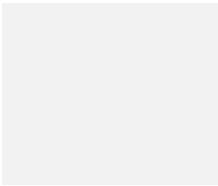


# OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION LOCAL PLAN

Integrated Impact Assessment  
Scoping Report

DECEMBER 2015

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# 1 Introduction

## 1.1 Purpose of the Scoping Report

This Scoping Report has been prepared by Arcadis Consulting UK Ltd. (former Hyder Consulting (UK) Ltd.) on behalf of the Old Oak and Park Royal Development Corporation (OPDC), as part of the combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), incorporating Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) (hereinafter referred to as the Integrated Impact Assessment (IIA)) of the emerging Local Plan. Habitats Regulations Assessment Screening will also be undertaken as a parallel process, the findings of which will be integrated into the IIA as appropriate.

As a Local Planning Authority, the OPDC has a duty to prepare a Local Plan that sets its strategy for development within its area and the policies that will be used to direct development and determine applications for planning permission across the entire OPDC area.

The Scoping Report represents the initial stage in the IIA process for the emerging Local Plan and sets the scope for the remainder of the process. Its purpose is to:

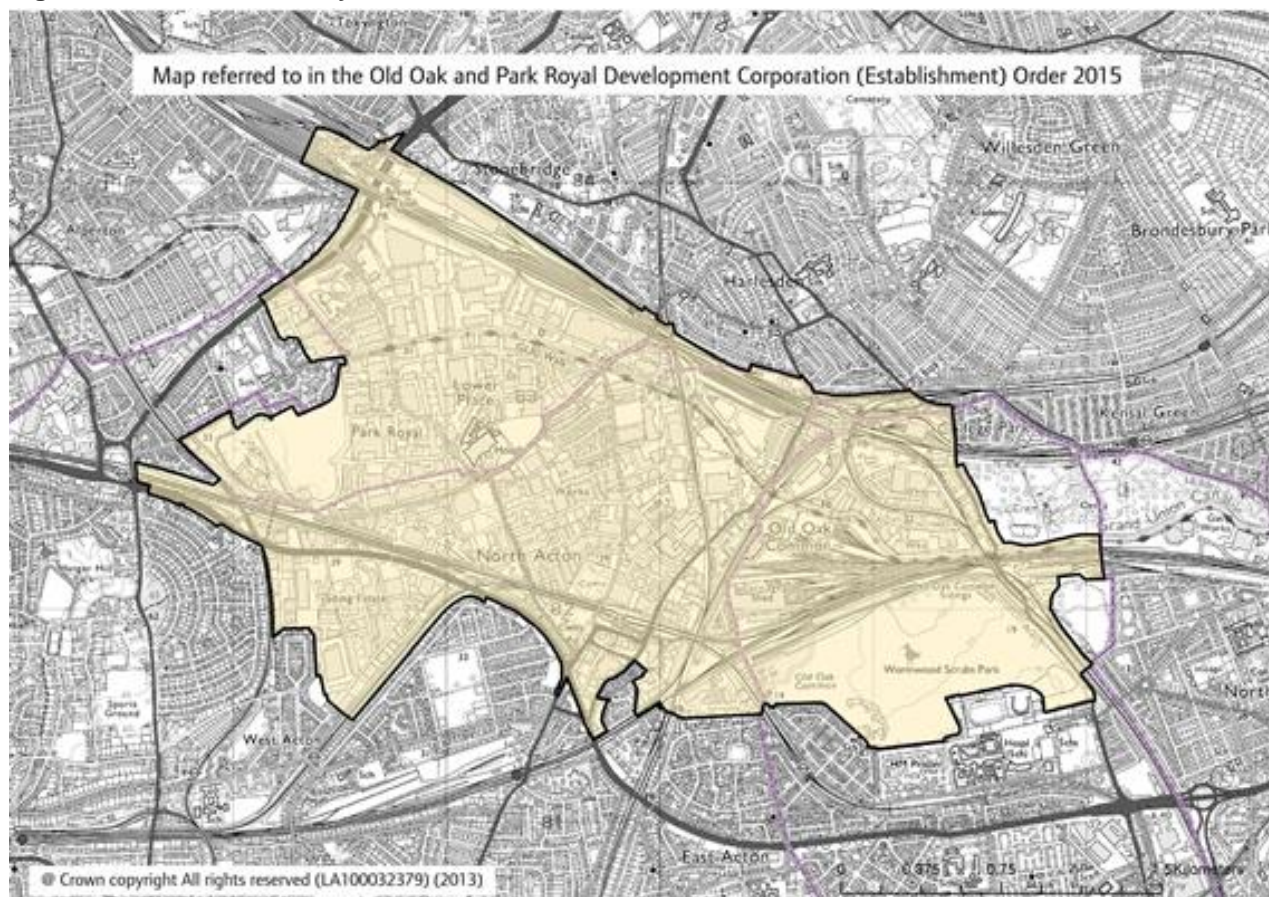
- Set the scope and level of detail of the IIA;
- Identify relevant plans, policies, programmes and initiatives that will inform the SA process and the Local Plan;
- Identify relevant baseline information;
- Identify key sustainability issues and problems; and
- Present an IIA Framework, consisting of sustainability objectives and indicators, against which the Local Plan can be assessed.

The SEA Directive requires the authority preparing the plan to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The preparation of a Scoping Report provides the most effective means of undertaking this consultation by providing the consultees with a document upon which they can make comments.

## 1.2 The Local Plan

Launched on 1 April 2015, the OPDC has been established by the Mayor of London, to take on powers of planning, regeneration, CPO and the ability to adopt and manage streets and space in the area covered by the emerging Old Oak and Park Royal Opportunity Area Planning Framework (OAPF). This new Local Planning Authority spans parts of the London Boroughs of Brent, Ealing and Hammersmith and Fulham and therefore takes on planning powers in the areas of these authorities that it covers. The OPDC boundary, including its relationship to its three constituent boroughs, is shown in **Figure 1-1**.

**Figure 1-1 OPDC Boundary**



The OPDC's purpose is to *'use the once-in-a-lifetime opportunity of investment in HS2 and Crossrail, to develop an exemplar community and new centre in north-west London, creating opportunities for local people and driving innovation and growth in London and the UK'*<sup>1</sup>.

The OPDC is a functional body of the Greater London Authority (GLA), working closely with a number of organisations including the Mayor of London, the GLA, Transport for London, central government, the local Boroughs of Brent, Ealing and Hammersmith & Fulham, residents in neighbouring local communities, local organisations, businesses, landowners, developers and regeneration agencies.

As a Local Planning Authority, the OPDC has a duty to prepare a Local Plan that sets its strategy for development within its area and the policies that will be used to direct development and determine applications for planning permission across the entire OPDC area. The plan period will be to 2037.

Until the OPDC adopts its own Local Plan for the OPDC area, the Boroughs' Local Plans will apply to the areas that they cover. **Figure 1-1** shows the areas covered the three constituent Local Authorities of the London Borough of Brent; the London Borough of Ealing; and the London Borough of Hammersmith and Fulham.

### **1.3 The London Plan and emerging Opportunity Area Planning Framework**

The London Plan is the overall strategic plan for London, and forms part of the development plan for the OPDC. The London Plan sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2036. London boroughs' Local Plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by councils and the Mayor.

<sup>1</sup> <https://www.london.gov.uk/priorities/planning/old-oak-park-royal>

The emerging Opportunity Area Planning Framework for Old Oak and Park Royal provides supplementary guidance to the London Plan to help to shape the regeneration of Old Oak and enhancement of Park Royal. It is expected to be adopted by the Mayor of London in October 2015.

## 1.4 Sustainable Development

The concept of sustainable development is central to the planning system. The term 'sustainable development' has been used since 1987 following the publication of the World Commission on Environment and Development (WCED) report 'Our Common Future' (The Brundtland Report). It called for a strategic that united development and the environment, and defined 'sustainable development' as:

*'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.'*

The UK Government has produced a Sustainable Development Strategy, 'Securing the Future' (March 2005). Priority areas for immediate action are outlined as:

- Sustainable consumption and production;
- Climate change and energy;
- Natural resource protection and environmental enhancement; and
- Sustainable communities.

To achieve forms of development that are more sustainable than previous development, proposals must strike an acceptable balance between maximising resource and energy efficiency; minimising environmental impacts; delivering social benefits; and supporting a healthy economy. The London Sustainable Development Commission (LSDC) provides advice to the mayor to help make London more sustainable as it continues to develop and grow. The priorities of LSDC are as follows:

- **London Infrastructure Plan 2050:** The Mayor has asked the Commission to advise on the London Infrastructure Plan 2050. The LSDC Chair is a member of the Infrastructure Delivery Board.
- **Circular Economy:** The LSDC sees waste as an opportunity to create new jobs and industries. This is why it's exploring ways to support London's move to a circular economy. In such an economy, waste is no longer considered just rubbish, but a resource of raw materials that has value.
- **Energy:** The LSDC will be exploring a range of issues around energy in the capital. This includes energy efficiency, and decentralised energy, meaning energy which is produced close to where it's used. The Commission will also look at how Londoners can overcome barriers to solar panel uptake in the capital. Progress here could also achieve greater investment in community infrastructure projects.
- **Green Economy:** The LSDC has made recommendations on ways to speed up the growth of London's low carbon goods and services sector. It is now helping to determine how these measures might be achieved. The LSDC is also helping to raise the capital's profile as a centre for 'cleantech' – technology which is environmentally friendly.

Relevant national and London based guidance has been considered and adhered to as part of this IIA. Where relevant, this has been referenced and reflected in the review of PPPs and the IIA Framework in Chapter 6.



## 1.5 Integrated Impact Assessment

The term Integrated Impact Assessment (IIA) can be used to describe the process of covering more than one type of impact assessment into a single process. Integrating different types of impact assessment into a single process can improve efficiencies in both the assessment itself, as many of the issues covered in the different forms of assessment overlap, as well as simplifying outcomes and recommendations for policy makers. Where more detail on certain issues is required or necessary, this can be undertaken and included within the IIA. This approach has been adopted by the Mayor of London, who has taken an integrated approach to assessing the impacts of his strategies, incorporating the requirements of SEA, SA, HIA, and EqlA. This IIA draws together the following impact assessments:

- Sustainability Appraisal and Strategic Environmental Assessment;
- Health Impact Assessment;
- Equalities Impact Assessment; and
- Habitats Regulations Assessment (HRA Screening will be undertaken as a parallel process, the findings of which will be integrated into the IIA as appropriate).

The following text provides further detail of each of the component impact assessments in turn. Section 3 provides further detail about how the assessment processes will be integrated.

## 1.6 Sustainability Appraisal and Strategic Environmental Assessment

SA is a process for assessing the social, economic, and environmental impacts of a plan and aims to ensure that sustainable development is at the heart of the plan-making process.

It is a legal requirement that Local Plans are subject to SA, under the Planning and Compulsory Purchase Act 2004. This Act stipulates that the SA must comply with the requirements of the SEA Directive which was transposed directly into UK law through the SEA Regulations.

SEA is a systemic process for evaluating the environmental consequences of plans and programmes to ensure that environmental issues are integrated and assessed at the earliest opportunity in the decision-making process. Article 1 of the SEA Directive states that the aim is to:

*'Provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.'*

It is possible to combine the processes of SEA and SA, as they share a number of similarities. NPPG promotes a combined process (i.e. a process which assesses social, economic and environmental effects) and this is the approach that has been adopted here. Whilst there are formalised approaches for both SA and SEA, only SEA has a legal obligation to perform certain activities. These legal obligations have been and will continue to be adhered to throughout the Integrated Impact Assessment for the new Local Plan. This Scoping Report includes a series of boxes which clearly identify the specific requirements of the SEA Directive that need to be fulfilled.

## 1.7 Health Impact Assessment

The online National Planning Practice Guidance (NPPG)<sup>2</sup> states that:

*'Local planning authorities should ensure that health and wellbeing, and health infrastructure, are considered in local and neighbourhood plans and in planning decision making...A health impact assessment may be a useful tool to use where there are expected to be significant impacts.'*

According to the NHS London Healthy Urban Development Unit:

*'A health impact assessment (HIA) helps ensure that health and wellbeing are being properly considered in planning policies and proposals.'*

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<sup>2</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/health-and-wellbeing/what-is-the-role-of-health-and-wellbeing-in-planning/>

Consequently, we are undertaking a high-level assessment of the possible health impacts of the Local Plan. As the OPDC is a pioneer for having public health expertise based within its core team, they have already ensured that public health expertise is, and will be, provided by the Local Authorities, Transport for London, GLA Health Team and Public Health England, as well as from OPDC Health Advisor. This will be integrated into the IIA process. Further details on the scope of the assessment and how the processes will be integrated can be found in Sections 2 and 3 of this report.

## 1.8 Equalities Impact Assessment

The Equality Act 2010 includes a public sector equality duty which requires public organisations and those delivering public functions to show due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation;
- Advance equality of opportunity; and
- Foster good relations between communities.

Consequently we are undertaking a high-level assessment of the possible equalities impacts of the Local Plan. This will be integrated into the IIA process. Further details on the scope of the assessment and how the processes will be integrated can be found in Sections 2 and 3 of this report.

## 1.9 Habitats Regulations Assessment

European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive') requires that any plan or programme likely to have a significant impact upon a Natura 2000 site (Special Area of Conservation (SAC) and Special Protection Area (SPA), which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. The overarching process is referred to as Habitats Regulations Assessment (HRA). In addition it is a matter of law that candidate SACs (cSACs), Sites of Community Importance (SCI), Ramsar sites and potential SPAs (pSPAs) are also considered in this process.

A HRA screening exercise will be undertaken to determine if they (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. This process will be documented in a Screening Report that will be submitted to Natural England for approval.

This is a parallel process to the IIA process and will be reported separately. However, its findings will be relevant to the IIA and vice versa so the two processes will need to interact. The NPPG3 states *that 'the sustainability appraisal should take account of the findings of a Habitats Regulations Assessment, if one is undertaken.'*

## 1.10 Consultation

### 1.10.1 SA Workshop

A scoping workshop was held in July 2015 with attendees from a range of organisations including officers from: the Greater London Authority (GLA); Transport for London (TfL); OPDC; Historic England; the London Boroughs of Brent, Ealing, Hammersmith and Fulham and Kensington and Chelsea; Public Health England; and the Environment Agency. The findings of this workshop have contributed to this report. Further details of the specific findings of the workshop are provided in **Appendix A**.

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<sup>3</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

### **1.10.2 Formal Consultation**

In accordance with regulation 12(5) of the SEA Regulations, this Scoping Report will be consulted upon for a five week period with the statutory SEA bodies, which include:

- Natural England;
- Historic England: and
- The Environment Agency.

This Scoping Report will be made available for comment on OPDC's website for the general public and other stakeholders during the consultation period, as well as being sent directly to the IIA Workshop attendees (see **Appendix A**). Comments received will be taken forward to inform the IIA process.

### **1.10.3 Additional Consultation**

An important element of the IIA, HIA and EqIA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.

## 2 Scope of the IIA (incorporating SA, SEA, HIA, EqlA and HRA)

### 2.1 Introduction

The following section describes the proposed spatial, temporal and technical scope of the assessments to be undertaken as part of the IIA.

### 2.2 Spatial Scope

The proposed study area for the IIA of the Local Plan, in general, is shown in **Figure 1-1**. However, as discussed at the Scoping Workshop, some effects, particularly in relation to health and employment and skills, will likely extend beyond this boundary. Studies in relation to the effects on local populations in the neighbouring areas to the OPDC boundary are currently ongoing. Relevant data collated as part of these studies will be integrated into the IIA process when available. Further data may also be collated when further information is available about the policies and the proposals of the Local Plan. It may then be necessary to collate more baseline data to enable the assessment of the effects of the Local Plan beyond its boundaries.

#### 2.2.1 Aspects of the Local Plan to be assessed and how

The framework of policies and proposals contained within the Local Plan will seek to regulate and control the development and use of land and to provide the basis for consistent and transparent decision making on individual planning applications. As options emerge, each of its components will be assessed to determine sustainability performance and to provide recommendations for sustainability improvements. The Local Plan is likely to include policies and proposals, grouped under the following headings (NB these may be subject to change):

1. Introduction
2. Vision and Objectives
3. Sustainable development
4. Design
5. Land uses
6. Transport
7. Environment and Utilities
8. Places
9. Delivery

The intention will be to ensure that the process is iterative with regular feedback occurring between the plan-makers and the IIA team, as options are developed.

The method adopted to assess each element of the plan will be slightly different, for example, the vision will simply be subject to a qualitative review in light of the IIA Framework objectives and an objective compatibility exercise will be used to determine if there are any key conflicts between the Local Plan Objectives and IIA Objectives.

However, it is expected that a more detailed assessment of the policies, allocations and alternatives will be undertaken using an assessment matrix.

### Assessment of Alternatives

It is a requirement of the SEA Directive that 'reasonable alternatives' are assessed and, therefore, alternative options will be assessed using the IIA Framework. In accordance with NPPG:

*'The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative.'*

Alternatives must be realistic and are likely to emerge from the plan-making process. However, the SEA can encourage further thinking around alternatives, and highlight where environmentally preferable options exist.

Alternatives have been a focus for several legal challenges within the UK, and so it is important to ensure reasonable alternatives are meaningfully considered. If there are genuinely no reasonable alternatives to a plan, alternatives should not be artificially generated.

The draft IIA Framework for consultation is presented in Section 6 of this report. The purpose of the assessment will be to determine the sustainability strengths and weaknesses of each option, such that this information can be used by the plan-makers to inform their decision to select the preferred options. It is proposed that for the strategic elements a matrix will be used for this assessment that enables the options to be easily compared.

The types of alternative options to be reviewed are currently anticipated to include:

- Strategic Spatial Strategy Options;
- Possible strategic policy directions; and
- Possible site allocations.

This report documents Stage A of the SEA process. The assessment of alternatives will be undertaken as part of Stage B of the SEA process, and therefore documented in subsequent IIA reports. This will include the Initial IIA Report, to be published with the Regulation 18 version of the draft Local Plan.

## **2.3 Temporal Scope**

The Local Plan will set out policies for the period to 2037. This will be used as the temporal scale for the IIA. This will help to identify whether effects are likely to be permanent (i.e. irreversible at least through the lifetime of the proposed measure/scheme) or temporary.

## **2.4 Technical Scope**

### **2.4.1 SEA**

The SEA Directive and the SEA Regulations require that the 'likely significant' effects on the environment are assessed, considering the following factors and interrelationship between them:

- Biodiversity;
- Population;
- Human health;
- Fauna and flora;
- Soil;
- Water;
- Air;
- Climatic factors;
- Material assets;
- Cultural heritage including architectural and archaeological heritage; and
- Landscape.

The above topics therefore form the technical scope of the SEA.

## 2.4.2 HIA

The NHS London Health Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool Framework (January 2013)<sup>4</sup> guidance lists the following health determinants, to be considered as a part of an assessment into health impacts:

1. Housing quality and design;
2. Access to healthcare services and other social infrastructure;
3. Access to open space and nature;
4. Air quality, noise and neighbourhood amenity;
5. Accessibility and active travel;
6. Crime reduction and community safety;
7. Access to healthy food;
8. Access to work and training;
9. Social cohesion and lifetime neighbourhoods;
10. Minimising the use of resources; and
11. Climate change.

The HIA elements of the IIA will therefore seek to assess the Local Plan in terms of its effects on the health of the local community, with wider effects being considered where relevant. This might include communities in the surrounding area, incoming residents and people coming in for work, visiting or just travelling through. This will encompass the determinants described above, where they relate to land use planning. There will be work developed around mitigating issues that impact negatively on health – physical, mental and emotional.

Within the assessment process, the HIA will be integrated throughout the IIA Framework (see section 6), with health, and impact on health, being considered under all relevant objectives. Most notably, however, the 'human health' topic of SEA will be expanded upon, to ensure that relevant baseline data, key sustainability issues and opportunities, objectives and mitigation is identified. Section 3 provides further information on how the HIA process will integrate with the IIA process.

## 2.4.3 EqIA

The EqIA process is designed to ensure that projects, policies and practices do not discriminate or disadvantage people and also to enable consideration of how equality can be improved or promoted. The EqIA will consider the impact of a proposal on relevant groups who share characteristics which are protected under the Equality Act (age, disability, race, faith, gender (including gender reassignment), sexual orientation, pregnancy and maternity, marriage and civil partnership) as well as others considered to be vulnerable within society such as low income groups.

This IIA Scoping Report, which integrates the requirements of EqIA, sets out the matters that have been identified as relevant for consideration in the EqIA. The EqIA will seek to identify those groups that may be affected by the proposals, to analyse what the equality impacts are, and what measures are to be applied to policy to minimise or eliminate the adverse impacts. Within the assessment process, the EqIA will be integrated throughout the IIA Framework (see section 6), with equalities issues being considered under all relevant objectives. Section 3 provides further information on how the HIA process will integrate with the IIA process.

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<sup>4</sup> <http://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2013/12/HUDU-Rapid-HIA-Tool-Jan-2013-Final.pdf>

## 2.4.4 HRA

Within the OPDC area there are no internationally designated SACs, SPAs or Ramsar sites. The closest to the site are listed in **Table 2-1**. A HRA screening exercise will be undertaken to determine if they (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. This process will be documented in a Screening Report that will be submitted to Natural England for approval. This is a parallel process to the IIA process and will be reported separately.

**Table 2-1 Statutory sites of international nature importance in proximity to the OPDC area**

Site Name	Designation	Approximate direction and distance from the site
Richmond Park	SAC	Data 26.9km, south of site
Wimbledon Common	SAC	8km, south of site

### Consultation Question (a)

Do you have any further suggestions regarding the scope of the IIA and its proposed appraisal of the Local Plan?

## 3 The IIA Process

### 3.1 Stages in the IIA Process

The Office of the Deputy Prime Minister's (ODPM) Practical Guide<sup>5</sup> as well as NPPG (March 2014), provide guidance on conducting an SA. This will be followed for the purposes of the IIA. The five main stages in conducting an SA are defined as:

- Stage A - setting the context and objectives, establishing the baseline and deciding on the scope;
- Stage B - developing and refining options and assessing effects;
- Stage C - preparing the Sustainability Appraisal Report;
- Stage D - consulting on the preferred option of the development plan and SA Report; and
- Stage E - monitoring significant effects of implementing the development plan.

**Table 3-1** presents the key stages in the SA process. This Scoping Report documents the findings of Stage A. The table also demonstrates how each of the SA (including SEA), HIA, EqlA and HRA assessment processes and stages are linked to each other, as well as to the preparation and development of the Local Plan.

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<sup>5</sup> ODPM (2005) A Practical Guide to the SEA Directive



**Table 3.1 Stages in the IIA Process**

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment		Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment
<b>Determining the scope of the Local Plan including specifying the opportunities or issues the authority wants to solve</b>	<b>A. Setting the context and objectives, establishing the baseline and deciding on the scope</b>	Identify related plans/programmes		Identify health related plans/programmes (as part of SA) linked into local Joint Strategic Needs Assessments	Review of relevant policies and strategies
		Identify environmental protection objectives		Derivation of health -related themes	Derivation of equality-related themes
		Baseline data and likely future trends	Identify all European sites within and up to 20km from the OPDC area	Gather baseline data relating to health (as part of SA)	Baseline data and likely future trends
		Identify sustainability issues and opportunities	Contact Natural England for details of all European sites (including conservation objectives) and consultation purposes	Identify health specific issues and relevant health determinants using the London Healthy Urban Development Unit tool (as part of SA)	Identify equalities specific issues
		Develop objectives, indicators and targets (Assessment Framework)	Liaise with SA team to ensure the Assessment Framework covers European sites appropriately	Ensure inclusion of health specific objectives, indicators and targets in SA Assessment Framework	Ensure inclusion of equalities specific objectives, indicators and targets in SA Assessment Framework
		Prepare SA Scoping Report, incorporating HRA and HIA	HRA information incorporated in SA Scoping Report	HIA information incorporated in SA Scoping Report.	EqIA information incorporated in SA Scoping Report.
		<b>Consult on the scope of the SA including HIA, EqIA and HRA</b>	<i>Consultation as part of SA Scoping Report consultation including consultation with Natural England</i>	<i>Consultation as part of SA Scoping Report consultation.</i>	<i>Consultation as part of SA Scoping Report consultation.</i>
	<b>Review of scoping consultation responses and preparation of Final Scoping Report to inform next stage.</b>				
<b>Generating options for the strategy and implementation plan to resolve these</b>	<b>B1/B2. Developing, refining and appraising</b>	Assess objectives against the Assessment Framework		<i>HIA effects evaluated through SA Framework – including mitigation</i>	<i>EqIA effects evaluated through SA Framework</i>

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment		Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment
challenges; appraising the options and predicting their effects (Regulation 18 Local Plan)	strategic alternatives	Develop, refine and appraise strategic options	Consider HRA implications of the options.		Screening exercise of proposed strategic options
		Evaluate/select preferred options			
	C. Prepare Initial SA Report				
Consultation on Local Plan Issues and Options (Regulation 18)	Consultation on Initial SA Report				
	Review of consultation responses and necessary actions to inform next stage				
Selecting preferred options for the strategy and implementation plan and deciding priorities	B3/B4. Assessing the effects of the Local Plan Preferred Options	Predict and assess effects of options taken forward		HIA effects evaluated through SA Framework – including mitigation	EqIA effects evaluated through SA Framework
		Proposed mitigation measures			
		Propose monitoring programme	Monitoring as part of SA	Monitoring as part of SA	Monitoring as part of SA
Production of the Draft Local Plan	C. Prepare SA Report		HRA Screening of draft Local Plan. HRA Screening Report produced separately and sent to Natural England for agreement of findings.	HIA fully documented in SA Report	EqIA fully documented in SA Report
Consultation of Draft Local Plan (Regulation 19)	D. Consultation on the SA Report		As above.	HIA Consultation included in SA Report consultation	EqIA Consultation included in SA Report consultation
Production of Final Local Plan	D. Prepare a supplementary or revised SA Report if necessary	Assess significant changes	Prepare updated HRA Report following Natural England comments (if necessary).	HIA assessment of significant changes undertaken as part of SA and options around mitigation or reduction of effect identified	EqIA assessment of significant changes undertaken as part of SA
		Prepare supplementary or revised SA Report			
Adoption of Local Plan	D. SA Statement				

## 4 Review of Relevant Plans, Programmes and Environmental Objectives

### 4.1 Introduction

The box below stipulates the SEA Directive requirements for this stage of the process.

#### **Box 1: SEA Directive Requirements for the Review of Plans Programmes and Environmental Protection Objectives**

*'an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes' (Annex 1 (a)).*

*'the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation' (Annex 1 (e))*

A review of other plans and programmes that may affect the preparation of the Local Plan was undertaken in order to contribute to the development of both the IIA and the Local Plan. This included:

- Identification of any external social, environmental or economic objectives, indicators or targets that should be reflected in the IIA process.
- Identification of any baseline data relevant to the IIA.
- Identification of any external factors that might influence the preparation of the plan, for example sustainability issues.
- Identification of any external objectives or aims that would contribute positively to the development of the Local Plan.
- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the Local Plan.

The review included documents prepared at international, national, regional and local scale. A brief summary of the documents reviewed and the main findings are summarised in **Tables 4-1 and 4-2**. Further details are presented in **Appendix B**.

**Table 4-1 Review of Plans, Policies and Programmes**

Plan, Policy or Programme	Directly Relevant Process
<b>International / European</b>	
European Directive 2001/42/EC (SEA Directive)	SEA
European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats	HRA, SEA
European Directive: Environmental Noise Directive 2002/49/EC	SEA, HIA, EqlA
EU Directive on Ambient Air Quality and Management 96/62/EC	SEA, HIA, EqlA
Water Framework Directive 2000/60/EC	SEA
Waste Framework Directive 2008/98/EC	SEA
Urban Waste Water Treatment Directive 91/271/EEC	SEA, HIA
Directive on the Promotion of the Use of Energy from Renewable Sources 2009/28/EC	SEA
Health for Growth 2014-2020, European Commission, 2011	HIA, SEA
European Convention on the Protection of the Archaeological Heritage (revised), 1992	SEA
European Landscape Charter 2000	SEA
<b>National</b>	
Greater London Authority Act 1999	HIA, EqlA
Equality Act 2010	HIA, EqlA
Wildlife and Countryside Act 1981	HRA
Flood and Water Management Act 2010	SEA, HIA
Energy Act 2013	SEA
Climate Change Act 2008	SEA, HIA, EqlA
Planning (Listed Building and Conservation Areas) Act 1990	SEA
Ancient Monuments and Archaeological Areas Act 1979	SEA
UK Climate Change Programme 2006	SEA, HIA, EqlA
National Planning Policy Framework, Department for Communities and Local Government, March 2012	SEA, HIA, EqlA

Plan, Policy or Programme	Directly Relevant Process
National Planning Policy for Waste, October 2014	SEA, HIA, EqlA
Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015	SEA, EqlA
The UK Government Sustainable Development Strategy, HM Government, 2005	SEA, HIA, EqlA
The UK Low Carbon Transition Plan, HM Government, July 2009	SEA
The Carbon Plan, HM Government, December 2011	SEA
UK Renewable Energy Strategy, HM Government, 2009	SEA
Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011	SEA, HIA
UK Post-2010 Biodiversity Framework, Joint Nature Conservation Committee and Department for Environment, Food and Rural Affairs, 2012	SEA
White Paper: Healthy Lives, Healthy People: our strategy for Public Health in England, Department for Health, June 2011	SEA, HIA, EqlA
UK Air Quality Strategy, Department for Environment, Food and Rural Affairs, 2011	SEA, HIA, EqlA
Noise Policy Statement for England, Department for Environment, Food and Rural Affairs, March 2010	SEA, HIA, EqlA
Policy statement: Planning for schools development, Department for Communities and Local Government, August 2011	SEA, EqlA
Written Ministerial Statement: Sustainable Drainage Systems, December 2014	SEA, HIA, EqlA
<b>Regional / London</b>	
The London Plan: Spatial Development Strategy for Greater London, Greater London Authority, July 2011	SEA, HIA, EqlA
Revised Early Minor Alterations to the London Plan, Greater London Authority, October 2013	SEA, HIA, EqlA
Further Alterations to the London Plan, Greater London Authority, March 2015	SEA, HIA, EqlA
Draft Minor Alterations to the London Plan 2015 – Housing Standards, and Parking Standards, Greater London Authority, May 2015	SEA, HIA, EqlA
Land for Industry and Transport Supplementary Planning Guidance, Greater London Authority, September 2012	SEA, HIA, EqlA
Green Infrastructure and Open Environments: The All London Green Grid, Supplementary Planning Guidance, Greater London Authority, March 2012	SEA, HIA, EqlA
London Infrastructure Plan 2050 update, March 2015	SEA, HIA, EqlA
London Plan Supplementary Planning Guidance on Housing, Greater London Authority,	SEA, HIA, EqlA

Plan, Policy or Programme	Directly Relevant Process
November 2012	
London Plan Social Infrastructure Supplementary Planning Guidance, May 2015	SEA, HIA, EqlA
London Plan Town Centres Supplementary Planning Guidance, July 2014	SEA, HIA, EqlA
London Plan Supplementary Planning Guidance, Sustainable Design and Construction, Greater London Authority, April 2014	SEA, HIA, EqlA
London Plan The Control of Dust and Emissions during Construction and Demolition SPG, July 2014	SEA, HIA, EqlA
London's Waste Resource: The Mayor's Municipal Waste Management Strategy, November 2011	SEA, HIA, EqlA
London Waste and Recycling Board Waste Management Planning Advice for New Flatted Properties, December 2014	SEA, HIA, EqlA
Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance, Greater London Authority, 2012	SEA, HIA, EqlA
Green Infrastructure and Open Environments: London's Foundations: Protecting the geodiversity of the capital: Supplementary Planning Guidance, Greater London Authority and London Geodiversity Partnership, March 2012	SEA
Securing London's Water Future, Greater London Authority, October 2011	SEA, HIA
The Mayor's Food Strategy: Healthy and Sustainable Food for London, London Development Agency, May 2006	SEA, HIA, EqlA
Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy, Greater London Authority, October 2011	SEA, HIA
Managing Risks and Increasing Resilience: The Mayor's Climate Change Adaption Strategy, Greater London Authority, October 2011	SEA, HIA
Cultural Metropolis: The Mayor's Culture Strategy, Greater London Authority, November 2010 and Achievements and Next Steps, Greater London Authority, Greater London Authority, 2014	SEA, HIA, EqlA
The London Health Inequalities Strategy, Greater London Authority, April 2010	SEA, HIA, EqlA
Planning for Equality and Diversity in London: Supplementary Planning Guidance to the London Plan, Greater London Authority, October 2007	EqlA
River Basin Management Plan. Thames River Basin District, Environment Agency, December 2009	SEA
The Mayor's Economic Development Strategy for London, Greater London Authority, May 2010	SEA, EqlA
Mayor's Biodiversity Strategy: Connecting with London's Nature, Greater London Authority, July 2002	SEA, HRA, HIA

Plan, Policy or Programme	Directly Relevant Process
Improving Londoners Access to Nature: London Plan Implementation Report, Greater London Authority, February 2008	SEA, HIA
London Biodiversity Action Plan, London Biodiversity Partnership, 2001	SEA, HIA
Clearing the Air: The Mayor's Air Quality Strategy, Greater London Authority, December 2010	SEA, HIA
Sounder City: The Mayor's Ambient Noise Strategy, Greater London Authority, March 2004	SEA, HIA
London View Management Framework Supplementary Planning Guidance, Greater London Authority, March 2012	SEA
Mayor's Transport Strategy, Greater London Authority, May 2010	SEA, HIA, EqIA
The Mayor's Equality Framework: Equal Life Chance for All, Greater London Authority, 2009	EqIA
<b>West London</b>	
West London Joint Waste Plan to 2031: London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond Upon Thames, July 2015	SEA, HIA
West London Sub Regional Transport Plan, Transport for London, 2014 update	EqIA, SEA, HIA
<b>Local</b>	
Old Oak and Park Royal draft Opportunity Area Planning Framework, Greater London Authority, February 2015	SEA, HIA, EqIA
<b>Brent</b>	
London Borough of Brent Local Development Framework, Core Strategy, Brent Council, July 2010	SEA
Brent Parks Strategy 2010-2015, Brent Council, publication date unknown	SEA, HIA, EqIA
Food for Thought: A Food Growing and Allotments Strategy for the London Borough of Brent and Action Plan 2014/16, Brent Council, publication date unknown	SEA, HIA, EqIA
Draft Community Safety Strategy 2014-17, Safer Brent Partnership, publication date unknown	SEA, HIA, EqIA
Brent Equality Strategy 2015-19, Brent Council, April 2015	EqIA
Brent Health and Wellbeing Strategy 2014-17, Brent Council and NHS Brent, publication date unknown	SEA, HIA, EqIA
Cultural Strategy for Brent 2010-15, Brent Council, publication date unknown	EqIA
A Regeneration Strategy for Brent 2010-2030, Brent Council, publication date unknown	SEA, HIA, EqIA
A Plan for Children and Families in Brent 2012-15, Brent Council, publication date unknown	EqIA

Plan, Policy or Programme	Directly Relevant Process
<b>Ealing</b>	
The Development Strategy 2026: Ealing Core Strategy, Ealing Council, April 2012	SEA
Sustainable Community Strategy 2006-2016 Ealing Council, Refresh July 2011	SEA, HIA, EqIA
Ealing Quality of Life for Older People 2006-2016, Ealing Council, publication date unknown	HIA, EqIA
Arts and Cultural Strategy 2013-2018, Ealing Council, publication date unknown	SEA, EqIA
Ealing Green Space Strategy 2012-2017, Ealing Council, November 2012	EqIA, HIA, SEA
Park Royal Southern Gateway Position Statement, Final Draft, London Borough of Ealing, April 2008	SEA
<b>Hammersmith and Fulham</b>	
Hammersmith and Fulham Core Strategy, Hammersmith and Fulham Council, October 2011	SEA
Hammersmith and Fulham Housing Strategy: Delivering the change we need in housing, Hammersmith and Fulham Council, May 2015	EqIA, HIA, SEA
Hammersmith and Fulham Health and Wellbeing Strategy 2013-15, Hammersmith and Fulham Council, publication date unknown	EqIA, HIA, SEA
Parks and Open Spaces Strategy 2008-2018, Hammersmith and Fulham Council, July 2008	EqIA, HIA, SEA
Hammersmith and Fulham CSPAN Physical Activity Strategy 2011-2016, Hammersmith and Fulham Council, November 2011	EqIA, HIA, SEA
Updated Surface Water Management Plan 2015, Hammersmith and Fulham Council, April 2015	SEA, HIA
Contaminated Land Strategy, Hammersmith and Fulham Council, 2001	SEA
<b>Kensington and Chelsea</b>	
Consolidated Local Plan (July 2015)	EqIA, HIA, SEA
Surface Water Management Plan (SWMP, February 2014)	EqIA, HIA, SEA
Local Flood Risk Management Strategy (LFRMS, July 2015)	SEA
Issues and Options Paper for Kensal Gasworks (June 2012)	EqIA, HIA, SEA
St Quintin and Woodlands Draft Neighbourhood Plan (May 2015)	EqIA, HIA, SEA

## 4.2 Key Results from the Review

Environmental, social and economic objectives and issues identified in the review of plans, programmes and environmental protection objectives (PPPs) of relevance to the IIA were used to generate a series of



common themes. Appendix B presents a summary of how the identification of common themes relates to each of the PPPs reviewed. How these themes relate to the relevant assessment processes is presented in **Table 4-2**. The results of this assessment have been used to inform the development of the draft IIA Framework. How the resulting draft Objectives relate to the identified themes is also shown in **Table 4-2**.

**Table 4-2 Results of the review of Plans, Policies and Programmes**

Common theme	Relevance to SEA, HIA, EqIA and HRA	Relevance to draft IIA Objective
<b>Environmental</b>		
Optimise the use of land through increasing the density of development	SEA: Soil, Material Assets, Population	2, 3, 4, 7, 17, 18
Promote sustainable design and mitigate and adapt to climate change	SEA: Human Health, Population, Climatic Factors, Material Assets; HIA; EqIA	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 15
Promote and protect the water environment including issues such as quality and resource use as well as reducing flood risk	SEA: Human Health, Population, Climatic Factors, Water, Material Assets; HIA; EqIA	3, 6, 7, 8, 9, 10, 15
Reduce greenhouse gas emissions, increase energy efficiency and promote the use of renewable energy and renewable technologies in appropriate locations	SEA: Climatic Factors, Air, Material Assets, Population	4, 6, 7, 8
Promote sensitive waste management	SEA: Material Assets, Climatic Factors, Population, Human Health, Soil, Landscape; HIA, EqIA	3, 7, 8, 9, 10, 11, 15
Protect and enhance the historic environment and recognise and appreciate landmarks, townscapes and their setting	SEA: Material Assets, Cultural Heritage, Population, Landscape	1, 2, 3, 5, 6, 7, 8, 12, 13, 18
Conserve and enhance biodiversity as an integral part of economic, social and environmental development	HRA; SEA: Biodiversity, Flora, Fauna, Population, Material Assets, Climatic Factors, Soil, Water	1, 6, 9, 10, 11, 15, 18
Achieve more effective geoconservation and improve soil quality	SEA: Soil, Climatic Factors, Human Health, Water, Landscape; HIA	2, 3, 6, 7, 8, 9, 10, 15
Improve air quality	SEA: Air, Climatic Factors, Human Health, Population, Material Assets; HIA, EqIA	4, 7, 8, 10, 22, 25, 17, 18
Minimise the adverse impacts of noise on people living and working in, and visiting the area	SEA: Population, Human Health, Material Assets; HIA; EqIA	1, 4, 5, 11, 15, 18
<b>Social</b>		
Improve health and well-being and promote greater levels of physical activity	SEA: Human Health, Population, Landscape; HIA; EqIA	1, 4, 7, 11, 13, 14, 15, 16, 17
To create an equal society which recognises people's different needs,	SEA: Human Health, Population; HIA; EqIA	13, 14, 15, 16, 17

Common theme	Relevance to SEA, HIA, EqIA and HRA	Relevance to draft IIA Objective
situations and goals, and removes the barriers that limit what people can do and be		
Maximise the contribution that the arts, culture and heritage can make to the community	SEA: Population, Material Assets, Cultural Heritage; HIA; EqIA	1, 12, 13
The need to ensure that new housing development meets local and regional needs (for all sections of society)	SEA: Population, Human Health, Material Assets; HIA; EqIA	1, 5, 13, 14, 15
Promote more sustainable transport choices and to improve accessibility	SEA: Population, Human Health, Material Assets, Air, Noise, Climatic Factors; HIA; EqIA	1, 2, 4, 7, 11, 15, 17
Recognise the importance of open spaces, sport and recreation and the contribution that they make to enhancing quality of life	SEA: Population, Human Health, Landscape, Material Assets; HIA; EqIA	1, 6, 12, 13, 14, 15
Improve educational attainment and training opportunities	SEA: Population, Human Health; HIA; EqIA	13, 14, 15, 16, 17, 18
Reduce crime and fear of crime	SEA: Population, Human Health; HIA; EqIA	1, 4, 13, 14, 15, 16, 17, 18
Economic		
Promote sustainable economic development and a range of employment opportunities	SEA: Population, Human Health, Material Assets; HIA; EqIA	16, 17, 18

**Consultation Question (b)**

Are there any additional PPPs that should be considered for review?

**Consultation Question (c)**

Are there any additional themes that could be drawn out of the review of PPPs?

## 5 The Sustainability Baseline and Key Sustainability Issues

### 5.1 Introduction

Box 2 defines the SEA Directive requirements for this element of the process.

#### Box 2: SEA Directive Requirements for Baseline Data Collation

*'the environmental characteristics of areas likely to be significantly affected' (Annex 1 (c))*

*'any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EC' (Annex 1 (d)).*

### 5.2 Methodology

Characterising the environmental and sustainability baseline, issues and context is an essential part of developing the IIA Framework. It comprises the following key elements:

- Characterising the current state of the environment within the Old Oak & Park Royal Development Corporation area including social and economic aspects; and
- Using this information to identify existing problems and opportunities that could be considered in the Local Plan.

The environmental, social and economic baseline was characterised through the following methods:

- Review of relevant local, regional and national plans, strategies and programmes;
- Data research based around a series of baseline indicators developed from the SEA Directive topics (biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape), ODPM guidance and NPPG, and the data available for London. This encompassed data relating to HRA. Data was also collated for additional socio-economic topic areas relating to HIA and EqIA including deprivation, housing and employment to ensure that a broad range of environmental, social and economic issues were considered; and
- The results of the scoping workshop with stakeholders in July 2015.

The collation of baseline data also enabled the identification of key sustainability issues and opportunities affecting the area.

Appendix C summarises the key baseline trends across the area. Each section is subdivided to present the following:

- The baseline indicators that have been used (some are also contextual indicators and may not actually form part of the IIA Framework).
- Descriptive text, graphs and statistics about the County.
- Key data gaps.

**Appendix C** also provides a summary of how the identified key sustainability issues and opportunities might be addressed in the Local Plan. Sustainability issues and opportunities identified from the baseline review are summarised in **Table 5-1**.

The SEA Directive requires 'material assets' to be considered within SA. Material assets refer to the stock of valuable assets within a study area and can include many things from valuable landscapes, natural and

cultural heritage through to housing stock, schools, hospitals and quality agricultural land. It is considered that the material assets of the area are appropriately covered in the following baseline sections, and consequently will not be repeated as a separate section:

- Biodiversity, Flora and Fauna;
- Soils and Geology;
- Cultural Heritage;
- Landscape;
- Housing; and
- Transportation.

