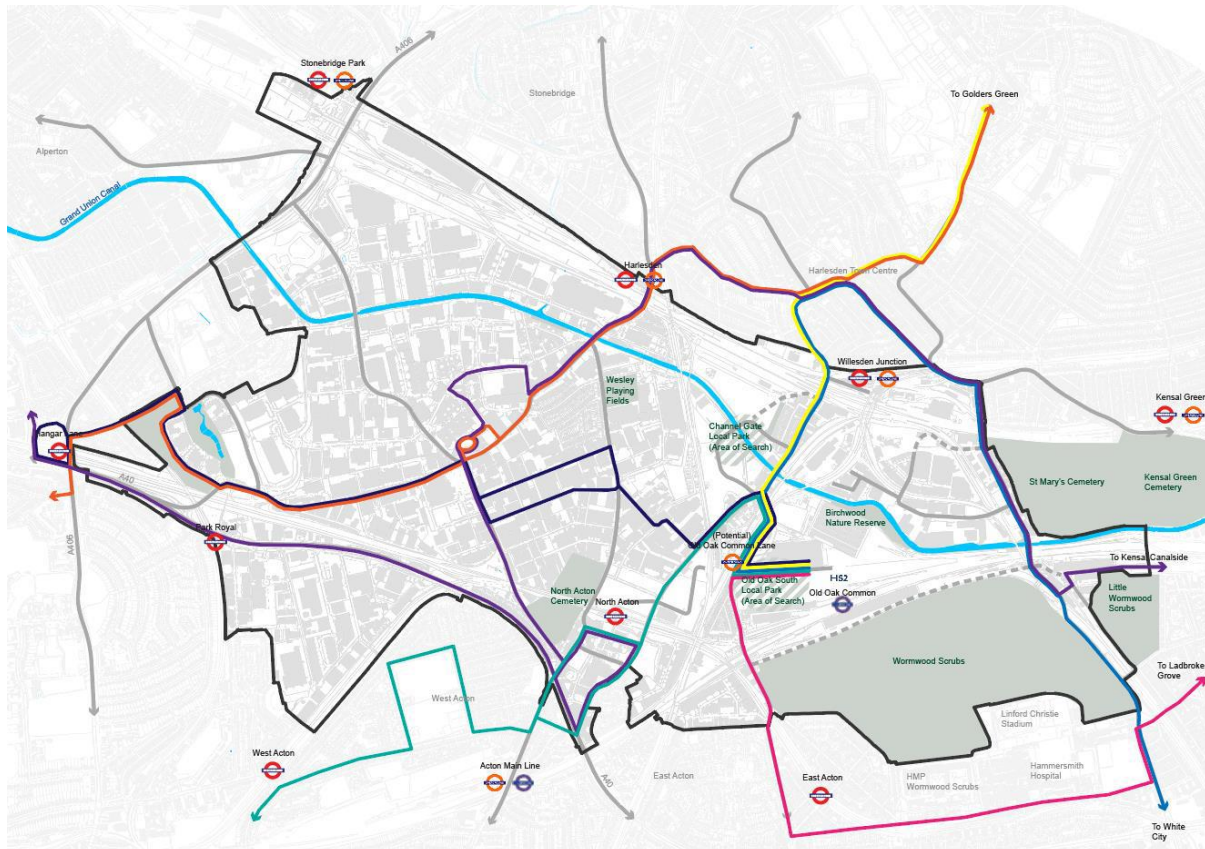
-  OPDC Boundary
-  London Overground Lines
-  Central Line
-  Bakerloo Line
-  Elizabeth Line
-  Piccadilly Line
-  West London Orbital
-  Potential Chiltern Line
-  HS2 Line
-  Great Western Main Line
-  West Coast Main Line