### 5.3 Key Sustainability Issues and Opportunities

**Table 5.1** presents a summary of the key sustainability issues and opportunities for OPDC.

**Table 5-1 Key Sustainability Issues and Opportunities**

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
Population	<ul style="list-style-type: none"> <li>The current population of OPDC is considered to be low, consisting of 4,491 persons in 1,898 households. The dominant age group is 25 – 64 years old. Compared to the national average (16.3%), the area has a significantly lower ageing population percentage (aged 65+) of 6.1%. OPDC have been charged with delivering at least 24,000 new homes within the study area, which will see the population rise significantly compared to its current level.</li> <li>After White British (21.6%), there are significant populations of Other White (18.6%) and Black (African/Caribbean and Other total 24%).</li> <li>There is an Irish Traveller community living within the study area.</li> <li>A large transitory construction workforce could also have negative effects on the community.</li> </ul>	<ul style="list-style-type: none"> <li>The influx of future population needs careful management to reduce inequalities throughout the area and adjoining boroughs. The Local Plan could seek to model the unknown future population, drawing on lessons learnt from other major development projects such as King's Cross.</li> <li>Careful consideration should be given to the wider population trend of an ageing population as well ensuring an attractive area for young adults and those who may be looking to raise a family. This provides opportunities for Lifetime Neighbourhoods and intergenerational mixed housing.</li> <li>The provision of accessible services should meet existing and new local population growth needs.</li> <li>The provision of social infrastructure needs for healthcare and key services due to a large future population needs to be prioritised, exploration of developing sites before threshold population numbers should be explored.</li> <li>The Local Plan should consider the potential for the withdrawal of Permitted Development Rights for the conversion of offices to residential use, to prevent the reduction in community cohesion and access to facilities.</li> </ul>	SEA: Population, Human Health HIA EqlA	1, 2, 4, 5, 13, 14, 15, 16
Education and Qualifications	<ul style="list-style-type: none"> <li>The percentage of people with no qualifications in 2011 was 16%. The percentage of people with NVQ Level 4 qualification or above was 36.5% compared with 44.7% for Inner London and 27.4% for England.</li> <li>There is a gap in education facilities within the area.</li> </ul>	<ul style="list-style-type: none"> <li>Positive trends in the following should be expected: <ul style="list-style-type: none"> <li>Reducing the number of residents without a qualification;</li> <li>Ensuring new population numbers have adequate educational facilities;</li> <li>Ensuring that schools and other education facilities outside the OPDC area aren't adversely affected.</li> </ul> </li> <li>Opportunities to incorporate work based learning/training should be incorporated into the Local Plan where possible. These opportunities could also be linked to the colleges and universities within the surrounding area.</li> </ul>	SEA: Population, Human Health, Material Assets HIA EqlA	13, 14, 15, 16

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
Health	<ul style="list-style-type: none"> <li>15.1% of the area's population stated they have limiting long-term illness or disability, higher than the London average.</li> <li>Life expectancy for men is 2 years lower than the national average.</li> <li>During the period 2010/11 and 2012/13, 11.8% of children at reception year were considered obese, with an additional 23.6% carrying excess weight. A further 23.6% of children in year 6 were identified as obese, with the same figure for London recorded at 22.5%.</li> <li>There are pockets of health deprivation within the study area along with a very poor living environment.</li> <li>Due to its industrial nature and history, there is a lack of primary care facilities within the OPDC boundaries, with the exception of Central Middlesex Hospital.</li> <li>There is currently poor accessibility to district and Local Park sized open space/green infrastructure/play space.</li> </ul>	<ul style="list-style-type: none"> <li>The rise of people who are in good health across the area and the continued reduction of those in poor health should be supported.</li> <li>The scale of development means that new care facilities need to be delivered, not as standalone but as part of a combined approach to social infrastructure provision.</li> <li>All new high streets need to obtain 10 out of 10 in the Healthy High Streets measure.</li> <li>Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on local communities- including both psychological and physical effects.</li> <li>Incoming population – there is an opportunity for the health of the local community to be built in to the Local Plan principles from the very beginning. This may include building in street networks, designed to support exercise and so that children can play independently; designing areas of multi-generational play; building in creativity, art, intrigue, surprise – to create a sense of place and a high quality environment; and designing housing and workspace that supports health and well-being.</li> <li>The Local Plan should seek to ensure that accessibility to open spaces, including green spaces, as this can have benefits for both physical and mental health.</li> <li>Design measures should be included within the Local Plan, that encourage a reduction in the need to travel by private car – this could include the provision of a mix of land uses; and the design of well-connected street networks at the human scale.</li> </ul>	SEA: Population, Human Health, Material Assets HIA EqlA	1, 4, 7, 11, 13, 14, 15, 16
Crime	<ul style="list-style-type: none"> <li>The area is one of the more deprived areas of the country in relation to crime levels. Car theft is average or above average in the centre of the OPDC. Violence against persons is also high or above average in the</li> </ul>	<ul style="list-style-type: none"> <li>Given the proposed retention of Strategic Industrial Location (SIL) in Park Royal, the Local Plan should seek to ensure that the design of new development improves the safety and perceived safety of the community and their property.</li> </ul>	SEA: Population, Human Health HIA	13, 14

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
	majority of the OPDC area.	<ul style="list-style-type: none"> <li>Secured by Design principles should be reflected in new development within the OPDC area alongside considering wider place-making aspirations.</li> </ul>	EqlA	
Water	<ul style="list-style-type: none"> <li>Both the River Brent and Grand Union Canal are characterised by poor chemical and biological water quality.</li> <li>The western boundary of the OPDC area is at risk of fluvial flooding from the River Brent.</li> <li>There is an increased threat from surface water flooding due to increased precipitation rates generated by climate change.</li> <li>There are risks associated with flooding and the mobilisation of contaminants linked to contaminated land within the area.</li> <li>Counters Creek Combined Sewer is nearly at capacity.</li> <li>In the past 20 years, Thames Water has seen a 15% increase in water usage throughout London. This is equivalent to an increase of 10 litres per person per decade.</li> </ul>	<ul style="list-style-type: none"> <li>The risk of flooding and the mobilisation of contaminants should be prevented through measures such as a site-wide drainage strategy and increased awareness. Such measures could also reduce the risk of flooding.</li> <li>The Local Plan should seek to ensure that there is sufficient infrastructural capacity for new development, ahead of occupation.</li> <li>The Local Plan should seek to encourage increased efficiency in the use of water through design measures.</li> <li>The Local Plan should seek to coordinate the implementation of flood mitigation measures with other public realm requirements including utilities and smart infrastructure.</li> </ul>	SEA: Water, Population, Human Health, Soil, Climatic Factors, Landscape HIA EqlA	3, 6, 7, 9, 10, 15
Soils and Geology	<ul style="list-style-type: none"> <li>There are no areas of Regionally Important Geodiversity Sites (RIGS) within the area.</li> <li>The area's heavy manufacturing history has left a legacy of land contamination which may give rise to number of development issues.</li> </ul>	<ul style="list-style-type: none"> <li>The Local Plan should seek to protect the area's soils from contamination and continue to remediate areas that were impacted in the past.</li> <li>The Local Plan should seek to support the decontamination of soil within the local area.</li> </ul>	SEA: Soil, Biodiversity, Human Health, Water HIA	2, 3, 9, 10, 15
Air Quality	<ul style="list-style-type: none"> <li>The principal threat to clean air in London comes from road traffic. There are areas of high NO2 concentrations in the along the strategic highway network. Poor air quality can damage people's health and quality of life. It can pose particular problems for vulnerable groups such as the elderly, young children and people suffering from respiratory diseases.</li> </ul>	<ul style="list-style-type: none"> <li>The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.</li> <li>The Local Plan should seek to ensure that any benefits generated to local air quality from a change in economic land use are not counteracted by the increase in population and</li> </ul>	SEA: Air, Climatic Factors, Material Assets, Human Health	4, 7, 11, 15



Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
	<ul style="list-style-type: none"> <li>Air Quality Management Areas (AQMA) are designated when local authorities have identified locations where national air quality objectives are unlikely to be achieved. The whole of the OPDC area is considered to be within an AQMA for levels of nitrogen dioxide (NO<sub>2</sub>)<sup>6</sup> and particulate matter smaller than 10 micrometres (PM<sub>10</sub>)<sup>7</sup>. Each of the three boroughs have identified the same exceedances and types of pollutants. New types of development in the area may lead to an improvement in local air quality.</li> </ul>	development overall.	HIA	

<sup>6</sup> Nitrogen dioxide (NO<sub>2</sub>) is one of a group of gases called nitrogen oxides. Road transport is estimated to be responsible for about 50% of total emissions of nitrogen oxides, which means that nitrogen dioxide levels are highest close to busy roads and in large urban areas. Gas boilers in buildings are also a source of nitrogen oxides. There is good evidence that nitrogen is harmful to health. The most common outcomes are respiratory symptoms such as shortness of breath and cough. Nitrogen dioxide inflames the lining of the lung and reduces immunity to lung infections such as bronchitis. Studies also suggest that the health effects are more pronounced in people with asthma compared to healthy individuals. <http://www.londonair.org.uk/LondonAir/guide/WhatIsNO2.aspx>

<sup>7</sup> Particles or particulate matter (PM) are tiny bits of solids or liquids suspended in the air. Particles originating from road traffic include carbon emissions from engines, small bits of metal and rubber from engine wear and braking as well as dust from road surfaces. Others include material from building and industry as well as wind-blown dust, sea salt, pollens and soil particles. Particles smaller than about 10 micrometers, referred to as PM<sub>10</sub>, can settle in the airway and deep in the lungs and cause health problems. The health effects of particle air pollution have been widely studied, and include premature death and the worsening of heart and lung disease, often increasing admissions to hospital. <http://www.londonair.org.uk/LondonAir/guide/WhatIsPM.aspx>

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
Climate Change	<ul style="list-style-type: none"> <li>Energy consumption within the area was similar to the London average in 2009-11.</li> </ul>	<ul style="list-style-type: none"> <li>Greenhouse gas emissions should be reduced at the rate, and exceeding where possible, required to meet local and national targets, helping to mitigate the impacts of climate change.</li> <li>The reduction of energy use in the area should be encouraged both by existing developments and future ones. This might include the development of a site-wide decentralised energy generation and storage network and to create a closed loop system.</li> <li>A high proportion of energy generated should be from low, zero or negative carbon energy sources.</li> </ul>	SEA: Air, Climatic Factors, Material Assets, Human Health HIA	4, 6, 7, 11, 15
Biodiversity, Flora and Fauna	<ul style="list-style-type: none"> <li>There are no designated sites<sup>8</sup> within the OPDC boundary and no nationally/internationally designated sites (Sites of Special Scientific Interest (SSSI)/SPA/SAC/Ramsar) within 2km.</li> <li>Richmond Park SAC is 6.9km to the south of the OPDC area and Wimbledon Common SAC is 8km to the south.</li> <li>Wormwood Scrubs is a Local Nature Reserve and possesses a variety of wildlife. It is popular with birdwatchers and supports woodland, grassland and is home to common lizards and at least 20 species of butterfly.</li> <li>The Grand Union Canal and adjacent area in Old Oak South is a nature conservation area of Metropolitan Importance.</li> </ul>	<ul style="list-style-type: none"> <li>The Local Plan should seek to ensure that impacts to designations, species and habitats is minimised as well as seeking to encourage increased biodiversity within the area.</li> <li>Opportunities should be sought to ensure that protected species have favourable conservation status and are thriving.</li> <li>Opportunities should be sought to promote habitat connectivity both within the area and outside of it. The layout of connected habitats and a wider green infrastructure scheme of walking and cycling routes could form the basis for the spatial planning of the OPDC area.</li> <li>Wormwood Scrubs Local Nature Reserve's and the Grand Union Canal's habitat and species should be protected and enhanced.</li> </ul>	SEA: Biodiversity, Flora, Fauna, Population, Soil, Water, Air, Climatic Factors, Landscape HIA	1, 9, 10, 11, 12, 15, 18

<sup>8</sup> Nature sites and areas of countryside can be 'designated', which means they have special status as protected areas because of their natural and cultural importance. There are restrictions on activities and developments that might affect a designated or protected area, e.g. building new houses or roads. This includes areas next to as well as in those areas. (<https://www.gov.uk/check-your-business-protected-area>)

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
	<ul style="list-style-type: none"> <li>There is potential for impacts to protected species as a result of an increasing population and the resulting development required to meet population needs.</li> </ul>			
Cultural Heritage assets	<ul style="list-style-type: none"> <li>There are a number of undeclared heritage assets in the area.</li> <li>There is the potential for undiscovered archaeological remains to exist throughout the area.</li> <li>There is one listed asset within the OPDC area – Brent Viaduct.</li> <li>Within the boundary there are two Conservation Areas, these include: Old Oak Lane; and along the Grand Union Canal.</li> <li>Adjacent to the study area are the St. Mary's Conservation Area in Hammersmith and Fulham, which includes the St Mary's Cemetery and parts of the Kensal Green Cemetery. The Kensal Green Cemetery Conservation Area in The Royal Borough of Kensington and Chelsea includes the majority of the listed buildings and monuments and the majority of the Registered Park and Garden (Grade I registered Park and Garden of special historic interest which contains the Grade I listed Anglican Chapel, twelve Grade II* listed buildings or monuments and 147 Grade II listed buildings or monuments).</li> <li>Within the surrounding area, the following conservation areas may also be affected by development within the OPDC area: <ul style="list-style-type: none"> <li>Harlseden;</li> <li>Old Oak and Wormholt;</li> <li>Hangerhill Garden Estate; and</li> <li>Hagerhill (Hay Mills) Estate.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The Local Plan should ensure that both designated and undesignated or undiscovered heritage assets and their settings, and archaeological remains are protected and, where appropriate, enhanced.</li> <li>Cultural heritage assets throughout the OPDC area could provide an opportunity for tourism and leisure. Opportunities should be sought to safeguard and promote awareness of the important heritage assets and their settings within the OPDC area – particularly in relation to the area's role in industry and during the interwar period.</li> <li>Cultural heritage assets could also provide an opportunity to enhance the area environmentally, socially, as well as economically. This should be considered throughout the development of the Local Plan, with assets being enhanced and conserved for future use.</li> <li>Statutory sites outside the OPDC boundary also need to be protected and safeguarded, particularly in terms of their setting. Cross-boundary issues with respect to heritage assets and views need to be addressed.</li> <li>OPDC could explore the potential for the production of a Local List of locally significant heritage assets, to be considered as part of the planning process.</li> <li>With the Mayor's support Historic England has recently consulted upon and is now finalising guidance for the comprehensive review programme for London's Archaeological Priority Areas. A desk-based appraisal should be undertaken by OPDC to identify areas of known or potential archaeological interest meriting identification as new priority areas.</li> </ul>	SEA: Population, Material Assets, Cultural Heritage, Landscape	1, 5, 12, 13, 18

Old oak and park royal development corporation local plan

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
	<p>Other notable listed buildings whose setting could be affected by development in the Opportunity Area include the Grade II* listed gatehouse and chapel at Wormwood Scrubs Prison, the Church of All Souls Harlesden (also Grade II*), and thirteen Grade II listed buildings within 250m of the boundary. Further afield are Statutory Listed buildings, the closest being Kenmont Primary School and Park Royal Underground Station.</p> <ul style="list-style-type: none"> <li>• The Old Oak Common and Park Royal areas have a disparate assortment of railway and industrial heritage that play a valuable role in informing the evolving character of the area. Specific collections of non-designated heritage assets are located along the east of Scrubs Lane, the interwar Rolls Royce works and Acava Studios on Hythe Road.</li> <li>• A significant number of the heritage assets listed above are on English Heritage's Heritage at Risk Register. These include Kensal Green Cemetery, as well as 35 monuments within it, including the Anglican Chapel. Twyford Abbey to the west of the opportunity area is also a long standing Heritage at Risk case.</li> <li>• Whilst there are at present no archaeological priority areas within the proposed local plan area, the Greater London Historic Environment Record holds information on several archaeological investigations, sites and finds. Notably the site of Acton Wells 18th century spa is located within the Opportunity Area. The open ground of Wormwood Scrubs was the site of a rifle range and anti-aircraft battery and may preserve as yet undiscovered earlier remains. The Grand Junction Canal and Old Oak Common area include aspects of railway and industrial archaeological interest. The 19th century Park Royal cemetery would also be of interest if subject to redevelopment.</li> </ul>			

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
Landscape and Townscape	<ul style="list-style-type: none"> <li>The OPDC area comprises a largely industrial townscape with its edges influenced by more residential areas and strategic roads. Railway infrastructure is a dominant feature across the site.</li> <li>Along the south-eastern boundary lies Wormwood Scrubs Park which is grassland and some woodland. The eastern boundary is Kensal Green Cemetery.</li> <li>While there are substantial areas of green space on the periphery of the plan area, the industrial nature of the area means that most parts have a severe open space deficiency.</li> </ul>	<ul style="list-style-type: none"> <li>Opportunities could be sought to maintain the important heritage of Old Oak in particular and OPDC more widely.</li> <li>Access to and awareness of the unique aspects of the area should be improved.</li> <li>The development of the area should enhance adjoining landscapes situated on the OPDC boundary and vice versa.</li> <li>Integration with the All London Green Grid Area SPG Frameworks is an important consideration.</li> <li>It is essential that townscape character and quality is maintained/enhanced through high quality design, careful siting, and incorporation of soft landscaping.</li> </ul>	SEA: Landscape, Material Assets, Cultural Heritage	1, 2, 5, 6, 8, 10, 11, 12, 13, 14, 15, 18
Waste	<ul style="list-style-type: none"> <li>Recycling rates are higher for Ealing compared to Brent, Hammersmith &amp; Fulham and London as a whole though they have increased between 2010 and 2012. There is currently no data available on the municipal waste sent to landfill in the area.</li> <li>There are several waste sites within the area: European Metal Recycling; Powerday; Capital Waste Ltd; UK Tyre Exporters; O'Donovan's Waste Disposal Ltd.</li> </ul>	<ul style="list-style-type: none"> <li>Opportunities should be sought to continue the reduction in waste being sent to landfill.</li> <li>London Waste and Recycling Board – there is an opportunity for the OPDC area to become an exemplar centre for the creation of an 'integrated circular economy'. This could include the creation, use and recycling of products locally, including the potential for the growing of local food through the use of vertical farms.</li> <li>The Local Plan should seek to increase rates of recycling, reuse and composting of waste, which would otherwise be sent to landfill.</li> <li>The Local Plan should explore the delivery of innovative waste transport and management techniques supported by smart city technology.</li> <li>Due to potential land use changes, there's a need to consider waste apportionment with the neighbouring boroughs and where waste will be processed if these uses are displaced by new development.</li> </ul>	SEA: Population, Human Health Material Assets, Soil, Air, Landscape, Climatic Factors HIA EqlA	2, 3, 6, 7, 8, 9, 10, 11, 15, 18
Transportation	<ul style="list-style-type: none"> <li>Old Oak and Park Royal are poorly connected to the</li> </ul>	<ul style="list-style-type: none"> <li>Opportunities should be sought to maximise modal shift towards sustainable transport modes, in particular, walking</li> </ul>	SEA: Population,	1, 4, 6, 7, 11, 13, 14, 15, 17,

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
	<p>wider road network.</p> <ul style="list-style-type: none"> <li>Both Old Oak and Park Royal generate significant numbers of road freight movements.</li> <li>Access to and from Old Oak station is currently poor.</li> <li>There are a number of 'hard edges' along the boundary of the OPDC area, which creates poor legibility for walkers and cyclists.</li> <li>Roads in Park Royal are congested.</li> </ul>	<p>and cycling.</p> <ul style="list-style-type: none"> <li>Opportunities should be sought that maximises rail transport of both goods and people.</li> <li>The Local Plan should seek to ensure that improvements in the area do not lead to increase pollution/traffic etc., elsewhere across London.</li> <li>Opportunities should be sought that maximises opportunity for green networks and improves connectivity for people across the area.</li> <li>Green Infrastructure – there is an opportunity to create green infrastructure which facilitates live/work/play/travel through as well as fast and meandering routes. However, the Local Plan should manage the spread of routes across the OPDC area, so that certain routes do not become congested.</li> <li>The Grand Union Canal presents a great opportunity for both water travel and freight movements as well as footpaths and should be considered a strategic transport link within the area. However, capacity issues should be taken into consideration.</li> <li>There is an opportunity to significantly improve accessibility to and throughout the site, including the creation of legible routes and reducing 'hard edges'. The Local Plan should consider alternatives to the use of on-street parking and servicing at the fronts of buildings, as these can have a negative effect on the 'street atmosphere'.</li> <li>Opportunities should be sought to reduce motorised transport and increase the use of greener, smarter, more sustainable modes of transport.</li> <li>Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road</li> </ul>	<p>Human Health, Air, Climatic Factors, Material Assets</p> <p>HIA</p> <p>EqlA</p>	18

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
		network and local communities.		
Noise	<ul style="list-style-type: none"> <li>Road and rail noise are significant contributors to the ambient noise environment, particularly around the town centre and main distributor roads.</li> </ul>	<ul style="list-style-type: none"> <li>The Local Plan should seek to minimise the effects from noise pollution on the existing and incoming population, and ensure that these effects do not disproportionately affect any particular socio-economic or equalities group.</li> </ul>	SEA: Human Health, Population HIA EqlA	1, 2, 4, 11, 12, 15, 18
Local Economy	<ul style="list-style-type: none"> <li>The area is characterised by some 2,000 businesses – the majority (75%) of these are micro in scale. The OPDC area suffers from employment deprivation. There's a strong element of warehousing and other light to heavy industrial uses. A large proportion of residents within the area work locally. The displacement of existing businesses in the area could lead to a negative effect on the existing community.</li> <li>Affordable workspace – much of the available workspace is affordable at present, due to its poor quality. There is also an issue relating to density in this area – warehousing uses are low employment generators.</li> <li>18.6% of the population have been claiming job seekers allowance for more than a year.</li> <li>There are inequalities between men and women.</li> <li>Infrastructure/Utilities – a key issue for the area is how infrastructure/utilities will be improved to accommodate the new development. In particular, broadband capacity is very poor at present within Park Royal. Also transport links need significant improvement.</li> <li>Town centres – there is a potential issue that the development of offices and retail facilities within the OPDC area would destroy neighbouring town centres, including Ealing town centre.</li> </ul>	<ul style="list-style-type: none"> <li>Employment and training - There is an opportunity for the Local Plan to specify that a proportion of incoming employment opportunities are to be directed towards local people in the existing and surrounding communities. This combines with an opportunity to upskill the local workforce, the majority of whom may currently be in lower-skilled jobs in the local area.</li> <li>The Local Plan should seek to provide employment and business opportunities that meet the current and future needs of the local and regional economy, within the context of the neighbouring communities.</li> <li>The Local Plan should seek to ensure that the appropriate infrastructure capacity is developed and planned comprehensively, ahead of the occupation of new development.</li> <li>A fine balance between place-making, providing enough facilities, and not destroying external town centres, needs to be sought. Improved connectivity from the OPDC area to the town centres could be beneficial in this respect. Harlesden town centre would be walkable from the OPDC area.</li> <li>Healthy New Towns – NHS England are seeking to promote this initiative in the OPDC area. This is based on health-led employment in the centre, for clean, green and healthy technology businesses. This may include research companies etc.</li> <li>North Acton is seeking to attract a university campus in the</li> </ul>	SEA: Population, Human Health, Material Assets HIA EqlA	1, 2, 3, 15, 16, 17, 18

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
	<ul style="list-style-type: none"> <li></li> </ul>	<p>OPDC area, which would buffer the industrial area further north, with an area of student housing further south. Anecdotal evidence suggests that the campus may be associated with Imperial College.</p> <ul style="list-style-type: none"> <li>Town centres – there is a potential issue that the development of offices and retail facilities within the OPDC area would negatively impact on neighbouring town centres, including Ealing town centre, if not appropriately managed.</li> <li>The land uses in the OPDC area are likely to experience a wholesale change from the existing situation. This could provide an opportunity to reduce disparities across the area.</li> </ul>		
Deprivation and Living Environment	<ul style="list-style-type: none"> <li>The area lies within other deprived areas of Brent, Ealing and Hammersmith &amp; Fulham and falls within the most deprived areas for living environments.</li> </ul>	<ul style="list-style-type: none"> <li>Deprivation is a very complex issue and a number of different issues will need to be addressed for noticeable improvements to be realised. Enhancements in the OPDC area that deliver employment opportunities, high quality new housing, improved public realm, and access to nature, would all provide benefits towards reducing deprivation.</li> </ul>	SEA: Population, Human Health HIA EqlA	1, 4, 5, 6, 8, 9, 11, 12, 13, 14, 15, 16, 17
Housing	<ul style="list-style-type: none"> <li>38.3% of the population in the OPDC area rent accommodation from private landlords, which is a rate that is significantly higher than adjoining boroughs.</li> <li>29.5% of households are owner-occupiers, compared to 42.9% in Brent, 34% in Hammersmith &amp; Fulham and 51.1% in Ealing.</li> <li>There is a shortage in the amount of affordable housing provided and there is a continuing need for affordable housing in the area and in London overall.</li> <li>There is a Traveller site next to Old Oak on Backley Road, which is linear against the railway line and a metal refinery.</li> <li>9% of households in the plan area are lone parent families and over 90% of these parents are women. Lone parents experience some of the greatest levels of</li> </ul>	<ul style="list-style-type: none"> <li>Opportunities should be sought to provide housing that meets London-wide and local needs including the provision of affordable, low cost market, student and special needs housing.</li> <li>The Local Plan should seek to lift more LSOAs out of the bottom 10% for housing deprivation.</li> </ul>	SEA: Population, Human Health HIA EqlA	1, 5, 11, 13, 14, 15



Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
	economic and housing need, their household incomes are only about a third of the average income. They are more than three times more likely to be dependent on benefits than the average household, and twice as likely to be in unsuitable housing.			

<sup>1</sup> Nitrogen dioxide (NO<sub>2</sub>) is one of a group of gases called nitrogen oxides. Road transport is estimated to be responsible for about 50% of total emissions of nitrogen oxides, which means that nitrogen dioxide levels are highest close to busy roads and in large urban areas. Gas boilers in buildings are also a source of nitrogen oxides. There is good evidence that nitrogen is harmful to health. The most common outcomes are respiratory symptoms such as shortness of breath and cough. Nitrogen dioxide inflames the lining of the lung and reduces immunity to lung infections such as bronchitis. Studies also suggest that the health effects are more pronounced in people with asthma compared to healthy individuals. <http://www.londonair.org.uk/LondonAir/guide/WhatIsNO2.aspx>

<sup>1</sup> Particles or particulate matter (PM) are tiny bits of solids or liquids suspended in the air. Particles originating from road traffic include carbon emissions from engines, small bits of metal and rubber from engine wear and braking as well as dust from road surfaces. Others include material from building and industry as well as wind-blown dust, sea salt, pollens and soil particles. Particles smaller than about 10 micrometers, referred to as PM<sub>10</sub>, can settle in the airway and deep in the lungs and cause health problems. The health effects of particle air pollution have been widely studied, and include premature death and the worsening of heart and lung disease, often increasing admissions to hospital. <http://www.londonair.org.uk/LondonAir/guide/WhatIsPM.aspx>

<sup>1</sup> Nature sites and areas of countryside can be 'designated', which means they have special status as protected areas because of their natural and cultural importance. There are restrictions on activities and developments that might affect a designated or protected area, e.g. building new houses or roads. This includes areas next to as well as in those areas. (<https://www.gov.uk/check-your-business-protected-area>).

## 5.4 Cross boundary considerations

The OPDC area sits within the context of three London boroughs (Ealing, Brent and Hammersmith & Fulham) with the Royal Borough of Kensington and Chelsea to the east. As such, it has a role to ensure that the scale of development proposed for the area is with an understanding of the pressures faced by those boroughs and by London as a whole. The area is bounded by major roads such as the A40, connectivity from south to north is poor – specifically with regard to walking and cycling connections into Park Royal, south to White City and east to Kensal Canal side. Care should therefore be taken when considering future development to ensure that the impacts felt by adjoining boroughs isn't too disruptive either during construction or post-construction phases (e.g. construction traffic when coupled with existing business traffic). However, equally this creates an opportunity to encourage inward investment which the boroughs could benefit from.

The area and the remit of the OPDC presents a unique opportunity to incorporate the site area's heritage within its future development plans. Further, on its boundary, lies the St Mary's, Kensal Green Cemetery (Grade I registered park and garden of special historic interest), which contains a Grade I listed chapel, twelve Grade II\* listed buildings/monuments and 147 Grade II listed buildings/monuments. Views from this into area and vice versa need to be adequately considered and protected throughout the development of the OPDC area.

The quantum and change of development types needs to be carefully managed to ensure that existing businesses are still able to remain open both within the area and outside of it. As the area develops, it will be important to consider how nearby town centres, such as Harlesden and Ealing, will be affected by the scale of change proposed.

The OPDC area suffers from high levels of living environment deprivation. There is poor connectivity within the site as well as out into the wider surroundings. The redevelopment of the area should seek to improve open space provision all around the area in addition to improving connections to Wormwood Scrubs as well as enable green infrastructure and services that could be used by residents and non-residents of the area alike.

There needs to be careful consideration of the future in-migration into the OPDC area. It's important that the current population (in neighbouring boroughs and within area) doesn't feel pushed out or has cause to be envious of the facilities and services provided when compared to their own. There should be a concerted effort to reduce inequality

### **Consultation Question (d)**

Do you agree with the sustainability issues and opportunities that we have identified?  
Are there additional issues that both the IIA and the Local Plan should consider?

### **Consultation Question (e)**

Is there any additional baseline information that you feel it would be important to include?

### **Consultation Question (f)**

Are there any particular topics or geographical areas of specific concern to your organisation?

## 6 The IIA Framework

### 6.1 Background to the IIA Framework

The IIA Framework underpins the assessment methodology and comprises a series of Sustainability Objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. Whilst the SEA Directive does not require the use of objectives, they are a recognised tool for undertaking the assessment and are aspirations/goals that an authority/organisation should work towards achieving.

The IIA Objectives are separate from the objectives of the Local Plan, although there may be some overlaps between them. To help measure the performance of the Local Plan's components against the IIA Objectives, it is beneficial if they are supported by a series of indicators. Baseline data should be collated to support each of the indicators, as this provides a means of determining current performance across the OPDC area and gauging how much intervention or the extent of work needed to achieve the targets that have been identified. The following section provides further details about the development of the IIA Framework.

### 6.2 Development of the IIA Objectives

The IIA Framework has been developed using the IIA Framework from the Draft Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) Integrated Impact Assessment (IIA) (February 2015)<sup>9</sup> as a base. This was analysed and refined, using the following:

- Comparison against the updated PPPs and identified key sustainability issues and opportunities;
- Comparison against the SAs developed for the Local Plans for:
  - Brent;
  - Ealing;
  - Hammersmith and Fulham.
- Assessment against the requirements of the NHS London Health Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool Framework (January 2013)
- Comparison with the 'Equality Framework' included in the Mayor of London's 'Equal Life Chances for All' Policy Statement (July 2009)
- Findings from the IIA Workshop

**Table 6-1** presents the proposed IIA objectives that will be used in the assessment of the Local Plan. Each of the IIA Objectives is supported by a series of sub-objectives to add further clarity and to assist the assessment process. However, it is noted that the objectives are not mutually exclusive and the assessment framework should be considered in its entirety. As such, the IIA Objectives are not presented in any particular order, with all objectives being considered as having equal weighting. The IIA Objectives included in **Table 6-1** below are:

1. To enhance the built environment and encourage 'place-making'
2. To optimise the efficient use of land through increased development densities and building heights, where appropriate
3. Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land
4. Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network
5. Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs

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<sup>9</sup> <https://www.london.gov.uk/sites/default/files/OOPR%20OAPF%20draft%20IIA%20Report.pdf>

6. Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect
7. To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy
8. To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste
9. Improve the quality of the water environment
10. Create and enhance biodiversity and the diversity of habitats across the area and its surroundings
11. To minimise air, noise and light pollution, particularly for vulnerable groups
12. To conserve and enhance the historic environment, heritage assets and their settings
13. Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare
14. Improve safety and reduce crime and the fear of crime
15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living
16. To improve the education and skills levels of all members of the population, particularly vulnerable groups
17. Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training
18. To encourage inward investment alongside investment within existing communities, to create sustainable economic growth

Where possible, IIA Objectives are also supported by indicators. The indicators selected link to those used to describe the baseline conditions across the area, as an understanding of the existing conditions is needed to inform the assessment. Where baseline data is not currently available, indicators have been suggested as to the type of information that may be appropriate. OPDC are currently undertaking a series of evidence-based studies, which will support the development of the Local Plan. Once this is available, relevant data will be added to the IIA baseline, and the indicators refined, as part of the iterative nature of the IIA process. Throughout the course of the IIA, quantified targets will be identified where possible to supplement this framework in liaison with OPDC.

**Table 6-1 Draft IIA Framework**

	<b>Draft IIA Objective and sub-objectives</b>	<b>Indicators (known indicators: <u>underlined</u>; proposed indicators: <i>italics</i>)</b>	<b>Relevance to SEA, HIA, EqIA, HRA</b>
<b>1</b>	<p><b>To enhance the built environment and encourage ‘place-making’</b></p> <ul style="list-style-type: none"> <li>Optimise development opportunities to develop and enhance local distinctiveness and character</li> <li>Ensure new buildings and public spaces are appropriately designed and constructed including enabling the creation of safe and welcoming spaces and access for all</li> <li>Create new, accessible and managed open spaces- public, communal, private and children’s play space, public realm and spaces where children can play independently, which reflect the needs of the community.</li> <li>Maximise the contribution that the arts, culture and heritage can make to a community including building creativity, art, intrigue, character and surprise into the built environment</li> <li>Increase in the legibility of public spaces and increase walking and cycling routes within and adjacent to Old Oak and Park Royal</li> <li>Encourage the use of contemporary technology in the public realm to support design, delivery and management</li> <li>Encourage adherence to the principles of Lifetime Neighbourhoods</li> </ul>	<ul style="list-style-type: none"> <li><i>Provision of publicly accessible open space in accordance with the London Plan Categorisation<sup>10</sup>:</i> <ul style="list-style-type: none"> <li>Regional Parks (400ha): 3.2 to 8km from homes;</li> <li>Metropolitan Parks (60ha): 3.2km from homes;</li> <li>District Parks (20ha): 1.2km from homes;</li> <li>Local Parks and Open Spaces (2ha): 400m from homes;</li> <li>Small Open Spaces (under 2ha): less than 400m from homes;</li> <li>Pocket Parks (under 0.4ha): less than 400m from homes;</li> <li>Linear Open Spaces (Variable): wherever feasible.</li> </ul> </li> <li><i>Proportion of accessible open spaces created which have a long term management and funding plan.</i></li> <li><i>Integration with the All London Green Grid Area Frameworks</i></li> <li><i>Number of new buildings and public spaces designed to be inclusive</i></li> <li><i>Proportion of new development incorporating an appropriate level</i></li> </ul>	<p>SEA: Population, Human Health, Material Assets, Cultural Heritage, Landscape</p> <p>HIA</p> <p>EqIA</p>

<sup>10</sup> [https://www.london.gov.uk/sites/default/files/ALGG\\_SPG\\_Mar2012.pdf](https://www.london.gov.uk/sites/default/files/ALGG_SPG_Mar2012.pdf)

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<ul style="list-style-type: none"> <li>Maximise delivery of active frontages in appropriate locations</li> </ul> <p>Link to objectives 12 (heritage), 5 (housing); 13 (community cohesion); 14 (crime and fear of crime); 15 (health and wellbeing)</p>	<p><i>of open space for recreation</i></p> <ul style="list-style-type: none"> <li><i>Legibility and quality of the pedestrian and cycle environment</i></li> <li><i>Proportion of new development incorporating Lifetime Neighbourhoods principles</i></li> <li><i>Proportion of people who are happy with their local environment as a place to live</i></li> <li><i>Proportion of new development using technology to improve legibility</i></li> </ul>	
2	<p><b>To optimise the efficient use of land through increased development densities and building heights, where appropriate</b></p> <ul style="list-style-type: none"> <li>Optimise housing density in a way that makes the most efficient use of land whilst meeting housing needs</li> <li>Optimise development density in a way that makes the most efficient use of land whilst meeting commercial needs and responding to sensitive areas</li> </ul> <p>Link to objectives 7 (natural resources use); and 8 (waste)</p>	<ul style="list-style-type: none"> <li><i>Housing density in comparison to neighbourhood quality</i></li> <li><i>Density of commercial development in comparison to existing (2015) levels</i></li> </ul>	<p>SEA: Population, Human Health, Biodiversity, Soil, Water, Landscape, Material Assets</p> <p>HIA</p>
3	<p><b>Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land</b></p> <ul style="list-style-type: none"> <li>Increase accessibility to household and commercial sustainable waste management facilities</li> <li>Improve soil quality and achieve more effective geoconservation where appropriate</li> </ul>	<ul style="list-style-type: none"> <li><u>Amount (hectares) of previously developed land available (Office for National Statistics Local Profiles)</u></li> <li><i>Quality of soil resources</i></li> <li><i>Materials balance as a result of construction activities</i></li> <li><i>Development and implementation of a strategic land remediation</i></li> </ul>	<p>SEA: Population, Human Health, Biodiversity, Soil, Water, Landscape, Material Assets</p> <p>HIA</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<ul style="list-style-type: none"> <li>Contribute to a scheme of strategic land remediation</li> </ul> <p>Link to objectives 4 (natural resources use); 6 (waste); and 12 (reuse of existing buildings)</p>	<p><i>scheme</i></p> <ul style="list-style-type: none"> <li><i>Amount of soil remediated on site</i></li> </ul>	
4	<p><b>Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network</b></p> <ul style="list-style-type: none"> <li>Increase the co-location of services and facilities, in accessible locations by walking, cycling and public transport</li> <li>Increase the connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks including via green infrastructure networks and the canal</li> <li>Prioritise walking and cycling over other forms of transport</li> <li>Increases the opportunity for the transport of goods and people by rail transport</li> <li>Consider the impact of construction on local infrastructure on local businesses and communities</li> <li>Support the testing and implementation of future transport modes</li> <li>Mitigate the impact of construction traffic</li> <li>Maximise the accessibility of stations</li> </ul> <p>Link to objectives 7 (climate change); 11 (pollution); and 14 (safety)</p>	<ul style="list-style-type: none"> <li><u>Distribution of major transport systems – roads, rail links</u></li> <li><i>Modal shift of existing travel patterns verses future travel patterns</i></li> <li><i>Connectivity of the cycling and walking network</i></li> <li><i>Km of designated cycling and walking routes</i></li> <li><i>Proportion of goods arriving and leaving the area by rail in comparison to road</i></li> <li><i>Proportion of waste and freight arriving and leading the area by canal.</i></li> <li><i>Proportion of shared spaces within the urban environment</i></li> <li><i>Controlled parking zones, car clubs and travel plan measures implemented</i></li> <li><i>Number of accessible public transport interchanges and bus stops (source: Equal Life Chances for All 2009)</i></li> <li><i>Number of local businesses negatively affected by construction activities</i></li> <li><i>Increase in traffic on the highway network in and around the OPDC area</i></li> </ul>	<p>SEA: Population, Human Health, Air, Climatic Factors, Material Assets, Landscape</p> <p>HIA</p> <p>EqIA</p>
5	<p><b>Improve access to well designed, well-located, market, affordable and</b></p>	<ul style="list-style-type: none"> <li><u>Dwelling Stock (Office for National Statistics Local Profiles).</u></li> </ul>	<p>SEA: Population,</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<p><b>inclusive housing of a range of types and tenures, to meet identified local and regional needs</b></p> <ul style="list-style-type: none"> <li>Provision of adaptable homes for independent living for older and disabled people</li> <li>Provision of innovative housing typologies to meet needs</li> <li>Provision of homes to meet the needs of older people including extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes</li> <li>Provision of housing suitable for family accommodation including single-parent families</li> <li>Increase in use of high quality design including meeting energy efficiency standards</li> <li>Provision of facilities to meet identified needs of Gypsies, Travellers and Travelling Show people</li> <li>Ensure all new homes meet Lifetime Homes standards</li> </ul> <p>Link to objectives 1 and 6 (sustainable design); 13 (community cohesion and social exclusion); 14 (secured by design); 15 (health)</p>	<ul style="list-style-type: none"> <li><i>Household density (Office for National Statistics Local Profiles)</i></li> <li><i>Proportion of LSOAs in the bottom 10% for housing deprivation</i></li> <li><i>Proportion of dwellings meeting all of the health and wellbeing credits in the Code for Sustainable Homes</i></li> <li><i>Proportion of dwellings that meet internal space standards</i></li> <li><i>Proportion of dwellings with a high SAP rating</i></li> <li><i>Proportion of the population considered to be homeless (source: Equal Life Chances for All 2009)</i></li> <li><i>Amount of family size housing (source: Equal Life Chances for All 2009)</i></li> <li><i>Proportion of single parent families living in unsuitable accommodation</i></li> <li><i>Amount of affordable housing (source: Equal Life Chances for All 2009)</i></li> <li><i>Amount of Lifetime Homes (source: Equal Life Chances for All 2009)</i></li> <li><i>Proportion of market, affordable and specialist housing delivered.</i></li> </ul>	<p>Human Health, Climatic Factors, Material Assets</p> <p>HIA</p> <p>EqIA</p>
6	<p><b>Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect</b></p> <ul style="list-style-type: none"> <li>Minimise the proportion of new development at risk of flooding from all sources including surface water, groundwater and reservoir flooding</li> </ul>	<ul style="list-style-type: none"> <li><u>River catchment areas (Environment Agency Thames Catchment Flood Management Plan, 2009).</u></li> <li><u>Distribution of areas at risk of fluvial flooding (Environment Agency Fluvial Flood Map)</u></li> </ul>	<p>SEA: Biodiversity, Human Health, Water, Air, Climatic Factors, Material Assets, Landscape</p>



	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<ul style="list-style-type: none"> <li>Minimise the increase in risk of flooding elsewhere</li> <li>Increase the use of sustainable design including Sustainable Urban Drainage, natural ventilation and shading for temperature adaptation</li> </ul> <p>Link to objectives 10 (habitat connectivity); 7 (energy efficiency); 12 (sustainable adaptation and reuse of existing buildings)</p>	<ul style="list-style-type: none"> <li><u>Areas susceptible to surface water flooding (Environment Agency Surface Water Flood Map)</u></li> <li><i>Proportion of energy usage in buildings using sustainable design compared with standard construction</i></li> </ul>	<p>HIA</p> <p>EqIA</p>
7	<p><b>To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy</b></p> <ul style="list-style-type: none"> <li>Enable the area to be more self-sufficient in terms of energy generation and storage</li> <li>Increase the proportion of energy generated from low, zero or negative carbon energy sources, through consideration of measures from the outset</li> <li>Increase the proportion of journeys made by non-motorised transport</li> <li>Increase the use of sustainable design to minimise the resource requirements and outputs of new development</li> </ul> <p>Link to objectives 4 (minimise the need to travel); 7 (sustainable design); and 12 (sustainable adaptation and reuse of existing buildings)</p>	<ul style="list-style-type: none"> <li><u>Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles)</u></li> <li><u>All energy consumption by sector (Office for National Statistics Local Profiles and DECC)</u></li> <li><i>Energy consumption per capita</i></li> <li><i>Proportion of properties generating energy from low or zero carbon sources, including solar.</i></li> <li><i>Proportion of new developments incorporating district heating or heat pumps</i></li> <li><i>Greenhouse gas emissions per capita compared with London and national averages</i></li> <li><i>Proportion of journeys made by non-motorised transport</i></li> <li>▪ <i>Proportion of energy generated from low, zero or negative carbon energy sources</i></li> </ul>	<p>SEA: Population, Human Health, Air, Climatic Factors, Material Assets</p> <p>HIA</p> <p>EqIA</p>
8	<p><b>To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green</b></p>	<ul style="list-style-type: none"> <li><u>Number of active / historic landfills on the site (Environment Agency)</u></li> <li><u>Percentage of household waste sent for reuse, recycling or</u></li> </ul>	<p>SEA: Biodiversity, Population, Human Health, Soil, Water, Climatic Factors,</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<p><b>waste</b></p> <ul style="list-style-type: none"> <li>Promote the creation of a circular economy for the management of waste</li> <li>Increase the use of recycled materials for the construction of buildings and infrastructure</li> <li>Address the displacement of waste management to other areas</li> <li>Enable the sustainable management of contaminated soils and hazardous waste</li> <li>Increase accessibility to household and commercial sustainable waste management facilities</li> <li>Maximise use of innovative waste collection and waste management techniques including smart technology</li> </ul> <p>Link to objectives 7 (resources use); 2 (efficient use of land); 3 (remediation)</p>	<p><u>composting (ONS Local Profiles)</u></p> <ul style="list-style-type: none"> <li><u>Amount of residual waste per household (ONS) sent to landfill or incineration</u></li> <li><u>Amount of commercial and industrial waste produced (Defra)</u></li> <li>Amount of waste recycled and re-used within the area</li> <li>Amount of waste transported within the area</li> </ul>	<p>Material Assets, Landscape</p> <p>HIA</p> <p>EqIA</p>
9	<p><b>Improve the quality of the water environment</b></p> <ul style="list-style-type: none"> <li>Promote the improved efficiency in the use of water domestically and commercially</li> <li>Promote the improved quality of local watercourses</li> <li>Prevent the risk posed to the water environment from the run-off of contaminants</li> <li>Ensure that infrastructural capacity is sufficient to accommodate new development ahead of occupation</li> </ul>	<ul style="list-style-type: none"> <li><u>Water and groundwater quality (Environment Agency)</u></li> <li><i>Development of a site wide drainage strategy</i></li> <li><i>Water consumption per capita</i></li> <li><i>Increase in infrastructural capacity as a proportion of new development</i></li> <li><i>Increased use of existing infrastructure</i></li> </ul>	<p>SEA: Water, Human Health, Soil, Landscape</p> <p>HIA</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	Link to objectives 1 (biodiversity); 3 (climate change adaptation); 4 (climate change contributions); 5 (pollution); 7 (remediation); and 12 (Grand Union Canal)		
10	<p><b>Create and enhance biodiversity and the diversity of habitats across the area and its surroundings</b></p> <ul style="list-style-type: none"> <li>Conserve or enhance existing biodiversity across the plan area, including on brownfield sites</li> <li>Increase the connectivity of habitats across the area and its surroundings</li> <li>Create new areas dedicated to nature conservation</li> <li>Seek to reduce the potential wide ranging impacts on international sites</li> </ul> <p>Link to objectives 3 (remediation); 6 (climate change adaptation); 9 (water environment); 11 (pollution); and 12 (Grand Union Canal)</p>	<ul style="list-style-type: none"> <li>Number and distribution of designated sites including <u>SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Sites of Importance for Nature Conservation (SINCs) and Local Wildlife Sites (MAGIC, <a href="http://www.magic.gov.uk">www.magic.gov.uk</a> and Local Authority websites)</u>.</li> <li>Key Biodiversity Action Plan (BAP) species and habitats present (<u>London BAP</u>)</li> <li><i>Protected species with favourable conservation status</i></li> <li><i>Habitat connectivity</i></li> <li><i>Condition of Wormwood Scrubs Local Nature Reserve</i></li> <li><i>Condition of Grand Union Canal area of nature conservation</i></li> <li><i>Increase in areas of greenspace for biodiversity including inaccessible areas</i></li> </ul>	<p>SEA: Biodiversity, Flora, Fauna</p> <p>HRA</p>
11	<p><b>To minimise air, noise and light pollution, particularly for communities and vulnerable groups</b></p> <ul style="list-style-type: none"> <li>Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities through the use of mitigation measures and the locating of</li> </ul>	<ul style="list-style-type: none"> <li>Number and distribution of Air Quality Management Areas (AQMAs) (<u>Air Quality Archive<sup>11</sup></u>)</li> <li><i>Number of new local air quality monitoring points</i></li> <li><i>Ill health attributed to air, noise or light pollution</i></li> </ul>	<p>SEA: Population, Human Health, Air, Material Assets</p> <p>HIA</p>

<sup>11</sup> <http://uk-air.defra.gov.uk/aqma/maps>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<p>future sensitive users away from pollution generators</p> <ul style="list-style-type: none"> <li>Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators</li> <li>Ensure that new waste management facilities do not negatively impact on sensitive uses including existing and future homes, and building occupants.</li> <li>Reduce emissions from construction and demolition sites</li> <li>Minimise light pollution</li> </ul> <p>Link to objectives 4 (sustainable transport); 7 (climate change); 15 (health)</p>	<ul style="list-style-type: none"> <li><i>Proportion of the population affected by high levels of noise during construction and post construction including a breakdown by equality group</i></li> <li><i>Proportion of the population affected by light pollution from traffic or industry during construction and post construction including a breakdown by equality group</i></li> <li><i>Proportion of population living within areas with regular exceedances in NOx and particulates</i></li> </ul>	EqIA
12	<p><b>To conserve and enhance the historic environment, heritage assets and their settings</b></p> <ul style="list-style-type: none"> <li>Promote the historical interpretation of heritage assets, including the canal, through the use of multifunctional green infrastructure</li> <li>Minimise heritage assets lost to new development</li> <li>Avoid adverse impacts on the setting of heritage assets, including those outside the OPDC area</li> <li>Maximise the reuse and adaptation of heritage assets for place-making and minimising the embedded carbon in new development</li> <li>Enhance local views and landscapes</li> </ul>	<ul style="list-style-type: none"> <li><u>Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens (<a href="http://www.magic.gov.uk">www.magic.gov.uk</a>)</u></li> <li><i>Decrease in the number of Heritage Assets at Risk in and around the area</i></li> <li><i>Increase in the number of heritage assets identified and protected through the development of Local List</i></li> <li><i>Increase in the number of heritage assets highlighted and enhanced or utilised for place-making and interpretation</i></li> <li><i>Development of a local views strategy and proportion of new developments adhering to its principles</i></li> <li><i>Increase in the number of heritage assets re-used for</i></li> </ul>	<p>SEA: Cultural Heritage, Material Assets, Biodiversity, Climatic Factors, Landscape</p> <p>HIA</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<ul style="list-style-type: none"> <li>Reduce the number of Heritage Assets at Risk in and around the area</li> <li>Reduce impacts on heritage assets and their settings in areas adjacent to the plan area</li> <li>Enhance areas of greenspace in connection with areas of importance for heritage protection</li> </ul> <p>Link to objectives 1 (place-making), 3 (reuse of existing buildings), 6 (energy efficiency), 7 (energy generation and sustainable design), 8 (use of recycled materials) and 18 (encourage inward investment).</p>	<i>development</i>	
13	<p><b>Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare</b></p> <ul style="list-style-type: none"> <li>Improve the quality of the public realm and increase the provision, accessibility and quality of public open spaces including play spaces</li> <li>To increase connectivity and avoid physical barriers and severance across the area through measures including green infrastructure, creating physical and social linkages with the surrounding communities</li> <li>Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision</li> </ul> <p>Link to objectives 1 (place-making); 4 (accessibility); 5 (housing); 14 (crime and fear of crime); 15 (health)</p>	<ul style="list-style-type: none"> <li><i>Number of offices converted to residential under permitted development rights</i></li> <li><i>Schemes to reduce the impact of construction on the local community</i></li> <li><i>Connectivity of pedestrian linkages across the area</i></li> </ul>	<p>SEA: Population, Human Health, Climatic Factors, Landscape, Material Assets</p> <p>HIA</p> <p>EqIA</p>
14	<p><b>Improve safety and reduce crime and the fear of crime</b></p> <ul style="list-style-type: none"> <li>Increase natural surveillance and other measures to design out crime</li> <li>Encourage increased safety through the use of traffic management and</li> </ul>	<ul style="list-style-type: none"> <li><u>Crime rates (Indices of Deprivation)</u></li> <li><i>Road traffic accidents and diversity profiling (source: Equal Life Chances for All 2009)</i></li> </ul>	<p>SEA: Population, Human Health, Material Assets</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<p>calming methods</p> <p>Link to objectives 1 (place-making); 4 (sustainable transport); 5 (housing); 13 (community cohesion); 15 (health)</p>	<ul style="list-style-type: none"> <li>Percentage of people who feel that there is less discrimination in their neighbourhood than 3 years ago (source: <i>Equal Life Chances for All 2009</i>)</li> <li>Percentage of the local population who feel personal safety on buses, tubes and trains (source: <i>Equal Life Chances for All 2009</i>)</li> <li>Percentage of women who feel safe using local bus, tube, trains, black cabs, and mini cabs at night, alone (source: <i>Equal Life Chances for All 2009</i>)</li> <li>Proportion of developments incorporating Secured by Design principles</li> </ul>	<p>HIA</p> <p>EqIA</p>
15	<p><b>Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</b></p> <ul style="list-style-type: none"> <li>Increase accessibility to social infrastructure including health care facilities, schools, social care and community facilities</li> <li>Increase the capacity of local social infrastructure</li> <li>Encouragement of opportunities for buildings with a shared community use and the co-location of services</li> <li>Facilitate the supply of local food through the provision of space for uses such as allotments or farmers markets</li> <li>Reduce the potential for an over-concentration of hot food takeaways in the local area</li> <li>Minimise construction phase impacts on communities, in relation to both physical and psychological health</li> </ul>	<ul style="list-style-type: none"> <li><u>Health Deprivation and Disability (Indices of Deprivation for England 2010)</u></li> <li>Proportion of the population living within walking distance of health care facilities</li> <li>Proportion of the population living within walking distance of education facilities</li> <li>Proportion of the population living within walking distance of social care facilities</li> <li>Proportion of the population living within walking distance of community facilities</li> <li>Proportion of the population with access to space for the growing of food locally</li> <li>Increase in the capacity of local social infrastructure</li> </ul>	<p>SEA: Population, Human Health, Material Assets, Soil, Air, Water, Landscape</p> <p>HIA</p> <p>EqIA</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	Link to objectives 1 (place-making); 4 (accessibility); 5 (housing); 13 (social and economic wellbeing)	<ul style="list-style-type: none"> <li><i>Childhood obesity rates</i></li> <li><i>Life expectancy</i></li> </ul>	
16	<p><b>To improve the education and skills levels of all members of the population, particularly vulnerable groups</b></p> <ul style="list-style-type: none"> <li>Increase in the availability of formal education across all age groups, including adults from all equality groups</li> <li>Increase in the availability of informal education and training for all</li> </ul> <p>Link to objectives 4 (accessibility); 13 (community cohesion); 15 (health and wellbeing); 117 (social and economic wellbeing); 18 (sustainable economic growth)</p>	<ul style="list-style-type: none"> <li><u>Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles).</u></li> <li><u>Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles).</u></li> <li><u>Education, Skills and Training Deprivation (Indices of Deprivation for England 2010).</u></li> <li><i>Proportion of the population with access to appropriate education facilities by sustainable transport modes</i></li> <li><i>Decrease in educational underachievement gap between disadvantaged groups and the wider community (source: Equal Life Chances for All 2009)</i></li> </ul>	<p>SEA: Population Human Health, Material Assets</p> <p>HIA</p> <p>EqIA</p>
17	<p><b>Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training</b></p> <ul style="list-style-type: none"> <li>Provision of access to a range of high quality local employment opportunities, a proportion of which will be directed towards local people, both during construction and permanent jobs, including those from disadvantaged groups</li> <li>Encourage workforces to reflect local and regional diversity in all occupations and at all levels</li> <li>Provision of access to a range of work-based and other training opportunities, a proportion of which will be directed towards local people,</li> </ul>	<ul style="list-style-type: none"> <li><u>Number of wards with LSOAs in the bottom 20% most deprived (Indices of Deprivation for England 2010).</u></li> <li><i>Proportion of new employment and training opportunities being awarded to local people via local procurement arrangements</i></li> <li><i>Proportion of new employment and training opportunities being awarded to local women via local procurement arrangements</i></li> <li><i>Employment rate by excluded group compared to employment rate of all Londoners (source: Equal Life Chances for All 2009)</i></li> <li><i>Workforce profile at all levels (source: Equal Life Chances for All</i></li> </ul>	<p>SEA: Population, Human Health, Material Assets</p> <p>HIA</p> <p>EqIA</p>

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<p>including those from disadvantaged groups</p> <ul style="list-style-type: none"> <li>Provision of a range of accessible retail stores, including food stores and smaller affordable shops for social enterprises</li> <li>Increase in the provision of facilities for childcare</li> <li>Encouragement of employer's to adopt the London Living Wage</li> </ul> <p>Link to objectives 15 (health and wellbeing); 116 (education and training) and 18 (sustainable economic growth)</p>	<p>2009)</p> <ul style="list-style-type: none"> <li><i>Proportion of the community living within walking distance of a local shop (see Table 6-2)</i></li> <li><i>Levels of Child Poverty (source: Equal Life Chances for All 2009)</i></li> <li><i>Number of childcare places (source: Equal Life Chances for All 2009)</i></li> <li><i>Take-up of subsidised childcare places (including those for disabled children) benchmarked against the LDA Childcare Affordability Programme (source: Equal Life Chances for All 2009)</i></li> </ul>	
18	<p><b>To encourage inward investment alongside investment within existing communities, to create sustainable economic growth</b></p> <ul style="list-style-type: none"> <li>Increase in the net number of businesses registered in the area</li> <li>Increase infrastructure and utilities capacity, including broadband connections</li> <li>Ensure workspace meets the needs of new and emerging businesses, including affordable, flexible and micro/SME workspace</li> <li>Deliver retail that does not negatively impact on neighbouring town centres</li> <li>Encourage the development of employment growth sectors including clean, green and healthy businesses</li> <li>Support the relocation of business from Old Oak to Park Royal.</li> </ul>	<ul style="list-style-type: none"> <li><u>Economy Local Profiles (ONS)</u></li> <li><u>Employment by industry (ONS- NOMIS)</u></li> <li><i>Proportionate coverage of broadband across the area</i></li> <li><i>Proportion of new employment development that includes an element of affordable workspace</i></li> <li><i>New businesses categorised as 'health-led'</i></li> <li><i>New businesses that contribute to the growth of the low carbon goods and services sector</i></li> <li><i>Amount of new employment floorspace in Old Oak</i></li> <li><i>Amount of new industrial floorspace in Park Royal</i></li> </ul>	<p>SEA: Population, Human Health, Material Assets</p> <p>HIA</p> <p>EqIA</p>



	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i> )	Relevance to SEA, HIA, EqIA, HRA
	<ul style="list-style-type: none"> <li>Intensify the use of workspaces within Park Royal</li> </ul> <p>Link to objectives 16 (education and training) and 17 (social and economic wellbeing).</p>		

**Table 6-2 – Accessibility Standards<sup>12</sup>**

Local Facility	Illustrative catchment populations	Minimum reasonable accessibility standards at different gross densities (assuming bendy routes)			
		40ppha	60ppha	80ppha	100ppha
Nursery / first school	2,000	600m	500m	400m	400m
Primary / middle school	4,000	800m	700m	600m	500m
Secondary School	8,000	1,200m	1,000m	700m	700m
Secondary School (large)	16,000	1,500m	1,200m	1,000m	1,000m
Health Centre (4 doctors)	10,000	1,200m	1,000m	900m	800m
Local Shop	1,500	500m	400m	400m	300m
Pub	6,000	1,000m	800m	700m	600m
Post Office	5,000	800m	700m	600m	600m
Community Centre	4,000	800m	600m	600m	500m
Local Centre	6,000	1,000m	800m	700m	600m
District Centre / Superstore	24,000	1,900m	1,500m	1,300m	1,200m
Leisure Centre	24,000	1,900	1,500m	1,300m	1,200m

<sup>12</sup> Barton, Grant and Guise 2003, *Shaping Neighbourhoods: A Guide for Health, Sustainability and Vitality*, Spon Press, London and New York. Note: ppha: persons per hectare

## 7 Next Steps

This Scoping Report has outlined how we intend to undertake the IIA of the Local Plan. Throughout this report we have included a series of questions we would like you to answer when providing your consultation responses. A list of the questions is provided below:

- (a) Do you have any further suggestions regarding the scope of the IIA and its proposed appraisal of the Local Plan?
- (b) Are there any additional PPPs that should be considered for review?
- (c) Are there any additional themes that could be drawn out of the review of PPPs?
- (d) Do you agree with the sustainability issues and opportunities that we have identified? Are there additional issues that both the IIA and the Local Plan should consider?
- (e) Is there any additional baseline information that you feel it would be important to include?
- (f) Are there any particular topics or geographical areas of specific concern to your organisation?
- (g) Are there any changes you consider should be made to the IIA Framework, IIA Objectives / sub-objectives or indicators?

Responses to this consultation should be sent to:

Peter Farnham  
Senior Strategic Planner  
Old Oak and Park Royal Development Corporation  
City Hall,  
The Queen's Walk,  
More London Riverside,  
London  
SE1 2AA

Following the receipt of the consultation comments, they will be reviewed and modifications made to the scope of the IIA as necessary. Stage B of the IIA process comprising the appraisal of the Local Plan will commence following refinement of the scope. It is expected that the next consultation on the IIA Report will be undertaken alongside the consultation on the draft Local Plan.



**APPENDIX A**

**Scoping Workshop Attendees and Findings**

**Table A-1 Workshop Attendee**

Name	Role	Organisation
Peter Farnham	Planner	OPDC
Rachel Flowers	Health Advisor	OPDC
Andrew Jones	Environment team	GLA
David English	Historic Places Advisor	Historic England
Claire Jones	Planner	LB Brent
Samuel Cuthbert	Planner	LB Ealing
Stuart Lines	Associate Director of Public Health	LB Hammersmith and Fulham
Lucy Saunders	Public Health Director	TfL/GLA
Gillian Kavanagh	Planner	RB Kensington & Chelsea
Steve Walker	Principal Planner - London	Environment Agency
Katherine Fletcher	Heritage and Conservation Officer	Historic England

**Table A-2 Key Sustainability Issues and Opportunities from Scoping Workshop: Consultee responses**

Topic	Summary of issues raised by Scoping Workshop attendees	Implications for the Local Plan
<b>Economy, employment and training</b>	<b>Issues</b> <ul style="list-style-type: none"> <li>Infrastructure/Utilities – a key issue for the area is how infrastructure/utilities will be improved to accommodate the new development. In particular, broadband capacity is very poor at present within Park Royal. Also transport links need significant improvement.</li> <li>Town centres – there is a potential issue that the development of offices and retail facilities within the OPDC area would destroy neighbouring town centres, including Ealing town centre.</li> <li>Affordable workspace – much of the available workspace is affordable at present, due to its poor quality. There is also an issue relating to density in this area – warehousing uses are low employment generators.</li> <li>Displacement of existing businesses – especially hostile in Old Oak</li> <li>How do we create jobs for local people if the business make-up of area changes? (i.e. Proposals for R&amp;D into climate change, circular economies but current use is more low-skilled and manufacturing)</li> <li>Microbusiness disruption during construction (they exist hand to mouth sometimes)</li> </ul>	<ul style="list-style-type: none"> <li>Incoming retail could be developed in small clusters. This could help to reduce the impact on other town centres. A fine balance between place-making, providing enough facilities, and not destroying external town centres, needs to be sought. Improved connectivity from the OPDC area to the town centres could be beneficial in this respect. Harlesden town centre would be walkable from the OPDC area.</li> <li>The effect of the construction phase of development could be significantly negative for existing business, through the potential impact on the transport network. A large transitory construction workforce could also have negative effects on the community.</li> <li>Potential for the withdrawal of PD Rights for the conversion of offices to residential use, to prevent the reduction in community cohesion and access to facilities.</li> </ul>
	<b>Opportunities</b> <ul style="list-style-type: none"> <li>Healthy New Towns – The OPDC is looking to submit a bid to become a Healthy New Town to NHS England. This is based on health-led employment in the centre, for clean, green and healthy technology businesses. This may include research companies etc.</li> <li>North Acton could expand on its existing student accommodation to attract further university facilities in the OPDC area, which would buffer the industrial area further north, with an area of student housing further south. Anecdotal evidence suggests that the campus may be associated with Imperial College.</li> <li>Affordable workspace – there is potential to create flexible/shared office environments, whereby users can rent desk-space without the need for a formal lease agreement for an entire office.</li> <li>The land uses in the OPDC area are likely to experience a wholesale change from the existing</li> </ul>	<ul style="list-style-type: none"> <li>Managing affordability</li> <li>Managing and creating robust S106 and CIL agreements</li> <li>Management of robust conditions that are deliverable and enforceable.</li> <li></li> </ul>

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Topic	Summary of issues raised by Scoping Workshop attendees	Implications for the Local Plan
	<p>situation. This could provide an opportunity to reduce disparities across the area, although may push out existing businesses.</p> <ul style="list-style-type: none"> <li>• Employment and training - There is an opportunity for the Local Plan to specify that incoming employment opportunities are to be directed towards local people in the existing and surrounding communities. This combines with an opportunity to upskill the local workforce, the majority of whom may currently be in lower-skilled jobs in the local area.</li> </ul>	
<b>Social</b>	<p><b>Issues</b></p> <ul style="list-style-type: none"> <li>• Accessibility – there is currently poor public transport access to the OPDC area – to get in to the area, would have to get a train to a tube station and then walk into the area from there. Further, there is poor wayfaring within the site.</li> <li>• Lack of primary healthcare</li> <li>• Hard edges – there are a number of ‘hard edges’ within the site, which create poor legibility.</li> <li>• There is a Traveller site next to Old Oak on Backley Road, which is linear against the railway line and a metal refinery.</li> <li>• Lack of affordable housing</li> <li>• Unknown future population that needs to be modelled – draw on lessons learnt from Kings Cross</li> <li>• How will site link to other areas outside OA boundaries?</li> <li>• Canal towpath plans need to be aware of how constrained the space is – can we accommodate all uses and users?</li> </ul>	<ul style="list-style-type: none"> <li>• HIA scope should consider the surrounding area, incoming residents and people coming in for work/visiting/travelling through.</li> <li>• Construction phase impacts should be considered within the Local Plan- including both psychological and physical effects.</li> <li>• Ensure Local Plan robust enough to deal with minimum %ages of affordable housing</li> </ul>
	<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>• Incoming population – there is an opportunity for the health of the local community to be built in to the Local Plan principles from the very beginning. This may include building in street networks, designed so that children can play independently; or building in creativity, art, intrigue,</li> </ul>	<ul style="list-style-type: none"> <li>• The Local Plan should consider minimising the use of on-street parking and servicing at the fronts of buildings, as these can have a negative effect on the ‘street atmosphere’.</li> </ul>



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Topic	Summary of issues raised by Scoping Workshop attendees	Implications for the Local Plan
	<p>surprise – to create a sense of place and a high quality environment.</p> <ul style="list-style-type: none"> <li>There is an opportunity to significantly improve accessibility to and throughout the site, including the creation of legible routes and reducing 'hard edges'.</li> </ul>	
Environment	<p><b>Issues</b></p> <ul style="list-style-type: none"> <li>There is currently poor accessibility to open space/green infrastructure/play space.</li> <li>River Brent and the Grand Union Canal – the water quality in these areas is currently very poor – biological and chemical.</li> <li>Remediation – Land contamination is a key issue in the area, particularly in certain areas, depending on the presence of London Clay.</li> <li>There are currently 2 large waste sites, which serve London. Concerns were raised regarding their potential displacement. This may lead to a waste apportionment issue/create problems of pollution outside of the plan area as a result of development in the OPDC area.</li> <li>Heritage at Risk – there are areas within the scope of the Local Plan which are considered to be negatively managed from a townscape and heritage perspective. Twyford Abbey and Hereford St Mary are included in the local list of heritage assets at risk. In addition to assets themselves, wider views should also be take into account. Although archaeology is not considered to be a priority in this area, this will also need to be assessed.</li> <li>Surface Water assessments to be more than site-wide but dealt with on strategic level – TW keen to ensure that new developments do not assume that capacity is available (due to provision of new TW assets).</li> </ul>	<ul style="list-style-type: none"> <li>The Local Plan could minimise the use of on-street parking and servicing at the fronts of buildings, as these can have a negative effect on the 'street atmosphere'.</li> <li>Adoption and maintenance of new assets – London Legacy Development Corporation lessons learnt?</li> <li>Cross-boundary issues with respect to heritage assets and views need to be addressed.</li> <li>Thames Water and Counters Creek combined sewer discussion/CIL/S106 payments to deal with a system already at capacity</li> <li></li> </ul>
	<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>Green Infrastructure – there is an opportunity to create green infrastructure which facilitates live/work/play/travel through as well as fast and meandering routes.</li> <li>Improvement to AQMA likely due to redevelopment of area but needs to ensure that population</li> </ul>	<ul style="list-style-type: none"> <li>The Local Plan should facilitate the use of green infrastructure, but also manage the spread of routes across the OPDC area, so that certain routes do not become congested.</li> <li>The Local Plan should seek to ensure that improvements in the area do not lead to increase</li> </ul>

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Topic	Summary of issues raised by Scoping Workshop attendees	Implications for the Local Plan
	<p>increase doesn't counteract that.</p> <ul style="list-style-type: none"> <li>• There is an opportunity to create SUDS across the area and reduce potentially polluting discharges to watercourses – also need to address differences in catchments between east and west.</li> <li>• London Waste and Recycling Board – there is an opportunity for the OPDC area to become an example centre for the creation of an 'integrated circular economy'. This could include the creation, use and recycling of products locally, including the potential for the growing of local food through the use of vertical farms.</li> <li>• Urban Heat Island Effect – opportunity to crease a decentralised energy hub and create a closed loop system.</li> <li>• An increase in population and new industries may create an opportunity to reduce pollution locally and increase efficiency/cleanliness.</li> </ul>	<p>pollution/traffic etc, elsewhere across London.</p>

**APPENDIX B**

**Review of Plans, Programmes and Environmental Protection Objectives**

**Table B-1 Sustainability Themes derived from the review of Policies, Plans and Programmes**

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
<b>Environment</b>			
<b>Promote sustainable design and mitigate and adapt to climate change</b>	<ul style="list-style-type: none"> <li>Climate change Act 2008</li> <li>UK Climate Change Programme 2006</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> <li>National Planning Policy for Waste 2014</li> <li>Written Ministerial Statement: Sustainable Drainage Systems 2014</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> <li>Social Infrastructure SPG 2015</li> <li>London Infrastructure Plan 2050 update 2015</li> <li>Sustainable Design and Construction SPG 2014</li> <li>The Mayor's Food Strategy 2008</li> <li>The Mayor's Climate Change Mitigation and Energy Strategy 2011</li> <li>The Mayor's Climate Change Adaption Strategy 2011</li> <li>London Plan Town Centres SPG 2014</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> </ul>
<b>Promote and protect the water environment including issues such as quality and resource use as well as reducing flood risk</b>	<ul style="list-style-type: none"> <li>Water Framework Directive 2000/60/EC</li> <li>Urban Waste Water Treatment Directive 91/271/EEC</li> <li>Flood and Water Management Act 2010</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> <li>Future Water 2011</li> <li>National Planning Policy for Waste 2014</li> <li>Written Ministerial Statement: Sustainable Drainage Systems 2014</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> <li>Social Infrastructure SPG 2015</li> <li>London Infrastructure Plan 2050 update 2015</li> <li>Sustainable Design and Construction SPG 2014</li> <li>Securing London's Water Future 2011</li> <li>Thames River Basin District RBMP 2009</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Hammersmith and Fulham Updated Surface Water Management Plan 2015</li> <li>Kensington and Chelsea Surface Water Management Plan 2014</li> <li>Kensington and Chelsea Local Flood Risk Management Strategy 2015</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> </ul>
<b>Reduce greenhouse gas emissions, increase energy efficiency and promote the use of renewable energy and renewable technologies in</b>	<ul style="list-style-type: none"> <li>Directive on the Promotion of the Use of Energy from Renewable Sources 2209/28/EC</li> <li>Energy Act 2013</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> <li>The UK Low Carbon Transition Plan</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Sustainable Design and Construction SPG 2014</li> <li>The Mayor's Climate Change Mitigation and Energy Strategy 2011</li> <li>The Mayor's Climate Change Adaption Strategy 2011</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> </ul>

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
<b>appropriate locations</b>	<ul style="list-style-type: none"> <li>2009</li> <li>The Carbon Plan 2011</li> <li>UK Renewable Energy Strategy 2009</li> <li>National Planning Policy for Waste 2014</li> </ul>	<ul style="list-style-type: none"> <li>London Infrastructure Plan 2050 update 2015</li> <li></li> <li></li> <li></li> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> <li></li> <li></li> <li></li> </ul>
<b>Promote sensitive waste management</b>	<ul style="list-style-type: none"> <li>Waste Framework Directive 2008/98/EC</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> <li>National Planning Policy for Waste 2014</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Sustainable Design and Construction SPG 2014</li> <li>The Control of Dust and Emissions during Construction and Demolition SPG 2014</li> <li>London Waste and Recycling Board Waste Management Planning Advice for New Flatted Properties, 2014</li> <li>The Mayor's Municipal Waste Management Strategy, 2011</li> <li>London Infrastructure Plan 2050 update 2015</li> </ul>	<ul style="list-style-type: none"> <li>West London Joint Waste Plan 2015</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> <li></li> </ul>
<b>Protect and enhance the historic environment and recognise and appreciate landmarks, townscapes and their setting</b>	<ul style="list-style-type: none"> <li>European Convention on the Protection of the Archaeological Heritage (revised) (1992)</li> <li>European Landscape Charter 2000</li> <li>Planning (Listed Building and Conservation Areas) Act 1990</li> <li>Ancient Monuments and Archaeological Areas Act 1979</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>London View Management Framework SPG 2012</li> <li>London Plan Town Centres SPG 2014</li> <li></li> <li></li> <li></li> <li></li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Ealing Green Space Strategy 2012-2017</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> <li></li> <li></li> </ul>
<b>Conserve and enhance biodiversity as an integral part of economic, social and environmental development</b>	<ul style="list-style-type: none"> <li>European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats</li> <li>Wildlife and Countryside Act 1981</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> <li>UK Post-2010 Biodiversity Framework 2012</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> <li>Social Infrastructure SPG 2015</li> <li>Mayor's Biodiversity Strategy 2002</li> <li>London Biodiversity Action Plan 2001</li> <li>London Infrastructure Plan 2050 update 2015</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> </ul>

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
<b>Achieve more effective geoconservation and improve soil quality</b>	<ul style="list-style-type: none"> <li>National Planning Policy for Waste 2014</li> </ul>	<ul style="list-style-type: none"> <li>London's Foundations Protecting the Geodiversity of the Capital 2012</li> <li>The Mayor's Food Strategy 2008</li> </ul>	<ul style="list-style-type: none"> <li>Food Growing and Allotments Strategy for Brent 2014/16</li> <li>Hammersmith and Fulham Contaminated Land Strategy 2001</li> </ul>
<b>Optimise the use of land through increasing the density of development</b>		<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
<b>Improve air quality</b>	<ul style="list-style-type: none"> <li>EU Directive on Ambient Air Quality and Management 96/62/EC</li> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> <li>UK Air Quality Strategy 2011</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> <li>Social Infrastructure SPG 2015</li> <li>Mayors Air Quality Strategy 2010</li> <li>The Control of Dust and Emissions during Construction and Demolition SPG 2014</li> <li>London Plan Town Centres SPG 2014</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> <li></li> </ul>
<b>Minimise the adverse impacts of noise on people living and working in, and visiting the area</b>	<ul style="list-style-type: none"> <li>European Directive: Environmental Noise Directive 2002/49/EC</li> <li>National Planning Policy Framework 2012</li> <li>Noise Policy Statement for England 2010</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> <li>Social Infrastructure SPG 2015</li> <li>The Mayor's Ambient Noise Strategy 2004</li> <li>London Plan Town Centres SPG 2014</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>St Quintin and Woodlands Draft Neighbourhood Plan 2015</li> </ul>
<b>Social</b>			
<b>Improve health and well-being and promote greater</b>	<ul style="list-style-type: none"> <li>Health for Growth 2014-2020</li> <li>National Planning Policy Framework 2012</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> </ul>

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
<b>levels of physical activity</b>	<ul style="list-style-type: none"> <li>Sustainable Development Strategy 2005</li> <li>Health Lives, Healthy People 2011</li> <li>National Planning Policy for Waste 2014</li> </ul>	<ul style="list-style-type: none"> <li>Social Infrastructure SPG 2015</li> <li>The Control of Dust and Emissions during Construction and Demolition SPG 2014</li> <li>Draft Housing SPG 2015</li> <li>Sustainable Design and Construction SPG 2014</li> <li>Play and Informal Recreation SPG 2012</li> <li>The Mayor's Food Strategy 2008</li> <li>The London Health Inequalities Strategy 2010</li> <li>Improving Londoners Access to Nature 2008</li> <li>London Infrastructure Plan 2050 update 2015</li> <li>London Plan Town Centres SPG 2014</li> </ul>	<ul style="list-style-type: none"> <li>Brent Parks Strategy 2010-2015</li> <li>Food Growing and Allotments Strategy for Brent 2014/16</li> <li>Brent Draft Community Safety Strategy 2014-17</li> <li>Brent Health and Wellbeing Strategy 2014-17</li> <li>A Plan for Children and Families in Brent 2012-2015</li> <li>Ealing Quality of Life for Older People 2006-2016</li> <li>Ealing Green Space Strategy 2012-2017</li> <li>Hammersmith and Fulham Health and Wellbeing Strategy 2013-15</li> <li>Hammersmith and Fulham Parks and Open Spaces Strategy 2008-2018</li> <li>Hammersmith and Fulham CSPAN Physical Activity Strategy 2011</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> </ul>
<b>To create an equal society which recognises people's different needs, situations and goals, and removes the barriers that limit what people can do and be</b>	<ul style="list-style-type: none"> <li>Equality Act 2010</li> <li>National Planning Policy Framework 2012</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Sustainable Design and Construction SPG 2014</li> <li>Social Infrastructure SPG 2015</li> <li>Play and Informal Recreation SPG 2012</li> <li>The Mayor's Food Strategy 2008</li> <li>The London Health Inequalities Strategy 2010</li> <li>Planning for Equality and Diversity in London SPG 2007</li> <li>Improving Londoners Access to Nature 2008</li> <li>The Mayor's Equality Framework 2009</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Brent Equality Strategy 2015-19</li> <li>A Regeneration Strategy for Brent 2010-2030</li> <li>A Plan for Children and Families in Brent 2012-2015</li> <li>Ealing Quality of Life for Older People 2006-2016</li> <li>Old Oak and Park Royal draft Opportunity Area Planning Framework 2015</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> <li>St Quintin and Woodlands Draft Neighbourhood Plan 2015</li> </ul>
<b>Maximise the contribution that the arts, culture and</b>		<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Play and Informal Recreation SPG 2012</li> </ul>	<ul style="list-style-type: none"> <li>Food Growing and Allotments Strategy for Brent 2014/16</li> <li>Cultural Strategy for Brent 2010-15</li> </ul>

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
<b>heritage can make to the community</b>		<ul style="list-style-type: none"> <li>• Social Infrastructure SPG 2015</li> <li>• The Mayor's Food Strategy 2008</li> <li>• The Mayor's Culture Strategy 2014</li> <li>• Shaping Neighbourhoods: Character and Context 2014</li> <li>• London Plan Town Centres SPG 2014</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Ealing Arts and Cultural Strategy 2013-2018</li> <li>• Old Oak and Park Royal draft Opportunity Area Planning Framework 2015</li> <li>• Ealing Sustainable Community Strategy 2006-2016</li> <li>• Kensington and Chelsea Consolidated Local Plan 2015</li> <li>• Kensington and Chelsea Issues and Options Paper for Kensal Gasworks 2012</li> <li>• St Quintin and Woodlands Draft Neighbourhood Plan 2015</li> </ul>
<b>The need to ensure that new housing development meets local needs (for all sections of society)</b>	<ul style="list-style-type: none"> <li>• National Planning Policy Framework 2012</li> <li>• Planning Policy for Traveller Sites 2015</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• The London Plan 2011, 2013, 2015</li> <li>• Draft Housing SPG 2015</li> <li>• Sustainable Design and Construction SPG 2014</li> <li>• London Infrastructure Plan 2050 update 2015</li> <li>• London Plan Town Centres SPG 2014</li> <li>•</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Brent Core Strategy 2010</li> <li>• Ealing Core Strategy 2012</li> <li>• Hammersmith and Fulham Core Strategy 2011</li> <li>• Ealing Quality of Life for Older People 2006-2016</li> <li>• Hammersmith and Fulham Housing Strategy 2015</li> <li>• Old Oak and Park Royal draft Opportunity Area Planning Framework 2015</li> <li>• Ealing Sustainable Community Strategy 2006-2016</li> <li>• Kensington and Chelsea Consolidated Local Plan 2015</li> <li>• Kensington and Chelsea Issues and Options Paper for Kensal Gasworks 2012</li> <li>• St Quintin and Woodlands Draft Neighbourhood Plan 2015</li> </ul>
<b>Promote more sustainable transport choices and to improve accessibility</b>	<ul style="list-style-type: none"> <li>• National Planning Policy Framework 2012</li> <li>• Sustainable Development Strategy 2005</li> <li>•</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• The London Plan 2011, 2013, 2015</li> <li>• Land for Industry and Transport SPG 2012</li> <li>• Mayor's Transport Strategy 2010</li> <li>• London Infrastructure Plan 2050 update 2015</li> <li>• London Plan Town Centres SPG 2014</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• West London Sub Regional Transport Plan 2010</li> <li>• Brent Core Strategy 2010</li> <li>• Ealing Core Strategy 2012</li> <li>• Hammersmith and Fulham Core Strategy 2011</li> <li>• Old Oak and Park Royal draft Opportunity Area Planning Framework 2015</li> <li>• Park Royal Southern Gateway Position Statement 2008</li> <li>• Kensington and Chelsea Consolidated Local Plan 2015</li> <li>• Kensington and Chelsea Issues and Options</li> </ul>



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Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
			Paper for Kensal Gasworks 2012 <ul style="list-style-type: none"> <li>St Quintin and Woodlands Draft Neighbourhood Plan 2015</li> </ul>
<b>Recognise the importance of open spaces, sport and recreation and the contribution that they make to enhancing quality of life</b>	<ul style="list-style-type: none"> <li>National Planning Policy Framework 2012</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Green Infrastructure and Open Environments SPG 2012</li> <li>Social Infrastructure SPG 2015</li> <li>Play and Informal Recreation SPG 2012</li> <li>The Mayor's Food Strategy 2008</li> <li>Improving Londoners Access to Nature 2008</li> <li>London Infrastructure Plan 2050 update 2015</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Brent Parks Strategy 2010-2015</li> <li>Food Growing and Allotments Strategy for Brent 2014/16</li> <li>Ealing Green Space Strategy 2012-2017</li> <li>Hammersmith and Fulham Parks and Open Spaces Strategy 2008-2018</li> <li>Old Oak and Park Royal draft Opportunity Area Planning Framework 2015</li> <li>St Quintin and Woodlands Draft Neighbourhood Plan 2015</li> </ul>
<b>Improve educational attainment and training opportunities</b>	<ul style="list-style-type: none"> <li>Policy statement: Planning for schools development 2011</li> <li>National Planning Policy Framework 2012</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Social Infrastructure SPG 2015</li> <li>London Infrastructure Plan 2050 update 2015</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> </ul>
<b>Reduce crime and fear of crime</b>	<ul style="list-style-type: none"> <li>National Planning Policy Framework 2012</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Sustainable Design and Construction SPG 2014</li> <li>Social Infrastructure SPG 2015</li> <li>Play and Informal Recreation SPG 2012</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>Brent Draft Community Safety Strategy 2014-17</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> </ul>
<b>Economic</b>			

Old oak and park royal development corporation local plan

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
Promote sustainable economic development and a range of employment opportunities	<ul style="list-style-type: none"> <li>National Planning Policy Framework 2012</li> <li>Sustainable Development Strategy 2005</li> </ul>	<ul style="list-style-type: none"> <li>The London Plan 2011, 2013, 2015</li> <li>Land for Industry and Transport SPG 2012</li> <li>The Mayor's Economic Development Strategy 2010</li> <li>London Infrastructure Plan 2050 update 2015</li> <li>London Infrastructure Plan 2050 update 2015</li> </ul>	<ul style="list-style-type: none"> <li>Brent Core Strategy 2010</li> <li>Ealing Core Strategy 2012</li> <li>Hammersmith and Fulham Core Strategy 2011</li> <li>A Regeneration Strategy for Brent 2010-2030</li> <li>Old Oak and Park Royal draft Opportunity Area Planning Framework 2015</li> <li>Ealing Sustainable Community Strategy 2006-2016</li> <li>Park Royal Southern Gateway Position Statement 2008</li> <li>Kensington and Chelsea Consolidated Local Plan 2015</li> <li>Kensington and Chelsea Issues and Options Paper for Kensal Gasworks 2012</li> </ul>

Figure B-1 – Hammersmith and Fulham Core Strategy 2011: Key Diagram

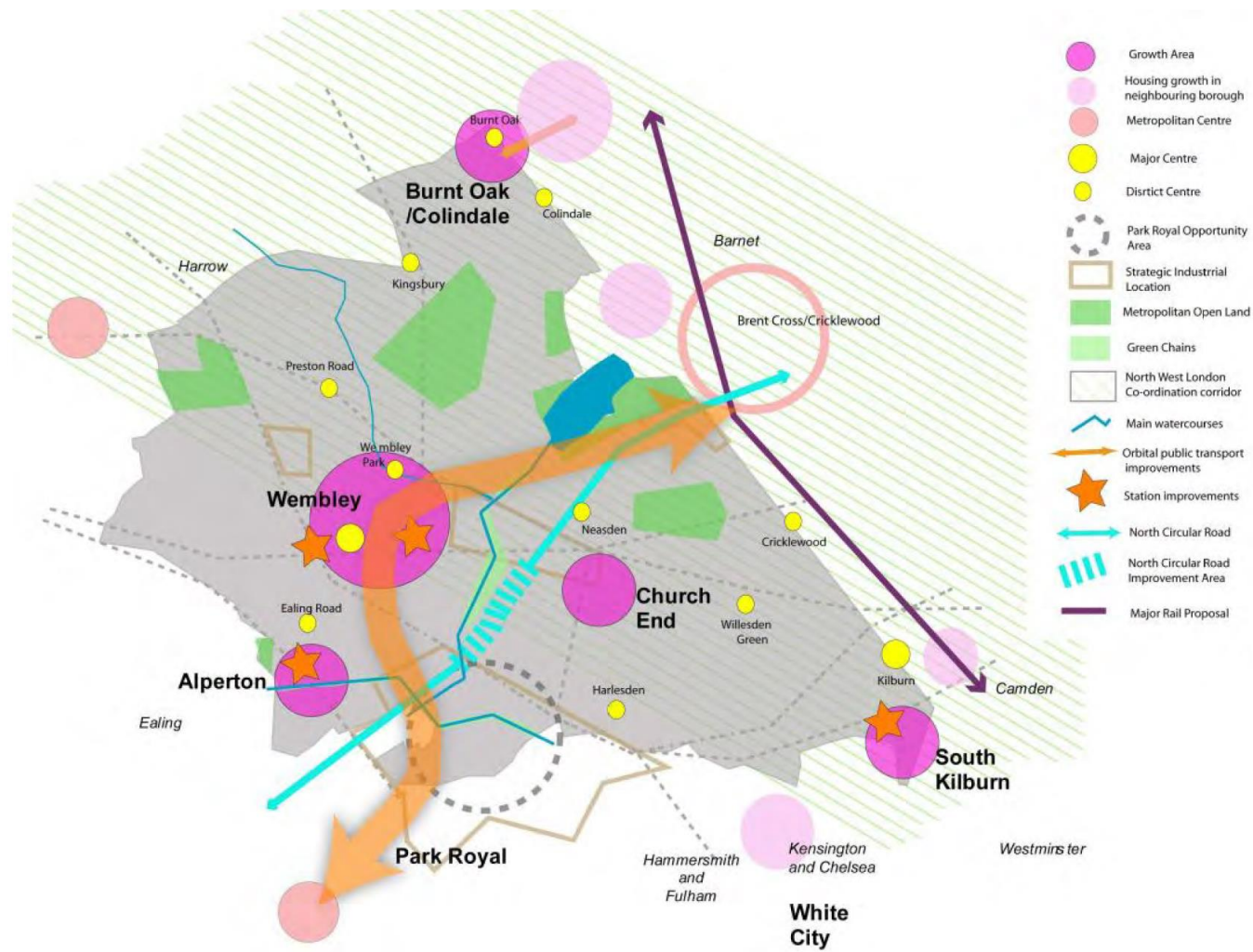


**Figure B-2 – Ealing Core Strategy 2012: Key Diagram**

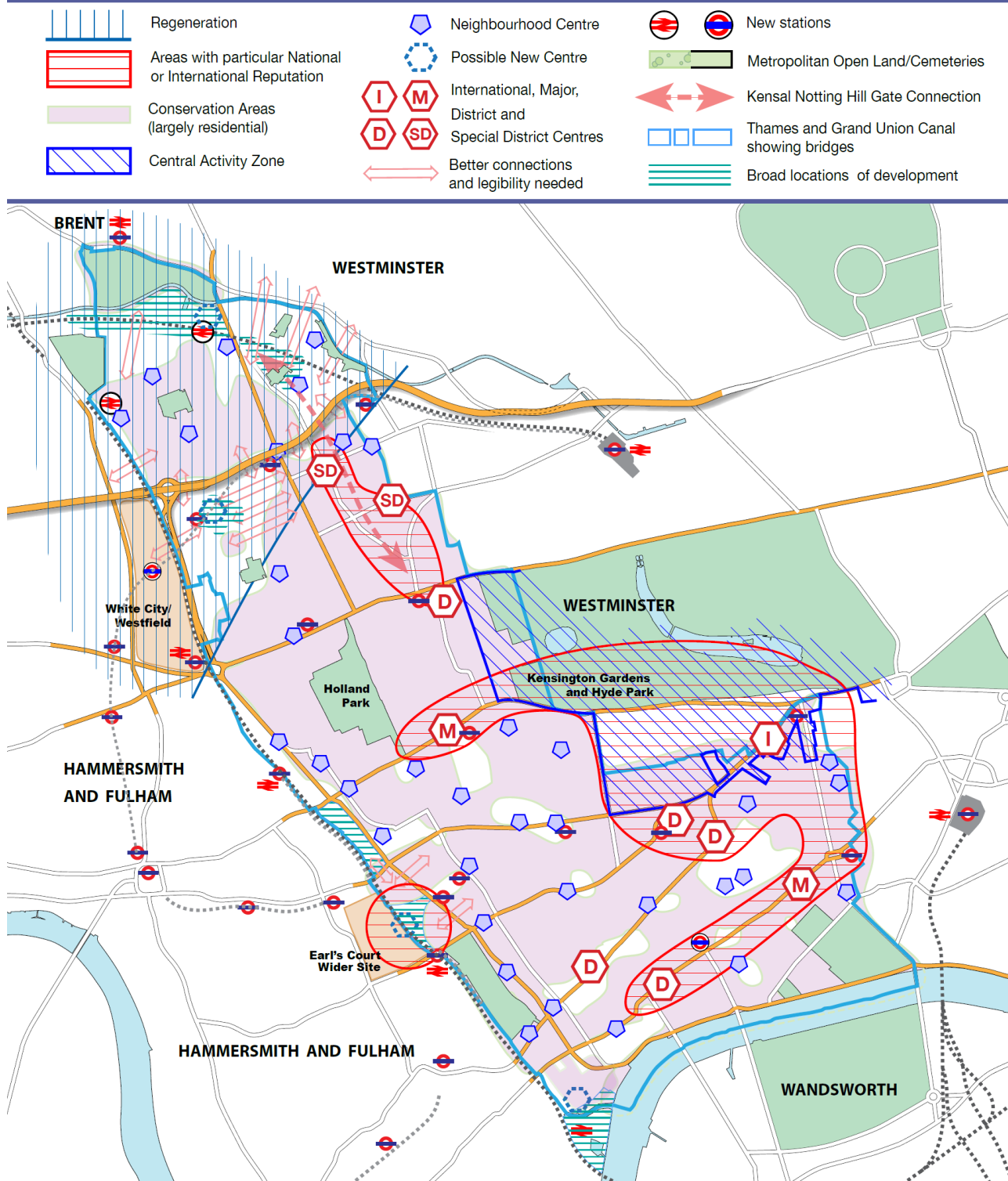




Figure B-3 – Brent Core Strategy 2010: Key Diagram



**Figure B-4 – Kensington and Chelsea Consolidated Local Plan 2015: Key Diagram**



## **APPENDIX C**

### **Baseline Data**

## C. The Sustainability Baseline and Key Sustainability Issues

### C.1 Population

The following baseline indicators have been used to identify key population trends and characteristics:

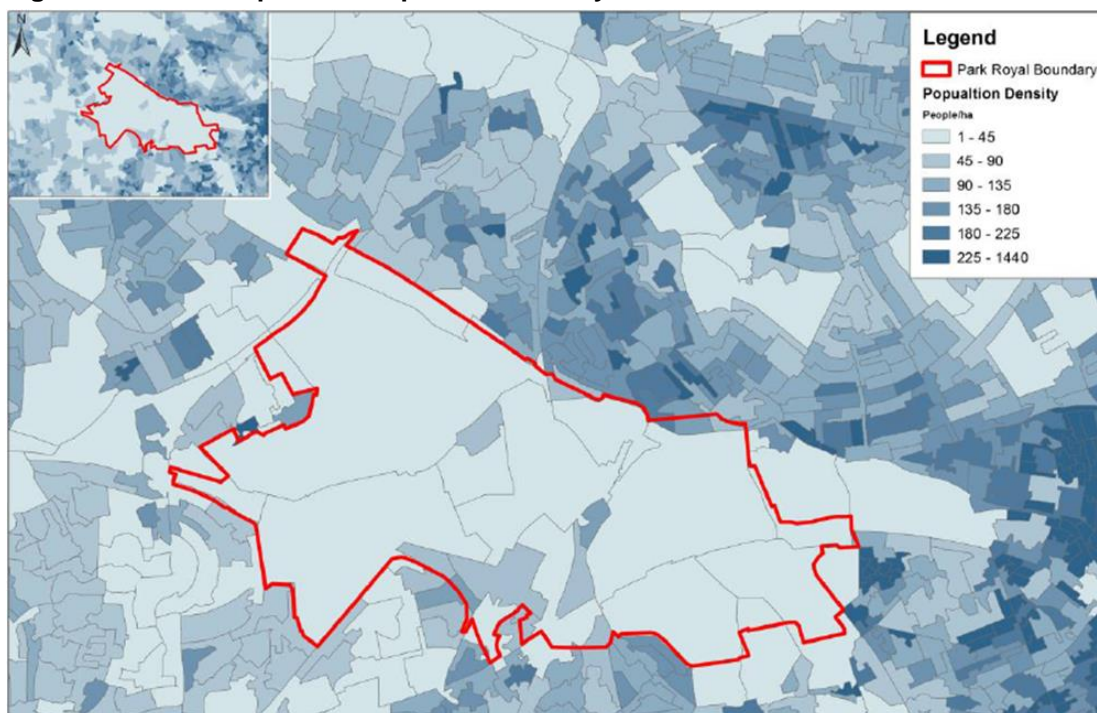
- Total population (2011 Census and Neighbourhood Statistics<sup>13</sup>).
- Area of Ealing, Brent and Hammersmith & Fulham (Office for National Statistics Local Profiles).
- Population density (Office for National Statistics Local Profiles).
- Age structure of the population (Office for National Statistics Local Profiles and 2011 Census).
- Mean household size (Office for National Statistics Local Profiles).
- Ethnic groups represented in the population (Office for National Statistics Local Profiles).
- Faith communities represented in the population (OAPF Draft IIA Report, GLA, February 2015)
- Gender balance and pay gap (OAPF Draft IIA Report, GLA, February 2015)

#### C.1.1 OPDC Area

The population of OPDC is just under 5,000 people contained in 1,898 households. **Figure C1-1** indicates the population density of the area.



**Figure C1-1 Comparative Population Density**



Source: OAPF Draft IIA Report, GLA, February 2015

The OPDC area covers some 650 hectares and due to its predominantly industrial nature has a much lower population density than its adjoining boroughs. Given the proposed minimum new homes of 25,500 this density is set to change. This influx of future population needs careful management to ensure inequalities don't worsen throughout the area and adjoining boroughs.

**Figure C1-2 Age profile**

Area	Total	Male	Female	Age 0-4	Age 5-17	Age 18-24	Age 25-64	Age 65-84	Age 85 +
England & Wales	56,075,912	49.2%	50.8%	6.2%	15.1%	9.4%	52.8%	14.2%	2.2%
England	53,012,456	49.2%	50.8%	6.3%	15.1%	9.4%	52.9%	14.1%	2.2%
London	8,173,941	49.3%	50.7%	7.2%	14.9%	10.0%	56.7%	9.6%	1.5%
Inner London	3,231,901	49.8%	50.2%	7.0%	13.3%	11.4%	59.7%	7.5%	1.1%
Outer London	4,942,040	49.1%	50.9%	7.4%	16.0%	9.2%	54.7%	10.9%	1.8%
Ealing	338,449	50.0%	50.0%	7.5%	15.1%	9.3%	57.4%	9.3%	1.4%
Brent	311,215	50.3%	49.7%	7.2%	15.4%	10.1%	56.8%	9.3%	1.2%
Hammersmith and Fulham	182,493	48.7%	51.3%	6.5%	11.3%	11.4%	61.8%	7.9%	1.1%
Park Royal & Old Oak	4,941	51.2%	48.8%	8.0%	14.2%	12.5%	59.3%	5.6%	0.5%

Source: Census 2011

As shown in **Figure C1-2**, the OPDC area contains a large proportion of working age adults and a smaller population of ages 65+ than the surrounding boroughs. Careful consideration should be given to the wider

population trend of an ageing population as well ensuring an attractive area for young adults and those who may be looking to raise a family.

**Figure C1-3 Components of population change**

**Components of population change**

mid-2011 to mid-2012

	Live births Thousands	Deaths Thousands	Natural change Thousands	Net migration & other changes Thousands	Total change Thousands
<b>Brent</b>	5.3	1.6	3.8	-1.3	2.4
<b>Hammersmith and Fulham</b>	2.7	0.9	1.8	-4.4	-2.6
<b>Ealing</b>	5.7	1.9	3.8	-2.5	1.4
<b>London</b>	134.0	47.6	86.5	17.5	104.0

Source:

ONS Local Profiles

Although there is a net loss of population from Brent, Ealing and Hammersmith & Fulham, there is a continued influx of people into London and this needs to be addressed as part of the area's redevelopment proposals.

The population of OPDC is ethnically diverse. Data indicates that 21.6% of the population were White British, with 18.6% identifying themselves as White Other (**Table C1-4**). Black African or Black Others are the main ethnic minority within OPDC, representing 24% of the population

**Table C1-4 Percentage of population by ethnic group**

Area	England & Wales	England	London	Inner London	Outer London	Ealing	Brent	Hammersmith and Fulham	Park Royal & Old Oak
White British	80.5%	79.8%	44.9%	38.4%	49.2%	30.4%	18.0%	44.9%	21.6%
White Irish	0.9%	1.0%	2.2%	2.3%	2.0%	3.1%	4.0%	3.5%	2.5%
White Gypsy Irish Traveller	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.6%
White Other White	4.4%	4.6%	12.6%	16.5%	10.1%	15.4%	14.3%	19.6%	18.6%
Mixed White and Black Caribbean	0.8%	0.8%	1.5%	1.8%	1.3%	1.2%	1.4%	1.5%	1.6%
Mixed White Black African	0.3%	0.3%	0.8%	1.0%	0.7%	0.6%	0.9%	0.8%	2.0%
Mixed White Asian	0.6%	0.6%	1.2%	1.3%	1.2%	1.4%	1.2%	1.5%	1.4%
Mixed Other Mixed	0.5%	0.5%	1.5%	1.8%	1.2%	1.3%	1.6%	1.7%	2.1%
Asian Indian	2.5%	2.6%	6.6%	3.4%	8.8%	14.3%	18.6%	1.9%	5.3%
Asian Pakistani	2.0%	2.1%	2.7%	1.9%	3.3%	4.3%	4.6%	0.9%	2.0%
Asian Bangladeshi	0.8%	0.8%	2.7%	5.1%	1.2%	0.5%	0.6%	0.6%	0.6%
Asian Chinese	0.7%	0.7%	1.5%	2.0%	1.2%	1.2%	1.0%	1.7%	3.0%
Asian Other Asian	1.5%	1.5%	4.9%	3.6%	5.7%	9.3%	9.2%	4.0%	5.6%
Black African	1.8%	1.8%	7.0%	8.6%	6.0%	5.1%	7.8%	5.8%	12.3%
Black Caribbean	1.1%	1.1%	4.2%	5.4%	3.5%	3.9%	7.6%	3.9%	8.2%
Black Other Black	0.5%	0.5%	2.1%	2.8%	1.6%	1.9%	3.4%	2.1%	3.5%
Other Arab	0.4%	0.4%	1.3%	1.6%	1.1%	2.9%	3.7%	2.9%	5.8%
Other Other	0.6%	0.6%	2.1%	2.6%	1.9%	3.1%	2.1%	2.7%	3.2%
<b>Total</b>	<b>56,075,912</b>	<b>53,012,456</b>	<b>8,173,941</b>	<b>3,231,901</b>	<b>4,942,040</b>	<b>338,449</b>	<b>311,215</b>	<b>182,493</b>	<b>4,941</b>

Source: Census 2011

The largest religious community in the OPDC area is Christian at 48.7%, which is higher than the London average of 48.4%, but lower than the English average of 59.4%. This is followed by Muslim at 21.7%, compared to a London average of 12.4% and an English average of 5%. Within the plan area, 14.6% stated no religion, which is lower than the London average of 20.7% and English average of 24.7%. Other minorities include Hindu (3.9%), Buddhist (1.4%), Sikh (1.2%), other religion (0.8%) and Jewish (0.3%).

**Table C1-5 Percentage of population by religion**

Area	Total	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	No religion	Religion not stated
England & Wales	56,075,912	59.3%	0.4%	1.5%	0.5%	4.8%	0.8%	0.4%	25.1%	7.2%
England	53,012,456	59.4%	0.5%	1.5%	0.5%	5.0%	0.8%	0.4%	24.7%	7.2%
London	8,173,941	48.4%	1.0%	5.0%	1.8%	12.4%	1.5%	0.6%	20.7%	8.5%
Inner London	3,231,901	45.4%	1.1%	2.2%	1.6%	14.4%	0.5%	0.5%	23.9%	10.4%
Outer London	4,942,040	50.4%	0.9%	6.9%	1.9%	11.1%	2.3%	0.7%	18.6%	7.2%
Ealing	338,449	43.7%	1.2%	8.5%	0.3%	15.7%	7.9%	0.6%	15.0%	6.9%
Brent	311,215	41.5%	1.4%	17.8%	1.4%	18.6%	0.5%	1.2%	10.6%	6.9%
Hammersmith and Fulham	182,493	54.1%	1.1%	1.1%	0.6%	10.0%	0.2%	0.5%	23.8%	8.4%
Park Royal Total	4,941	48.7%	1.4%	3.9%	0.3%	21.7%	1.2%	0.8%	14.6%	7.3%

Source: Census 2011

A study on the gender pay gap by the Government Equalities Office showed that 10% of the overall pay gap can be attributed to occupational sex segregation. A 10% greater share of men in an occupation is associated with 2 per cent higher average hourly wages. 12% of the gap is due to the industries in which men and women work, 21% is due to difference in years of experience of full-time work, 16% is due to negative effect on wages of having previously worked part –time or having taken time out of the labour market to look after family. 36% of the pay gap cannot be explained by any of the characteristics that have been controlled for in the study.