Annex 42

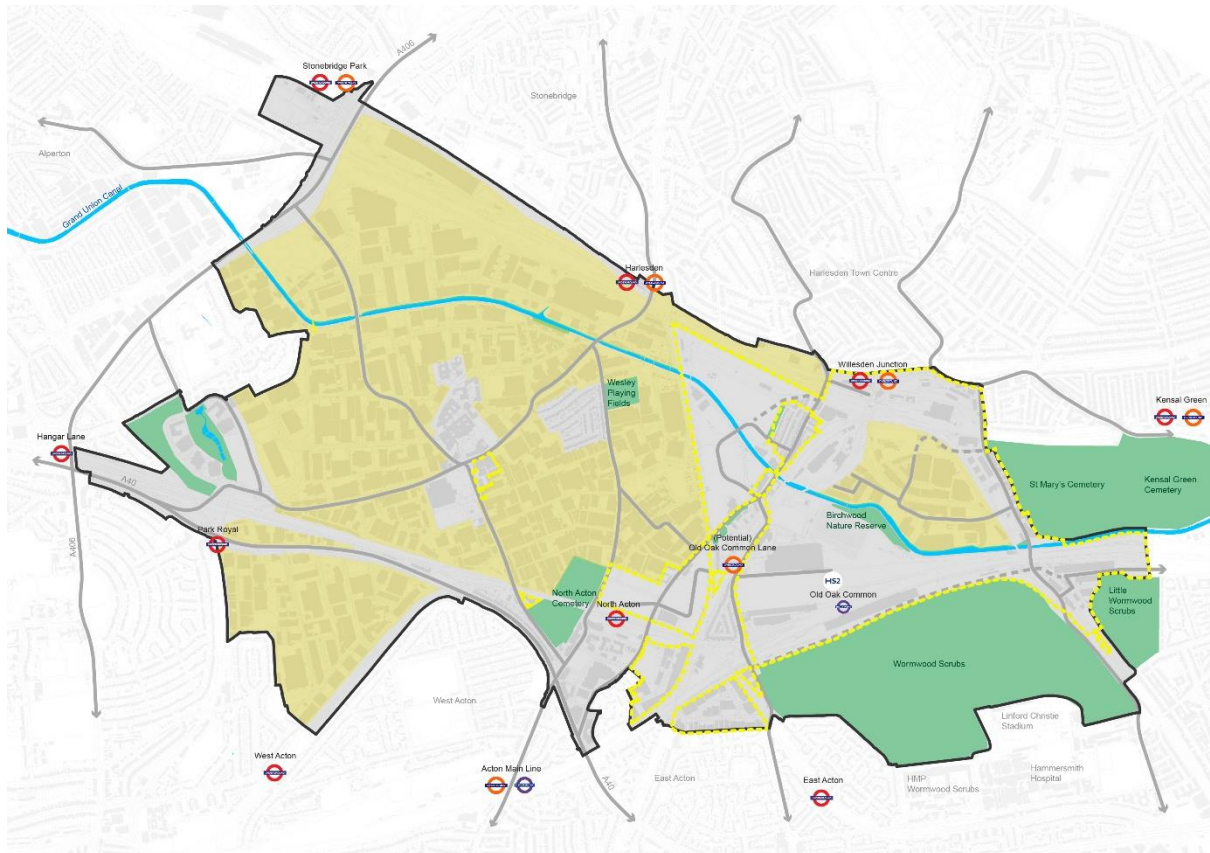
Replacement figure 7.14

- Route 7
- Route 218
- Route 220
- Route 226 (Golders Green to OOC)
- Route 226b (Neasden to Ealing)
- Route 487
- New Route



Annex 43

Replacement figure 9.4



Key

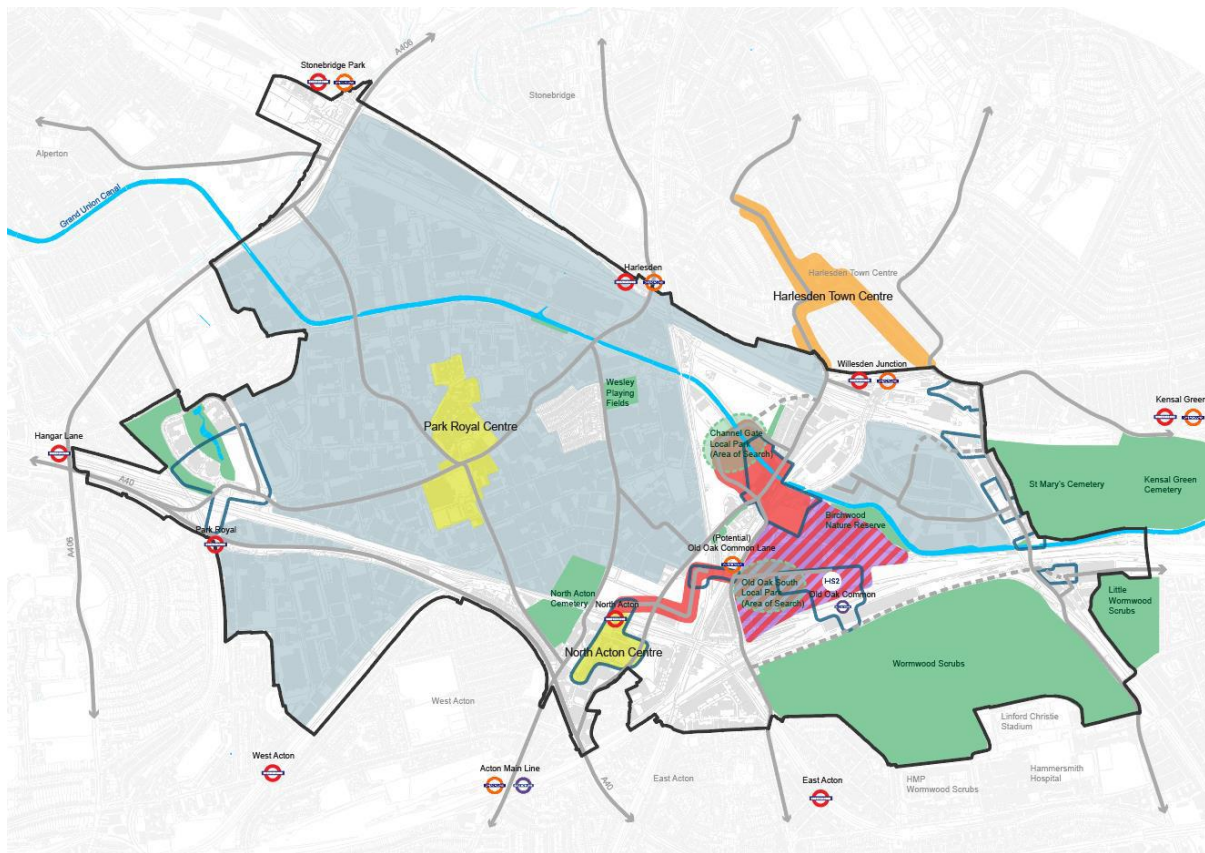
-  OPDC Boundary
-  Strategic Industrial Land (SIL)
-  De-designated SIL land
-  Non-SIL land
-  New and enhanced routes
-  Potential future new routes