**Table C1-6 Percentage of population by gender**

Area	Total	Male	Female
England & Wales	56,075,912	49.2%	50.8%
England	53,012,456	49.2%	50.8%
London	8,173,941	49.3%	50.7%
Inner London	3,231,901	49.8%	50.2%
Outer London	4,942,040	49.1%	50.9%
Ealing	338,449	50.0%	50.0%
Brent	311,215	50.3%	49.7%
Hammersmith and Fulham	182,493	48.7%	51.3%
Park Royal & Old Oak	4,941	51.2%	48.8%

Source: Census 2011

**Table C1-7 Marital Status**

Area	All Categories	Single	Married	Same Sex Civil Partnership	Separated	Divorced	Widowed
England & Wales	45,496,780	34.6%	46.6%	0.2%	2.6%	9.0%	7.0%
England	42,989,620	34.6%	46.6%	0.2%	2.7%	9.0%	6.9%
London	6,549,173	44.1%	39.8%	0.4%	3.2%	7.4%	5.0%
Inner London	2,636,853	53.5%	31.2%	0.7%	3.5%	7.3%	3.9%
Outer London	3,912,320	37.8%	45.7%	0.3%	3.0%	7.4%	5.8%
Ealing	269,572	40.6%	44.1%	0.4%	3.0%	6.8%	5.1%
Brent	248,458	42.1%	43.2%	0.3%	3.4%	6.2%	4.7%
Hammersmith and Fulham	152,863	55.9%	29.6%	0.5%	2.9%	7.4%	3.7%
Park Royal & Old Oak	3931.3	50.7%	34.2%	0.5%	4.1%	7.5%	3.0%

Source: Census 2011

### C.1.3 Data Gaps and Uncertainties

- Future population makeup for OPDC area
- Proportion of the population that is transgender/has undergone gender reassignment
- Sexual Orientation of the population
- Data on pregnancy and maternity in relation to the local population and employment

## C.2 Education and Qualifications

The following baseline indicators have been used to characterise levels of education and attainment:

- Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles).
- Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles).
- Education, Skills and Training Deprivation (Indices of Deprivation for England 2010).



## C.2.1 OPDC Area

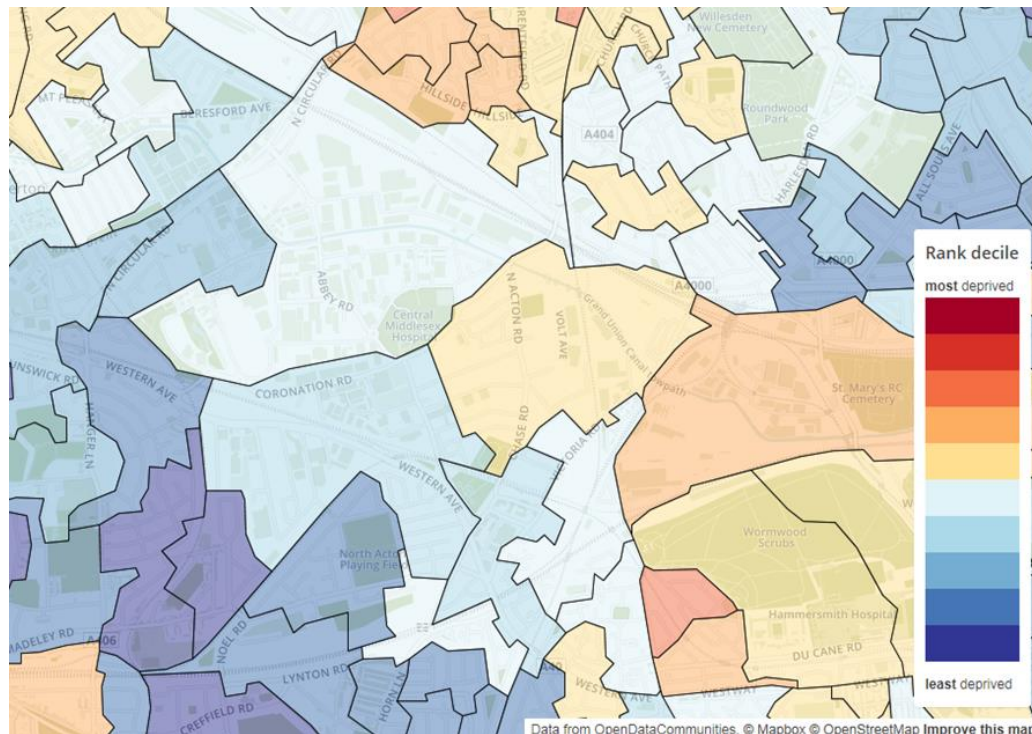
The area's level of skills and educational deprivation is average though there is great disparity between the adjoining boroughs. The low population density also creates uncertainty in the identification of trends. The percentage of people with no qualifications in 2011 was 16%. The percentage of people with NVQ Level 4 qualification or above was 36.5% compared with 44.7% for Inner London and 27.4% for England.

**Table C2-1 Percentage of the population and level of qualification achieved**

Area	All Student Age	No Qualifications	Level 1	Level 2	Apprenticeship	Level 3	Level 4 Above	Other
England & Wales	45,496,780	23%	13.3%	15.3%	3.6%	12.3%	27.2%	5.7%
England	42,989,620	22%	13.3%	15.2%	3.6%	12.4%	27.4%	5.7%
London	6,549,173	18%	10.7%	11.8%	1.6%	10.5%	37.7%	10.0%
Inner London	2,636,853	16%	8.5%	9.4%	1.0%	10.1%	44.7%	10.5%
Outer London	3,912,320	19%	12.3%	13.5%	2.1%	10.7%	33.0%	9.7%
Ealing	269,572	16%	9.9%	10.5%	1.4%	9.6%	37.0%	15.1%
Brent	248,458	19%	10.4%	10.9%	1.2%	9.7%	33.3%	15.4%
Hammersmith and Fulham	152,863	13%	7.0%	8.3%	1.2%	10.7%	49.6%	10.5%
Park Royal Total	3,931	16%	9.0%	9.9%	1.9%	9.0%	36.5%	17.4%

Source: Census 2011

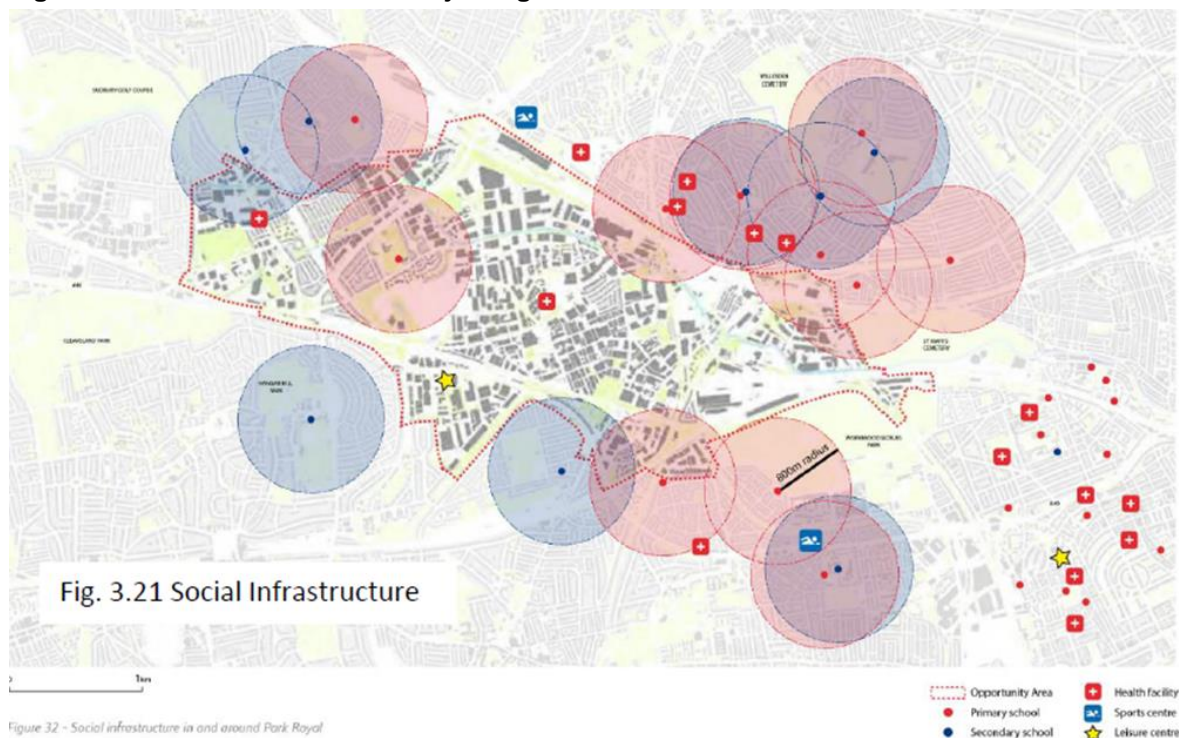
**Figure C2-1 Education, Skills and Training Deprivation in OPDC**



Source: Indices of Deprivation 2010 for England

Brent in particular has a higher percentage of at least one member of staff who isn't fully proficient at their job when compared to London and therefore the Local Plan should seek to include job skills training opportunities and further education facilities.

**Figure C2-2 Education facilities adjoining OPDC Area**



Source: OAPF Draft IIA Report, GLA, February 2015

As can be seen from **Figure C2-2** there is a gap in education facilities within the area. The Local Plan and future development needs to ensure adequate provision for the new residents and existing alike.

## C.2.2 Data Gaps and Uncertainties

- Accessibility to secondary school education.
- Number and location of establishments offering life-long learning opportunities.

## C.3 Health

The following baseline data has been used to identify key trends:

- Census 2011 health status data
- Census 2011 life expectancy
- Children living in poverty
- Childhood obesity rates
- Health Deprivation and Disability (Indices of Deprivation for England 2010)
- Provision of GPs and Healthcare

It is noted that a number of the other topics within this baseline will also have an influence on health levels, including data on: population, education, air quality, noise, crime, employment, deprivation and living environment, housing, biodiversity and open space (landscape and townscape).

### C.3.1 OPDC Area

The health of people in the OPDC area is relatively good – 51.6% state they are in Very Good Health (see **Figure C3-1**). Deprivation is higher than average and 37.5% of children were living in poverty in 2010. Life expectancy for males is 76.2 years, which was lower than the average for London. The average life expectancy for females was 83.6 years which is higher than the London average (82.8%). 8.6% of births between 2008 and 2012 were low birth weight births, which compares with a 7.4% nationally.

During the period 2010/11 and 2012/13, 11.8% of children at reception year were considered obese, with an additional 23.6% carrying excess weight. A further 23.6% of children in year 6 were identified as obese, with the same figure for London recorded at 22.5%.

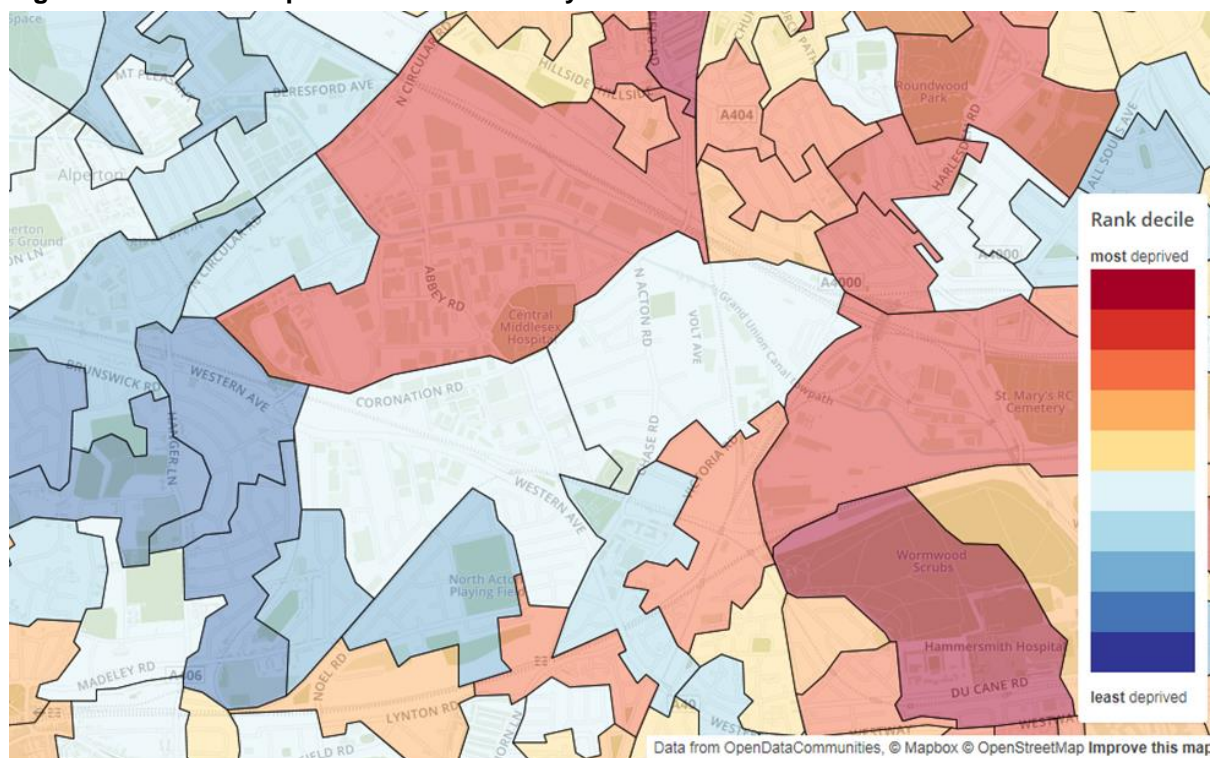
**Table C3-1 Census 2011 Health**

Area	Total	Very Good Health	Good Health	Fair Health	Bad Health	Very Bad Health
England and Wales	56,075,912	47.1%	34.1%	13.2%	4.3%	1.3%
England	53,012,456	47.2%	34.2%	13.1%	4.2%	1.2%
London	8,173,941	50.5%	33.3%	11.2%	3.7%	1.2%
Inner London	3,231,901	52.6%	31.6%	10.5%	3.9%	1.4%
Outer London	4,942,040	49.1%	34.5%	11.7%	3.6%	1.1%
Ealing	338,449	49.2%	34.5%	11.4%	3.8%	1.2%
Brent	311,215	48.1%	34.8%	11.8%	4.0%	1.4%
Hammersmith and Fulham	182,493	56.5%	29.2%	9.4%	3.6%	1.3%
Park Royal & Old Oak	4,941	51.6%	33.9%	9.6%	3.9%	0.9%

The OPDC area includes at least one LSOA in the bottom 20% for health deprivation and disability; see **Figure C3-1** below.



**Figure C3-1 Health Deprivation and Disability in OPDC**



Source: Indices of Deprivation 2010 for England

Due to its industrial nature and history, there is a lack of primary care facilities within the OPDC boundaries, with the exception of Central Middlesex Hospital, as seen from **Figure C3-2**.

**Figure C3-2 Provision of GPs and Healthcare in OPDC**

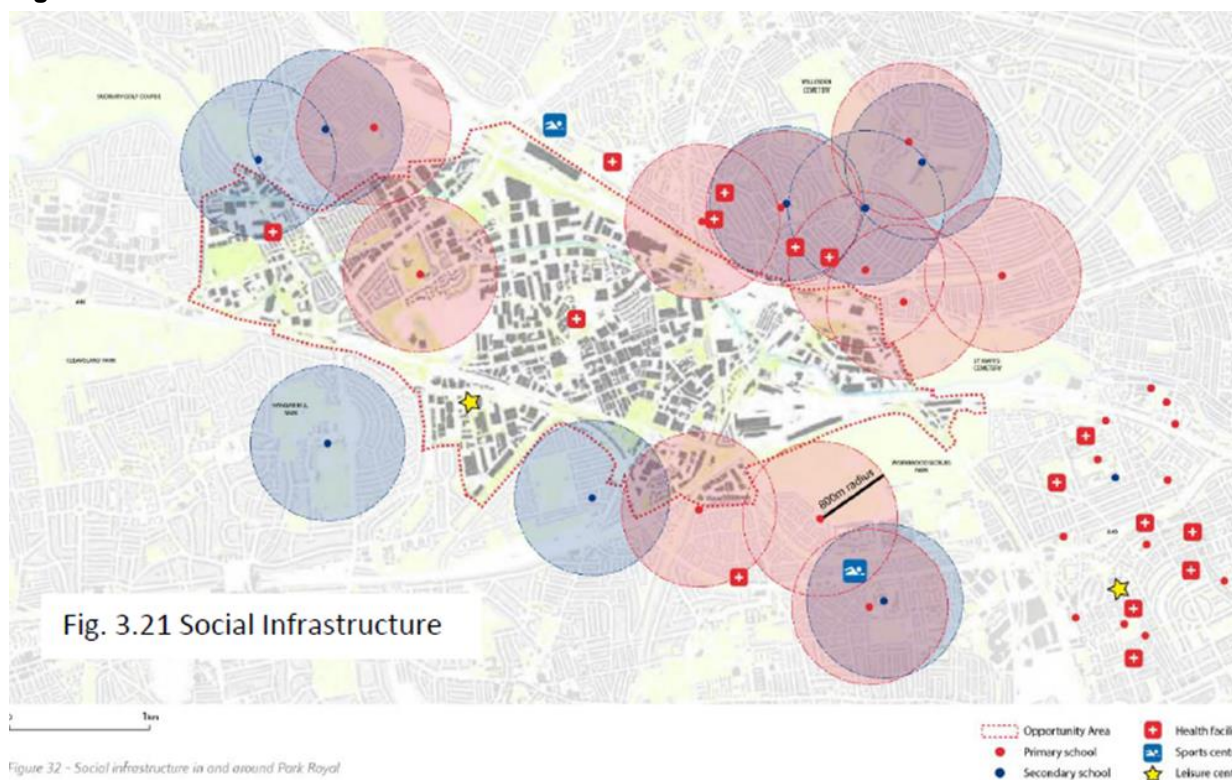


Figure 32 - Social infrastructure in and around Park Royal

Source: OAPF Draft IIA Report, GLA, February 2015



## C.3.5 Data Gaps and Uncertainties

- Proportion of population in area with access to hospital / GP / Dentist
- How children travel to school
- Play and open space quality, quantity and accessibility
- Further detailed information on disability and accessibility throughout the OPDC area and its buildings

## C.4 Crime

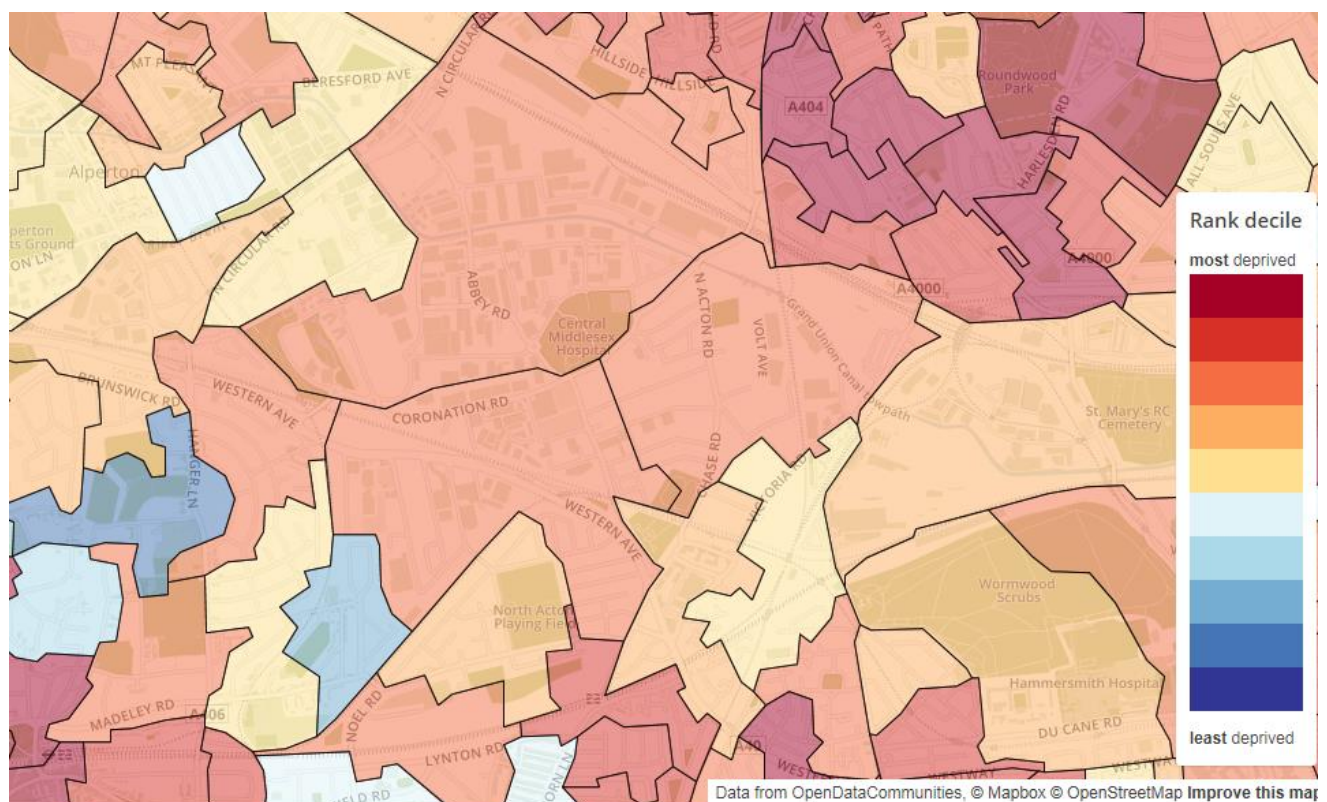
The following baseline data has been identified:

- Crime rates (Indices of Deprivation).
- Car theft
- Violence against persons (rank)
- Total Crime (rank)

### C.4.1 OPDC Area

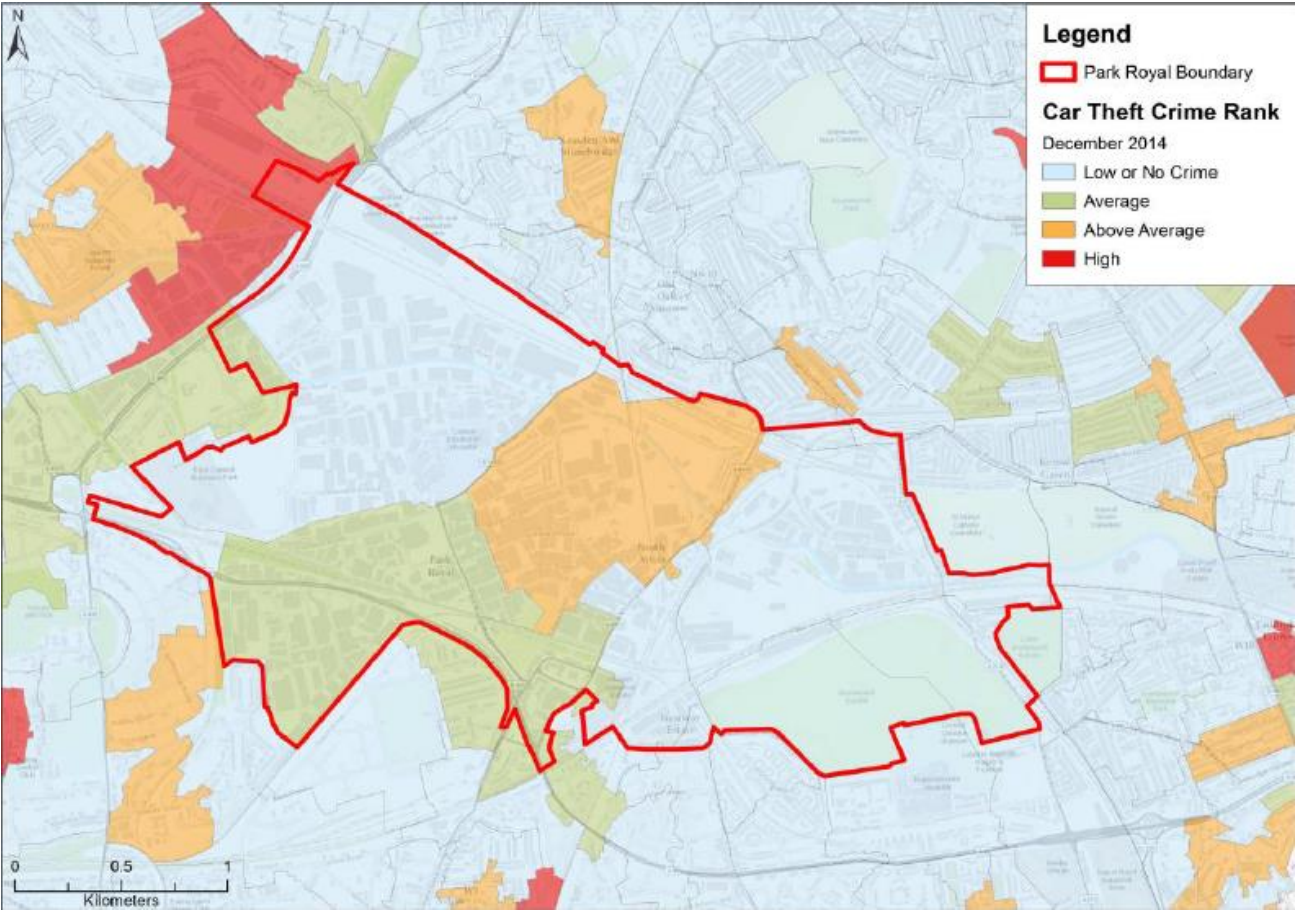
Crime in and around the OPDC area is predominantly violent crime or anti-social behaviour offences. The area is one of the more deprived areas of the country in terms of crime.

**Figure C4-1 Crime Deprivation in OPDC**



Source: Indices of Deprivation 2014

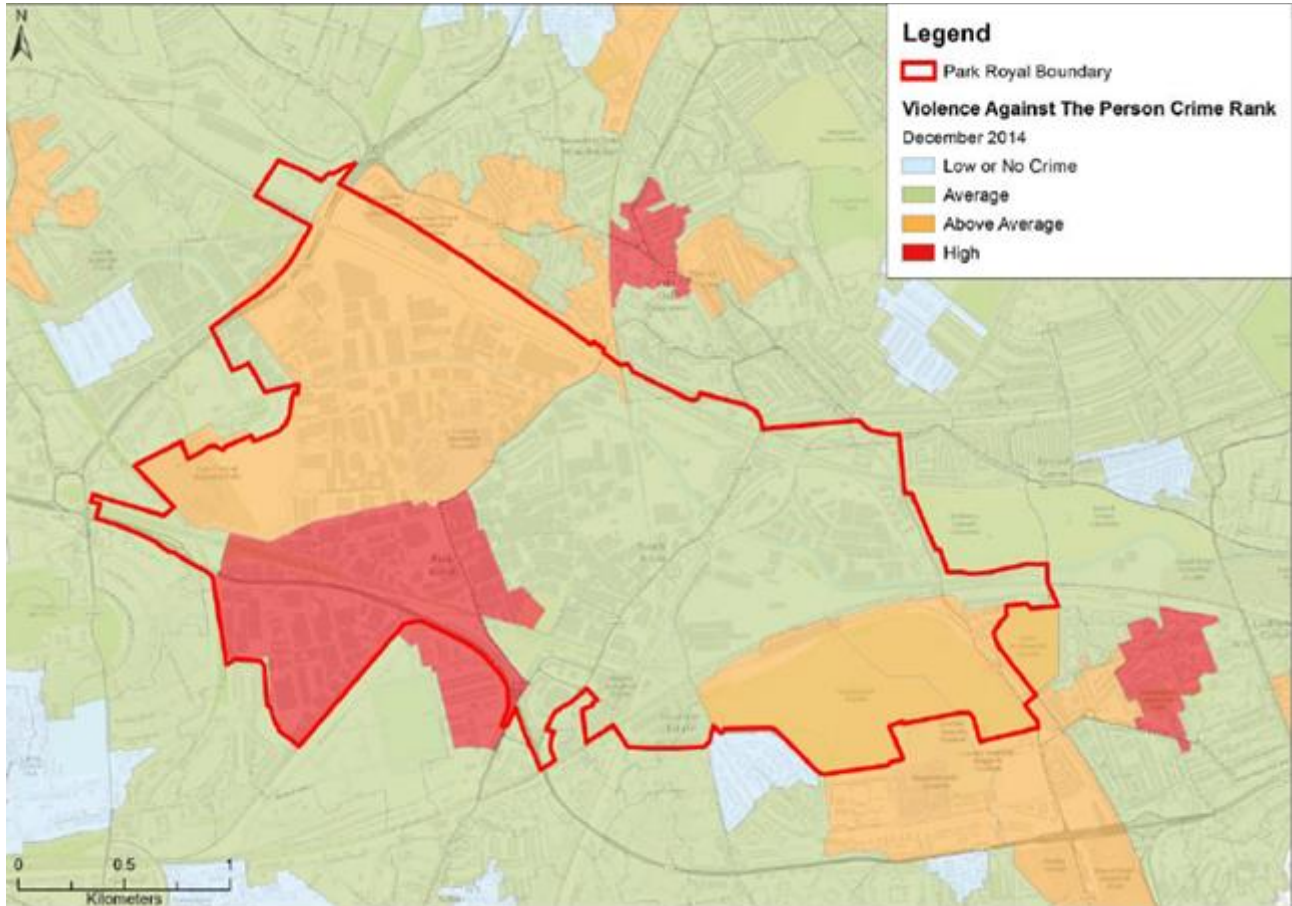
Figure C4-2 Car Theft



Source: OAPF Draft IIA Report, GLA, February 2015

Car theft is average or above average in the centre of the OPDC (see **Figure C4-2**). Violence against persons is also high or above average in the majority of the OPDC area. Given the industrial nature of the site, the Local Plan should seek to ensure that the design new development improves the safety and perceived safety of the community and their property.

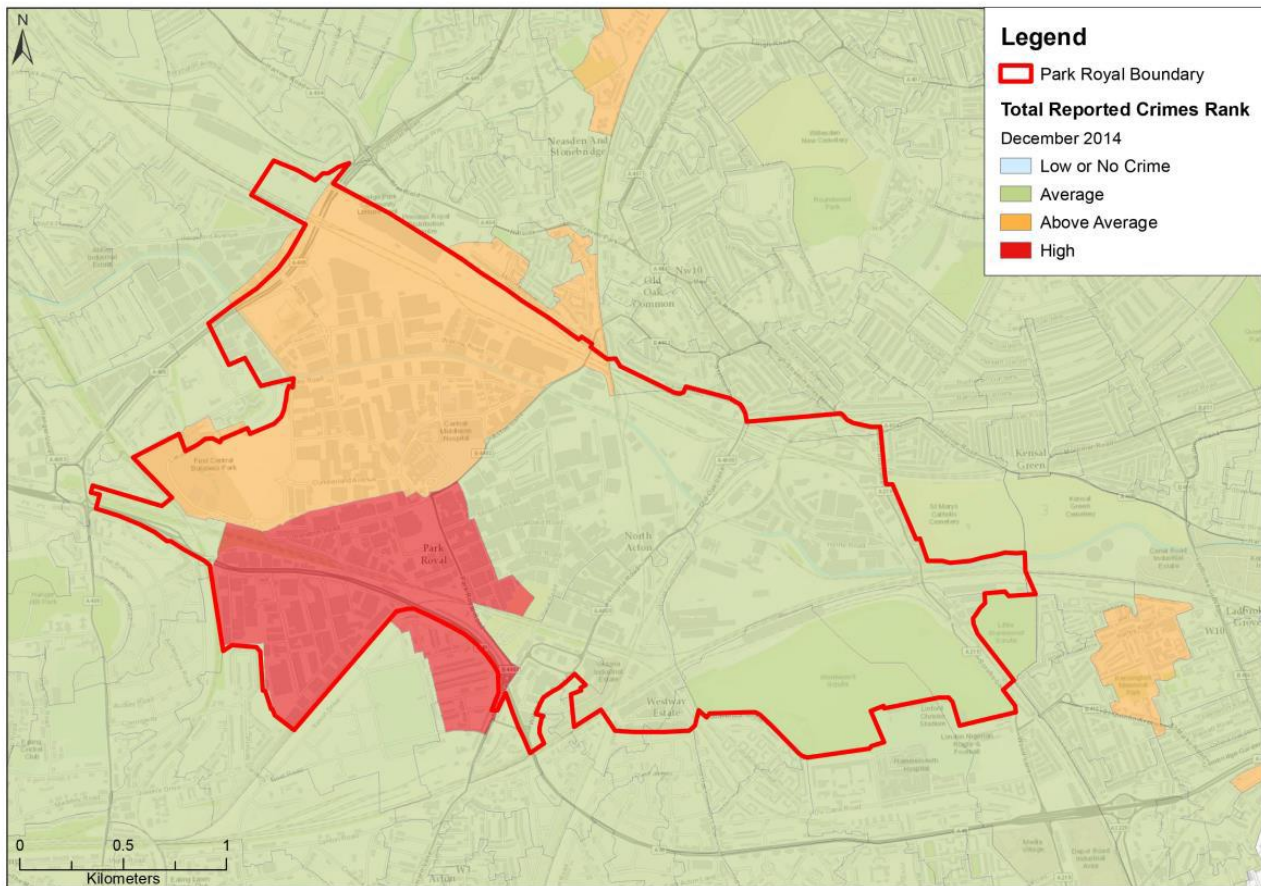
**Figure C4-3 Violence against Persons**



Source: OAPF Draft IIA Report, GLA, February 2015



**Figure C4-4 Total Crime Rank**



Source: OAPF Draft IIA Report, GLA, February 2015

## C.4.2 Data Gaps and Uncertainties

- Percentage of people who feel safe in the place where they live
- Percentage of people who feel safe travelling on public transport at night
- How to best incorporate influx of population

## C.5 Water

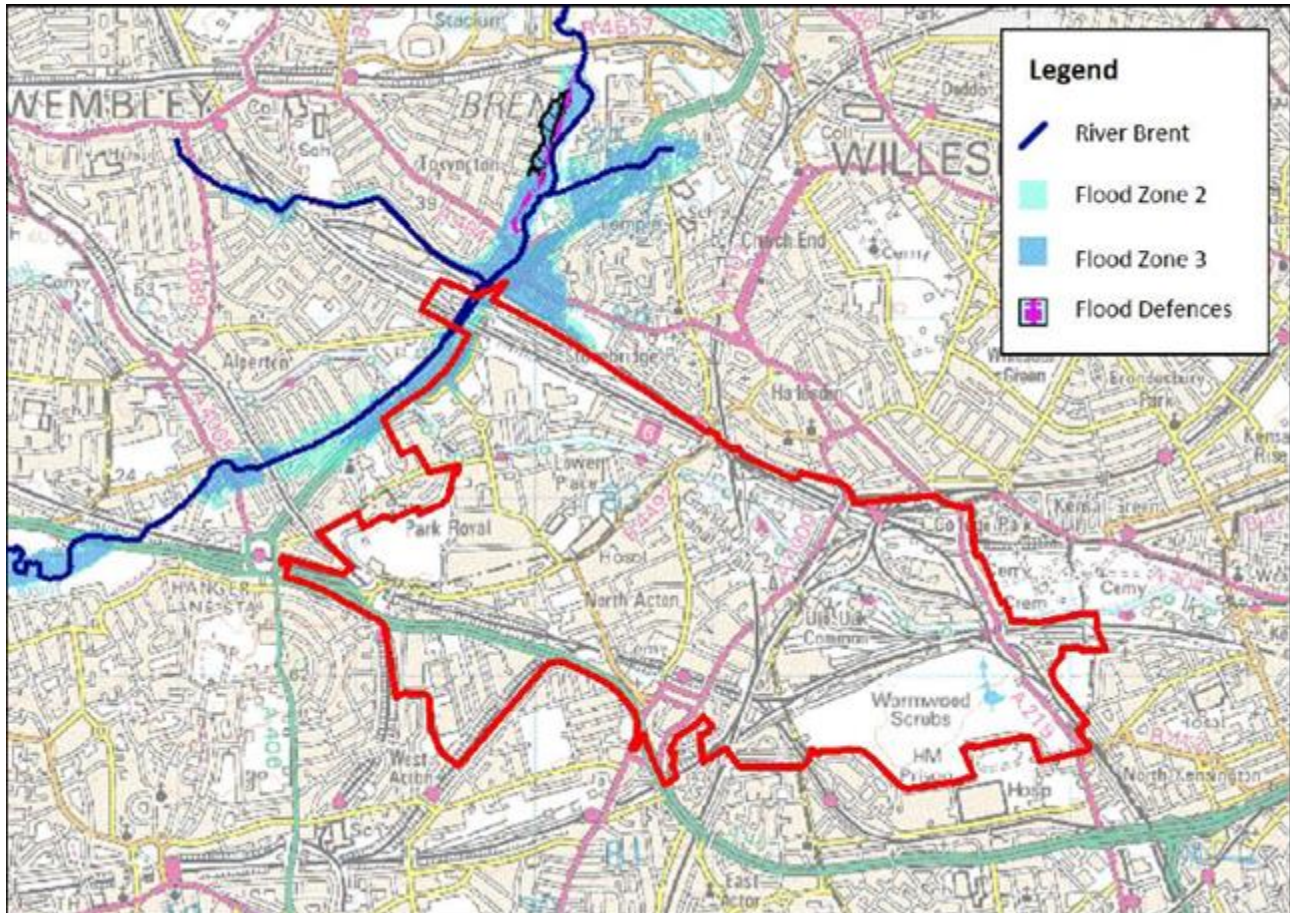
The following baseline indicators have been used to characterise the water environment within in the OPDC area:

- River catchment areas (Environment Agency Thames Catchment Flood Management Plan, 2009)
- Distribution of areas at risk of fluvial flooding (Environment Agency Fluvial Flood Map)
- Areas susceptible to surface water flooding (Environment Agency Surface Water Flood Map)
- Water and groundwater quality (Environment Agency).

## C.5.1 OPDC Area

Water is an essential resource required for both domestic and industrial use. The study area's western boundary follows the lie of the River Brent and the Grand Union Canal runs from west to east of the area. The main source of flood risk to the area lies fluvial flood risk at its western edge and from surface water puddling along the road network of area (Figures C5-1 and C5-2). There is particular risk around Old Oak Common station and the area immediately to the north of Central Middlesex Hospital in Park Royal. Fluvial flooding is associated with the River Brent. There are small areas of Flood Zone 2 and 3 in the north-western corner of the area.

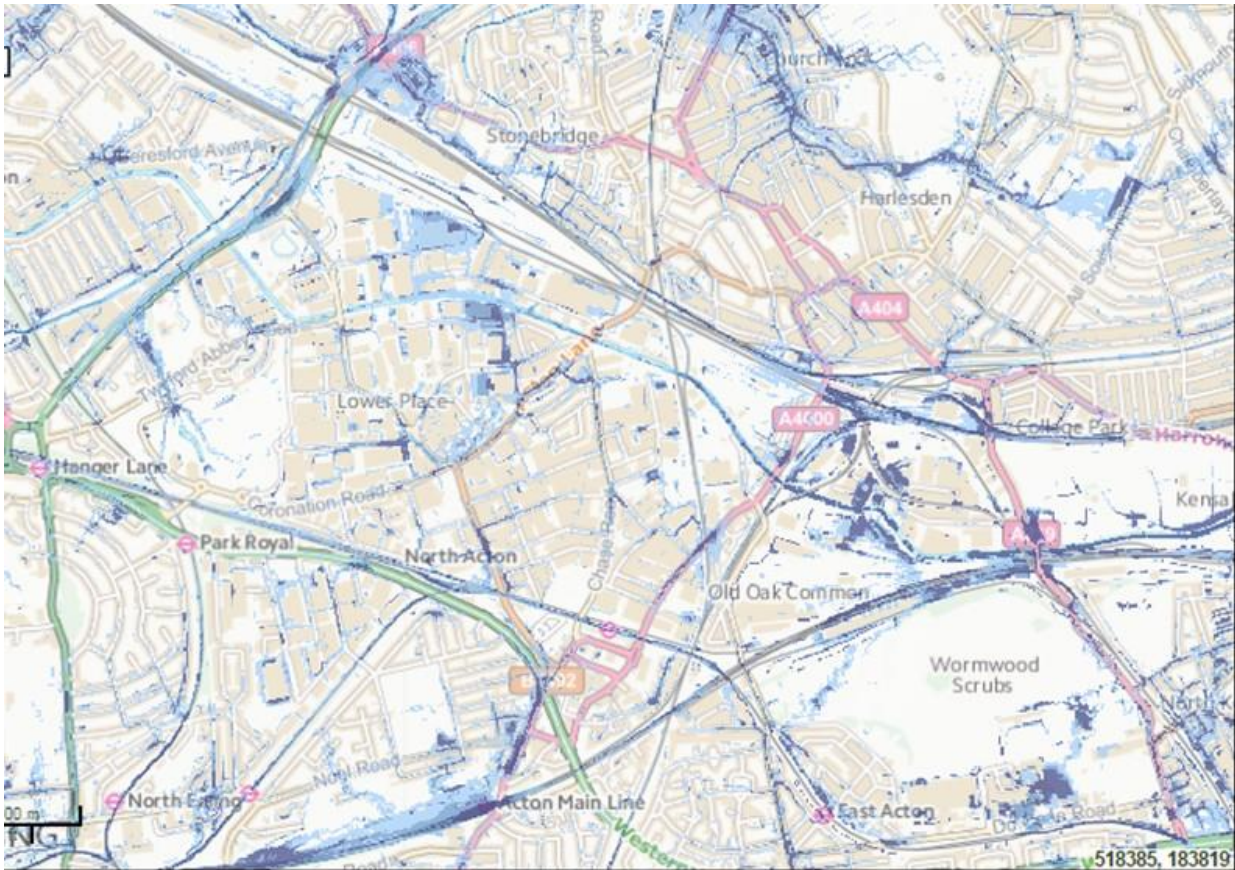
**Figure C5-1 Fluvial Flood Risk**



Source: Environment Agency Flood Map



**Figure C5-2 Surface Water Flood Risk in OPDC**



Source: Environment Agency Flood Map

Each Londoner on average consumed 161 litres of water per day compared to the England and Wales average of 149 litres per day. In the past 20 years, Thames Water has seen a 15% increase in water usage throughout London. This is equivalent to an increase of 10 litres per person per decade.

Both River Brent and Grand Union Canal are currently characterised as having poor water quality for their chemical and biological makeup. The Thames RBMP Actions for the Lower Brent indicate a desire to provide fish easement for three weirs between Brent Junction and Queensbury Road. Development within the OPDC area could contribute to an improvement in the watercourses' water quality overall.

## C.5.2 Data Gaps and Uncertainties

- Further objectives could be identified from adjoining Borough's Surface Water Management Plan
- Thames Water have indicated that Counters Creek is at capacity for any new influx into the combined sewer system – but formal assessment has not been identified.

## C.6 Soil and Land Quality

The following baseline indicators have been used to characterise the soil and land quality conditions across the borough and within the four London boroughs:

- Amount (hectares) of previously developed land available (Office for National Statistics Local Profiles).
- Number of active / historic landfills on the site (Environment Agency)

### C.6.1 OPDC Area

The 2010 ONS Local Profile in **Table C6-1** highlights the amount of previously developed land available in the three boroughs that make up the Old Oak and Park Royal Development Corporation. This reflects the high density urban environment of the borough.

**Table C6-1 Previously Developed Land**

	Vacant land Hectares	Vacant buildings Hectares	Derelict land and buildings Hectares	Land currently in use with known potential Hectares	Land that is unused or may be available for redevelopment Hectares
<b>Ealing</b>	0	0	0	0	140
<b>Hammersmith and Fulham</b>	0	10	0	0	100
<b>Brent</b>	0	20	30	10	150
<b>London</b>	640	330	270	340	3,660

Source: ONS Local Profiles

According to the Environment Agency website there is one historic landfill within the area boundary (Twyford Service Station). The last waste received at this site was in 1968. However there are other sites, particularly within Old Oak which will need to be relocated and the waste apportionment dealt with due the proposed change in land use of the area.

### C.6.2 Data Gaps and Uncertainties

- Area of contaminated land returned to beneficial use
- Type of contaminants within the OPDC area
- Extent of current and historic waste sites and waste transfer sites

## C.7 Air Quality

The following baseline indicators have been used to identify environmental conditions and key trends:

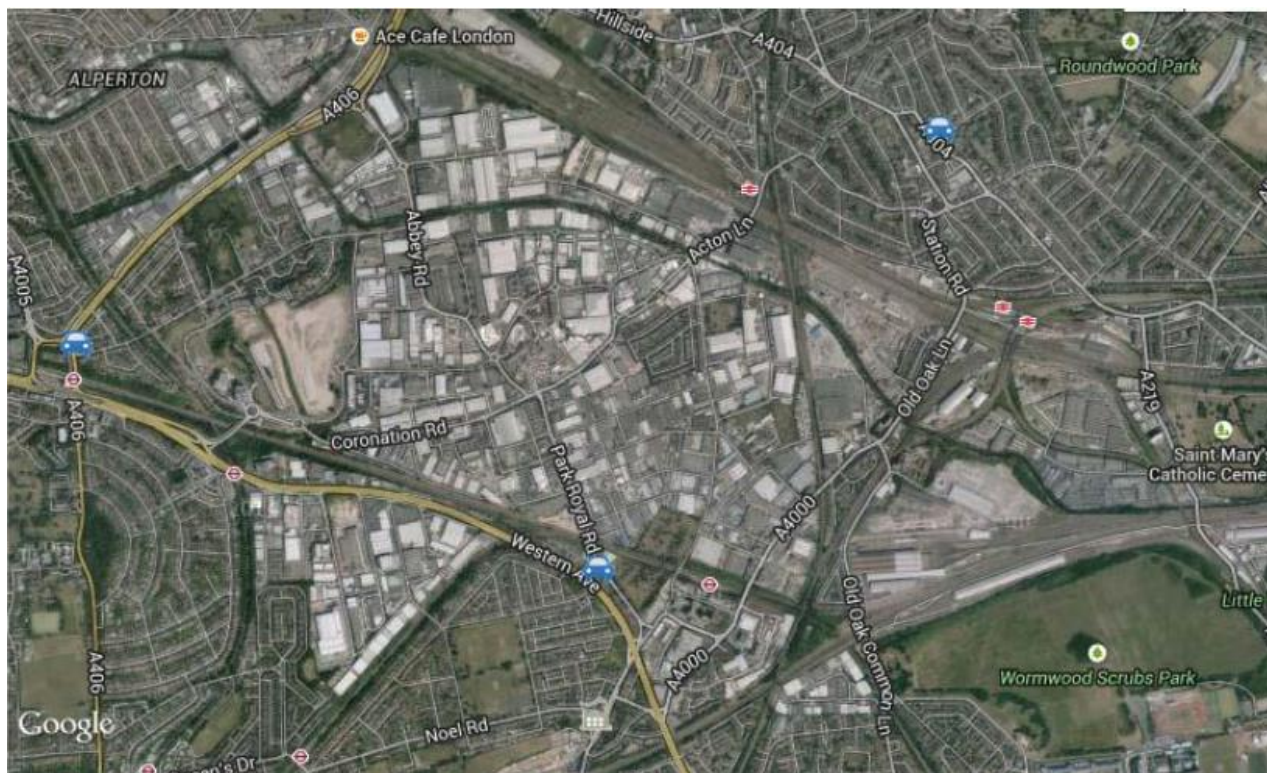
- Number and distribution of Air Quality Management Areas (AQMA) (Air Quality Archive<sup>14</sup>)
- Monitoring data for NO<sub>2</sub> and PM<sub>10</sub>

### C.7.1 OPDC Area

The principal threat to clean air in London comes from road traffic. Poor air quality can damage people's health and quality of life. It can pose particular problems for vulnerable groups such as the elderly, young children and people suffering from respiratory diseases.

AQMAs are designated when local authorities have identified locations where national air quality objectives are unlikely to be achieved. The whole of the OPDC area is considered to be within an AQMA for levels of NO<sub>2</sub> and PM<sub>10</sub>. Each of the three boroughs have identified the same exceedances and types of pollutants. There are three monitoring sites though only two are within the OPDC boundary itself as shown in **Figure C7-1**. Hanger Lane Gyratory (Ealing) Air Quality monitoring Station in operation since 2003 and Western Avenue Air Quality Monitoring Station in operation since 2010 are roadside stations located at the southern boundary of the OA and are operated to LAQN standards. The highest recorded annual mean (see **Figure C7-3**) (1st January 2014 – 1st January 2015) of Nitrogen Dioxide (NO<sub>2</sub>) concentration was measured at Hanger Lane Gyratory (67.6 $\mu$ g/m<sup>3</sup>) followed by Western Avenue at 64.367.6 $\mu$ g/m<sup>3</sup> both exceeding the objective mean of 40 $\mu$ g/m<sup>3</sup>. There are areas of high NO<sub>2</sub> concentrations in the OPDC area, particularly along the strategic highway network.

**Figure C7-1 AQMA in the OPDC**



Source: Defra

<sup>14</sup> <http://uk-air.defra.gov.uk/aqma/maps>



**Figure C7-2 AQMA Objectives**

National air quality objectives and European Directive limit and target values for the protection of human health							
Pollutant	Applies	Objective	Concentration measured as <sup>10</sup>	Date to be achieved by and maintained thereafter	European obligations	Date to be achieved by and maintained thereafter	New or existing
Particulates (PM <sub>10</sub> )	UK	50µg.m <sup>-3</sup> not to be exceeded more than 35 times a year	24 hour mean	31 December 2004	50µg.m <sup>-3</sup> not to be exceeded more than 35 times a year	1 January 2005	Retain existing
	UK	40µg.m <sup>-3</sup>	annual mean	31 December 2004	40µg.m <sup>-3</sup>	1 January 2005	
	Indicative 2010 objectives for PM <sub>10</sub> (from the 2000 Strategy and 2003 Addendum) have been replaced by an exposure reduction approach for PM <sub>2.5</sub> (except in Scotland – see below)						
	Scotland	50µg.m <sup>-3</sup> not to be exceeded more than 7 times a year	24 hour mean	31 December 2010			Retain existing
	Scotland	18µg.m <sup>-3</sup>	annual mean	31 December 2010			
Particulates (PM <sub>2.5</sub> ) Exposure Reduction	UK (except Scotland)	25µg.m <sup>-3</sup>	annual mean	2020	Target value 25µg.m <sup>-3</sup> <sup>12</sup>	2010	New (European obligations still under negotiation)
	Scotland	12µg.m <sup>-3</sup>		2020	Limit value 25µg.m <sup>-3</sup>	2015	
	UK urban areas	Target of 15% reduction in concentrations at urban background <sup>11</sup>		Between 2010 and 2020	Target of 20% reduction in concentrations at urban background	Between 2010 and 2020	
Nitrogen dioxide	UK	200µg.m <sup>-3</sup> not to be exceeded more than 18 times a year	1 hour mean	31 December 2005	200µg.m <sup>-3</sup> not to be exceeded more than 18 times a year	1 January 2010	Retain existing
	UK	40µg.m <sup>-3</sup>	annual mean	31 December 2005	40µg.m <sup>-3</sup>	1 January 2010	
Ozone	UK	100µg.m <sup>-3</sup> not to be exceeded more than 10 times a year	8 hour mean	31 December 2005	Target of 120µg.m <sup>-3</sup> not to be exceeded more than 25 times a year averaged over 3 years	31 December 2010	Retain existing

Source: Defra

**Figure C7-3 Air Quality Monitoring data 1st January 2014-1st January 2015**

	Nitrogen Dioxide NO <sub>2</sub>	Particles PM <sub>10</sub>
Ealing - Western Avenue	64.3	29.3
Ealing - Hanger Lane Gyratory	67.6	25.4
Brent - John Keble Primary School	N/A	21.9

Source: OAPF Draft IIA Report, GLA, February 2015

## C.7.2 Data Gaps and Uncertainties

- Extent to which new development should adhere to the Mayor's Air Quality Neutral benchmark.
- How existing business can reduce reliance on road freight traffic with introduction of rail improvements

## C.8 Energy and Climate Change

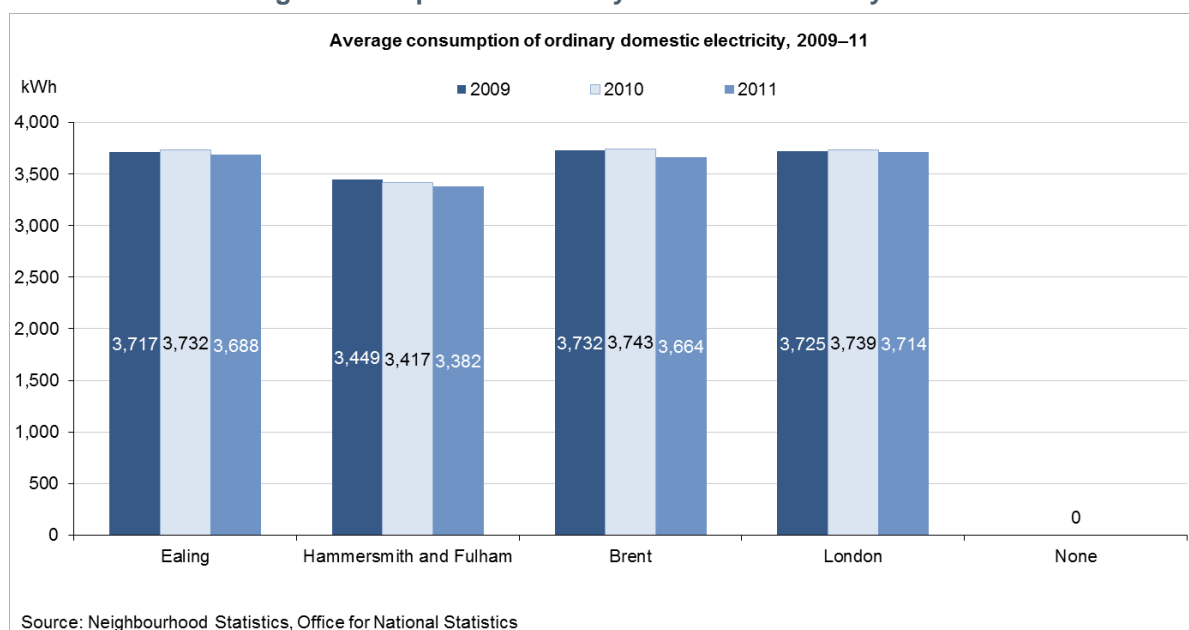
The following baseline indicators have been used:

- Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles).
- All energy consumption by sector (Office for National Statistics Local Profiles and DECC).

### C.8.1 OPDC Area

Although climate change is a global phenomenon, action to avoid its most serious effects and to minimise the emission of greenhouse gases needs to occur at a local level. The area will not be immune to the impacts of climate change, either directly or as a result of policy responses at the national and international levels.

**Table C8-1 Average consumption of ordinary domestic electricity**



Source: ONS Local Profiles

The three boroughs perform similarly when compared to London and each other for average consumption domestic electricity. The scale of development should seek to encourage as energy efficient development as possible, as well as consider the positive benefit of a site-wide decentralised energy network.

**Table C8-2 Energy Consumption by Sector**

## Energy consumption by sector

2011

	<b>Total</b>	<b>Industry and commercial</b>	<b>Domestic</b>	<b>Transport</b>
	<b>gWh</b>	<b>gWh</b>	<b>gWh</b>	<b>gWh</b>
<b>Ealing</b>	5,127	1,746	2,249	1,132
<b>Hammersmith and Fulham</b>	3,198	1,386	1,227	586
<b>Brent</b>	4,037	1,199	2,044	794
<b>London</b>	134,347	50,341	55,547	28,178

Source: ONS Local Profiles

The Planning and Energy Act 2008 allows local authorities to include policies in their local plan's setting out reasonable requirements for:

- A proportion of energy used in development in their area to be energy from renewable sources
- A proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development

The above policies should be carefully considered and balanced in the Local Plan with the need to ensure that the environment of the borough is not adversely affected.

## C.8.2 Data Gaps and Uncertainties

- Area specific energy data
- Greenhouse gas emissions data
- Levels of energy efficiency in homes and commercial buildings
- Energy consumption in industrial units within Park Royal and Old Oak

## C.9 Biodiversity, Flora and Fauna

The following baseline indicators have been used to characterise conditions across the four boroughs and within the LLDC area boundary:

- Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Local Wildlife Sites (LWS) (MAGIC, [www.magic.gov.uk](http://www.magic.gov.uk) and Local Authority websites).
- Key Biodiversity Action Plan (BAP) species and habitats present (London BAP).

### C.9.1 OPDC Area

London is a surprisingly green city and approximately 48% is surfaced in vegetation, rivers and still waters. London supports thousands of species, from algae and fungi to molluscs and mammals

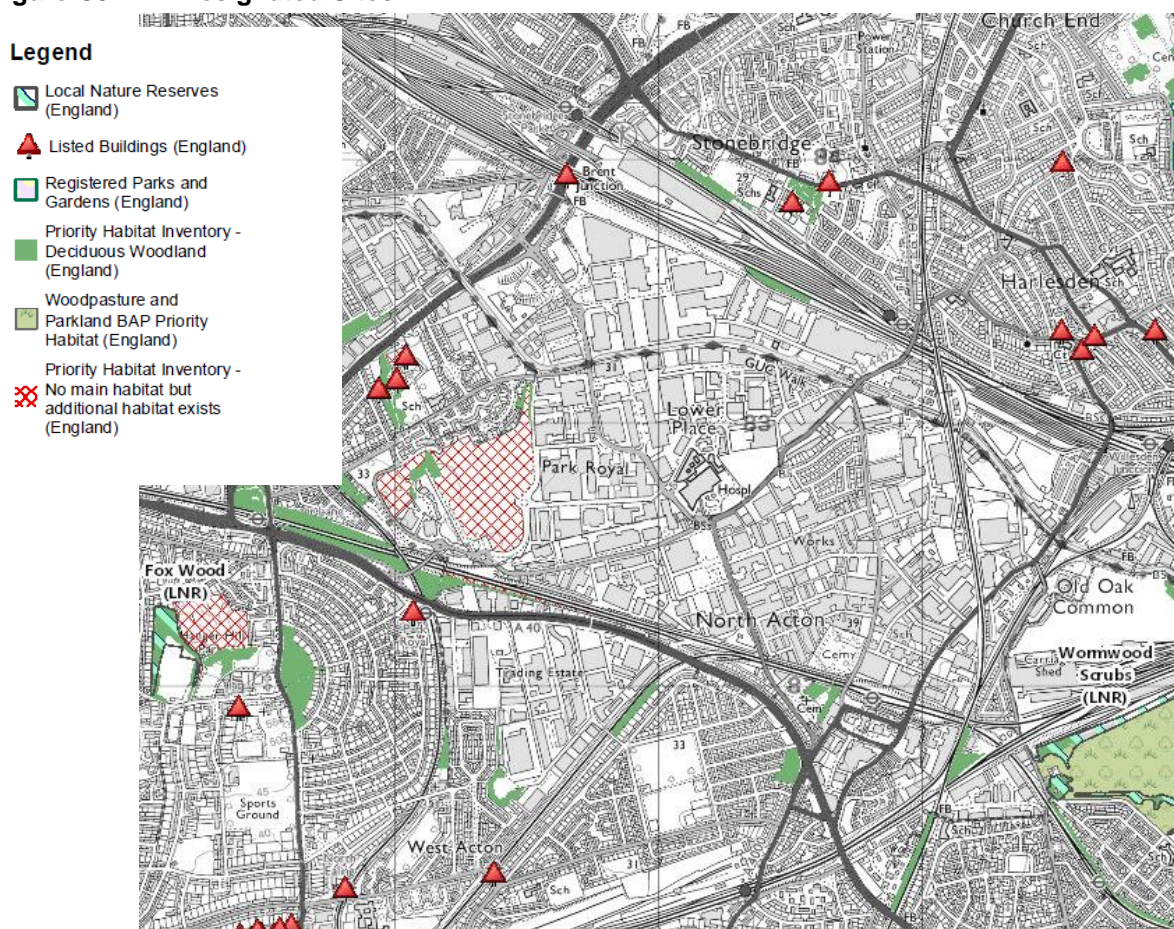
Within the OPDC area there are no SACs, SPAs, Ramsar sites, SSSIs or NNRs. There is one LNR: Wormwood Scrubs. The Grand Union Canal and adjacent area in Old Oak South is a nature conservation area of Metropolitan Importance. Other designated sites in proximity to the plan area are listed in **Table C9-1**.

**Table C9-1 Closest statutory sites of international, national and local nature importance**

Site Name	Designation	Approximate direction and distance from the OPDC area
Wormwood Scrubs	LNR	Within OPDC boundary
Fox Wood	LNR	675 metres, southwest
Westbere Copse	LNR	3.4km, northeast
Barn Elms Wetland Centre	SSSI	4.4km, south
Richmond Park	SAC	6.9km, south
Wimbledon Common	SAC	8km, south

Wormwood Scrubs Local Nature Reserve's habitat and species should be protected and enhanced.

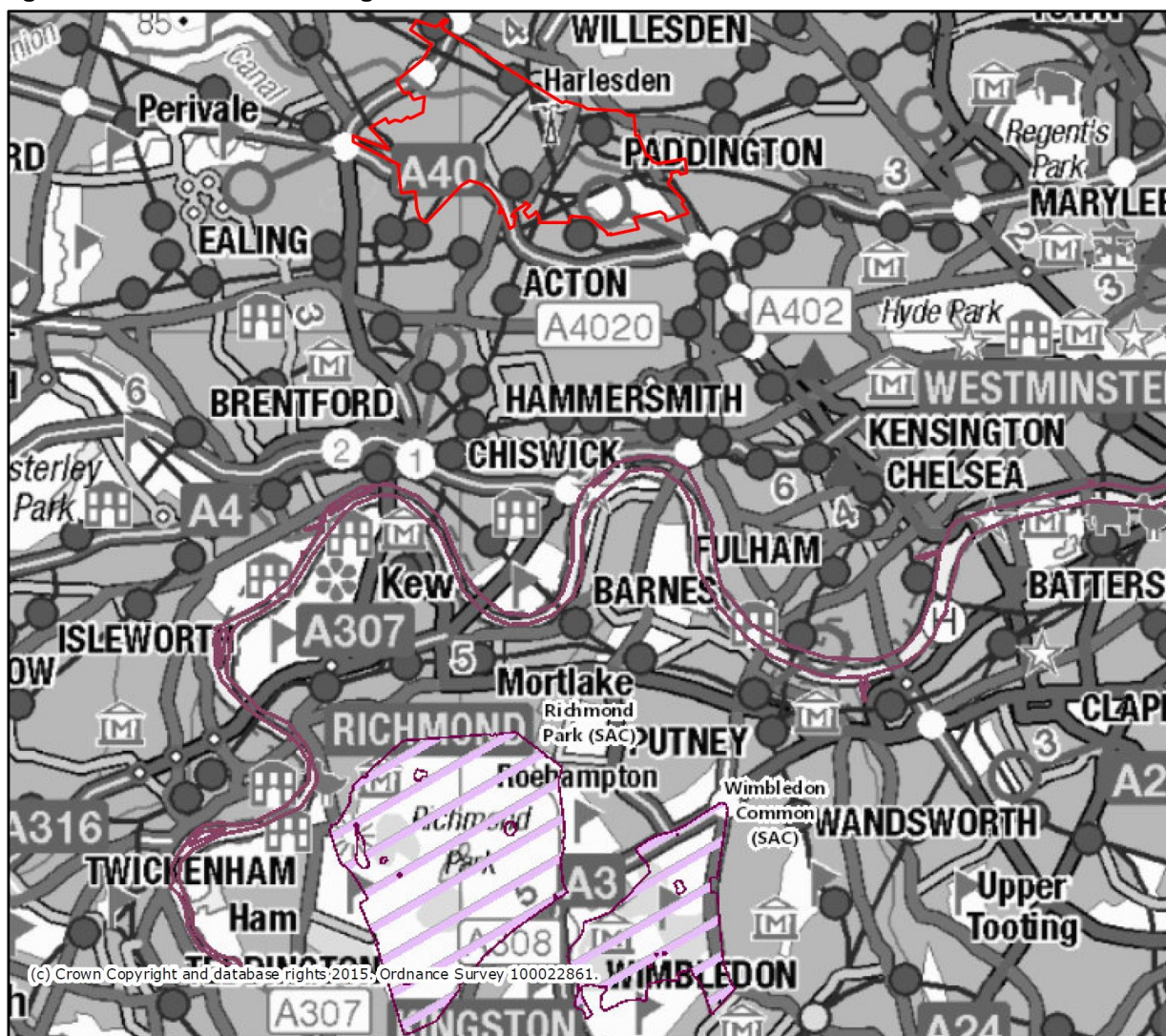
**Figure C9-1 Designated Sites**



Source: Magic.gov.uk, 4 August 2015



Figure C9-2 International Designations



Source: Magic.gov.uk, 4 August 2015

The area presents an opportunity to create and protect other sites within the boundary as well as promote green habitat connectivity to areas outside the boundary.

The UK government published 'Biodiversity: The UK Action Plan' in 1994. This plan combined new and existing conservation initiatives with an emphasis on a partnership approach. It contains 59 objectives for conserving and enhancing species and habitats as well as promoting public awareness and contributing to international conservation efforts. Following on from the initial strategy publication, 391 Species Action Plans (SAPs) and 45 Habitat Action Plans (HAPs) were published for the UK's most threatened (i.e. "priority") species and habitats. In addition there are approximately 150 Local Biodiversity Action Plans, normally at county level. These plans usually include actions to address the needs of the UK priority habitats and species in the local area, together with a range of other plans for habitats and species that are of local importance or interest (Biodiversity Action Reporting System<sup>15</sup>).

The London BAP is made up of many individual species and habitat plans. Each plan gives information on the status and threats to the species or habitat. London BAP species and habitats include the following:

#### Habitat Action Plans

- Acid grassland

<sup>15</sup> <http://www.ukbap-reporting.org.uk/>

- Chalk grassland
- Heathland
- Parks and urban greenspaces
- Private gardens
- Reedbeds
- Rivers and streams
- Standing water
- Tidal Thames
- Wasteland
- Woodland

#### **Species Action Plans**

- Bats
- Black poplar
- House sparrow
- Mistletoe
- Reptiles
- Sand martin
- Stag beetle
- Water vole

Source: London BAP<sup>16</sup>

## **C.9.2 Data Gaps and Uncertainties**

- No records of other priority habitats and species within the boundary area
- Data relating to biodiversity on brownfield land/railway sidings in particular
- Data relating to the connectivity of greenspaces and the mapping of any greenspaces (non-designated) across the area

## **C.10 Cultural Heritage**

The following baseline indicators have been used to characterise the heritage baseline:

- Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens<sup>17</sup>.
- Historic England Heritage Assessment of Old Oak<sup>18</sup>

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<sup>16</sup> <http://www.lbp.org.uk/londonpriority.html>

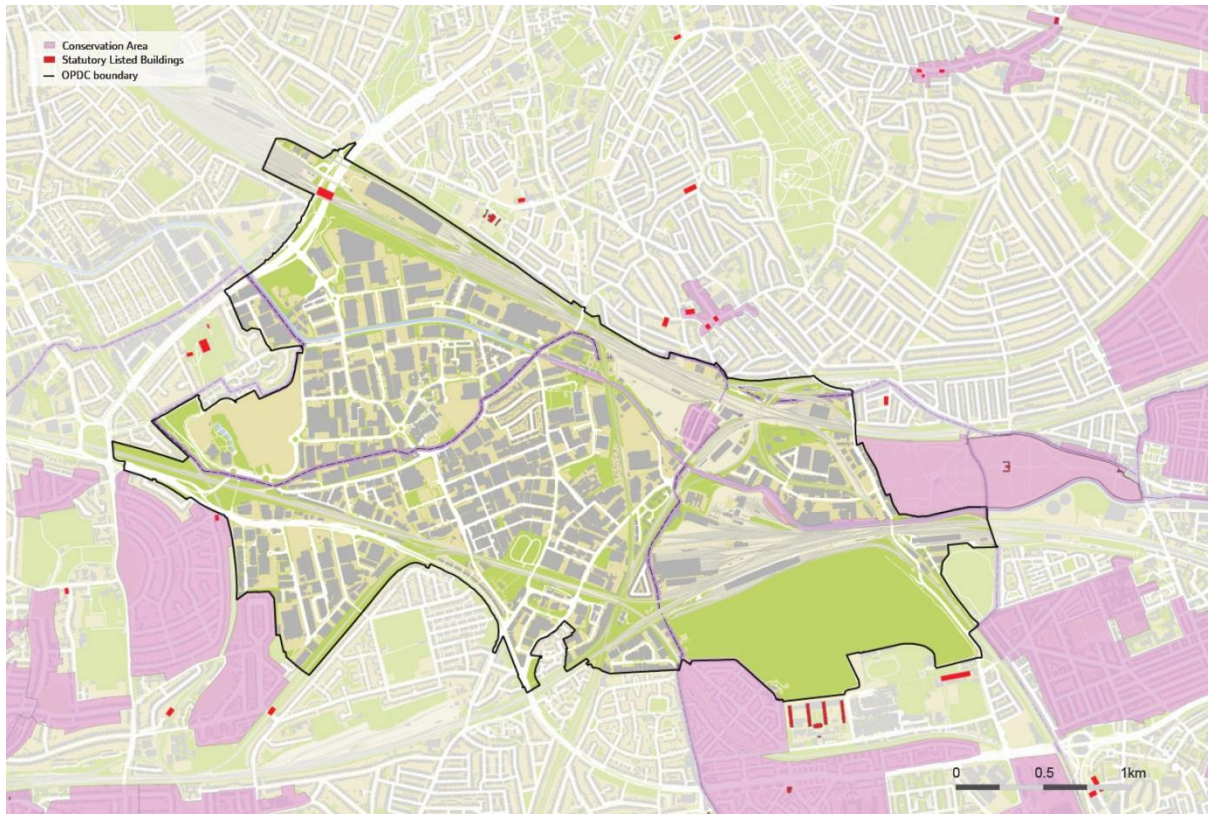
<sup>17</sup> [www.magic.gov.uk](http://www.magic.gov.uk)

<sup>18</sup> <http://research.historicengland.org.uk/redirect.aspx?id=6294>

## C.10.1 OPDC Area

There is one listed asset within the OPDC area – Brent Viaduct.

**Figure C10-1 Sites of Cultural and Archaeological Importance**



Source: OAPF Draft IIA Report, GLA, February 2015

There are no SAMs within the area.

Within the boundary there are 2 Conservation Areas, these include:

- Old Oak Lane; and
- along Grand Union Canal.

Adjacent to the study area are the St. Mary's Conservation Area in Hammersmith and Fulham, which includes the St Mary's Cemetery and parts of the Kensal Green Cemetery. The Kensal Green Cemetery Conservation Area in The Royal Borough of Kensington and Chelsea includes the majority of the listed buildings and monuments and the majority of the Registered Park and Garden (Grade I registered Park and Garden of special historic interest which contains the Grade I listed Anglican Chapel, twelve Grade II\* listed buildings or monuments and 147 Grade II listed buildings or monuments).

Within the surrounding area, the following conservation areas may also be affected by development within the OPDC area:

- Harlseden;



- Old Oak and Wormholt;
- Hangerhill Garden Estate; and
- Hagerhill (Hay Mills) Estate.

Prior to the mid-nineteenth century, Old Oak Common area was common-ground and farmland sitting beside the Grand Junction Canal (now the Grand Union Canal) from its development in 1794. With the arrival of the railways in 1838 and their expansion into the twentieth century, industry shortly followed along the railways and the canal making use of these connections. By the late nineteenth century, Old Oak Common had been transformed into an industrial area home to heavy industries and works supporting the railways.

Following the First World War, the increase in motorised transport saw the arrival of motor car production with Park Ward manufacturing Rolls Royce vehicles at its site on Hythe Road. In the latter half of the twentieth century, redevelopment of some of the Victorian industrial buildings for lighter industry and office floorspace was carried out reflecting the restructuring of the national economy.

To the west in Park Royal, the area generally known as Twyford was farmland until the Royal Agricultural Show took place from 1903 to 1905 (which provides the area's name). Following 1905, the industrial character began to emerge with the area used as a munitions factory during the First World War alongside manufacturing and food production. By 1932 there were 73 factories employing 13,500 workers which grew to over 45,000 in the 1960s following relatively light bomb damage in the Second World War and the post-war boom period. Through the latter part of the twentieth century, industrial restructuring saw the relocation of large multinational firms, such as Heinz, away from Park Royal.

Other notable listed buildings whose setting could be affected by development in the Opportunity Area include the Grade II\* listed gatehouse and chapel at Wormwood Scrubs Prison, the Church of All Souls Harlesden (also Grade II\*), and thirteen Grade II listed buildings within 250m of the boundary. Further afield are Statutory Listed buildings, the closest being Kenmont Primary School and Park Royal Underground Station.

The Old Oak Common and Park Royal areas have a disparate assortment of railway and industrial heritage that play a valuable role in informing the evolving character of the area. Specific collections of non-designated heritage assets are located along the east of Scrubs Lane, the interwar Rolls Royce works and Acava Studios on Hythe Road. The OPDC would be seeking to designate and manage new Conservation Areas and a Local List.

A significant number of the heritage assets listed above are on English Heritage's Heritage at Risk Register. These include Kensal Green Cemetery, as well as 35 monuments within it, including the Anglican Chapel. Twyford Abbey to the west of the opportunity area is also a long standing Heritage at Risk case.

Whilst there are at present no archaeological priority areas within the proposed local plan area, the Greater London Historic Environment Record holds information on several archaeological investigations, sites and finds. Notably the site of Acton Wells 18th century spa is located within the Opportunity Area. The open ground of Wormwood Scrubs was the site of a rifle range and anti-aircraft battery and may preserve as yet undiscovered earlier remains. The Grand Junction Canal and Old Oak Common area include aspects of railway and industrial archaeological interest. The 19th century Park Royal cemetery would also be of interest if subject to redevelopment.



## C.10.2 Data Gaps and Uncertainties

- Planning permissions adversely affecting known or potential designated assets (historic buildings, archaeological sites etc.)
- Boroughs' Local Lists of Heritage Assets

The following baseline indicators have been used to characterise the landscape and townscape baseline:

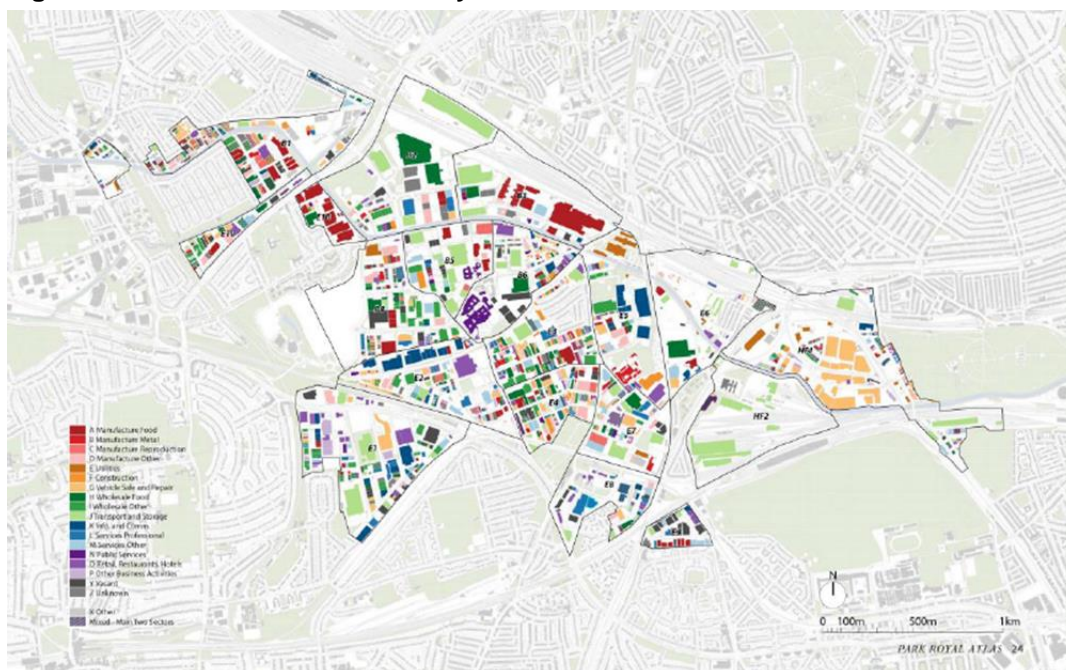
- Designated sites
- Land uses on the study area
- Conservation Areas
- Open Space

## C.11.1 OPDC Area

There are no Areas of Outstanding Natural Beauty (AONBs) within OPDC.

The OPDC area comprises a largely industrial townscape with its edges influenced by more residential spaces. Railway infrastructure is a dominant feature across the site.

**Figure C11-1 Land Uses in the Study Area**



Source: OAPF Draft IIA Report, GLA, February 2015

The study area lies between two catchment areas – River Brent and the lost river of Counters Creek (now a combined sewer). Park Royal is predominantly warehousing and industrial units with Central Middlesex Hospital in the centre of it.

Old Oak is industrial units with the Cargiant site a dominant feature. At present a Crossrail depot is also being built there.

There is a Conservation Area along Old Oak Lane and along Grand Union Canal. The old Rolls Royce factory forms part of Old Oak.

Along the south-eastern boundary lies Wormwood Scrubs Park which is grassland and some woodland. The eastern boundary is Kensal Green Cemetery. While there are substantial areas of green space on the

periphery of the plan area, the industrial nature of the area means that most parts have a severe open space deficiency. Integration with the All London Green Grid Area Frameworks is an important consideration.

## C.11.2 Data Gaps and Uncertainties

- Number of noise and light pollution complaints
- Percentage of new housing completions in area achieving design standards such as Building for Life and Lifetime Homes

## C.12 Waste

The following baseline indicators have been used to characterise the existing conditions:

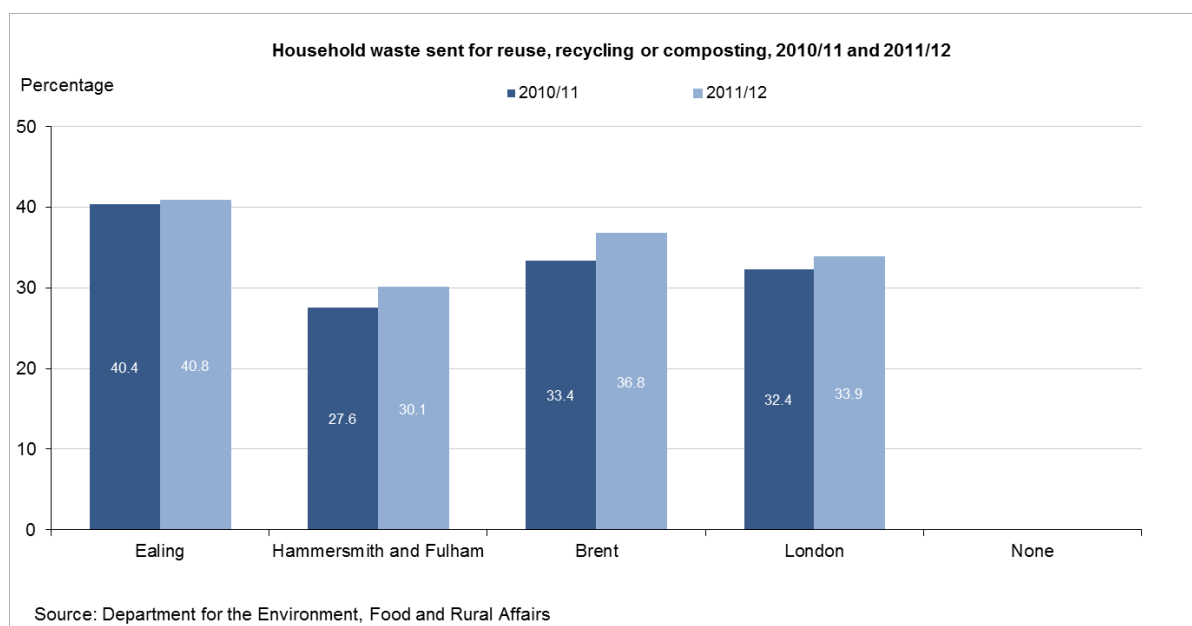
- Percentage of household waste sent for reuse, recycling or composting (ONS Local Profiles).
- Amount of residual waste per household (ONS).
- Amount of commercial and industrial waste produced (Defra).

### C.12.1 OPDC Area

There are no area-specific statistics for the study area.

Recycling rates are higher for Ealing compared to Brent, Hammersmith & Fulham and London as a whole though they have increased between 2010 and 2012 (**Table C12-1**).

**Table C12-1 Household Waste Sent for Reuse, Recycling or Composting**



There is currently no data available on the municipal waste sent to landfill in the area.

There are several waste sites within the area:

- European Metal Recycling
- Powerday
- Capital Waste Ltd
- UK Tyre Exporters
- O'Donovan's Waste Disposal Ltd.

## C.12.2 Data Gaps and Uncertainties

- Percentage of municipal waste sent to landfill in study area.
- Waste facilities available in each borough and how to deal with apportionment

## C.13 Transportation

The following baseline indicators have been used to characterise the existing conditions across the borough:

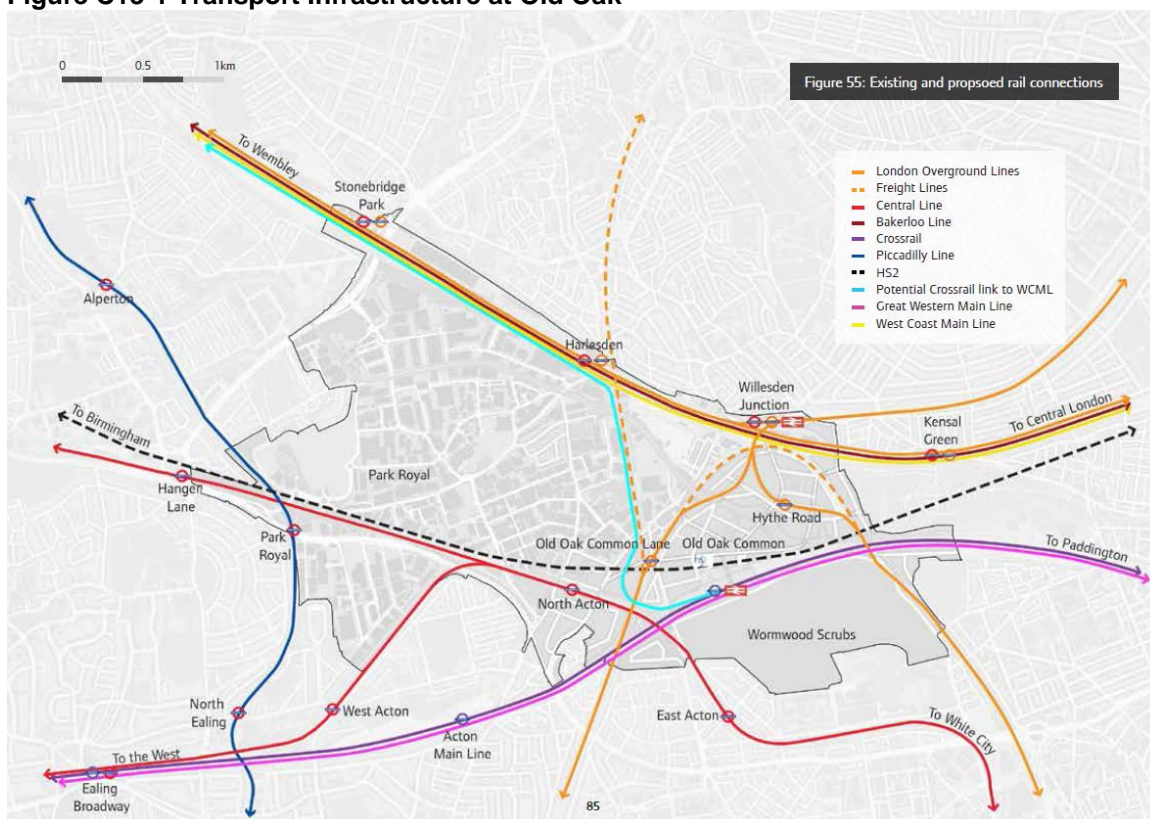
- Distribution of major transport systems – roads, rail links
- Draft Old Oak and Park Royal Opportunity Area Planning Framework, Transport Strategy, February 2015

### C.13.1 OPDC Area

The Transport Strategy made a number of high level assumptions and modelled the impacts of area's proposals. It didn't take into account the transport impacts resulting from the relocation of existing activities. Further work is being explored to consider these elements. There is also a number of transport proposals identified which are contingent on land coming available which is likely to be beyond the 2031 timescales.

The new Old Oak Common station and surrounding interchange will be the key driver for development in the area and will be the focus of future transport connections. HS2 will provide 18 trains per hour between Old Oak and the North, with Birmingham Airport just 31 minutes from Old Oak. The new Crossrail station at Old Oak will provide up to 24 trains per hour into central London, as well as services towards Heathrow and Reading. The presence of a Crossrail station will be one of the most important transport connections to the site, providing a significant increase in rail capacity to the West End, City and Canary Wharf. Crossrail will provide excellent regional and sub-regional connectivity to Old Oak.

**Figure C13-1 Transport Infrastructure at Old Oak**



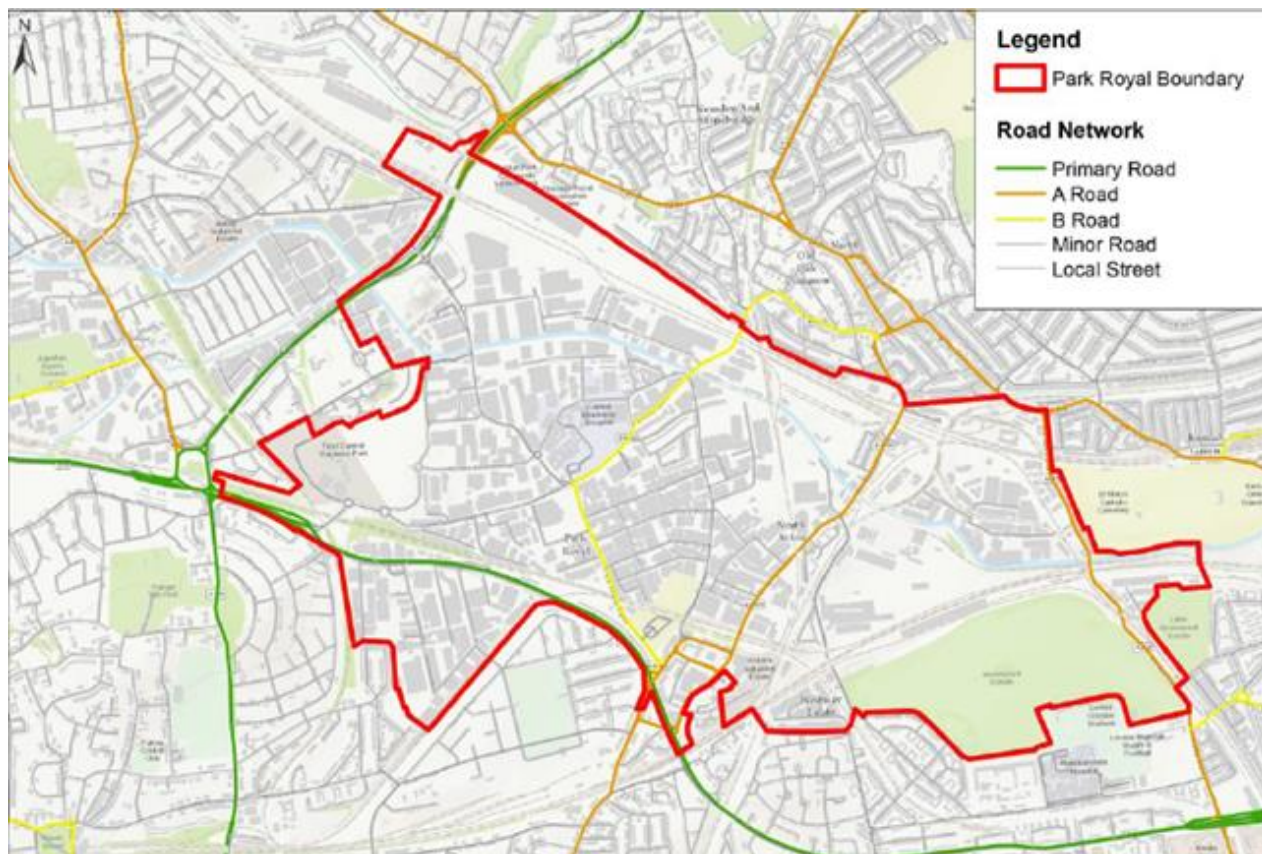
Source: OAPF Transport Strategy, GLA, February 2015



The study didn't consider the impacts of the number of homes being proposed nor the number of jobs. As such this needs careful consideration in the Local Plan.

Old Oak and Park Royal generate a significant number of road freight movements. The current road network is shown in **Figure C13-2**. Park Royal is home to London's largest industrial area and has significant wholesale, transport and warehouse activity. Any new proposals must consider the existing road users and capacity requirements, along with ensuring improvements in non-road transport, such as rail and by foot or cycle.

**Figure C13-2 Road Network**



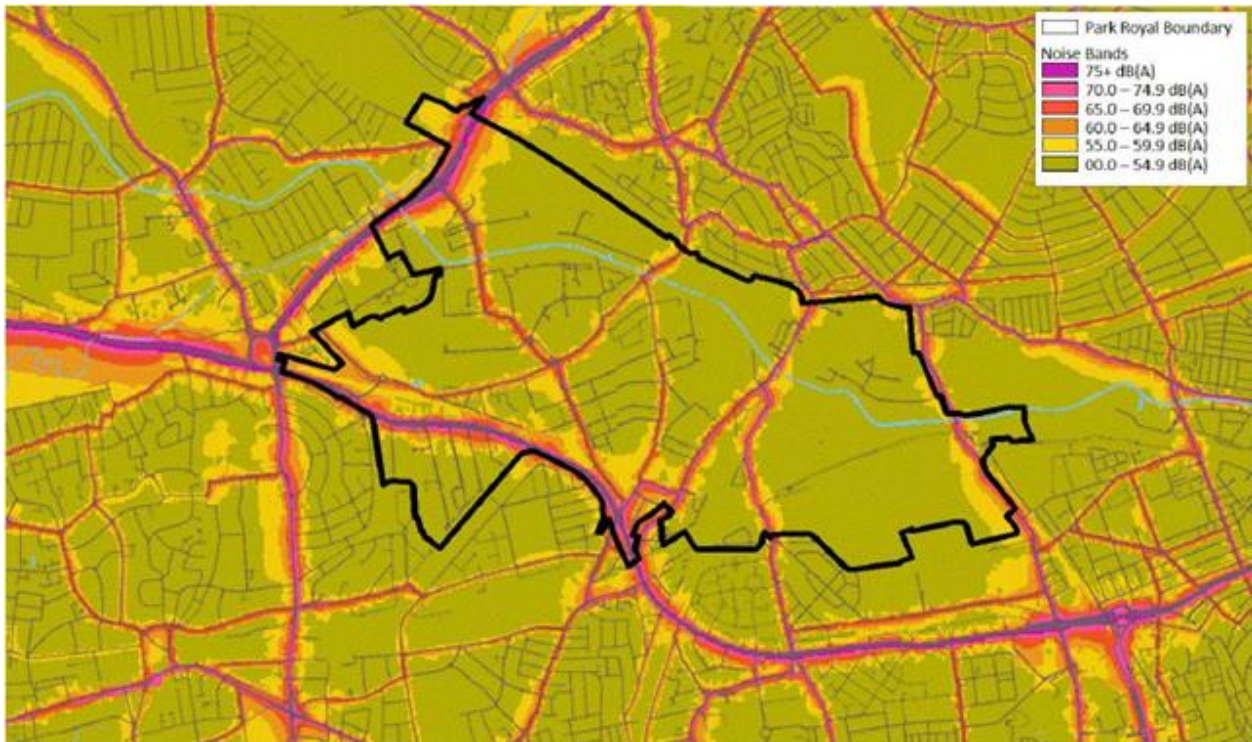
Source: OAPF Draft IIA Report, GLA, February 2015

The Grand Union Canal presents a great opportunity for both water travel and freight movements as well as footpaths and should be considered a strategic transport link within the area.

Noise is defined as unwanted sound. Sensitive receptors to noise include residential areas, educational facilities, health care facilities and places of worship. Road and rail noise are significant contributors to the ambient noise environment, particularly around the town centre and main distributor roads. Department for Environment, Food and Rural Affairs (Defra) Online road, rail and industrial noise mapping shows the extent to which these noise sources may affect sensitive receptors. Built up areas shield unwanted sound and cause the effect to decrease over a short distance. Open areas such as parks allow the noise to travel over a longer distance and disturb users of such spaces.

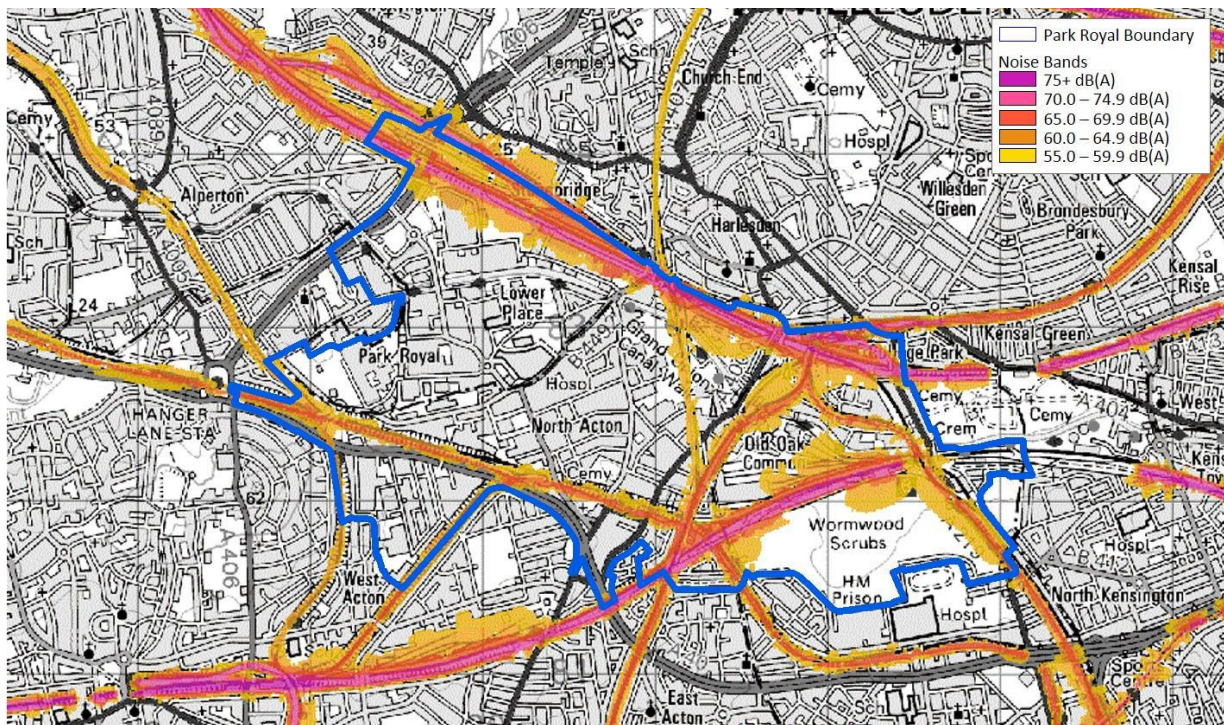


**Figure C13-3 Road Traffic Noise – average daytime**



Source: [www.services.defra.gov.uk/wps/portal/noise](http://www.services.defra.gov.uk/wps/portal/noise) in OAPF Draft IIA Report, GLA, February 2015

**Figure C13-4 Rail Noise – average daytime**



Source: [www.services.defra.gov.uk/wps/portal/noise](http://www.services.defra.gov.uk/wps/portal/noise)

Source: [www.services.defra.gov.uk/wps/portal/noise](http://www.services.defra.gov.uk/wps/portal/noise) in OAPF Draft IIA Report, GLA, February 2015



## C.13.2 Data Gaps and Uncertainties

- Impacts on proposed quantum of development on existing businesses and residents in terms of access by road and rail

## C.14 Economy

The following baseline indicators have been used to characterise economic conditions across the borough:

- Economy Local Profiles (ONS)
- Employment by industry (ONS- NOMIS).

### C.14.1 OPDC Area

Smaller businesses, independent traders and entrepreneurs tend to dominate the study area. The image of Park Royal and Old Oak developments range from larger freight and wholesale businesses through to microbusinesses that survive because the area offers a place for their industry not available elsewhere in London coupled with inexpensive rents. On one hand while this can contribute to an entrepreneurial spirit, on the other it can translate into a weakness from an economic standpoint.

This is contributing towards pressure for redevelopment and regeneration. Redevelopment would help alleviate housing shortages in London but careful consideration needs to be given to how any new provision of retail will impact on other neighbouring town centres such as Ealing. Similarly, redevelopment of the area is likely to give rise to local pressures from existing businesses who are likely to be unwilling to relocate.

In 2010, 18.6% of the adult population were long-term unemployed (claiming job seekers allowance for over 1 year). This figure is above the national average of 10.1% and the London-wide figure of 11.5%.

A higher than average proportion of the area's population are classified in sales and customer service occupations, process plant occupations, elementary occupations and skilled trades compared to London as a whole. Professional occupations and associate professional and technical occupations however are lower than London's average but higher than regional and national averages. This data is presented in **Table C14-1**.