Annex 44

Replacement figure 10.3










Key

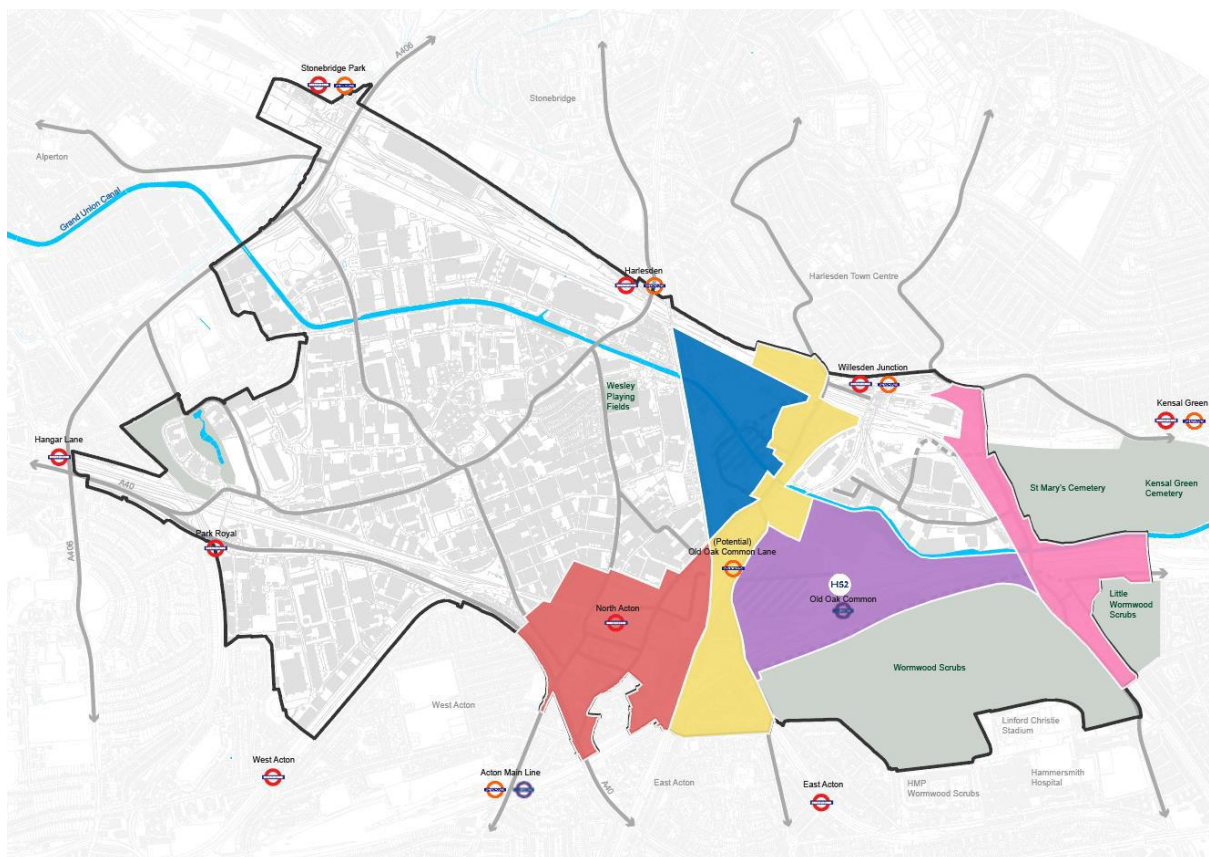
-  OPDC Boundary
-  Major Town Centre
-  Major Town Centre / Commercial Centre
-  District Town Centre
-  Neighbourhood Town Centre
-  Strategic Industrial Location (SIL)
-  Clusters
-  New and enhanced publicly accessible open space
-  Areas of search for new Local Park
-  New and enhanced routes
-  Potential future new routes



Annex 45

New figure (to become 10.6)








-  OPDC Boundary
-  Channel Gate
-  Old Oak Lane and Old Oak Common Lane
-  North Acton and Acton Wells
-  Old Oak South
-  Scrubs Lane
-  New and enhanced publicly accessible open space
-  New and enhanced routes
-  Potential future new routes



Annex 46

Replacement figure 11.3

Key

-  OPDC Boundary
-  Publicly owned land
-  Privately owned land
-  HS2 worksite
-  Existing residential areas
-  New and enhanced routes
-  Potential future new routes