**Table C14-1 Employment by Occupation Jul 2011-Jun 2012**

Area	Total employed 16-74	Managers Directors Senior Officials	Professional Occupations	Associate_ Professional/Technical Occupations	Administrative Secretarial Occupations	Skilled Trades_Occupations	Caring Leisure Other Service Occupations	Sales Customer/Service Occupations	Process Plant and Machine Operatives	Elementary Occupations
England & Wales	26,526,336	10.8%	17.4%	12.7%	11.4%	11.5%	9.4%	8.4%	7.2%	11.1%
England	25,162,721	10.9%	17.5%	12.8%	11.5%	11.4%	9.3%	8.4%	7.2%	11.1%
London	3,998,897	11.6%	22.5%	16.3%	11.7%	8.3%	7.9%	7.5%	4.7%	9.6%
Inner London	1,637,362	12.4%	25.6%	19.7%	9.7%	6.3%	7.1%	6.6%	3.3%	9.4%
Outer London	2,361,535	11.0%	20.3%	13.9%	13.0%	9.7%	8.4%	8.1%	5.7%	9.8%
Ealing	164,820	10.9%	21.0%	14.2%	10.7%	9.9%	7.5%	7.9%	6.1%	11.8%
Brent	147,461	9.6%	18.2%	12.6%	10.9%	10.6%	8.2%	9.5%	6.9%	13.5%
Hammersmith and Fulham	99,618	14.6%	27.0%	22.1%	9.6%	5.4%	6.5%	5.5%	2.5%	6.7%
Park Royal & Old Oak	2,461	8.6%	19.1%	15.7%	11.5%	11.0%	7.4%	7.8%	6.2%	12.6%

Source: OAPF Draft IIA Report, GLA, February 2015

**Table C14-2 Local Industry Units by Broad Industry Group**

Area	England & Wales	England	London	Inner London	Outer London	Ealing	Brent	Hammersmith and Fulham	Park Royal & Old Oak
Employed Age 16-74	26,526,336	25,162,721	3,998,897	1,637,362	2,361,535	164,820	147,461	99,618	24,611
Agriculture/Forestry/Fishing	0.9%	0.8%	0.1%	0.1%	0.1%	0.0%	0.0%	0.1%	0.1%
Mining/Quarrying	0.2%	0.2%	0.1%	0.2%	0.1%	0.2%	0.1%	0.3%	0.2%
Manufacturing	8.9%	8.8%	3.2%	2.2%	3.9%	4.7%	4.6%	2.3%	3.9%
Electricity/Gas/Steam/Air conditioning Supply	0.6%	0.6%	0.3%	0.2%	0.3%	0.2%	0.2%	0.2%	0.1%
Water Supply/Sewerage/Waste Remediation Activities	0.7%	0.7%	0.4%	0.2%	0.4%	0.4%	0.3%	0.2%	0.3%
Construction	7.7%	7.7%	6.6%	4.4%	8.1%	7.9%	8.9%	4.0%	8.0%
Wholesale/Retail/Trade/Repair Motor Vehicles	15.9%	15.9%	13.1%	11.0%	14.5%	14.4%	17.0%	10.6%	15.5%
Transport Storage	5.0%	5.0%	5.0%	3.5%	6.1%	7.3%	5.7%	3.2%	6.8%
Accommodation & Food Service	5.6%	5.6%	6.3%	7.4%	5.5%	6.7%	7.9%	6.8%	9.2%
Info & Communication	4.0%	4.1%	6.9%	8.2%	6.0%	8.4%	6.3%	9.6%	7.3%
Financial/Insurance	4.3%	4.4%	7.7%	9.5%	6.4%	4.1%	4.4%	9.9%	3.5%
Real Estate	1.4%	1.5%	2.0%	2.1%	1.9%	1.8%	1.8%	2.9%	2.5%
Professional Scientific Technology	6.6%	6.7%	10.9%	14.1%	8.6%	8.8%	8.4%	16.1%	7.8%
Administrative Support Service	4.9%	4.9%	5.9%	5.9%	5.8%	6.8%	6.6%	5.4%	6.4%
Public Administration/ Defence	6.0%	5.9%	5.0%	4.3%	5.5%	3.8%	3.6%	3.0%	3.3%
Education	9.9%	9.9%	9.6%	9.2%	9.9%	9.0%	8.1%	8.2%	8.7%
Health	12.5%	12.4%	10.7%	10.1%	11.2%	9.8%	10.3%	9.4%	10.1%
Other: Other	5.0%	5.0%	6.4%	7.4%	5.7%	5.7%	6.0%	7.6%	6.5%

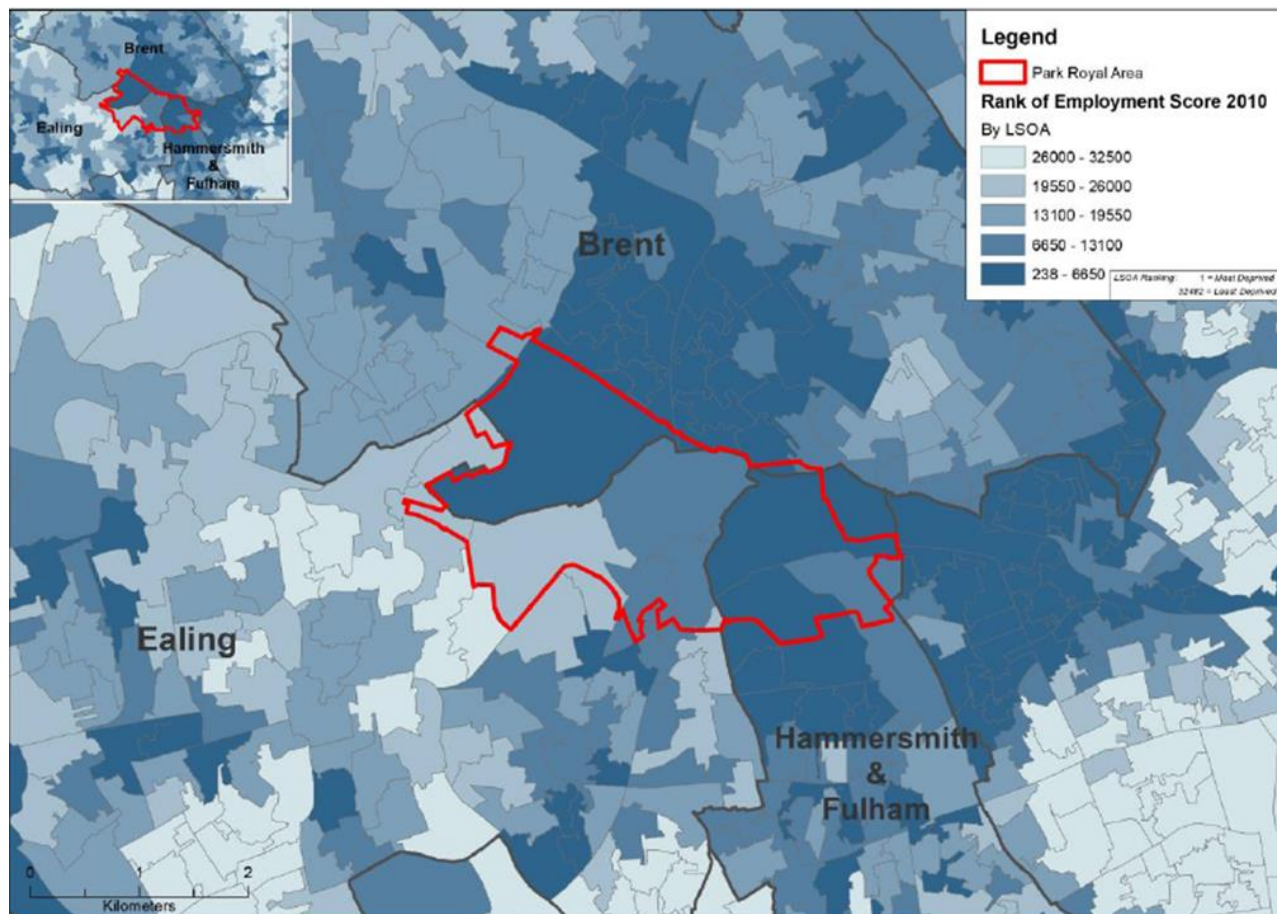
Source: OAPF Draft IIA Report, GLA, February 2015

**Table C14-2** shows the employment by industry in the study area and surrounding boroughs. There's a higher than the London average of manufacturing, construction, wholesale and accommodation & food services within the Park Royal and Old Oak study area.

These more intensive industries need to be accommodated in terms of the proposed redevelopment whilst also allowing new industries to flourish – especially by providing space for green technologies.

The area ranks among the most deprived in terms of its employment deprivation as can be seen from **Figure C14-1**.

**Figure C14-1 Local Industry Units by Broad Industry Group**



Source: OAPF Draft IIA Report, GLA, February 2015

As such, consideration needs to be made to as how this can be addressed within the Local Plan whilst also considering how this redevelopment, its economic potential and new population increase will sit within the wider borough and London context.

## B.14.2 Data Gaps and Uncertainties

- Planning consents for employment uses and take up of employment floorspace
- Noise impacts from commercial uses
- Commercial / retail rental data
- No. / % of people working from home

## B.15 Deprivation and Living Environment

The following baseline data has been identified:

- Number of wards with LSOAs in the bottom 20% most deprived (Indices of Deprivation for England 2010).



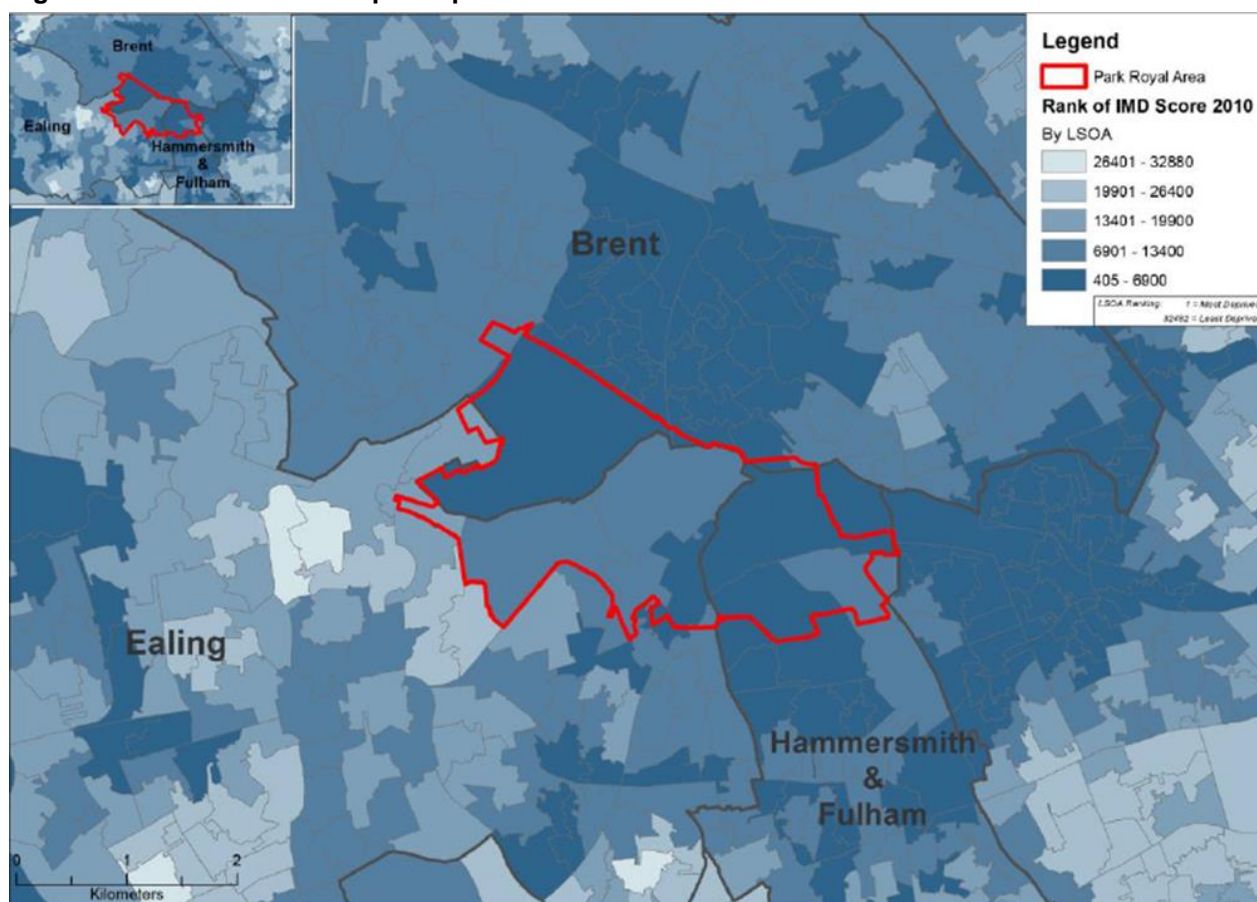
## B.15.1 OPDC Area

The Indices of Deprivation 2010 were published by Communities and Local Government in March 2011. The purpose of the Indices is to identify small areas of England which are experiencing multiple aspects of deprivation. It replaces the Indices of Deprivation 2007 as the official measure of deprivation in England. Deprivation is a multi-faceted and complex problem which influences and is influenced by a wide range of factors. The ID2010 contains seven domains which relate to income deprivation, employment deprivation, health deprivation and disability, education skills and training deprivation, barriers to housing and services, living environment deprivation, and crime.

The average Indices of Multiple Deprivation (IMD) score measure reflects the average level of deprivation across LSOAs in the borough. In 2010, the study area's average IMD score ranks it as being in the most deprived LSOAs within London.

However, it's difficult to look at any trends for the study area due to the OPDC's recent formation and is made up of parts of a number of LSOAs.

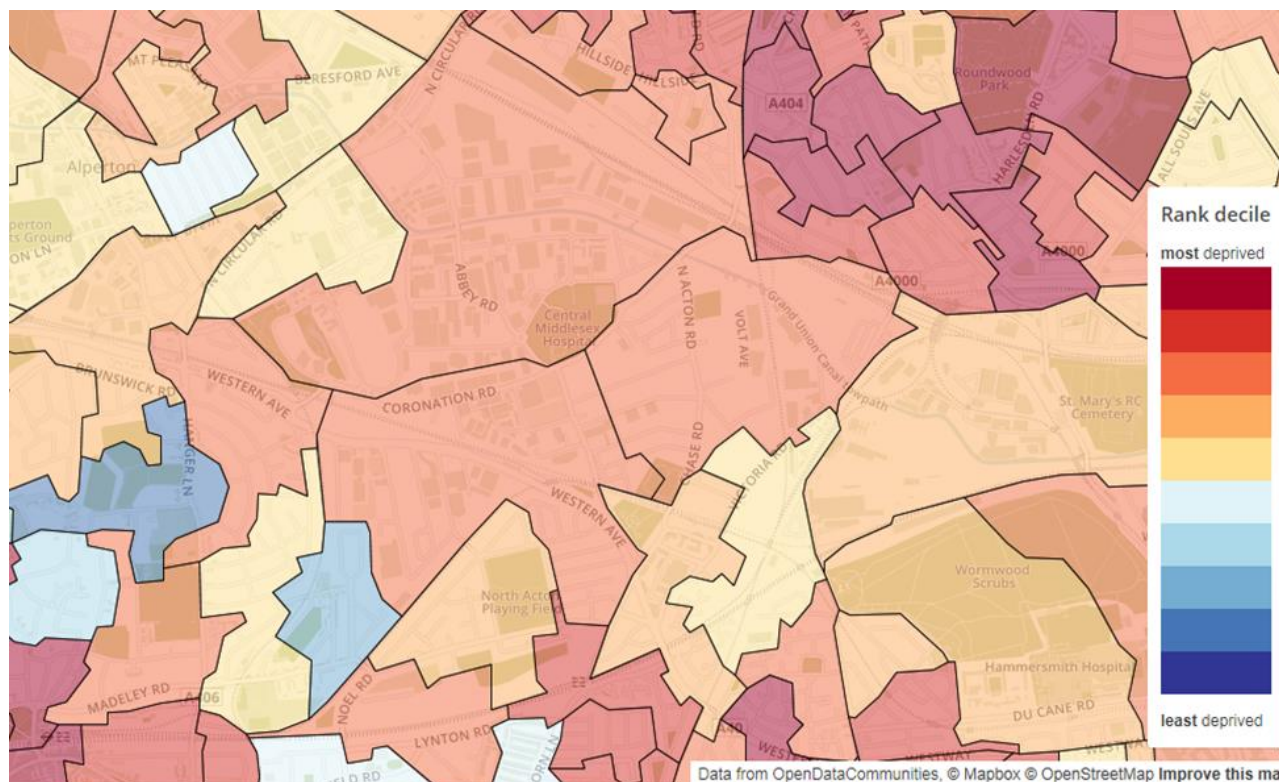
**Figure C15-1 Indices of Multiple Deprivation in OPDC**



Source: OAPF Draft IIA Report, GLA, February 2015

Given its largely industrial nature, it's also reasonable to assume that the small residential population coupled with its industrial make-up means that the levels of deprivation within the area may be skewed.

**Figure C15-2 Overall living environment deprivation levels in OPDC**



Source: Indices of Deprivation

As seen from **Figure C15-2**, what is clear irrespective of the set-up of the OPDC area is that it suffers from high levels of living environment deprivation probably due much to the fact that it is largely industrial rather mixed use or residential and this needs to be a significant consideration in the Local Plan.

## B.15.2 Data Gaps and Uncertainties

- Provision of childcare
- Deprivation statistics for the area

## B.16 Housing

The following baseline indicators have been used to characterise the status of housing across the borough:

- Dwelling Stock (Office for National Statistics Local Profiles)
- Household density (Office for National Statistics Local Profiles)
- Household composition (OAPF Draft IIA Report, GLA, February 2015)

The area only contains some 1,898 households, with the rest being industrial and warehouse units. Given the remit of the OPDC the housing numbers within the area is set to rise sharply in Old Oak. Currently dwelling stock suggests that compared to adjoining boroughs owner-occupiers is a lower percentage than that of Ealing and a large percentage are in private landlord's hands.



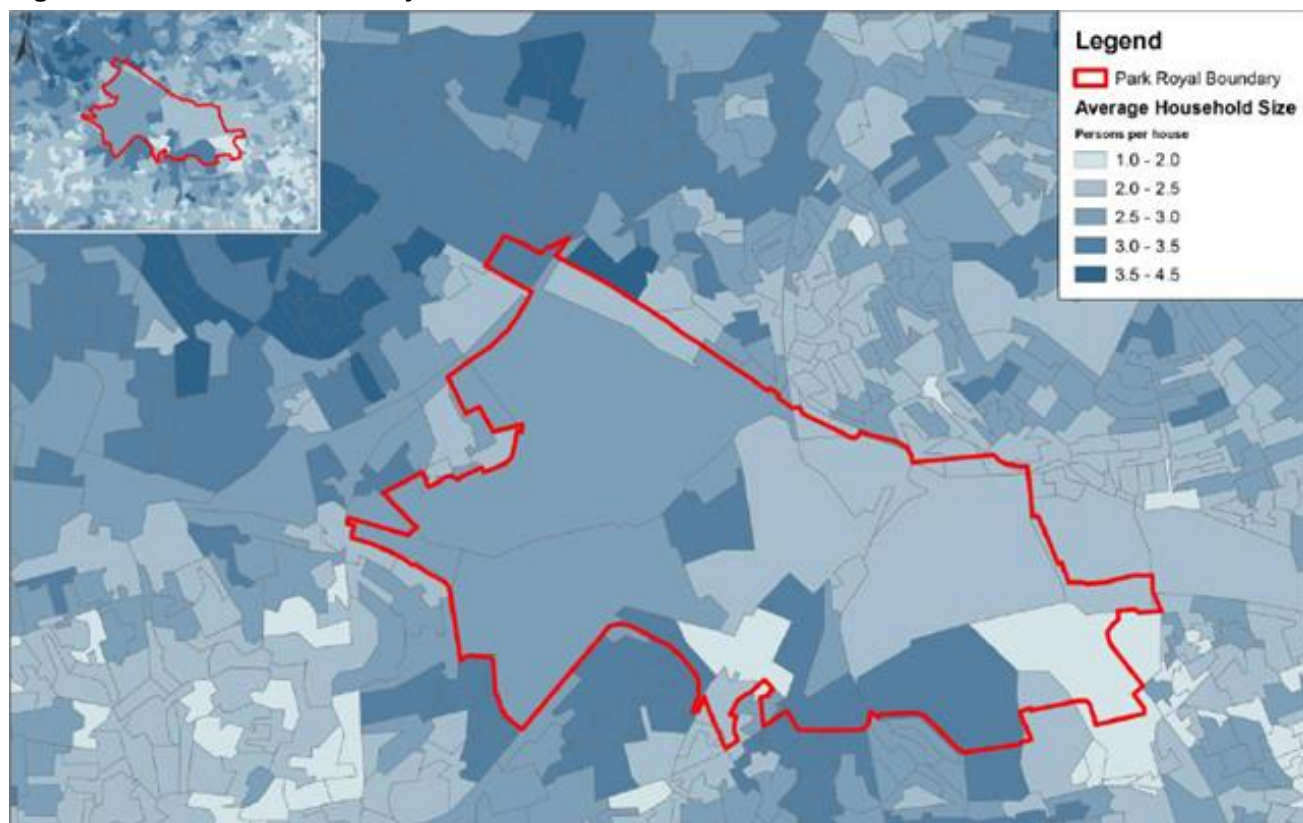
**Table C16-1 Dwelling Stock by Tenure and Condition**

Area	All households	Owned: Owned outright	Owned: Owned with a mortgage or loan	Shared ownership (part owned and part rented)	Social rented: Rented from council (local authority)	Social rented: Other	Private rented: Private landlord or agent	Private rented: Other	Living rent free
England and Wales	23,366,044	30.8%	32.7%	0.8%	9.4%	8.2%	15.3%	1.4%	1.4%
England	22,063,368	30.6%	32.8%	0.8%	9.4%	8.3%	15.4%	1.4%	1.3%
London	3,266,173	21.1%	27.1%	1.3%	13.5%	10.6%	23.7%	1.3%	1.3%
Inner London	1,363,817	14.1%	19.4%	1.5%	18.8%	14.0%	29.2%	1.6%	1.5%
Outer London	1,902,356	26.2%	32.7%	1.1%	9.7%	8.2%	19.9%	1.2%	1.2%
Ealing	124,082	22.9%	28.2%	1.8%	10.5%	7.6%	26.4%	1.2%	1.5%
Brent	110,286	20.3%	22.6%	1.5%	9.7%	14.4%	28.8%	1.3%	1.4%
Hammersmith and Fulham	80,590	15.9%	18.1%	1.6%	15.7%	15.4%	30.0%	1.7%	1.5%
Park Royal & old Oak	1,898	12.9%	16.6%	7.5%	7.3%	17.1%	37.1%	1.2%	0.9%

Source: OAPF Draft IIA Report, GLA, February 2015

Household density at its most dense in the south-eastern part of the area due to the predominantly industrial use of the area itself as can be seen from **Figure C16-1**.

**Figure C16-1 Household Density**



Source: OAPF Draft IIA Report, GLA, February 2015

Affordable housing considerations as well as housing unit proportions (types and tenures) need to be considered in the Local Plan.

9% of households in the plan area are lone parent families and over 90% of these parents are women. The proportion of such households in the population doubles since the 1991 census. Single parents make up a high proportion of households living in social housing (23% of council tenants and 32% of housing associated tenants).

Lone parents experience some of the greatest levels of economic and housing need, their household incomes are only about a third of the average income. They are more than three times more likely to be dependent on benefits than the average household, and twice as likely to be in unsuitable housing.

## C.16.2 Data Gaps and Uncertainties

- Future population composition

## C.17 Crossboundary Issues

For many authorities, the geographical scale of particular baseline issues means that they relate closely to neighbouring authorities. For example, housing provision and prices, employment migration and commuting, service provision and education can all result in flows of people across boundaries. In order to help to characterise the baseline further, some of these key 'crossboundary' issues have been identified below.

- There is not enough affordable housing being constructed in London to meet current demand; and as the number of households in London grows, demand for affordable housing will increase. These issues may be exacerbated in future years if trends remain the same. There are therefore opportunities for the OPDC Local Plan to contribute to reducing this trend.
- Surface water flood risk and the measures to manage this may also be a crossboundary issue e.g. surface water runoff from one borough having an impact on a neighbouring borough. OPDC need to work in partnership with the neighbouring boroughs to ensure flood risk is reduced for future generations.
- Employment and economic activity rates within OPDC area is particularly important especially when consideration needs to be made with adjoining town centres as well as existing business that may not have anywhere else to go.
- There is a severe lack of open space currently in the area and in the adjacent boroughs overall - it is important that the OPDC Local Plan incorporates open space.
- Although Wormwood Scrubs and the Grand Union Canal are important biodiversity assets, other space within the area and the adjoining boroughs need to be developed. The benefits of this could be at least two-fold. The Local Plan should support the existing biodiversity but also encourage more biodiversity into other sections of the study and promote green connectivity. Green spaces need to be multi-functional and evenly located so as to avoid over-reliance on one particular space.
- Impact of significant quantum of development on the surrounding heritage assets and settings needs to be carefully managed.
- Cumulative impacts regarding major roads and the impact on the new rail infrastructure should be considered.

## **APPENDIX D**

### **Initial Analysis of other relevant SA Frameworks**

### Development of SA Framework Objectives

**Note:** although some of the objectives may be comparable to more than one objective, a 'best fit' approach has been taken. It is noted that relevant assessment criteria/sub-objectives from each of the frameworks will be drawn upon where relevant. It is also noted that although the HUDU Matrix assessment criteria relate to project-level assessments, these have been interpreted to become more relevant at the policy assessment level.

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
<b>1. Biodiversity.</b> To conserve and enhance natural habitats and wildlife and bring nature closer to people.	<b>Biodiversity EN4.</b> To conserve and enhance biodiversity.	9. Protect and enhance the natural environment and biodiversity.		<ul style="list-style-type: none"> <li>Maintain or enhance biodiversity</li> </ul>	<p>1. Conserve and enhance biodiversity and promote the use of green infrastructure</p> <p>The HRA findings will be integrated into the SA through assessment under this objective.</p>
<b>2. Water Quality &amp; Water Resources.</b> To improve the quality of groundwater and to achieve the wise management and sustainable use of water resources. Minimise the risk of surface flooding and promote sustainable urban drainage.	<b>Water Quality &amp; Resources EN2.</b> To improve water quality; conserve water resources and provide for sustainable sources of water supply.	12. Improve water quality, conserve water resources and minimise the impact of flooding.		<ul style="list-style-type: none"> <li>Incorporation of sustainability drainage techniques</li> </ul>	<p>2. Improve the quality of water resources and achieve their sustainable use</p> <p>3. Minimise the risk of and from flooding</p>



Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
<p><b>3. Natural resources.</b> To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured products. Recycle demolition materials in construction and minimise the consumption of water and energy in developments</p>			<p><b>Careful consumption 10.</b> Responsible consumption of resources in the borough.</p>		<p>The aspects of this objective will be covered under proposed objectives relating to: water resources; energy; regeneration and waste.</p>
<p><b>4. Climate Change.</b> To address the causes of climate change through minimising the emissions of greenhouse gases. Encourage energy generation from renewable and low carbon sources, and promote energy efficiency.</p>	<p><b>Climate Change EN7.</b> To reduce contributions to climate change and reduce vulnerability to climate change.</p>	<p>11. Reduce contributions to and vulnerability to climate change.</p>	<p><b>Climate Change 11.</b> Reduce climate change and its impact on the borough.</p>	<ul style="list-style-type: none"> <li>• Incorporation of low and zero carbon energy source planning</li> <li>• Layout of development and schemes to maximise passive energy use, and respond to winter and summer temperatures including ventilation, shading and landscaping.</li> <li>• Proposals which incorporate sustainable</li> </ul>	<p>4. To minimise contributions to climate change through greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.</p> <p>Reducing vulnerability</p>

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
				design and construction techniques	to climate change will be targeted through other objectives including those related to reducing flood risk, sustainable water use, minimising other resource use, sustainable design and green infrastructure.
<b>5. Air Quality.</b> To improve air quality.	<b>Air Quality EN3.</b> To improve air quality.	5. Minimise detrimental noise impacts. 10. Improve air quality.	<b>Reduce pollution</b> <b>8.</b> Reduce the level of pollution.	<ul style="list-style-type: none"> <li>Minimisation of construction impacts</li> <li>Minimisation of noise pollution caused by traffic and commercial uses</li> <li>Minimisation of air pollution caused by traffic and commercial uses</li> </ul>	5. To minimise air, noise and light pollution, particularly for vulnerable groups
6. <b>Energy.</b> To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy					The aspects of this objective will be merged under the climate change objective

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
and electricity.					above.
<b>7. Waste.</b> To minimise production of waste across all sectors in the OA and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste.	<b>Waste Management EN8.</b> To minimise the production of waste and use of non-renewable materials.	14. Reduce waste generation and increase waste recycling.		<ul style="list-style-type: none"> <li>Proposals which encourage recycling (including building materials)</li> </ul>	6. To minimise production of waste across all sectors in the OA and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste.
<b>8. Soil conditions and contamination.</b>  Ensure all contaminated sites are remediated prior to development with the option of in-situ treatment investigated.	<b>Land and Soil EN9.</b> To conserve and enhance land quality and soil resources.				The aspects of this objective will be included under the regeneration objective below.
<b>9. Accessibility / Availability (Transport).</b> To ensure that all residents and visitors have	<b>Traffic EN1.</b> To reduce the effect of traffic on the	15. Reduce vehicular dependency and	<b>Reduce transport impacts 9.</b> Reduce the effect of	<ul style="list-style-type: none"> <li>Prioritisation and encouragement of walking and cycling including through the use of shared spaces and cycle</li> </ul>	7. Minimise the need to travel through improving accessibility by walking,

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
access to key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot (relative to those taken by car).	<p>environment</p> <p><b>Accessibility S7.</b> To improve accessibility to key services especially for those most in need.</p> <p><b>Efficient Movement EC5.</b> To encourage efficient patterns of movement in support of economic growth.</p>	promote the use of sustainable modes of transport.	transport on the environment.	<p>lanes/parking, including inclusive accessible routes.</p> <ul style="list-style-type: none"> <li>• Connectivity of public realm and internal routes to local and strategic cycle and walking networks</li> <li>• Traffic calming measures and minimisation of road injuries</li> <li>• Connectivity of new development to public transport, local services and facilities, reducing the need to travel by car</li> </ul>	cycling and public transport
<b>10. Built and Historic Environment.</b> To enhance and protect the existing built environment (including the architectural distinctiveness, townscape /landscape and archaeological heritage), and ensure new buildings are	<p><b>Landscape &amp; Townscape EN5.</b> To maintain and enhance the quality of landscapes and townscapes.</p> <p><b>Historic</b></p>	3. Preserve and enhance the local historic environment and cultural heritage.	<b>Heritage 7.</b> Improve the local environment and heritage		8. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape /landscape and archaeological heritage), and ensure

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
appropriately designed and constructed	<b>Environment &amp; Cultural Assets EN6.</b> To conserve and, where appropriate, enhance the historic environment and cultural assets.				new buildings are appropriately designed and constructed
<b>11. Regeneration and Land Use.</b> To stimulate regeneration that maximises benefit to the most deprived areas and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings.	<b>Regeneration EC3.</b> To reduce disparities in economic performance and promote sustainable regeneration.	13. Enhance existing buildings and facilities, and encourage the reuse/remediation of vacant land and under-utilised buildings.		<ul style="list-style-type: none"> <li>Proposals which make the best use of existing land</li> <li></li> </ul>	9. To stimulate regeneration that maximises benefit to the most deprived areas and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings, including the remediation of contaminated land.
<b>12. Housing.</b> To ensure that	<b>Housing S.4 to</b>	6. Improve access to well designed,	<b>Affordable homes</b>	<ul style="list-style-type: none"> <li>Health and wellbeing credits of the Code</li> </ul>	10. Improve access to

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
all Londoners have access to good quality, well-located, affordable housing that promotes liveability.	provide everybody with the opportunity to live in a decent home.	affordable, inclusive and appropriately located housing.	<b>4.</b> Provide decent and affordable homes	<p>for Sustainable Homes</p> <ul style="list-style-type: none"> <li>Housing needs of older people including extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes</li> <li>Adaptable homes for independent living for older and disabled people</li> <li>Good design through layout and orientation</li> <li>Range of housing types and sizes, including affordable housing, in response to local housing needs</li> <li>Energy efficient housing (high SAP rating)</li> </ul>	well designed, well-located, affordable and inclusive housing of a range of types and tenures, to meet identified local needs.
<b>13. Employment.</b> To offer everyone the opportunity for rewarding, well-located and satisfying employment.	<p><b>Growth EC1.</b> To encourage sustainable economic growth.</p> <p><b>Employment EC2.</b></p>	<p>16. Promote local employment opportunities, training and skills attainment.</p> <p>17. Support</p>	<b>Satisfying work 6.</b> Increase the opportunities for satisfying and well paid work.	<ul style="list-style-type: none"> <li>Provision of access to local employment and training opportunities including temporary construction and permanent 'end-use' jobs</li> <li>Provision of childcare facilities</li> </ul>	11. To offer everyone the opportunity for rewarding, well-located and satisfying employment locally



Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
	<p>To offer everybody the opportunity for rewarding and satisfying employment.</p> <p><b>Investment EC4.</b> To encourage and accommodate both indigenous and inward investment.</p>	sustainable economic growth.	<b>Sustainable Economy 12.</b> Improve the sustainability of the local economy.	<ul style="list-style-type: none"> <li>Provision of managed and affordable workspace for local businesses, including live/work units</li> <li>Opportunities for work for local people via local procurement arrangements</li> </ul>	12. To encourage indigenous and inward investment to create sustainable economic growth
<b>14. Liveability and Place.</b> To create and sustain liveable, mixed use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	<b>Community Identity S6.</b> To encourage a sense of community, identity and welfare				Aspects of this objective will be addressed under equality and diversity as well as accessibility and health and wellbeing objectives.
<b>15. Open space.</b> Improve the quality of the public realm and increase the number of public		8. Protect and enhance public open space.		<ul style="list-style-type: none"> <li>Retention and enhancement of existing open and natural spaces including improved accessibility</li> </ul>	13. Improve the quality of the public realm and increase the provision, accessibility and quality

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
open spaces.				<ul style="list-style-type: none"> <li>Provision of new open or natural space</li> <li>Provision of play spaces for children and young people</li> <li>Provision of allotments and community farms to facilitate the supply of local food</li> </ul>	of public open spaces.
<b>16. Education and Skills.</b> To improve the education and skills levels of the population.	<b>Education and skills S3.</b> To improve the education and skills of the population	18. Improve opportunities for education and training.	<b>Education and skills 3.</b> Improve the education and skills of young people and adults.	<ul style="list-style-type: none"> <li>Contribution to meeting primary, secondary and post 19 educational needs</li> </ul>	14. To improve the education and skills levels of the population .
<b>17. Safety and security.</b> Reduce the amount of crime and reduce the fear of crime through building and public realm design principles.	<b>Crime Prevention and Community Safety S5.</b> To reduce crime and anti-social activity	4. Reduce crime, fear of crime and antisocial behaviour.		<ul style="list-style-type: none"> <li>Proposals and policies seeking to design out crime including increasing natural surveillance</li> <li>Creation of attractive, multi-use public spaces and buildings</li> <li>Community engagement</li> </ul>	15. To reduce crime and the fear of crime through building and public realm design principles
<b>18. Health and Well-being.</b>	<b>Health and</b>	1. Actively support inclusive access to	<b>Health 2.</b> Improve health of population	<ul style="list-style-type: none"> <li>Retention and provision of additional</li> </ul>	16. To maximise the

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
To maximise the health and well-being of the population, reduce inequalities in health and promote healthy living.	<b>Wellbeing S2.</b> To improve the health and wellbeing of the population.	essential health, community and local services. 7. Reduce health inequalities and promote healthy living.	overall	<p>social infrastructure</p> <ul style="list-style-type: none"> <li>• Meeting identified needs for healthcare services</li> <li>• Meeting identified needs for other social infrastructure eg schools, social care and community facilities (including capacity, location and accessibility)</li> <li>• Opportunities for shared community use and co-location of services</li> <li>• Provision of a range of retail uses, including for affordable shops, a range of food stores and avoidance of an over-concentration of hot food takeaways.</li> </ul>	health and well-being of the population, reduce inequalities in health and promote healthy living.
<b>19. Equality and Diversity.</b> To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	<b>Prosperity and Social Inclusion S1.</b> To reduce poverty and social exclusion.	2. Promote community involvement, voluntary and partnership working. 19. Promote cultural and community	<b>Social Justice 1.</b> Increase equality and social justice. <b>Social cohesion 5.</b> Increase local residents' sense of community and	<ul style="list-style-type: none"> <li>• Connectivity of existing communities through layout and movement, avoiding physical barriers and severance and land uses and spaces which encourage social interaction</li> <li>• Provision of a mix of uses and a range of</li> </ul>	<b>17.</b> To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: key aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
		identity.	social cohesion.	<p>community facilities</p> <ul style="list-style-type: none"> <li>• Opportunities for the voluntary and community sectors</li> <li>• Adherence to the principles of Lifetime Neighbourhoods</li> </ul>	and social exclusion.

## **APPENDIX E**

### **Response to consultation comments**

Respondent	Relevant comment extract	Response
Brent Friends of the Earth	<p><b>(a) Do you have any further suggestions regarding the scope of the IIA and its proposed appraisal of the Local Plan?</b>            Answer: The issue of sustainability should be emphasized from the beginning of the description of the scope of the IIA. The size of this development means that it will have a profound effect on the environment both of the OPDC area and the surroundings.</p> <p>The SEA Directive refers to the promotion of accepted measures that promote sustainability including reasonable alternatives.            We are concerned that such “accepted measures” – notably potential energy saving systems such as district heating and the possible provision of heat pumps should be considered at an early stage since they would affect the design and construction of the buildings themselves and need to be considered at a very early stage in the Plan..</p>	<p>Agree. Text amended to reflect this.</p> <p>Agree. Additional indicator included.</p>
Brent Friends of the Earth	<p><b>(b) Are there any additional PPPs that should be considered for review?</b>            Answer: No local Authority Air Quality Action Plans have been included. Most of the existing area is categorized as an AQMA, Air Quality Management Area. This has implications for the future transport policy and is most important in relation to the Health Impact Assessment.</p>	<p>Noted.</p>
Brent Friends of the Earth	<p><b>(c) Are there any additional themes that could be drawn out of the review of PPPs?</b>            Answer. The issues of sustainability, health impact, transport, climate change are all intertwined with the provision of affordable energy, air quality, the actual construction of buildings, the quality of the means of transport and the levels of carbon dioxide reduction, so, although they may be classified as separate themes in relation to the various impact assessments they will have common issues which need to be included wherever relevant.</p>	<p>Noted. The role of the IIA Report is to coordinate the assessment of these elements to provide holistic recommendations.</p>



Respondent	Relevant comment extract	Response
Brent Friends of the Earth	<p><b>(d) Do you agree with the sustainability issues and opportunities that we have identified? Are there additional issues that both the IIA and the Local Plan should consider?</b></p> <p>Answer: We are concerned that the standards of construction of all buildings, houses and flats, public buildings and commercial and industrial development, should all reach the best standards of energy efficiency and not simply satisfy the latest regulatory standards.</p> <p>Also that every effort should be made to promote the use of renewable energy through incorporating solar energy panels where practicable, considering too the use of heat pumps and the provision of district heating.</p> <p>In relation to transport we hope that the use of the canal will be promoted and that consideration should be given to establishing a low emission zone which would require that all vehicles entering the area are low emission vehicles that have to pass the necessary tests at regular intervals.</p>	<p>Agree. Objective 7 seeks to help to ensure this.</p> <p>Noted. Objective 7 seeks to help to ensure this alongside enabling other renewable energy generation sources.</p> <p>Agree. New indicator for Objective 4 included:</p> <p>Proportion of waste and freight arriving and leaving the area by canal.</p> <p>Noted. The OPDC area is within the Greater London Low Emission Zone.</p>
Brent Friends of the Earth	<p><b>(e) Is there any additional baseline information that you feel it would be important to include?</b></p> <p>Answer: The changes in the area will be so great that existing baseline information would not provide an adequate comparison. It would be better to make comparisons with the highest possible recommended values so that the IIA measures show how effectively the OPDC is likely to achieve the best possible standards.</p>	<p>Disagree. The existing baseline provides an initial starting point to monitor the delivery of the Local Plan.</p>

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Brent Friends of the Earth	<p><b>(f) Are there any particular topics or geographical areas of specific concern to your organisation?</b></p> <p>Answer: We have already said that our main concerns are that energy efficiency, use of renewable energy and prevention of air pollution are incorporated into all policies and buildings. We also believe that a sufficient number of affordable dwellings should be included in the housing plans.</p>	Noted.
Building Products Index Ltd	<p>Yes there should be changes to IIA Framework, IIA Objectives/Sub Objectives Box 18 first bullet point" increase in the net number of businesses registered in the area" This is a bad objective and should be removed. The quantity of businesses is not a suitable objective, the quality of businesses is a better objective, or the ratio between the square metre a business occupies and the number of people employed might be better if you are seeking to attract employment to the area.</p>	<p>Disagree. A net increase in businesses is considered to be a sound objective to be considered by the IIA.</p> <p>Noted. The quality of workspace is considered to be addressed through the delivery of workspaces for new and emerging businesses alongside the encouragement of development of employment growth sectors.</p> <p>Noted. The workspace densities are considered in the final bullet point of Objective 18.</p> <p>Noted. Objective 17 considers the number of people being employed in the area.</p>

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Car Giant	2. Section 4.2 outlines a series of environmental, social and economic objectives that have been used to generate some common themes. We recognise the importance of the need “to ensure that new housing development meets local needs” however we do think that there should also be recognition that Old Oak Common is also a Strategic regional housing site and that the objective should be to meet the need to ensure that new housing development addresses ‘local and London needs.’	Agree. Text amended to state "to ensure that new housing development meets local and regional needs"
Car Giant	A common theme has also been included within 4.2 to “reduce crime and fear of crime.” Whilst we agree with this objective, it is inevitable that there is potential for crime to increase when comparing the number of residents now to the number residents in the future. However, we believe that there is an opportunity to make the area safer and the objective should be to ‘promote safer communities and reducing fear of crime.’	Disagree. The wording is considered appropriate for the relevant objective.
Car Giant	3. Section 5 identifies the key Sustainability Issues and Opportunities for the OPDC. Within the Local Economy topic section the table outlines that the Local Plan should seek to “provide business opportunities that meet the current and future needs of the local economy, within the context of the neighbouring communities” and that “there is an opportunity for the Local Plan to specify that incoming employment opportunities are to be directed towards local people in the existing and surrounding.” Whilst we don’t disagree with the overall objectives of providing business opportunities and employment opportunities, we do think that these points contradict the GLAs vision that this opportunity area will be a major employment centre of London-wide significance and we suggest that the wording should be revised to illustrate maximising opportunities for local people to access jobs.	Agree. Text amended to state: "The Local Plan should seek to provide employment and business opportunities that meet the current and future needs of the local and regional economy, within the context of the neighbouring communities."  Noted. Text amended to state: "there is an opportunity for the Local Plan to specify that a proportion of incoming employment opportunities are to be directed towards local people in the existing and surrounding"
Car Giant	In addition to this, the table states (page33) that “retail should be in small clusters” and “the Local Plan should manage the affordability of newly generated economic	Agree. The following sentences have been removed: "§ Incoming retail should

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	activities.” We support the principle of retail development but we want to highlight that fragmentation of retail in clusters has the potential to not be compatible with commercially sustainable retail which should be considered going forward.	be developed in small clusters. This could help to reduce the impact on other town centres.”
Car Giant	In addition, we agree with the principle of affordable new generated economic opportunities, but we do think that this provides risk to the potential investment of offices and therefore suggest that the Local Plan should promote the commercial viability of employment space instead.	Disagree. This implication is not considered to be a significant risk.
Car Giant	4. Section 6 illustrates the draft IIA objective and sub- objectives and starts to introduce indicators and approach to target setting. We believe that some of the potential targets outlined throughout need further consideration and evaluation and we would like to engage further and have more focused discussions with the OPDC on these targets once the Local Plan has further developed. Some examples to note is firstly the indicator/objective for a proportion of family housing. We feel that the objective would be improved if it was not so prescriptive and instead stated ‘provision of accommodation suitable for a range of different household types.’	Noted. Further engagement will be carried out through the plan making process.  Disagree. The sub-objectives are considered to be appropriate in supporting the overarching objective.
Car Giant	Further to this, there are a number of objectives relating to employment and economy. On page 48, it has been proposed to offer a proportion of new employment and training opportunities to “local people” and “local women” via procurement arrangements. For Old Oak to succeed as a business destination it needs to be more than a local employment destination. We believe that the real objective is not the proportion of jobs offered to local people, but making the most of opportunities for local people to access employment here.	Noted. The reference provided relates to an indicator for monitoring the delivery of the objective. The proportion of jobs offered to local people is considered to be a representation of the opportunities for local people to access employment.

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Diocese of London	<p><b>2a) Do you have any further suggestions regarding the scope of the IIA and its proposed appraisal of the Local Plan?</b></p> <p>The long term management and funding of the public spaces such as open spaces, highways, pedestrian and cycle routes along with community facilities and social infrastructure will be crucial to the success of the development as a community through its life.</p> <p>Further consultation is supported concerning the desire and viability of locally managed spaces and places that allow for genuine community engagement and involvement. This could help determine what is required from the community's perspective as plans evolve and if the capacity exists to support such local initiatives.</p>	Noted. Objective 1, sub-objective 3 will be amended to reference management of open spaces.
Diocese of London	<p>Health Impact assessments should look at provision of interventions that improve health and are complementary to local health services. The prospect of the OPDC area taking a fresh look at health provision is exciting and such improvements in local health and related services that promote and support well-being would be welcomed and potentially have a beneficial impact in adjoining areas if spaces, places, and services are more widely accessed.</p>	Noted.
Diocese of London	<p>Concerning the Equalities Impact Assessment, the future make-up of the local population(s) cannot be predicted with any accuracy. The principles for the assessment are provided by statute and we would welcome the OPDC involving members of the area's diverse community to help test out approaches and complete such assessments that will support key decisions ahead. We would be keen to help the OPDC with the EIA's that will allow us all to gain further understanding of the issues faced day to day and to work closely with those with most to lose when services and developments fail to meet their needs within the plans for development ahead. To guard against this risk, the community's involvement and influence on key aspects of</p>	Noted. This suggestion will be used to inform OPDC engagement processes and updates to the Local Plan.

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	design and accessibility will greatly enhance what takes shape within the OPDC area.	
Diocese of London	<p><b>2(b) Are there any additional PPPs that should be considered for review?</b></p> <p>The Mayor of London's Supplementary Planning Guidance on Social Infrastructure 2015.</p> <p>The Mayor of London's Cultural Strategy to help guide introducing facilities, destinations and activities across the OPDC area.</p>	Noted. Mayor's Culture Strategy is already included within the list of PPPs and subsequent assessment.
Diocese of London	<p><b>2(e) Is there any additional baseline information that you feel it would be important to include?</b></p> <p>The plans showing social infrastructure include 'as the crow flies distances' from facilities. Ideally baseline data should show actual travel times from new development (particularly residential) to those facilities as new facilities may not be available from the outset, given that the area has little connectivity currently.</p> <p>N.B. Burlington Danes Academy and primary school, Wood Lane are not shown on the plans.</p>	Noted. Consideration will be given to provided actual travel times in the IIA.
Diocese of London	<p>Re: The list of issues the authority wants to solve - we would welcome increased community engagement that builds on their knowledge and experience to help shape the Local Plan. These assessments and their review should identify and tackle areas of concern to community stakeholders.</p>	Noted.



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Diocese of London	The base line data concerning the current and small resident population in and around Old Oak Common Lane are valuable pointers but need to be recognised in the context of significant population growth and change. The make-up of the large population increase within new developments cannot be accurately predicted nor can its various needs and priorities be established with certainty at this stage.	Noted.
Diocese of London	<p>2(f) Are there any particular topics or geographical areas of specific concern to your organisation?</p> <p>The Diocese of London oversees all the parishes which fall within the OPDC area. Our particular concern is to ensure the Diocese is able to meet the spiritual needs of both the present and the new community although ministering to the whole person means the church has a long track-record in supporting those both in terms of need and celebration.</p> <p>Through the London Diocesan Board for Schools we also sponsor schools which are inclusive, have an open admissions policy and a balanced Christian ethos.</p> <p>The Diocese is part of a joint venture that provides modern health facilities to meet contemporary needs.</p> <p>Local parish facilities are in use across the Diocese to deliver community services involving local groups and volunteers.</p> <p>The Diocese works with other faith communities, locally, and regionally.</p>	Noted

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Diocese of London	<p><b>Objective 1 To enhance the built environment and encourage ‘place-making’</b></p> <p>The Diocese strongly supports this objective and the sub-objectives. We aim to ensure that our own places of worship, schools and ancillary facilities achieve these aims and of course churches are often the most distinctive and beautiful buildings in an area and help to provide a sense of place and legibility. We would welcome an additional sub-objective that emphasises the creation of safe and welcoming spaces for all</p> <p>We support the principle of Lifetime Neighbourhoods</p>	Agree. Objective 1 amended to reflect this aspiration
Diocese of London	<p><b>Objective 2 To optimise the efficient use of land through increased development densities and building heights, where appropriate</b></p> <p>We have concerns about these objectives and sub-objectives. The pressures to make efficient use of land and to create development value that can fund essential infrastructure are understood but if Old Oak is to be a real neighbourhood it must become a community and attract those who want to invest long-term in the area such as families for whom high density is not necessarily appropriate. The optimisation of future developments should not risk creating an area with housing and services that serves its community poorly. Lessons can be learned from other recent developments across London. We would draw your attention to the Olympic Park SPG which states: [This] SPG emphasises the importance of family housing, supported by new and improved open spaces and social infrastructure such as schools and health facilities. This will be in contrast to much recent apartment dominated development and help establish lifetime neighbourhoods where people will choose to live, settle and raise families.</p> <p>Assessments associated with family and other specific housing needs should help develop standards and policies safeguarding the community for a lifetime whilst meeting current demand for homes.</p>	Noted. Objective 5 considers the delivery of a range of housing types and tenures including family housing.

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Diocese of London	<p><b>Objective 4 Minimise the need to travel and improve accessibility for all users</b></p> <p>We understand that Old Oak Common transport interchange will be amongst the most connected in the UK. There needs to be a distinction between the importance of the interchange and its promotion nationally and the local movement of visitors, residents and local traffic within the OPDC area once studies have been conducted. OOC needs to be a destination in its own right as well as an efficient interchange.</p>	<p>Noted. Objective 1 considers the role of creating a destination through land uses and wider placemaking.</p>
Diocese of London	<p><b>Objective 5 Improve access to well designed, well located, market, affordable and inclusive housing of a range of types</b></p> <p>As noted above, we believe that new homes should be 'liveable' and a proper allocation of internal space specified to better support the needs of different family sizes and other households.</p>	<p>Noted. Objective 5 considers the delivery of Lifetime Homes standards.</p>

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Diocese of London	<p><b>Objective 13 Increase community cohesion and reduce social exclusion</b></p> <p>The Diocese strongly supports this objective and the sub-objectives noted above. Some of the indicators used for Objective 15 relating to walking distance could usefully be used for the second sub-objective here.</p> <p>We note that the Brent Local Plan SA has the following objective: 'Community Identity S6. To encourage a sense of community, identity and welfare'.</p> <p>Although difficult to measure, the Diocese strongly believes this will be critical to assessing the success of the new community. Amending the proposed objective to incorporate this would be welcomed and demonstrate that the OPDC is putting the community at the heart of its planning process.</p> <p>The provision of appropriate places and spaces that support such aspects of community life should be encouraged.</p>	<p>Noted. As the IIA Framework should be considered as a whole, it is not considered necessary to repeat the sub-objectives of Objective 15. Objective 1 considers developing and enhancing local distinctiveness.</p> <p>Agree. Wording of Objective 13 modified.</p>

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Diocese of London	<p><b>Objective 15 Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</b></p> <p>The Diocese strongly supports this objective and particularly the sub-objectives noted above.</p> <p>With regard to the indicator ‘Increase in the capacity of local social infrastructure’, we would be interested to know how this will be measured</p> <p>We note that there is no indicator for access to retail facilities which should be included and the impact there could be on neighbouring high street areas that could suffer as a result of developments.</p> <p>We would welcome assessment of the potential offered by an engaged and active community in running their open spaces, community gardens and shared facilities. The OPDC might want to consider this approach with developers.</p>	<p>Noted. The GLA Social Infrastructure SPG suggests how social infrastructure capacity can be measured.</p> <p>Agree. Wording of Objective 17 amended to reflect access to retail facilities.</p>

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Environment Agency	<p><b>Consultation Question (b)</b>  <b>Are there any additional PPPs that should be considered for review?</b>  Environment Agency comments We feel the following PPPs should also be considered for review:  <b>International/European</b>  The revised Waste Framework Directive which can be found at the following websites:  <a href="http://ec.europa.eu/environment/waste/framework/">http://ec.europa.eu/environment/waste/framework/</a>  and  <a href="https://www.gov.uk/guidance/waste-legislation-and-regulations">https://www.gov.uk/guidance/waste-legislation-and-regulations</a>  <b>National</b>  Separate collection of waste paper, plastic, metal and glass:  <a href="https://www.gov.uk/guidance/separate-collection-of-waste-paper-plastic-metal-and-glass">https://www.gov.uk/guidance/separate-collection-of-waste-paper-plastic-metal-and-glass</a>  Flood Risk Regulations 2009 and Flood and Water Management Act 2010:  <a href="http://www.legislation.gov.uk/ukxi/2009/3042/pdfs/ukxi_20093042_en.pdf">www.legislation.gov.uk/ukxi/2009/3042/pdfs/ukxi_20093042_en.pdf</a>  <a href="http://www.legislation.gov.uk/ukpga/2010/29/contents">http://www.legislation.gov.uk/ukpga/2010/29/contents</a></p>	<p>Noted. Flood and Water Management Act 2010 is already included in the review. It is considered that it is not necessary to include the Flood Risk Regulations in addition, as these interpret the Act. It is considered that guidance relating to the separation of waste, as referenced, is relevant to public and private waste collectors (as stated on the link quoted) and is not directly relevant to land use planning, although the sustainable management of waste will be addressed using other guidance.</p>



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Environment Agency	<p>Regional/London The control of dust and emissions during construction and demolition Supplementary Planning Guidance: <a href="https://www.london.gov.uk/sites/default/files/Dust%20and%20Emissions%20SPG%208%20July%202014_0.pdf">https://www.london.gov.uk/sites/default/files/Dust%20and%20Emissions%20SPG%208%20July%202014_0.pdf</a> Environment Agency Waste and Air Quality Evidence Gathering Project Summary Report December 2013 London's Wasted Resource: The Mayor's Municipal Waste Management Strategy Making Business Sense of Waste: The Mayor's Business Waste Management Strategy: <a href="https://www.london.gov.uk/priorities/environment/publications/the-mayors-waste-management-strategies">https://www.london.gov.uk/priorities/environment/publications/the-mayors-waste-management-strategies</a> London Waste and Recycling Board Waste Management Planning Advice for New Flatted Properties: <a href="http://www.lwarb.gov.uk/wp-content/uploads/2015/05/Final-report-Waste-Management-Planning-Advice-for-Flatted-Properties.pdf">http://www.lwarb.gov.uk/wp-content/uploads/2015/05/Final-report-Waste-Management-Planning-Advice-for-Flatted-Properties.pdf</a> Securing London's Water Future-The Mayors Water Strategy: <a href="https://www.london.gov.uk/priorities/environment/publications/securing-london-s-water-future-the-mayor-s-water-strategy">https://www.london.gov.uk/priorities/environment/publications/securing-london-s-water-future-the-mayor-s-water-strategy</a> The table includes the 2009 River Basin Management Plan (RBMP) but the 2015 RBMP is due to published imminently and therefore should inform the forthcoming Local Plan. Local We understand that the OPDC are in the process of preparing a suite of detailed evidence to support the Local Plan. We recommend that the following documents are included in the evidence suite:</p> <ul style="list-style-type: none"> <li>· 'Integrated Water Management Strategy'</li> </ul>	<p>Noted. Although not a PPP, OPDC will liaise with EA to acquire the Waste and Air Quality Evidence Gathering Report to be used for baseline evidence. A London specific air quality strategy is included in the review. It is considered that the business-specific waste management strategy is not directly relevant. The Mayor's water strategy is included in the review. The 2015 Thames River Basin Management Plan will be added once published, as part of the iterative process of IIA.</p> <p>Noted. OPDC is developing an Integrated Water Management Plan.</p>

Respondent	Relevant comment extract	Response
Environment Agency	<p><b>Brent, Ealing &amp; Hammersmith and Fulham</b></p> <p>We note that you have referenced LB Hammersmith and Fulham's Surface Water Management Plan (SWMP) as relevant evidence to the SEA. The OPDC Local Plan should also reference and be informed by LB's Ealing and Brent Surface Water Management Plan. The SWMPs have designated Critical Drainage Areas (CDA'S) within the OPDC boundary so it is important that the recommendations of the Local Plan and policies ensure a joined up approach is taken in addressing surface water flood risk issues in the CDA's.</p> <p>The Local Plan should also be informed by the 3 boroughs separate Strategic Flood Risk Assessments. However, it is a possibility that these documents are have been superceded by more relevant information which is why we also recommend that the OPDC carries out a new Strategic Flood Risk Assessment.</p>	Noted.
Environment Agency	<p><b>Consultation Question (c)</b></p> <p><b>Are there any additional themes that could be drawn out of the review of PPPs?</b></p> <p>Environment Agency comments We support the inclusion of 'Water' as a theme providing this considers flood risk, water quality and water resources.</p> <p>We recommend that the flood risk theme includes an assessment of all local sources of flooding such as surface water and ground water, river flooding and as the site is downstream from the Welsh Harp reservoir it is important that the potential risk of flooding from reservoirs is assessed.</p> <p>We recommend that the 'Water' theme also includes an objective to achieve sustainable drainage throughout the site.</p> <p>We recommend that a theme is included to 'promote, protect and enhance Green Infrastructure'. The provision of well planned and good quality Green Infrastructure (GI) will provide multiple benefits. These include reducing flood risk, improving ecological value and enhancing biodiversity, improving air quality, reducing the urban heat island effect and improving amenity value. Good quality GI can help to achieve the objectives of the SEA and the HIA.</p>	<p>Agree. It is considered that the water 'theme' includes the key issues identified. The more detailed information will included in the IIA Framework for use in the assessments. Objective 6 considers the use of sustainable drainage. It is considered that this could include GI. GI is also relevant to a number of other IIA Objectives, and will be considered as a multiple benefit throughout the assessment.</p>

Respondent	Relevant comment extract	Response
Environment Agency	<p><b>Consultation Question (d)</b>  <b>Do you agree with the sustainability issues and opportunities that we have identified? Are there additional issues that both the IIA and the Local Plan should consider?</b>  Environment Agency Comments  <b>Water</b>  We broadly support the key issues listed in this section but feel that opportunity should be taken to strengthen the wording of:  “The risk of flooding and the mobilisation of contaminants should be minimised through measures such as a site-wide drainage strategy and increased awareness.”  We recommend that the wording is changed to state that the mobilisation of contaminants should be prevented. It may also be appropriate to state that the risk of flooding should be minimized by the use of Sustainable Drainage Systems throughout the site wide drainage strategy.  The Local Plan should also seek to ensure that any contaminated groundwater is remediated through the redevelopment of the area.</p>	<p>Noted. Objective 9 of the IIA Framework considers the risk to the water environment from the run-off of contaminants. Flood risk and sustainable drainage is specifically addressed under Objective 6.  Noted. Objective 6 identifies the use of sustainable urban drainage.  Noted. This suggestion will be used to inform the development of the Local Plan.</p>
Environment Agency	<p><b>Soils and Geology</b>  We recommend that the Local Plan promotes the CL:AIRE Definition of Waste: Development Industry Code of Practice. This will help to ensure that materials are re-used on site in a sustainable manner.  <a href="http://www.claire.co.uk/index.php?option=com_content&amp;view=category&amp;id=977&amp;Itemid=330">http://www.claire.co.uk/index.php?option=com_content&amp;view=category&amp;id=977&amp;Itemid=330</a></p>	<p>Noted. The IIA Scoping Report includes guidance relating to waste policy. However, it is considered that guidance for contractors is not directly relevant for the IIA.  Noted. This suggestion will be used to inform the development of the Local Plan.</p>
Environment Agency	<p><b>Air Quality</b>  Air quality is a serious problem in London. We therefore recommend that the Local Plan ensures that the Sustainable Design and Construction Supplementary Planning Guidance is followed. We also recommend that the Local Plan requires all new Waste facilities to fully enclose operations and considers requiring existing facilities to enclose operations due to the increase in population and sensitive receptors as a result of the redevelopment of the OPDC area.</p>	<p>Noted. The IIA Scoping Report references the GLA Sustainable Design and Construction SPG.  Noted. This suggestion will be used to inform the development of the Local Plan.</p>

Respondent	Relevant comment extract	Response
Environment Agency	<b>Climate Change</b> We recommend that flood risk management and SuDS should be included in the opportunities for climate change adaptation. Flood Risk to the OPDC may increase as a result of climate change and therefore the Local Plan presents an opportunity to promote Sustainable Drainage Systems (SuDS) which can help to reduce flood risk, reduce the urban heat island effect and increase the energy efficiency of buildings.	Noted. Objective 6 identifies the use of sustainable urban drainage. Noted. This suggestion will be used to inform the development of the Local Plan.
Environment Agency	<b>Biodiversity Flora and Fauna</b> Invasive species such as Japanese Knotweed and Giant Hogweed are present throughout the Brent Catchment. We therefore think the Local Plan should seek to address this issue and take a strategic approach to removal of these species within the OPDC area.	Noted. This suggestion will be used to inform the development of the Local Plan.
Environment Agency	<b>Waste</b> We agree that the potential land use changes mean that the Local Plan needs to consider any impact on the ability of neighboring boroughs to meet their waste apportionment. The OPDC should also consider the potential reduction in waste processing capacity as a result of the proposed changes in land use, particularly as the redevelopment of the area may result in significant amounts of construction and demolition waste. If these waste processing facilities need replacing the OPDC should assess appropriate locations on a strategic level. The report has identified waste sites within the OPDC boundary and we recommend that the Local Plan considers whether it is appropriate to introduce new residential development in close proximity to these sites if they are to remain and if any mitigation measures will be required.	Noted. This suggestion will be used to inform the development of the Local Plan.
Environment Agency	<b>Deprivation and Living Environment</b> The provision of good quality and well connected GI will help to provide access to nature and improve amenity of the OPDC area and provide benefits which could contribute to reducing deprivation.	Agree. Objective 13 sub-objectives amended to specifically reflect this. Noted. This suggestion will be used to inform the development of the Local Plan.

Respondent	Relevant comment extract	Response
Environment Agency	<p><b>Consultation Question (f)</b>  <b>Are there any particular topics or geographical areas of specific concern to your organisation?</b></p> <p>Environment Agency comments  We are aware that there are drainage capacity issues in the wider area which should be addressed through cross boundary co-operation. Possible solutions may include achieving drainage solutions within the OPDC boundary and exploring opportunities to retrofit SuDS in neighbouring boroughs.  The Alperton Housing Zone will may also add pressure to the existing infrastructure but may also present an opportunity to provide contribute to strategic water infrastructure and GI solutions. This may also result in the Grand Union Canal being used more frequently by the residents of both the OPDC area and the Housing Zone. This needs to be considered and provides more justification for maximising opportunities to increase GI along the Grand Union Canal.</p>	<p>Noted. Objective 6 identifies the use of sustainable urban drainage.  Noted. This suggestion will be used to inform the development of the Local Plan.</p>
Historic England	<p>Historic England welcomes the attention given by the IIA scoping report to Heritage at Risk, and the importance of development within the OPDC area seeking opportunities to protect and enhance these assets. However, we have some concerns that treatment of cultural heritage throughout the document is uneven and at times confused. While the IIA goes into a satisfactory level of detail in section 5.4 in relation to Kensal Green Cemetery we would expect to see this consideration flow through the document. We note that there is confusion in this part of the document about the St Mary's Conservation Area in Hammersmith and Fulham, which includes St Mary's Cemetery and parts of the Grade I registered landscape of Kensal Green Cemetery, and Kensal Green Cemetery Conservation Area in RBKC, which includes the vast majority of the listed buildings and monuments and the majority of the Registered Park and Garden. This is important in relation to the issue of the setting. This needs to be addressed in a manner that is proportionate to the significance of the heritage assets that will be affected by the development proposed at Old Oak and Park Royal, with particular consideration required regarding the potential impacts on the heritage significance of those assets.</p>	<p>Agree. Table 5-1 in Appendix C amended for clarification.</p>

Respondent	Relevant comment extract	Response
Historic England	We also consider that the IIA does not fully take into account the wider positive role that heritage can play environmentally, socially and economically.	Noted. Text added to Table 5-1. It is considered that the IIA Framework covers the wider benefits, which will be explored in the assessment through the sub-objectives included.
Historic England	Historic England welcomed the opportunity to participate in the Scoping Workshop that partially informs this document. We note that the section relating to Heritage at Risk in Appendix A is confusing due to typographical errors.	Noted. IIA Scoping Report amended to address errors.
Historic England	<p>Unfortunately this confusion is also evident in the Baseline Data (section C.10) where the map is not only difficult to read with regard to conservation areas, some of which are not illustrated, but it does not include Registered Parks and Gardens of Special Historic Interest that could be affected, nor does it show the five APAs within a 500m radius of the OPDC area, and the spread of listed buildings and monuments in Kensal Green Cemetery appears inaccurate. The associated list of conservation areas that may be affected by development within the OPDC area on p.24 should be expanded to include Kensal Green Cemetery Conservation Area and Oxford Gardens Conservation Area, both of which are in the Royal Borough of Kensington and Chelsea. Also, we note that the Hanger Hill Garden Estate and Hanger Hill (Haymills) Estate Conservation Areas in Ealing are both mislabelled.</p> <p>In the accompanying text on p.25 the St Marys Cemetery and Kensal Green Cemetery, and their respective designations, are not clearly differentiated.</p> <p>While the OPDC does not currently have a list of locally significant buildings, the three local boroughs who previously acted as planning authorities for this area have produced local lists. As such you may also wish to make reference to undesignated heritage assets, which should also be considered as part of the planning process.</p>	Agree. Heritage map has been updated. Text regarding the potential to explore the production of a Local List to protect and/or enhance heritage assets added to Table 5-1 and IIA Framework.



Respondent	Relevant comment extract	Response
Historic England	<p><b>Question A.</b>  <b>Do you have any further suggestion regarding the scope of the IIA and its proposed appraisal of the Local Plan?</b></p> <p>It is important that the references to heritage in the IIA inform the policies in the new Local Plan and any related plans or documents that flow from it. These themes and their interrelationships should inform the whole plan. Since the conservation of the historic environment is a strategic priority in the NPPF, the IIA should facilitate the development of a positive strategy for the historic environment as set out in paragraphs 126 and 157 (8) of the NPPF. For this reason, we would expect consideration of the historic environment to include and go beyond the relevant issues highlighted on p. 20 of the IIA (Common themes), which currently overlook the role of the historic environment in providing low carbon and green options for developments.</p>	<p>Agree. The IIA Framework is to be considered as a whole, with the interrelationships between the objectives noted in the framework for clarity. The relationship between the historic environment and sustainable design and energy generation will be noted.</p>

Respondent	Relevant comment extract	Response
Historic England	<p><b>Question B.</b>  <b>Are there any additional Plans, Policies or Programmes that should be considered for review?</b></p> <p>The list of international documents omits the European Landscape Charter (2000), also known as the Florence Charter. We would encourage you to add this.</p> <p>We would query the inclusion of the Government Office for London Circular 1/2000: Strategic Planning in London in your list of national plans policies and programmes. This document has been superseded. We would encourage you to include Historic England's Historic Environment Good Practice Advice in Planning Notes on:</p> <ol style="list-style-type: none"> <li>1. The Historic Environment in Local Plans (2015);</li> <li>2. Managing Significance in Decision-Taking in the Historic Environment (2015); and</li> <li>3. The Setting of Heritage Assets (2015).</li> </ol> <p>We would also encourage you to make reference to the English Heritage publication Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment (2013). These documents are all available on our website: <a href="https://historicengland.org.uk/images-books/publications/">https://historicengland.org.uk/images-books/publications/</a>.</p> <p>At a local level you may wish to make reference to the lists of locally significant buildings that have been produced by the London boroughs of Brent, Ealing and Hammersmith and Fulham.</p>	<p>Noted. Agree with comment with regards to the European Landscape Charter and the London Circular 1/2000. However, it is considered that the other documents referenced are guidance as opposed to PPPs. These will be used as reference document, but not included in the PPP review itself.</p>

Respondent	Relevant comment extract	Response
Historic England	<p><b>Question C.</b>  <b>Are there any additional themes that could be drawn out of the review of PPPs?</b>  As per our response to question A, the environmental theme of protecting and enhancing the historic environment is also relevant to draft IIA objectives 6, 7 and 8. This is particularly relevant when considering adapting and reusing existing buildings and infrastructure such as the Grand Union Canal. Furthermore, we consider that the wording of theme should be amended to read "... and recognise and appreciate landmarks, townscapes and their setting". This is important as there are numerous very highly graded heritage assets whose setting could be dramatically changed by development within the OPDC area.</p> <p>Historic England welcomes the social theme that specifically seeks to maximise the contribution that the arts, culture and heritage can make to the community. Given the heritage significance of the canal passing through the opportunity area, and the proximity of various highly significant heritage assets such as Kensal Green and Twyford Abbey, we would also suggest that heritage has the potential to contribute strongly to the economic development of the area through the reuse of buildings and tourism. As such you could, in our opinion, add objective 12 to the list of relevant objectives for the economic theme.</p>	<p>Agree. Theme modified in Table 4-2 and Appendix B. Cross-references added to Table 4-2 and Objective 12 in the IIA Framework.</p>

Respondent	Relevant comment extract	Response
Historic England	<p><b>Question D.</b>  <b>Do you agree with the sustainability issues and opportunities that we have identified? Are there additional issues that both the IIA and the Local Plan should consider?</b></p> <p>In line with our guidance Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment (2013), we would encourage the Cultural Heritage Objective (12) to be reworded to say “To conserve and enhance the historic environment, heritage assets and their settings”. This would reflect the fact that the most significant impacts of the planned development at Old Oak and Park Royal for the historic environment, will be on the setting of heritage assets in the surrounding area. We would also encourage you to make the following alterations to the sub-objectives in objective 12 (Heritage):</p> <ul style="list-style-type: none"> <li>• Reword the second sub-objective to say “Avoid the loss of heritage assets to new development”</li> <li>• Add to the wording of the third sub-objective to say “Avoid adverse impacts on the setting of heritage assets, including those outside OPDC area”</li> <li>• An additional indicator for objective 12 could be the development of a heritage strategy, potentially including works to enhance or better reveal heritage significance in and around the OPDC area, celebrating local character/features including as part of a public engagement strategy. Such a heritage strategy could be linked to objectives 13, 15, 16 and 17 to enhance the social benefits to the new and existing communities derived from the heritage of Old Oak Park Royal. This work could also highlight economic opportunities which would link it to objective 18.</li> </ul>	<p>Agree. Wording for Objective 12 amended.</p> <p>Disagree. Wording considered to be appropriate for minimising loss of heritage assets.</p> <p>Agree. Text amended to reflect this.</p> <p>Disagree. Although the suggestion would be beneficial, it is not appropriate for the role of an IIA objective.</p>

Respondent	Relevant comment extract	Response
Historic England	<p>In addition to these comments about objective 12 (heritage), we would recommend that further consideration be given to the following IIA objectives and sub-objectives:</p> <ul style="list-style-type: none"> <li>• Objective 1 (p.38) could be developed to state “Optimise development opportunities to develop and enhance local distinctiveness and character” and “Maximise the contribution ... intrigue, character and surprise into the built environment.”</li> <li>• Objective 3 (p. 39) could be linked to objective 12 with specific regard to reusing existing buildings.</li> <li>• Objectives 6 and 7 (p. 42) could be linked to objective 12 in terms of the sustainable adaption and reuse of existing buildings, and embodied energy that historic buildings contain.</li> <li>• Objectives 9 and 10 (pp. 43-44) could be linked to objective 12 in terms of better revealing heritage significance and helping people enjoy the Grand Union Canal</li> </ul>	Agree. Wording for Objectives 1, 3, 6, 7, 9 and 10 amended.
Historic England	<p><b>Question E.</b>  <b>Is there any additional baseline information that you feel it would be important to include?</b></p> <p>In addition to the general points raised above that relate to the baseline information, we are pleased to note that the English Heritage Old Oak Area Assessment is mentioned on p. 23 of the Baseline Data review. We would encourage the OPDC to complete a similar piece of characterisation work for the Park Royal area. Further work considering particular areas or building types may also help inform later stages of the plan making process. These are likely to be particularly useful if the OPDC choose to designate any conservation areas or create a local list of buildings and structures of heritage significance.</p>	Noted.

Respondent	Relevant comment extract	Response
Historic England	<p><b>Question F.</b>  <b>Are there any particular topics or geographical areas of specific concern to your organisation?</b></p> <p>As our comments on the IIA highlight, the most sensitive and significant heritage assets that will be affected by development in the opportunity area, are those located outside of its boundaries. The most notable of these is Kensal Green Cemetery. The consequence of this is that the setting of heritage assets should be an important consideration in the development of the Local Plan to ensure that it will result in sustainable development as defined by the NPPF. We look forward to working with the OPDC in developing the local plan to achieve this aim, as well as to develop characterful places that will add to London's rich built legacy.</p>	Noted.
Historic England Archaeology	<p>We welcome the references to archaeology in the scoping report. Whilst there are at present no archaeological priority areas within the proposed local plan area, the Greater London Historic Environment Record holds information on several archaeological investigations, sites and finds. Notably the site of Acton Wells 18th century spa is located within the Opportunity Area. The open ground of Wormwood Scrubs was the site of a rifle range and anti-aircraft battery and may preserve as yet undiscovered earlier remains. The Grand Junction Canal and Old Oak Common area include aspects of railway and industrial archaeological interest. The 19th century Park Royal cemetery would also be of interest if subject to redevelopment.</p> <p>Thus although the Opportunity Area is not generally of high archaeological potential, major redevelopment could affect a range of undesignated heritage assets of archaeological interest. With the Mayor's support Historic England has recently consulted upon and is now finalising guidance for the comprehensive review programme for London's Archaeological Priority Areas so we recommend that this document is referred to as a relevant Regional Policy &amp; Programme. A desk-based appraisal should then be undertaken to identify areas of known or potential archaeological interest meriting identification as new priority areas to inform implementation of NPPF historic environment policy.</p>	Noted. Text added to baseline and key issues. The guidance itself is not considered to be a PPP, although subsequent strategies or baseline data will be added at a later stage of the IIA as part of the iterative process.



Respondent	Relevant comment extract	Response
Natural England	Under the section looking at the “Review of plans and programmes” in Table 4.1 where West London is considered, the entry for the West London Waste Plan can be updated to say that the plan has now been adopted and is no longer the “Proposed Submission Plan”.	Agree. Text amended to reflect this.
Resident	<p>1. Additional Consultation, (paragraph 1.9.3, page 6) of the Scoping Report says “An important element of the IIA, HIA and EqlA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.”</p> <p>We note that we have not been approached by OPDC officers regarding the scoping report and know no others that have been. (NB this was discussed at the GUA meeting on 7th October). We would very much like to know - who have been identified as key representatives, what was the process for their identification and have any of those identified been advised of this.</p>	<p>OPDC’s Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC’s website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>

Respondent	Relevant comment extract	Response
Resident	<p>2. Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC's Issues &amp; Options Local Plan has not been proactively provided.</p>	<p>The SEA Directive requires OPDC to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The Consultation Bodies are Historic England, Natural England and the Environment Agency.</p> <p>To enable a wider range of stakeholders to input into the Local Plan development process from an early stage, OPDC considered it appropriate to exceed legislative requirement and invite interested parties to submit comments.</p> <p>All stakeholders on OPDC's consultation database were contacted via email on 4 September 2015 and a copy was placed on OPDC's website.</p> <p>OPDC is in week 30 of a 25-30 year project. The statutory function as a local planning authority means that staffing has focused on a team that will progress evidence base for policies and ensure robust processes are in place to manage planning applications. The Strategy and Programmes team, including Communications and Engagement, is still embryonic; therefore, your patience is appreciated while the Corporation</p>

Respondent	Relevant comment extract	Response
		<p>continues to staff up to serve local residents and businesses, meet groups to forge relationships and works to set-up a community group.</p> <p>On 12 October, OPDC Communications and Planning officers presented to a small group of GUA members to start these meetings and to explain how local communities can get involved in the planning process. OPDC convened a second meeting with GUA members on 3 November to discuss the Scoping Report and wider Local Plan process with a public workshop on the vision and objectives held on 30 November prior to the Local Plan consultation in early 2016.</p>

Respondent	Relevant comment extract	Response
Resident	<p>The European Assessment Directive or the European Union requires that realistic alternatives are assessed. Recent legal judgements have also asserted the importance of public authorities consulting upon arguable yet discarded options.</p> <p>We ask that community-based alternatives – set out in the following Vision and Objectives are assessed, with positive and negative effects identified, and included in the OPDC's Issues &amp; Options Local Plan.</p>	<p>The provided community-based vision and objectives provide a comprehensive and detailed range of suggestions which are being used to directly inform the draft Local Plan proposed vision and objectives. Where the suggestions are more relevant for policy options, these have also been used to inform the development of these options.</p> <p>As the provided community-based vision and objectives have directly and positively informed the development of the draft OPDC Local Plan, that will be subject to the IIA, a separate IIA on these is not considered necessary.</p> <p>Following a public workshop on the vision and objectives on 30 November, further community input has been provided into the development of the vision and objectives.</p> <p>As agreed at the workshop, feedback on this work and how the provided community-based vision and objectives have informed the Local Plan will be provided in January 2016. There will also be subsequent opportunity to comment on the vision and objectives during the first Local Plan consultation from February 2016.</p>

Respondent	Relevant comment extract	Response
Resident	<p>3. A key issue for all section of the community in and around the OPDC is the impact of a 30 year construction period – including issues of dust, noise, vibration and pollution, and ability of the boroughs to meet the potential accommodation, facilities and amenity needs of construction workers. This has not been fully considered in the report. It must be fully identified and planned for as quite separate IIA and Local Plan objectives.</p>	<p>Agree. Amendments made: Key Sustainability issues and opportunities Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.” Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.” Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods. § Consider the impact of construction on local infrastructure on local businesses and communities.</p>

Respondent	Relevant comment extract	Response
		<p>§ Mitigate the impact of construction traffic</p> <p>11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p> <p>§ Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise light pollution</p> <p>13. Increase community cohesion and reduce social exclusion</p> <p>§ Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision.</p> <p>15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</p>



Respondent	Relevant comment extract	Response
		<p>§ Minimise construction phase impacts on communities, in relation to both physical and psychological health”</p>

Respondent	Relevant comment extract	Response
Resident	<p>1. Additional Consultation, (paragraph 1.9.3, page 6) of the Scoping Report says “An important element of the IIA, HIA and EqlA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.”</p> <p>We note that we have not been approached by OPDC officers regarding the scoping report and know no others that have been. (NB this was discussed at the GUA meeting on 7th October). We would very much like to know - who have been identified as key representatives, what was the process for their identification and have any of those identified been advised of this.</p>	<p>OPDC's Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC's website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>

Respondent	Relevant comment extract	Response
Resident	2. Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC's Issues & Options Local Plan has not been proactively provided.	<p>The SEA Directive requires OPDC to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The Consultation Bodies are Historic England, Natural England and the Environment Agency.</p> <p>To enable a wider range of stakeholders to input into the Local Plan development process from an early stage, OPDC considered it appropriate to exceed legislative requirement and invite interested parties to submit comments.</p> <p>All stakeholders on OPDC's consultation database were contacted via email on 4 September 2015 and a copy was placed on OPDC's website.</p> <p>OPDC is in week 30 of a 25-30 year project. The statutory function as a local planning authority means that staffing has focused on a team that will progress evidence base for policies and ensure robust processes are in place to manage planning applications. The Strategy and Programmes team, including Communications and Engagement, is still embryonic; therefore, your patience is appreciated while the Corporation</p>

Respondent	Relevant comment extract	Response
		<p>continues to staff up to serve local residents and businesses, meet groups to forge relationships and works to set-up a community group.</p> <p>On 12 October, OPDC Communications and Planning officers presented to a small group of GUA members to start these meetings and to explain how local communities can get involved in the planning process. OPDC convened a second meeting with GUA members on 3 November to discuss the Scoping Report and wider Local Plan process with a public workshop on the vision and objectives held on 30 November prior to the Local Plan consultation in early 2016.</p>

Respondent	Relevant comment extract	Response
Resident	<p>The European Assessment Directive or the European Union requires that realistic alternatives are assessed. Recent legal judgements have also asserted the importance of public authorities consulting upon arguable yet discarded options.</p> <p>We ask that community-based alternatives – set out in the following Vision and Objectives are assessed, with positive and negative effects identified, and included in the OPDC's Issues &amp; Options Local Plan.</p>	<p>The provided community-based vision and objectives provide a comprehensive and detailed range of suggestions which are being used to directly inform the draft Local Plan proposed vision and objectives. Where the suggestions are more relevant for policy options, these have also been used to inform the development of these options.</p> <p>As the provided community-based vision and objectives have directly and positively informed the development of the draft OPDC Local Plan, that will be subject to the IIA, a separate IIA on these is not considered necessary.</p> <p>Following a public workshop on the vision and objectives on 30 November, further community input has been provided into the development of the vision and objectives.</p> <p>As agreed at the workshop, feedback on this work and how the provided community-based vision and objectives have informed the Local Plan will be provided in January 2016. There will also be subsequent opportunity to comment on the vision and objectives during the first Local Plan consultation from February 2016.</p>

Respondent	Relevant comment extract	Response
Resident	<p>3. A key issue for all section of the community in and around the OPDC is the impact of a 30 year construction period – including issues of dust, noise, vibration and pollution, and ability of the boroughs to meet the potential accommodation, facilities and amenity needs of construction workers. This has not been fully considered in the report. It must be fully identified and planned for as quite separate IIA and Local Plan objectives.</p>	<p>Agree. Amendments made:</p> <p>Key Sustainability issues and opportunities  Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.”  Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.”  Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives  “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods.  § Consider the impact of construction on local infrastructure on local businesses</p>

Respondent	Relevant comment extract	Response
		<p>and communities.</p> <p>§ Mitigate the impact of construction traffic</p> <p>11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p> <p>§ Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise light pollution</p> <p>13. Increase community cohesion and reduce social exclusion</p> <p>§ Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision.</p> <p>15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</p>



Respondent	Relevant comment extract	Response
		<p>§ Minimise construction phase impacts on communities, in relation to both physical and psychological health”</p>

Respondent	Relevant comment extract	Response
Resident	Design Strategy & Density: all new design should be in keeping with the original architecture of the area, which is Victorian and Edwardian. Constructions should only be 5 storeys high near the main station or commercial hubs, but residential dwellings should be lower and be surrounded by sufficient green areas (currently under-represented on the Old Oak Green Grid on page 39) for a village feel. No tall buildings should be visible from the TITRA conservation area or Park Royal Bridge. Any plan to repeat the bland, gloomy, soulless design of North Acton should be immediately discarded - that recent development is an eyesore. Only appealing and thoughtful development please.	Noted. The following objectives consider the design, massing and height of buildings: Objective 1 considers enhancement of the built environment and encouragement of place-making. Objective 2 considers the optimisation of the efficient use of land through increased development densities and building heights, where appropriate.
Resident	Old Oak Lane should become a secondary road and be freed from lorries and HGVs, many of which are a danger to pedestrians due to the high speed at which they drive. Trucks and large commercial vehicles should be redirected to Atlas Road and the new highways connecting Hythe Road and Old Oak Common, for example. Channel Gate Road, which was created by bulldozing our Victorian cottages must be closed down, landscaped, and given back to the TITRA community for future generations.	Noted. Objective 4 considers the transport network and Objective 14 considers the use of traffic calming measures.
Resident	Regarding the need to liaise with the local communities that will not be a problem. We have always welcomed the opportunity and pro-actively asked to engage if necessary.	Noted.
Resident	Can I also say that I was surprised to read in your literature that 'the wider area around Old Oak and Park Royal contains some of the most deprived communities in England'. Did a resident pen this, or someone who has never lived here? Please explain.	Noted. This statement is based on the Indices of Multiple Deprivation.
Resident	You should change all references to "Middlesex Hospital" to "Central Middlesex Hospital".	Agree. Text amended to reflect this.

Respondent	Relevant comment extract	Response
RBKC	<p><b>(a) Do you have any further suggestions regarding the scope of the IIA and its proposed appraisal of the Local Plan?</b></p> <p>In terms of the spatial scope which is set out at section 2.2, RBKC notes that “Studies in relation to the effects on local populations in the neighbouring areas to the OPDC boundary are currently ongoing.” However, we would further welcome specific mention of local populations in the neighbouring area of RBKC. We would also anticipate that these additional studies will account for the Kensal Canalside Opportunity Area which is proximate to the OPDC.</p>	Disagree. Reference to local populations in neighbouring areas is considered sufficient for the purposes of the draft IIA Scoping Report
RBKC	<p><b>(b) Are there any additional PPPs that should be considered for review?</b></p> <p>RBKC considers that the following documents are absent from Table 4-1 and should be included because their implications go beyond authority boundaries:</p> <p><b>Kensington &amp; Chelsea</b></p> <ul style="list-style-type: none"> <li>• Consolidated Local Plan (July 2015) – particularly with regard to Chapter 3 ‘Our Vision and Strategic Objectives’ (including the Key Diagram) and Chapter 5 ‘Kensal’, Chapter 20 ‘Kensal Gas Works’</li> <li>• Surface Water Management Plan (SWMP, February 2014)</li> <li>• Local Flood Risk Management Strategy (LFRMS, July 2015)</li> <li>• Issues and Options Paper for Kensal Gasworks (June 2012)</li> <li>• St Quintin and Woodlands Draft Neighbourhood Plan (May 2015)</li> </ul> <p><b>Regional / London</b></p> <ul style="list-style-type: none"> <li>• Social Infrastructure SPG (May 2015)</li> <li>• The Control of Dust and Emissions During Construction and Demolition SPG (July 2014)</li> <li>• Town Centres SPG (July 2014)</li> <li>• London Planning Statement SPG (May 2014)</li> <li>• London Infrastructure Plan 2050 Update (March 2015)</li> </ul> <p><b>National</b></p> <ul style="list-style-type: none"> <li>• National Planning Policy for Waste (October 2014)</li> <li>• Planning Policy for Traveller Sites has since been updated in August 2015</li> <li>• Written Ministerial Statement: Sustainable Drainage Systems (December 2014) (equivalent to national planning policy)</li> </ul>	Agree. Text amended. It is considered that the London Planning Statement SPG is more relevant to the Local Plan preparation than the IIA.

Respondent	Relevant comment extract	Response
RBKC	<p><b>(c) Are there any additional themes that could be drawn out of the review of PPPs?</b></p> <p>RBKC considers the themes which have been identified are comprehensive for the purposes of the Impact Assessment.</p>	Noted
RBKC	<p><b>(d) Do you agree with the sustainability issues and opportunities that we have identified? Are there additional issues that both the IIA and the Local Plan should consider?</b></p> <p>RBKC welcomes the section 5.4 which addresses cross boundary considerations and references St Mary's and Kensal Green Cemetery. However, we would encourage the OPDC to expand on a commitment to 'stitching the edge', a principle mentioned at the scoping meeting (21 July 2015). There is no reference to consideration of how boundaries will be developed in this IIA document, or how potential issues could be mitigated. This is of particular importance for Kensal Canalside.</p>	<p>Agree. Objective 2, bullet point 2 amended to state: Optimise development density in a way that makes the most efficient use of land whilst meeting commercial needs and responding to sensitive areas.</p> <p>Agree. Objective 4, bullet point 2, will be amended to state: Increase the connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks including via green infrastructure networks and the canal</p>
RBKC	<p><b>(f) Are there any particular topics or geographical areas of specific concern to your organisation?</b></p> <p>Yes, as discussed above RBKC is mainly concerned about the cross boundary considerations, including Kensal Canalside, St Mary's and Kensal Green Cemetery, and also the economic impact particularly on retail centres and transport linkages. RBKC is also concerned about the impact on surface water drainage and flooding in the Counters Creek catchment area, which includes a large proportion of RBKC's area. Please see RBKC's response to the Old Oak and Park Royal Planning Opportunity Area Framework document (14 April 2015).</p>	Noted. Objective 4 considers surface water drainage and flooding.

Respondent	Relevant comment extract	Response
RBKC	<p>(g) Are there any changes you consider should be made to the IIA Framework, IIA Objectives / sub-objectives or indicators?</p> <p>The Council reiterates its request that direct reference is made to improving links to other opportunity areas via rail. Both Crossrail (Kensal Canalside) and the Overground (White City) stand to benefit from direct access to the Opportunity Areas and embracing connectivity between the Mayor's key growth areas should be included within the objectives and indicators.</p>	<p>Agree. Objective 4, bullet point 2, amended to state: Increase the connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks including via green infrastructure networks and the canal</p>
RBKC	<p>The Council welcomes the indicator for objective 12 which includes "Decrease in the number of Heritage Assets at Risk in and around the area". However, we would request that St Mary's and Kensal Green Cemetery is mentioned as it borders the OPDC area, and so the need to protect this heritage asset's context is critical.</p>	<p>Disagree. Reference to heritage assets at risk in and around the area is considered sufficient for the purposes of the draft IIA Scoping Report</p>

Respondent	Relevant comment extract	Response
<p>St Quintin and Woodlands Neighbourhood Forum</p>	<p><b>General</b>  The document has been published for consultation with no covering statement from the OPDC. It is a lengthy and technical document, which contains no summary of conclusions as to its implications for the development of the OPDC Local Plan. As a document on which the general public and local residents associations can become meaningfully 'engaged', it is challenging to say the least. Nevertheless, the document states at paragraph 1.9.3 that An important element of the IIA, HIA and EqlA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.  As far as we can ascertain through contact with many local residents associations and community organisations, there has been no such attempt to draw the attention to this document to 'key representatives from the community'. It has been published on the OPDC consultation webpage, but we are not aware of any further efforts to draw it to the attention of those living in and around the OPDC area. We wish this to be noted as a matter of record.</p>	<p>OPDC's Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC's website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>

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St Quintin and Woodlands Neighbourhood Forum	<p>Page 8 on Assessment of Alternatives for SEA screening states It is a requirement of the SEA Directive that 'reasonable alternatives' are assessed and, therefore, alternative options will be assessed using the IIA Framework. In accordance with NPPG:</p> <p>The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative.'</p> <p>We have struggled to find any part of the Hyder report which sets out any 'reasonable alternatives' ...</p>	<p>Noted. Information has been added to section2.2.1 . The draft IIA Scoping Report represents the initial stage in the SA process for the emerging Local Plan and sets the scope for the remainder of the process. Its purpose is to:</p> <p>Set the scope and level of detail of the SA;  Identify relevant plans, policies, programmes and initiatives that will inform the SA process and the Local Plan;  Identify relevant baseline information;  Identify key sustainability issues and problems; and  Present an SA Framework, consisting of sustainability objectives and indicators, against which the Local Plan can be assessed.</p> <p>Assessment of Alternatives relates to the options suggested in the Regulation 18 version of the draft Local Plan.</p>



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St Quintin and Woodlands Neighbourhood Forum	<p>... or explains why it is assumed that the OPDC area should be planned on the basis of an incoming 24,000 homes and 55,000 jobs. These figures are now included in the 2015 London Plan, as a result of the additions made through the FALP exercise. But we can find little or no rationale or detailed justification for these targets in the FALP documentation.</p> <p>In the IIA there is a statement at Appendix C Baseline Data Page 2 which reads 'Given the proposed minimum new homes of 25,500 this density is set to change'. No explanation of the rationale or planning justification for this proposed new density for the OPDC area is provided.</p> <p>Hammersmith and Fulham Council consulted on a revised Draft Local Plan from 9th January to 20th February 2015. We appreciate that planning powers for this northern part of the borough are now in the hands of the OPDC, but this does not negate the work that the Borough Council has previously undertaken in respect of the Old Oak area.</p> <p>This LBHF Draft Local Plan stated in relation to the Old Oak Opportunity Area at paragraph 6.8 The Mayor of London's Further Alterations to the London Plan (FALP) 2014 identifies Old Oak as an Opportunity Area. It includes land in the OORA in LBHF and land within the London Boroughs of Ealing and Brent and covers 155 hectares in total. The Opportunity Area is identified as having the potential to provide up to 24,000 homes and 55,000 jobs, making it London's largest Opportunity Area in terms of its potential contribution to growth. The Council considers that approximately 18,000 homes and 50,000 jobs could be accommodated within LBHF and that approximately 6,000 homes and 20,000 jobs could be delivered within the next 20 years covered by this Local Plan, thereby helping to accommodate a substantial quantum of London's homes and jobs needs. It is important that the new homes are available to Londoners rather than to international investors.</p>	<p>The current version of the London Plan (consolidated with amendments with from the FALP) was adopted in March 2015 following an Examination in Public.</p> <p>As such the London Plan's minimum housing targets and indicative employment figures for Old Oak and Park Royal are form part of the Development Plan for the OPDC area.</p> <p>The Old Oak and Park Royal OAPF supplements the London Plan, establishing the principles for the range of densities across Old Oak.</p> <p>This strategic planning policy and guidance provides the baseline for the draft IIA Scoping Report.</p>

Respondent	Relevant comment extract	Response
St Quintin and Woodlands Neighbourhood Forum	<p>We support the view of LBHF that planning for 24,000 homes, rather than approximately 18,000, is potentially excessive development of the OPDC area and needs a fuller justification than has as yet been provided. The risk remains that such development will lead to densities and building heights which fail to integrate with existing communities in the area, and which will overload the road network and other infrastructure such a drainage and water supply.</p> <p>The LBHF Draft Local Plan suggests a series of options for the Old Oak Regeneration Area Alternative Options - Policy OORA (Strategic Policy – Old Oak Regeneration Area) Maintain the current policy where existing strategic industrial land and waste uses are safeguarded. Defer the regeneration of parts of the site until suitable transport nodes are operational Optimise the quantum of development as far as possible but prohibit tall buildings in the regeneration area. Rather than a mix of employment and residential, land use could be weighted towards the provision of employment. Rather than a mix of employment and residential, land use could be weighted towards the provision of more residential use.</p> <p>The St Quintin and Woodlands Forum supports the use of the Old Oak regeneration area for a combination of new jobs and new homes. But we have serious concerns that the London Plan targets severely under-estimate the capacity of the existing and planned road network to cope with the scale of development envisaged, and as reflected in Hyder's IIA scoping study. We understand that EU and UK SEA legislation requires that 'reasonable alternatives' are consulted on, and we do not see that this has happened in this case?</p>	<p>The current version of the London Plan (consolidated with amendments with from the FALP) was adopted in March 2015 following an Examination in Public.</p> <p>As such the London Plan's minimum housing targets and indicative employment figures for Old Oak and Park Royal are form part of the Development Plan for the OPDC area.</p> <p>The Old Oak and Park Royal OAPF supplements the London Plan, establishing the principles for the range of densities across Old Oak.</p> <p>This strategic planning policy and guidance provides the baseline for the draft IIA Scoping Report.</p> <p>Assessment of Alternatives relates to the options suggested in the Regulation 18 version of the draft Local Plan.</p>

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St Quintin and Woodlands Neighbourhood Forum	<p>Paragraph 4.2 of the Hyder document is headed Key Results from the Review and reads:</p> <p>Environmental, social and economic objectives and issues identified in the review of plans, programmes and environmental protection objectives (PPPs) of relevance to the IIA were used to generate a series of common themes. Appendix B presents a summary of how the identification of common themes relates to each of the PPPs reviewed. How these themes relate to the relevant assessment processes is presented in Table 4-2. The results of this assessment have been used to inform the development of the draft IIA Framework. How the resulting draft Objectives relate to the identified themes is also shown in Table 4-2.</p> <p>It is very hard for the lay reader or member of the public can understand how the subsequent table can be labelled as 'Key Results'. There are no 'results' stated. The document states 'the results of this assessment have been used to inform the development of the draft IIA framework', without explaining in what manner? There is no sense of which findings or 'results' from the assessment have proved more influential than any other.</p>	Noted. Table 4-2 renamed 'Results of review of Plans, Policies and Programmes.

Respondent	Relevant comment extract	Response
St Quintin and Woodlands Neighbourhood Forum	On question a) the scope of the IIA seems inadequate in failing to provide any explanation or justification for the main London Plan policies for the OPDC Local Plan (55 jobs and 24,000 homes) and failing to identify or explore any 'reasonable alternatives'.	<p>The current version of the London Plan (consolidated with amendments with from the FALP) was adopted in March 2015 following an Examination in Public.</p> <p>As such the London Plan's minimum housing targets and indicative employment figures for Old Oak and Park Royal are form part of the Development Plan for the OPDC area.</p> <p>The Old Oak and Park Royal OAPF supplements the London Plan, establishing the principles for the range of densities across Old Oak.</p> <p>This strategic planning policy and guidance provides the baseline for the draft IIA Scoping Report.</p>
St Quintin and Woodlands Neighbourhood Forum	On question d) sustainability issues which are not explored include the scale of proposed development on local infrastructure (road network, sewers and drainage, water supply) all of which are already vulnerable to the cumulative impact of approved developments in White City East (Imperial West, Westfield 2, Stanhope/BBC, St James).	<p>Noted. Title of Objective 4 amended to state Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network.</p> <p>Objective 9 considers the capacity of water infrastructure to meet future demand.</p>

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>The document is very encouraging. TITRA strongly supports the emerging themes such as:</p> <ul style="list-style-type: none"> <li>- Increasing economic development and encouraging upskilling, employment and inward investment</li> <li>- Renewal of existing business sites (including brownfield) to enable future development / business growth</li> <li>- Different types of residential housing, especially affordable</li> <li>- Improving transport, particularly rail, cycling and pedestrian access</li> <li>- Social infrastructure, whether shops, schools, health care units and other amenities</li> </ul>	Noted.

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>2.1. No commitment to existing communities We, as local residents, believe that the IIA must have explicit PPPs for safeguarding and enhancing existing residential communities.</p> <p>There are 5,000 people living in large and small housing estates and cottages and they seem to be absent from the document or the workshops that preceded it. These residential areas have a range of construction, waste-related and other pollution and transport issues (from development being pushed to the edges of London boroughs) which require direct consideration (and suitable mitigation) by the Local Plan assessment:</p> <p>Area Major issues North Acton conservation area • Heavy traffic &amp; pollution from HGVs on Old Oak Lane / same issues from HGVs using Channel Gate Road access to Willesden Euroterminal • Powerday waste plant – pollution and odours since its opening • Clean Power energy recovery plant - in partnership with Network Rail – which threatens pollution in Kensal Rise and Harlesden as well as the North Acton conservation area • Years of disruption from HS2 construction works &amp; traffic access to Euroterminal site • Parking and rubbish dumping issues Wells House Road • Encirclement and land take from HS2 construction • Years of serious disruption from HS2 construction / TfL Old Oak Common station construction</p>	<p>Agree. Amendments made:</p> <p>Key Sustainability issues and opportunities Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.” Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.” Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods. § Consider the impact of construction on local infrastructure on local businesses and communities. § Mitigate the impact of construction traffic 11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups § Minimise noise pollution caused by traffic and commercial uses during the construction and operation of</p>

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The island triangle residents' association	<p>In addition, the North Acton road infrastructure as a whole is already overworked and beset by traffic jams through the day – often because of very minor roadworks – which leads to increased levels of pollution.</p> <p>Our association believes that the authorities together with local residents will have to set up local air quality monitoring capabilities locally to align with the Local Plan with Theme 5's aspiration of improving air quality. Whatever the planned level of development, residents (in existing and new communities) need proof that nearby activities - waste sites, major construction work like HS2 aren't causing problems.</p> <p>TITRA has recently taken part in a small academic study by Mapping for Change, a whollyowned subsidiary of UCL, which has confirmed that properties on Old Oak Lane experience NO2 levels above EU limits (BBC London report on the project is here: <a href="http://www.bbc.co.uk/news/uk-england-london-34439468">http://www.bbc.co.uk/news/uk-england-london-34439468</a>).</p> <p>However, the TITRA community has no localised monitoring of risks such as particulates (PMs) which present an even more alarming pollution risk, given multiple local waste sites, waste haulage, cement batching, excavation and construction material stockpiling and rail transport activities in North Acton alone. Since TITRA has been able to do air quality NO2 monitoring at very modest cost, and the association is aware that the OPDC is starting to collaborate with smart city technology providers, we believe that localised air quality monitoring would be a realistic and an invaluable application for such technologies.</p> <p>TITRA asks that these different environmental pollution and construction blight issues are explicitly acknowledged in the IIA and commitments to remedial measures brought</p>	<p>Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting. An additional indicator has been added in IIA Objective 11.</p>



Respondent	Relevant comment extract	Response
	into its core themes.	

Respondent	Relevant comment extract	Response
The island triangle residents' association	2.2 No waste treatment plants near residents' homes TITRA notes that under IIA Theme 8: waste management, that the OPDC wants to reduce waste displacement (exporting domestic waste out of London area) and promote a 'circular economy for waste', there should be a counterbalancing principle of no waste treatment sites being located adjacent to resident areas in line with London Plan 2015's commitment to ensuring quality of life and a clean environment for the capital's residents.	Noted. Objective 11 amended to recognise the need for waste management facilities to not negatively impact on sensitives uses including existing and future homes and building occupants. A sub objective has been added in IIA Objective 11.
The island triangle residents' association	If the corporation is to realise its target of 24,000 new homes, then our association believes that it should be clarifying that: 1) energy recovery sites that will adversely affect residential areas / entertainment /cultural hubs 2) any waste facilities need a major buffer between sites and residential areas – TITRA suggests at least 1000 metres. Sadly, the authorities and borough planners never seem to accept the misery and degradation to people's quality of life that arises from such plants and inadequately-enforced environmental controls. The Old Oak Lane conservation area (and Harlesden) is proof that a mere 50-100m is nowhere near sufficient distance between waste processing sites and residential areas, even with the supposed latest 'best available technology' waste management technology in place.	Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting. A sub objective has been added in IIA Objective 11.
The island triangle residents' association	Also with regard to the waste issue, TITRA is very concerned by the implications of IIA Theme 3 sub-theme's intention to: "increase accessibility to household and commercial sustainable waste management facilities". This statement looks to our association to be a covert statement of support for the location of waste handling sites along the canal in Old Oak as envisaged in the 2015 London Plan and the OPDC's OAPF. Our association cannot accept that intention without clear safeguards and an entirely new approach by London planning authorities establishing buffer zones between people's homes and waste sites.	Noted. It is the intention of the sub-objective to minimise travel to such facilities as household waste recycling centres, to encourage people to recycle and minimise travel distances. A sub objective has been added in IIA Objective 11.
The island triangle residents'	TITRA emphasises that without evidence of new, more sympathetic thinking to existing and new residents' needs and risks to their health, the likely result of the IIA's potentially ambiguous industrial development and waste treatment themes is that waste / industrial uses will be pushed to the edge of the development zone –	Noted. Objective 11 amended to recognise the need for waste management facilities to not negatively impact on sensitives uses including

Respondent	Relevant comment extract	Response
association	replicating the disastrous development in recent decades whereby the three boroughs of Ealing, Brent & Hammersmith & Fulham simply pushed development to the margins – i.e. North Acton – of their respective areas. This would jeopardise new housing developments in Old Oak as well as old ones.	<p>existing and future homes and building occupants.</p> <p>OPDC Board adopted the West London Waste Plan to safeguard:</p> <ul style="list-style-type: none"> <li>• Twyford Waste Transfer Station;</li> <li>• Quattro, Victoria Road.</li> </ul> <p>In addition OPDC will continue to work with stakeholders regarding the long-term aspirations of Powerday.</p>
The island triangle residents' association	TITRA requires a clear statement for no waste treatment sites near to residential areas.	Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting.
The island triangle residents' association	<p>2.3. Innovation in housing</p> <p>TITRA welcomes IIA theme 5's commitment to "affordable and inclusive housing of a range of types and tenures, to meet identified local needs" but asks whether greater emphasis can be given to innovative forms of housing for the development area. While a number of the capital's universities have provided student / graduate accommodation blocks, these buildings are largely unattractive high rise blocks with only limited retail space or community resources on the ground floor – in the example of the North Acton gyratory, this is already giving a ghost town feel to the area. The association believes that the OPDC, with its co-ordinated planning powers for the development zone, has a unique opportunity to create the conditions for innovative small-scale housing and rented accommodation types that gets away from the current trend for "ghost towns" of high rise blocks.</p>	Agree. Objective 5 to make reference to the delivery of innovative housing typologies to meet needs

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>3.0 Additional PPPs  3.1 Sustainable communities  TITRA acknowledges that the OPDC has carried out a thorough assessment ahead of the local plan but there is no sense in the document that the PPPs have really examined how it is going to deliver sustainable communities.  Looking at the North Acton area alone, apart from The Collective's building on Old Oak Lane (whose developer has given thought to community needs with a planned canalside space and multiple building uses), there is little doubt that Old Oak will see further high rise residential build but the general experience of North Acton (and future developers' plans for Portal Way central area / piazza surrounded by 30-storey plus buildings) is that there is:</p> <ul style="list-style-type: none"> <li>· Hardly any use of ground floor retail / community facilities</li> <li>· Very limited attempts to animate or liven up public spaces</li> <li>· Mainly high rise units leading to under-used, wind-blown public areas</li> <li>· Existing residential areas are being / will be overwhelmed by high rise units or isolated by the impacts of construction work being carried over years and decades</li> </ul> <p>The association asks that since the lifeless public space and construction-driven isolation of existing communities are already issues in North Acton, that it should be acknowledged and addressed with a core PPP to create the conditions for sustainable communities in the assessment whether from community events, Wi-Fi in public spaces and so on.</p>	Noted. It is considered that Objective 1 of the IIA Framework will address these potential issues.

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>4.0. Additional themes</p> <p>4.1 Greater clarity required on industrial and residential development</p> <p>TITRA notes that while the Local Plan will boost economic growth and employment, the IIA has commitments to activities such as waste handling in the zone, which can potentially be read as encouraging 'dirty' sites in proximity to residential areas.</p> <p>The result of the less-than-clear industrial development and waste treatment themes in the IIA document is that waste and industrial uses will potentially be pushed to the edge of the development zone – which could replicate the disastrous and polluting development in recent decades whereby the three boroughs of Ealing, Brent &amp; Hammersmith &amp; Fulham simply pushed development to the edge of their boroughs.</p> <p>These previous, flawed policies have left residential communities like the Old Oak conservation area with 1) a legacy of pollution and 2) needing to constantly press local polluters and the authorities to enforce pollution controls. For sites such as Euroterminal and Powerday, these tasks have been going on for more than a decade.</p> <p>TITRA asks for explicit commitments by the completed assessment for:</p> <ul style="list-style-type: none"> <li>· A clear separation of industrial/waste and residential development</li> <li>· Acknowledgment that communities may need information and resources if they are having deal with such issues</li> <li>· Smart monitoring of polluting sites leading to more effective enforcement of pollution prevention and controls</li> </ul>	<p>Noted. Objective 11 amended to recognise the need for waste management facilities to not negatively impact on sensitives uses including existing and future homes and building occupants.</p> <p>Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting.</p>

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>5.0 Do you agree with the sustainability issues identified?</p> <p>5.1. Mitigation of pollution during Old Oak's redevelopment &amp; beyond</p> <p>TITRA agrees with the broad idea of making Old Oak's renewal sustainable but it requires that specific pollution issues as well as the impact of area construction/transport/logistics on existing communities should be assessed. This omission has to be resolved with a direct commitment in the IIA to:</p> <ul style="list-style-type: none"> <li>· Effective monitoring of vehicles and traffic movements on existing as well as new roads in the development zone (ideally using smart technologies and sensors as mentioned above)</li> <li>· More effective enforcement of HGV and car pollution controls (including more</li> </ul>	<p>Noted. Amendments to be made:</p> <p>Key Sustainability issues and opportunities</p> <p>Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.”</p> <p>Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.”</p> <p>Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives</p> <p>“4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods.</p> <p>§ Consider the impact of construction on local infrastructure on local businesses and communities.</p> <p>§ Mitigate the impact of construction traffic</p> <p>11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p> <p>§ Minimise noise pollution caused by traffic and commercial uses during the construction and operation of</p>

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>6.1 Waste sites in Old Oak</p> <p>Aside of the issue of waste sites discussed in section 2.2. above, TITRA is very concerned by the lack of clarity over the permitted uses of the Willesden Euroterminal site, including:</p> <ol style="list-style-type: none"> <li>1) Pollution from HGV traffic accessing the Euroterminal site</li> <li>2) The likely use of the site by HS2 for tunnel waste / construction spoil removal</li> <li>3) Network Rail and its partner Clean Power's plans for developing an energy recovery site at the Willesden Euroterminal – whether HS2 is built or not – and whether the partners have asked the OPDC whether it will support this development.</li> </ol>	Noted. This information will be used to inform discussions with relevant stakeholders.
The island triangle residents' association	<p>The document is very encouraging. TITRA strongly supports the emerging themes such as:</p> <ul style="list-style-type: none"> <li>- Increasing economic development and encouraging upskilling, employment and inward investment</li> <li>- Renewal of existing business sites (including brownfield) to enable future development / business growth</li> <li>- Different types of residential housing, especially affordable</li> <li>- Improving transport, particularly rail, cycling and pedestrian access</li> <li>- Social infrastructure, whether shops, schools, health care units and other amenities</li> </ul>	Noted.



Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>2.1. No commitment to existing communities We, as local residents, believe that the IIA must have explicit PPPs for safeguarding and enhancing existing residential communities.</p> <p>There are 5,000 people living in large and small housing estates and cottages and they seem to be absent from the document or the workshops that preceded it. These residential areas have a range of construction, waste-related and other pollution and transport issues (from development being pushed to the edges of London boroughs) which require direct consideration (and suitable mitigation) by the Local Plan assessment:</p> <p>Area Major issues North Acton conservation area • Heavy traffic &amp; pollution from HGVs on Old Oak Lane / same issues from HGVs using Channel Gate Road access to Willesden Euroterminal • Powerday waste plant – pollution and odours since its opening • Clean Power energy recovery plant - in partnership with Network Rail – which threatens pollution in Kensal Rise and Harlesden as well as the North Acton conservation area • Years of disruption from HS2 construction works &amp; traffic access to Euroterminal site • Parking and rubbish dumping issues Wells House Road • Encirclement and land take from HS2 construction • Years of serious disruption from HS2 construction / TfL Old Oak Common station construction</p> <p>Midland Terrace • At least 6 Years of serious disruption from HS2 construction / TfL Old Oak Common station construction. The compound behind the houses will only be released after 2032! Wesley Road • Lack of amenities such as shops • Parking issues</p> <p>Lack of amenities is true for all the local areas and during construction even the existing ones are likely to disappear.</p>	<p>Agree. Amendments made:</p> <p>Key Sustainability issues and opportunities Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.” Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.” Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods. § Consider the impact of construction on local infrastructure on local businesses</p>

Respondent	Relevant comment extract	Response
	<p>The advent of HS2 will lead to land-take, disruption from 24/7 construction and road closures which will to say the least, degrade the quality of life in these communities. The association feels that these issues some be acknowledged, even if action on them may necessarily be years away.</p>	<p>and communities.</p> <p>§ Mitigate the impact of construction traffic</p> <p>11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p> <p>§ Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise light pollution</p> <p>13. Increase community cohesion and reduce social exclusion</p> <p>§ Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision.</p> <p>15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</p>

Respondent	Relevant comment extract	Response
		<p>§ Minimise construction phase impacts on communities, in relation to both physical and psychological health”</p>

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>In addition, the North Acton road infrastructure is overworked and beset by traffic jams through the day which leads to pollution. TITRA has recently carried out its own air pollution monitoring of NO2 to recognised government standards through Mapping for Change, a wholly-owned subsidiary of UCL. This small-scale study has confirmed that properties on Old Oak Lane experience NO2 levels above EU limits.</p> <p>We ask that these different issues are explicitly acknowledged and scope for future remedial measures brought into the assessment's core themes.</p>	Noted. This information used to inform proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting. An indicator has been added in IIA Objective 11.
The island triangle residents' association	<p>2.2 No waste treatment plants near residents' homes</p> <p>TITRA notes that under IIA Theme 8: waste management, that the OPDC wants to reduce waste displacement (exporting domestic waste out of London area) and promote a 'circular economy for waste', there should be a counterbalancing principle of no waste treatment sites being located adjacent to resident areas in line with London Plan 2015's commitment to ensuring quality of life and a clean environment for the capital's residents.</p>	Noted. Objective 11 amended to recognise the need for waste management facilities to not negatively impact on sensitives uses including existing and future homes and building occupants. A sub objective has been added in IIA Objective 11.
The island triangle residents' association	<p>If the corporation is to realise its target of 24,000 new homes, then our association believes that it should be clarifying that:</p> <ol style="list-style-type: none"> <li>1) energy recovery sites that will adversely affect residential areas / entertainment /cultural hubs</li> <li>2) any waste facilities need a major buffer between sites and residential areas – TITRA suggests at least 1000 metres. Sadly, the authorities and borough planners never seem to accept the misery and degradation to people's quality of life that arises from such plants and inadequately-enforced environmental controls. The Old Oak Lane conservation area (and Harlesden) is proof that a mere 50-100m is nowhere near sufficient distance between waste processing sites and residential areas, even with the supposed latest 'best available technology' waste management technology in place.</li> </ol>	Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting. An indicator has been added in IIA Objective 11.

Respondent	Relevant comment extract	Response
The island triangle residents' association	Also with regard to the waste issue, TITRA is very concerned by the implications of IIA Theme 3 sub-theme's intention to: "increase accessibility to household and commercial sustainable waste management facilities". This statement looks to our association to be a covert statement of support for the location of waste handling sites along the canal in Old Oak as envisaged in the 2015 London Plan and the OPDC's OAPF. Our association cannot accept that intention without clear safeguards and an entirely new approach by London planning authorities establishing buffer zones between people's homes and waste sites.	Noted. It is the intention of the sub-objective to minimise travel to such facilities as household waste recycling centres, to encourage people to recycle and minimise travel distances. A sub objective has been added in IIA Objective 11.
The island triangle residents' association	TITRA emphasises that without evidence of new, more sympathetic thinking to existing and new residents' needs and risks to their health, the likely result of the IIA's potentially ambiguous industrial development and waste treatment themes is that waste / industrial uses will be pushed to the edge of the development zone – replicating the disastrous development in recent decades whereby the three boroughs of Ealing, Brent & Hammersmith & Fulham simply pushed development to the margins – i.e. North Acton – of their respective areas. This would jeopardise new housing developments in Old Oak as well as old ones.	<p>Noted. Objective 11 amended to recognise the need for waste management facilities to not negatively impact on sensitives uses including existing and future homes and building occupants.</p> <p>OPDC Board adopted the West London Waste Plan to safeguard:</p> <ul style="list-style-type: none"> <li>• Twyford Waste Transfer Station;</li> <li>• Quattro, Victoria Road.</li> </ul> <p>In addition OPDC will continue to work with stakeholders regarding the long-term aspirations of Powerday.</p>
The island triangle residents' association	TITRA requires a clear statement for no waste treatment sites near to residential areas.	Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting.

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>2.3. Innovation in housing TITRA welcomes IIA theme 5's commitment to "affordable and inclusive housing of a range of types and tenures, to meet identified local needs" but asks whether greater emphasis can be given to innovative forms of housing for the development area. While a number of the capital's universities have provided student / graduate accommodation blocks, these buildings are largely unattractive high rise blocks with only limited retail space or community resources on the ground floor – in the example of the North Acton gyratory, this is already giving a ghost town feel to the area. The association believes that the OPDC, with its co-ordinated planning powers for the development zone, has a unique opportunity to create the conditions for innovative small-scale housing and rented accommodation types that gets away from the current trend for "ghost towns" of high rise blocks.</p> <p>In addition, everything that is being created around North Acton stations seems to be for the benefit of the students and does not seem to take into account local residents, who if nothing else, were here first.</p>	<p>Agree. Objective 5 amended to make reference to the delivery of innovative housing typologies to meet needs</p>

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>3.0 Additional PPPs 3.1 Sustainable communities TITRA acknowledges that the OPDC has carried out a thorough assessment ahead of the local plan but there is no sense in the document that the PPPs have really examined how it is going to deliver sustainable communities. Looking at the North Acton area alone, apart from The Collective's building on Old Oak Lane (whose developer has given thought to community needs with a planned canalside space and multiple building uses), there is little doubt that Old Oak will see further high rise residential build but the general experience of North Acton (and future developers' plans for Portal Way central area / piazza surrounded by 30-storey plus buildings) is that there is:</p> <ul style="list-style-type: none"> <li>• Limited use of ground floor retail / community facilities</li> <li>• Very limited attempt to animate or liven up public spaces</li> <li>• Mainly high rise units leading to under-used, wind-blown public areas</li> <li>• Existing residential areas are being/will be overwhelmed by high rise building or isolated by the impacts of construction work being carried over years, even decades</li> </ul> <p>The association asks that since the lifeless public space and construction-driven isolation of existing communities are already issues in North Acton, that it should be acknowledged and addressed with a core PPP to create the conditions for sustainable communities in the assessment whether from community events, Wi-Fi in public spaces and so on.</p>	<p>Noted. It is considered that Objective 1 of the IIA Framework will address these potential issues.</p>
The island triangle residents' association	<p>In addition, the density of development seems to be completely overwhelming and giving nothing back to the existing communities. As per the London Plan, the maximum allowed in an urban area is 650 habitable rooms per hectare. Surely, around North Acton that has been severely exceeded with all the planning applications coming to the fore.</p>	<p>Noted. OPDC has a scheme of delegation with LB Ealing. As such the borough will continue to determination planning applications within North Acton.</p> <p>The London Plan density matrix is supplemented by the GLA Housing SPG which provides guidance for delivering</p>



Respondent	Relevant comment extract	Response
		higher housing densities.
The island triangle residents' association	<p>4.0. Additional themes</p> <p>4.1 Greater clarity required on industrial and residential development</p> <p>TITRA notes that while the Local Plan will boost economic growth and employment, the IIA has commitments to activities such as waste handling in the zone, which can potentially be read as encouraging 'dirty' sites in proximity to residential areas.</p> <p>The result of the less-than-clear industrial development and waste treatment themes in the IIA document is that waste and industrial uses will potentially be pushed to the edge of the development zone – which could replicate the disastrous and polluting development in recent decades whereby the three boroughs of Ealing, Brent &amp; Hammersmith &amp; Fulham simply pushed development to the edge of their boroughs. These previous, flawed policies have left residential communities like the Old Oak conservation area with 1) a legacy of pollution and 2) needing to constantly press local polluters and the authorities to enforce pollution controls. For sites such as Euroterminal and Powerday, these tasks have been going on for more than a decade. TITRA asks for explicit commitments by the completed assessment for:</p> <ul style="list-style-type: none"> <li>· A clear separation of industrial/waste and residential development</li> <li>· Acknowledgment that communities may need information and resources if they are having deal with such issues</li> <li>· Smart monitoring of polluting sites leading to more effective enforcement of pollution prevention and controls</li> </ul>	<p>Noted. Objective 11 amended to recognise the need for waste management facilities to not negatively impact on sensitives uses including existing and future homes and building occupants.</p> <p>Noted. This information will be used to inform the emerging Air Quality Study and proposed air quality policies within the emerging Local Plan and OPDC corporate environmental target setting.</p>

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>5.0 Do you agree with the sustainability issues identified?</p> <p>5.1. Mitigation of pollution during Old Oak's redevelopment &amp; beyond</p> <p>TITRA agrees with the broad idea of making Old Oak's renewal sustainable but it requires that specific pollution issues as well as the impact of area construction/transport/logistics on existing communities should be assessed. This omission has to be resolved with a direct commitment in the IIA to:</p> <ul style="list-style-type: none"> <li>· Effective monitoring of vehicles and traffic movements on existing as well as new roads in the development zone (ideally using smart technologies and sensors as mentioned above)</li> <li>· More effective enforcement of HGV and car pollution controls (including more</li> </ul>	<p>Noted. Amendments made:</p> <p>Key Sustainability issues and opportunities</p> <p>Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.”</p> <p>Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.”</p> <p>Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives</p> <p>“4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods.</p> <p>§ Consider the impact of construction on local infrastructure on local businesses and communities.</p> <p>§ Mitigate the impact of construction traffic</p> <p>11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p> <p>§ Minimise noise pollution caused by traffic and commercial uses during the construction and operation of</p>

Respondent	Relevant comment extract	Response
The island triangle residents' association	<p>6.1 Waste sites in Old Oak</p> <p>Aside of the issue of waste sites discussed in section 2.2. above, TITRA is very concerned by the lack of clarity over the permitted uses of the Willesden Euroterminal site, including:</p> <ol style="list-style-type: none"> <li>1) Pollution from HGV traffic accessing the Euroterminal site</li> <li>2) The likely use of the site by HS2 for tunnel waste / construction spoil removal</li> <li>3) Network Rail and its partner Clean Power's plans for developing an energy recovery site at the Willesden Euroterminal – whether HS2 is built or not – and whether the partners have asked the OPDC whether it will support this development.</li> </ol>	<p>Noted. This information will be used to inform discussions with relevant stakeholders.</p>
The island triangle residents' association	<p>We are also concerned over the destruction of all the small sites of green spaces around this already isolated and largely industrial area and would like to respectfully request that this issue is given priority in replacing any cut down vegetation as quickly as possible and with semi mature trees. The area already suffers with severe pollution and planting at the end of construction would create a desert during the long years. Also, mature trees protect the environment in many ways and young saplings actually produce CO2 before they become mature. This issue is important to the local residents for many reasons, some of which are visual, some which are noise reduction. We have watched these trees grow and mature over 30 years and would like them protected rather than cut down for convenience. We would like the green spaces to be increased in number and size rather than reduced. At the moment, the only additional planting on the plans is forecast in the newly created areas.</p>	<p>Noted. OPDC will work with relevant stakeholders in relation to the re-provision of trees and street greening.</p> <p>The emerging draft Local Plan will be supported by a Green Infrastructure Strategy and Public Realm Strategy which will provide guidance in relation to the location and amount of street greening and new open spaces within Old Oak and Park Royal</p>
West London Line Group	<p>Allow for growth for all types of transportation by safeguarding enough space at key locations for sufficient vehicles to serve each of these. This implies being cautious as to the amount of land to be used for building development, as well as generous with the space needed for passenger circulation in and around stations. Stratford station (East London) could well offer lessons here since, despite its size and recent development, it can feel dangerously crowded at times of peak usage.</p>	<p>Noted. Development proposals will need to demonstrate through relevant submission material that access and circulation is safe and supports wider placemaking.</p>

Respondent	Relevant comment extract	Response
West London Line Group	Allow for growth in all rail services in and around Old Oak Common at all four stations (main HS2/GWML/Crossrail complex, Hythe Road and Old Oak Common Land Overground stations, and Willesden Junction), with passive provision for platform and turnback extensions. For example, the Overground platforms and turnbacks should at a future time be able to accommodate 10 or preferably 12-car trains.	Noted. Transport modelling for future capacity requirements will be undertaken by the relevant transport authorities including HS2, Transport for London and Network Rail.
West London Line Group	<p>Most importantly, for the benefit of the country, the sub-region and the local area, make provision for a five 12-car platform station on top of the HS2 station box to allow direct and proximate connections between HS2/Crossrail/GWML services and West London Line/West Coast Main Line/Midland Main Line services. These additional links should be provided (i) to underpin the economic success of the MDC area, (ii) to allow good connections here to Heathrow, and (iii) to reduce the stress on Crossrail at Old Oak Common and tube and other services at Euston upon the opening of both Phases 1 and 2 of HS2. Any architectural 'statements' presently destined for the roof of the HS2 atrium should be raised one 'floor' to surmount these WLL platforms instead.</p> <p>No other building should be placed on top of the HS2 station box</p>	<p>Noted. Transport modelling for future capacity requirements will be undertaken by the relevant transport authorities including HS2, Transport for London and Network Rail.</p> <p>This will be used to inform the design of the station and any potential over station development.</p>

Respondent	Relevant comment extract	Response
West London Line Group	<p>1. Additional Consultation, (paragraph 1.9.3, page 6) of the Scoping Report says “An important element of the IIA, HIA and EqlA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.”</p> <p>We note that we have not been approached by OPDC officers regarding the scoping report and know no others that have been. (NB this was discussed at the GUA meeting on 7th October). We would very much like to know - who have been identified as key representatives, what was the process for their identification and have any of those identified been advised of this.</p>	<p>OPDC's Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC's website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>

Respondent	Relevant comment extract	Response
West London Line Group	2. Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC's Issues & Options Local Plan has not been proactively provided.	<p>The SEA Directive requires OPDC to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The Consultation Bodies are Historic England, Natural England and the Environment Agency.</p> <p>To enable a wider range of stakeholders to input into the Local Plan development process from an early stage, OPDC considered it appropriate to exceed legislative requirement and invite interested parties to submit comments.</p> <p>All stakeholders on OPDC's consultation database were contacted via email on 4 September 2015 and a copy was placed on OPDC's website.</p> <p>OPDC is in week 30 of a 25-30 year project. The statutory function as a local planning authority means that staffing has focused on a team that will progress evidence base for policies and ensure robust processes are in place to manage planning applications. The Strategy and Programmes team, including Communications and Engagement, is still embryonic; therefore, your patience is appreciated while the Corporation</p>

Respondent	Relevant comment extract	Response
		<p>continues to staff up to serve local residents and businesses, meet groups to forge relationships and works to set-up a community group.</p> <p>On 12 October, OPDC Communications and Planning officers presented to a small group of GUA members to start these meetings and to explain how local communities can get involved in the planning process. OPDC convened a second meeting with GUA members on 3 November to discuss the Scoping Report and wider Local Plan process with a public workshop on the vision and objectives held on 30 November prior to the Local Plan consultation in early 2016.</p>



Respondent	Relevant comment extract	Response
West London Line Group	<p>The European Assessment Directive or the European Union requires that realistic alternatives are assessed. Recent legal judgements have also asserted the importance of public authorities consulting upon arguable yet discarded options.</p> <p>We ask that community-based alternatives – set out in the following Vision and Objectives are assessed, with positive and negative effects identified, and included in the OPDC's Issues &amp; Options Local Plan.</p>	<p>The provided community-based vision and objectives provide a comprehensive and detailed range of suggestions which are being used to directly inform the draft Local Plan proposed vision and objectives. Where the suggestions are more relevant for policy options, these have also been used to inform the development of these options.</p> <p>As the provided community-based vision and objectives have directly and positively informed the development of the draft OPDC Local Plan, that will be subject to the IIA, a separate IIA on these is not considered necessary.</p> <p>Following a public workshop on the vision and objectives on 30 November, further community input has been provided into the development of the vision and objectives.</p> <p>As agreed at the workshop, feedback on this work and how the provided community-based vision and objectives have informed the Local Plan will be provided in January 2016. There will also be subsequent opportunity to comment on the vision and objectives during the first Local Plan consultation from February 2016.</p>

Respondent	Relevant comment extract	Response
West London Line Group	3. A key issue for all section of the community in and around the OPDC is the impact of a 30 year construction period – including issues of dust, noise, vibration and pollution, and ability of the boroughs to meet the potential accommodation, facilities and amenity needs of construction workers. This has not been fully considered in the report. It must be fully identified and planned for as quite separate IIA and Local Plan objectives.	<p>Agree. Amendments made:</p> <p>Key Sustainability issues and opportunities  Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.”  Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.”  Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives  “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods.  § Consider the impact of construction on local infrastructure on local businesses and communities.  § Mitigate the impact of construction traffic  11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups  § Minimise noise pollution caused by traffic and commercial uses during the construction and operation of</p>

Respondent	Relevant comment extract	Response
Resident	<p>1. Additional Consultation, (paragraph 1.9.3, page 6) of the Scoping Report says “An important element of the IIA, HIA and EqlA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.”</p> <p>We note that we have not been approached by OPDC officers regarding the scoping report and know no others that have been. (NB this was discussed at the GUA meeting on 7th October). We would very much like to know - who have been identified as key representatives, what was the process for their identification and have any of those identified been advised of this.</p>	<p>OPDC's Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC's website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>
Resident	<p>2. Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC's Issues &amp; Options Local Plan has not been proactively provided.</p>	<p>The SEA Directive requires OPDC to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The Consultation Bodies are Historic England, Natural</p>

Respondent	Relevant comment extract	Response
		<p>England and the Environment Agency.</p> <p>To enable a wider range of stakeholders to input into the Local Plan development process from an early stage, OPDC considered it appropriate to exceed legislative requirement and invite interested parties to submit comments.</p> <p>All stakeholders on OPDC's consultation database were contacted via email on 4 September 2015 and a copy was placed on OPDC's website.</p> <p>OPDC is in week 30 of a 25-30 year project. The statutory function as a local planning authority means that staffing has focused on a team that will progress evidence base for policies and ensure robust processes are in place to manage planning applications. The Strategy and Programmes team, including Communications and Engagement, is still embryonic; therefore, your patience is appreciated while the Corporation continues to staff up to serve local residents and businesses, meet groups to forge relationships and works to set-up a community group.</p> <p>On 12 October, OPDC Communications and Planning officers presented to a small group of GUA members to start these</p>

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		<p>meetings and to explain how local communities can get involved in the planning process. OPDC convened a second meeting with GUA members on 3 November to discuss the Scoping Report and wider Local Plan process with a public workshop on the vision and objectives held on 30 November prior to the Local Plan consultation in early 2016.</p>

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Resident	<p>The European Assessment Directive or the European Union requires that realistic alternatives are assessed. Recent legal judgements have also asserted the importance of public authorities consulting upon arguable yet discarded options.</p> <p>We ask that community-based alternatives – set out in the following Vision and Objectives are assessed, with positive and negative effects identified, and included in the OPDC's Issues &amp; Options Local Plan.</p>	<p>The provided community-based vision and objectives provide a comprehensive and detailed range of suggestions which are being used to directly inform the draft Local Plan proposed vision and objectives. Where the suggestions are more relevant for policy options, these have also been used to inform the development of these options.</p> <p>As the provided community-based vision and objectives have directly and positively informed the development of the draft OPDC Local Plan, that will be subject to the IIA, a separate IIA on these is not considered necessary.</p> <p>Following a public workshop on the vision and objectives on 30 November, further community input has been provided into the development of the vision and objectives.</p> <p>As agreed at the workshop, feedback on this work and how the provided community-based vision and objectives have informed the Local Plan will be provided in January 2016. There will also be subsequent opportunity to comment on the vision and objectives during the first Local Plan consultation from February 2016.</p>

Respondent	Relevant comment extract	Response
Resident	3. A key issue for all section of the community in and around the OPDC is the impact of a 30 year construction period – including issues of dust, noise, vibration and pollution, and ability of the boroughs to meet the potential accommodation, facilities and amenity needs of construction workers. This has not been fully considered in the report. It must be fully identified and planned for as quite separate IIA and Local Plan objectives.	<p>Agree. Amendments made:</p> <p>Key Sustainability issues and opportunities  Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.”  Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.”  Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives  “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods.  § Consider the impact of construction on local infrastructure on local businesses and communities.  § Mitigate the impact of construction traffic  11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups  § Minimise noise pollution caused by traffic and commercial uses during the construction and operation of</p>



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Friends of Wormwood Scrubs	<p>2. Consultation Question (d) (sustainability issues and opportunities) Table 5 -1 p 28 Topic: Biodiversity, Flora and Fauna Key Issue: Wormwood Scrubs The Friends would emphasise the biodiversity of the Scrubs associated with its uniquely rural nature. Implications/Opportunities The Friends endorse all these. With regard to the protection and enhancement of the Scrubs' habitat and species, we draw attention to the ecological enhancement proposals for the Scrubs at present being developed jointly by HS2 and LBHF.</p>	Noted. The biodiversity designations for Wormwood Scrubs are referenced within table 5-1 and opportunities for the Local Plan to protect and enhance the habitat and species recognised.
Friends of Wormwood Scrubs	<p>3. Consultation Question (f) (particular topics or geographic areas of specific concern) 5.4 text fourth para: "The redevelopment of the area should seek to improve open space provision all around the area in addition to improving connections to Wormwood Scrubs as well as enable green infrastructure and services that could be used by residents and non-residents of the area alike". (a) The Scrubs is (of course) of specific concern to the Friends. We have consistently argued for creation of open space within the OPDC area without recourse to the Scrubs as a substitute for such open space. We endorse Draft IIA Objectives 1. bullet point 3 "Create new, accessible, open-spaces-public, communal, private and children's play space, public realm and spaces where children can play independently." (b) Existing connections to the Scrubs are perfectly adequate for its existing use. Any future connection must not be at the expense of its existing character or adversely affect its biodiversity (see Question (d) above).</p>	Noted.
Friends of Wormwood Scrubs	<p>4. Draft IIA Objective 10: proposed indicator "Condition of Wormwood Scrubs LNR" we repeat reference to the ecological enhancement proposals in 2. above.</p>	Noted

Respondent	Relevant comment extract	Response
Hammersmith Society	First of all, we have to be critical of the format of the document itself. It is really quite indigestible even to a group such as ours, with many professionals as members. We have already emphasised in our comments on the Draft Statement of Community Engagement, which was considerably more accessible than the IIA document, the importance of the OPDC producing consultation documents that are clearly and simply set out and in plain English. The IIA document has no preamble or introduction to explain its purpose in terms that a reasonable lay person can easily understand – nor does it provide a summary of conclusions or priorities. Only the second introductory paragraph under 1.1 is comprehensible, the rest being jargon. However the sections at 5.4 Cross boundary considerations and Section 6 – would have acted as a quite comprehensible introduction.	Noted. A non-technical summary for the Draft IIA of the Regulation 18 version of the Local Plan will be provided.
Hammersmith Society	We acknowledge that such a document is a required part of the Local Plan process, and that there is a need for speed. However, the document promotes the importance of community involvement throughout the Local Plan process. To our knowledge, and from our involvement with the Grand Union Alliance, key representatives have not been identified by OPDC as is suggested with a view to working through the document.	<p>OPDC's Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC's website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to</p>

Respondent	Relevant comment extract	Response
		undertake this given their roles on the OPDC Board and wider community activities.
Hammersmith Society	Define that the Vision is really about the eastern 'Old Oak' side of the OPDC area and that the western side will remain but be enhanced as an Industrial/business area.	Disagree. Park Royal is considered valuable industrial area which should benefit from enhancements and support. The proposed Vision reflects this.
Hammersmith Society	Recognise that the OPDC is potentially about the development around a nationally important transport hub (HS2/Crossrail1 etc) and a series of neighbourhood both existing and proposed. OPDC's success will be judged largely on how well it reconciles these differing requirements.	Noted. This information will be used to inform the emerging draft Local Plan.
Hammersmith Society	Recognise that for the OPDC will be more than the sum of these parts and that there should be elements of the development which would be of wider appeal. This was identified in Key Objective 3 of the OAPF which stated : 'Potential for large scale catalyst uses such as new educational facility, football stadium, sports complex, health, arts leisure or cultural centre' : This society favours arts, leisure and/or a cultural centre which might include elements such as a lido, ice skating, concert hall.	Agree. Cultural uses are envisaged to play a key role in the regeneration of the area. This information will be used to inform the emerging draft Local Plan.
Hammersmith Society	The scale of the residential development needs to be defined and justified so that it is not just accepted that the apparently random number of 24,000 new homes is targeted without proper consideration of the type of neighbourhoods that will result.	The current version of the London Plan (consolidated with amendments with from the FALP) was adopted in March 2015 following an Examination in Public.

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		<p>As such the London Plan's minimum housing targets for 24,000 new homes and indicative employment figures for Old Oak and Park Royal are form part of the Development Plan for the OPDC area.</p> <p>The Old Oak and Park Royal OAPF supplements the London Plan, establishing the principles for the range of densities across Old Oak.</p> <p>The minimum 24,000 target was developed through a development capacity exercise which has been refined to reflect local sensitives and development opportunities in the OAPF.</p> <p>This strategic planning policy and guidance provides the baseline for the draft IIA Scoping Report.</p> <p>The OAPF provides principles for the delivery of densities that respond to sensitive areas in and around the OPDC area. The Local Plan will develop this guidance further.</p>
Hammersmith Society	The neighbourhoods need to be of a human scale and distinctive : The densities need to be appropriate so that a wide range of homes can be provided and if some are in towers these are limited in height to say 10 storeys.	Noted. The OPDC Local Plan will be supported by a Character Study and Development Capacity Study to inform scale of development and local character.

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Hammersmith Society	Neighbourhood areas need to be completed in phases and have access to proper community facilities (e.g. Appropriate retail, schools, doctor's surgeries etc).	Agree. The delivery of development will be defined through the Development Capacity Study and required infrastructure identified
Hammersmith Society	The phasing of development (over the potential 30 year period) needs to be carefully considered so that completed neighbourhoods are protected from the potential disruption/disturbance of living in an almost continuous building site.	Noted. Managing the impact on surrounding neighbourhoods is being suggested within the emerging Local Plan.
Hammersmith Society	There is no mention of private amenity spaces nor for that matter landscaping : There needs to be proper and commensurate provision of open spaces both as parks but also play spaces for all age groups.	Noted. The GLA Housing SPG sets out requirements for private amenity spaces for development. The emerging Local Plan will be supported by a Public Realm Strategy that will provide guidance for landscaping and the wider public realm
Hammersmith Society	The standard of architectural design throughout has got to be of exceptionally good quality : Not just the same old stuff we see being rolled out all over London : The new stations – particularly the HS2/Crossrail station – should be the subject of an international competition : It is after all potentially the second largest after Waterloo : Think Kings Cross or Birmingham New Street. To achieve this will probably require the appointment of a highly respected and able design champion.	Noted. Architectural quality is critical to the success of Old Oak. As such the Place Review Group has been established to independently assess major planning applications and emerging planning policies.
Hammersmith Society	There should be a strong emphasis in the Local Plan regarding conservation areas and the use of heritage assets	Noted. Conservation and heritage policy options will be proposed within the Local Plan
Hammersmith Society	The GUA have rightly identified that canal should be not just cleaned up and used, but also developed with boat basins and the like to provide vitality and greater use of the canal. The point could also be made of using the canal for the transport of materials during the construction works in order to reduce the burden on local roads.	Noted. This information will be used to inform the emerging draft Local Plan.

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Harlesden Town Team	<p>1. Additional Consultation, (paragraph 1.9.3, page 6) of the Scoping Report says “An important element of the IIA, HIA and EqlA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.”</p> <p>We note that we have not been approached by OPDC officers regarding the scoping report and know no others that have been. (NB this was discussed at the GUA meeting on 7th October). We would very much like to know - who have been identified as key representatives, what was the process for their identification and have any of those identified been advised of this.</p>	<p>OPDC's Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC's website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>
Harlesden Town Team	<p>2. Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC's Issues &amp; Options Local Plan has not been proactively provided.</p>	<p>The SEA Directive requires OPDC to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The Consultation Bodies are Historic England, Natural</p>

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		<p>England and the Environment Agency.</p> <p>To enable a wider range of stakeholders to input into the Local Plan development process from an early stage, OPDC considered it appropriate to exceed legislative requirement and invite interested parties to submit comments.</p> <p>All stakeholders on OPDC's consultation database were contacted via email on 4 September 2015 and a copy was placed on OPDC's website.</p> <p>OPDC is in week 30 of a 25-30 year project. The statutory function as a local planning authority means that staffing has focused on a team that will progress evidence base for policies and ensure robust processes are in place to manage planning applications. The Strategy and Programmes team, including Communications and Engagement, is still embryonic; therefore, your patience is appreciated while the Corporation continues to staff up to serve local residents and businesses, meet groups to forge relationships and works to set-up a community group.</p> <p>On 12 October, OPDC Communications and Planning officers presented to a small group of GUA members to start these</p>



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		<p>meetings and to explain how local communities can get involved in the planning process. OPDC convened a second meeting with GUA members on 3 November to discuss the Scoping Report and wider Local Plan process with a public workshop on the vision and objectives held on 30 November prior to the Local Plan consultation in early 2016.</p>

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Harlesden Town Team	<p>The European Assessment Directive or the European Union requires that realistic alternatives are assessed. Recent legal judgements have also asserted the importance of public authorities consulting upon arguable yet discarded options.</p> <p>We ask that community-based alternatives – set out in the following Vision and Objectives are assessed, with positive and negative effects identified, and included in the OPDC's Issues &amp; Options Local Plan.</p>	<p>The provided community-based vision and objectives provide a comprehensive and detailed range of suggestions which are being used to directly inform the draft Local Plan proposed vision and objectives. Where the suggestions are more relevant for policy options, these have also been used to inform the development of these options.</p> <p>As the provided community-based vision and objectives have directly and positively informed the development of the draft OPDC Local Plan, that will be subject to the IIA, a separate IIA on these is not considered necessary.</p> <p>Following a public workshop on the vision and objectives on 30 November, further community input has been provided into the development of the vision and objectives.</p> <p>As agreed at the workshop, feedback on this work and how the provided community-based vision and objectives have informed the Local Plan will be provided in January 2016. There will also be subsequent opportunity to comment on the vision and objectives during the first Local Plan consultation from February 2016.</p>

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Harlesden Town Team	<p>3. A key issue for all section of the community in and around the OPDC is the impact of a 30 year construction period – including issues of dust, noise, vibration and pollution, and ability of the boroughs to meet the potential accommodation, facilities and amenity needs of construction workers. This has not been fully considered in the report. It must be fully identified and planned for as quite separate IIA and Local Plan objectives.</p>	<p>Agree. Amendments made:</p> <p>Key Sustainability issues and opportunities  Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.”  Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.”  Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives  “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods.  § Consider the impact of construction on local infrastructure on local businesses</p>

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		<p>and communities.</p> <p>§ Mitigate the impact of construction traffic</p> <p>11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p> <p>§ Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise light pollution</p> <p>13. Increase community cohesion and reduce social exclusion</p> <p>§ Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision.</p> <p>15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</p>

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		<p>§ Minimise construction phase impacts on communities, in relation to both physical and psychological health”</p>

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Regents Canal Network	A great concern is the 'future proofing' of the OPDC project with its predicted 25-30 year development. A planning mechanism needs to be employed that allows stages of updating and revision of the development plans as the project proceeds. The housing and transport requirement of 10 years ago would not be appropriate now as they have changed noticeably, so the OPDC plans made now may not suit in 10 years time, let alone the full term of the project. Having been involved with the Kings Cross Central Development for many years, I can confirm that lessons must be learned from unrevised outdated decisions that are set in stone.	Noted. The OPDC Local Plan is being informed by evidence base which enables it to take a flexible approach to accommodate change. The Local Plan will be reviewed annually through the Annual Monitoring Report. Should changes be required, the Local Plan will be updated in accordance with due processes.
Regents Canal Network	On the positive side, it seems that lessons have been learned from the disorder and inadequacies of the LLDC, and the set up and management of the OPDC is far more competent, and also includes close consideration and involvement of the community which is lacking in the Lee Valley.	Noted
Regents Canal Network	<p>The poor quality of some of the documentation supplied by OPDC is of concern as it is so dense and inaccessible. The result can be a lack of clarity from which misjudgments and misinterpretations can result, or may have even occurred in the recent flurry of erudite and indigestible documents.</p> <p>This has been caused in part by the 'undue haste' in the planning proceedings, and as identified by the London Assembly, among others. Can the timetable be readjusted, and good order and careful thought processes prevail.</p>	<p>Noted. With regard to the IIA scoping report, the content and structure is informed by statutory requirements.</p> <p>The timetable for the Regulation 18 consultation has been amended in response to concerns raised by stakeholders to take place in late January to deliver an 8 week formal consultation period alongside supplementary processes.</p>

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Regents Canal Network	<p>One other matter that needs to be addressed is the over-ambitious density proposals for this neighbourhood that is not central London. The density of housing can be fairly high even in this location, but the predicted total of 24,000 new homes will impose an unreasonable density for West London, particularly as large numbers of mega towers will not be acceptable in this neighbourhood. Again lessons should be learned from unsuitable towering developments that have been parachuted into sensitive areas all over London with pressure from the Mayor.</p>	<p>The current version of the London Plan (consolidated with amendments with from the FALP) was adopted in March 2015 following an Examination in Public.</p> <p>As such the London Plan's minimum housing targets for 24,000 new homes and indicative employment figures for Old Oak and Park Royal are form part of the Development Plan for the OPDC area.</p> <p>The Old Oak and Park Royal OAPF supplements the London Plan, establishing the principles for the range of densities across Old Oak.</p> <p>This strategic planning policy and guidance provides the baseline for the draft IIA Scoping Report.</p> <p>The OAPF provides principles for the delivery of densities that respond to sensitive areas in and around the OPDC area. The Local Plan will develop this guidance further.</p>



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Regents Canal Network	<p>The main issue for the Regents Network is for the Grand Union Canal to be given careful consideration, as mentioned in the GUA response.</p> <ul style="list-style-type: none"> <li>• The Grand Union Canal is a navigation. The use by boats travelling along the canal is being encouraged to bring London's canals back to life. This will include freight transport as well as leisure boating. It could become very busy with ten or fifteen barges passing every hour. But it will still be a wonderful environment and will remain calm and gentle.</li> <li>• There needs to be a strict limit to moored boats along the main channel. There may be opportunities for a group of boats to be moored in a wider stretch or a lay-by, where there can be a mooring facility and infrastructure, but opportunistic mooring in any available space and along to towpath should be discouraged. After all, the canal is not a housing estate, and as the London Plan says, the canal 'should not be used as an extension of the developable land in London' (BRN Policy 7.27, Para 7.84). It is added that 'nor should parts of it be a continuous line of moored craft'.</li> <li>• However, at any opportunity there should be provision of Visitor Moorings, with adequate infrastructure and services.</li> <li>• Everything along the canal and in the vicinity should be calm. It is perfectly ok if nothing happens along the canal, and the open water itself becomes the feature. Our canals have become to be appreciated as a quiet haven, even in the centre of London</li> <li>• That the canals should be 'animated' is a perverse notion perpetrated by British Waterways and now the Canal and River Trust, which has been solidly objected to by Regents Network and others for many years. But it was BWB talking as a property developer rather than a navigation authority, and it is unfortunate that this notion is often repeated, and more than likely coming from property developers wanting to exploit the canals. The last thing the canal needs is to be animated.</li> <li>• There have been suggestions that side basins could be constructed along the canal, but this is not favoured unless there is a sound reason for their use. The basins could</li> </ul>	<p>Noted. This information will be used to inform the development of the draft Local Plan.</p>

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	<p>be destinations for water transport passengers or freight, or for visitor moorings for instance. As a water feature let into the surrounding developments, a basin would be a weak objective unless carefully designed and as a special undertaking. In any event, if a water feature is required then it is possible to construct a pond in any location other than canalside, and could include fountains if it is further away. Canals and fountains do not go well together.</p> <ul style="list-style-type: none"> <li>• New buildings should be set back from the edge of the canal, to preserve and protect the waterway's character and individuality. Pressure from property developers for their buildings to be close to water in order to increase their rents and profits is not acceptable. Heritage, environment, scenery and views come before profit. Buildings in the canal vicinity should also be low level to avoid enclosing the waterway, and historically it was more typical to have an open wharf at the canalside with the warehouse set back. Dining areas in front of restaurants and cafes should also be set back rather than at the water's edge.</li> <li>• Towpaths are now for pedestrian use, although the occasional horse-drawn tourist barge would not go amiss, as we have on other parts of the canal network. Incidentally, it is a requirement that any canalside railings, equipment, lighting and so on should be designed so that a towing rope would not be snagged, even these days. As the towpaths are used by walkers, family groups, baby buggies, dogs on leads, the elderly and wheelchairs etc, then they are not suitable as a cycle route as they are not sufficiently wide to be considered for sharing. A genuine 'leisure' cyclist or a family cycle group could be acceptable as pedestrians could readily be given priority with perfect safety and without great disturbance. Any cyclist venturing on to a towpath should know that they are restricted to travelling more or less at walking speed, and not expect to get anywhere very quickly.</li> <li>• The take-over of towpaths by fast cyclists is not acceptable, and the towpaths have become unpleasant, and dangerous, for pedestrians. It should be the cyclist who use alternative routes to get to their destinations, rather than the pedestrians finding alternatives routes as is the case at the present. It is the pedestrians that have priority, but that is no longer the case along many stretches of towpath in London.</li> </ul>	

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	<ul style="list-style-type: none"> <li>• Cycling is strongly supported. It is an important enough activity for it to be given special attention, and there is a widespread development of cycle paths, and the funding available to continue expanding the cycle networks. OPDC should set new standards and take the opportunity with the comprehensive development of such a large area to provide dedicated cycle paths, or in the case of new shared paths they should be of sufficient generous width to share with pedestrians safely. It will also avoid frightening the horses.</li> <li>• The future use and activity on the canals in West London for freight is developing , with particular focus on the Park Royal area and other local industrial and business centres that are canalside. It is seen that this will help to alleviate the gridlock on the roads a certain amount, but more importantly will have a marked effect on the improvement of air quality as canal transport is 80% less polluting than lorries.</li> <li>• There is no doubt of the advantages of using the canals in the OPDC area during the construction phases of the development over a number of years, which will reduce lorry movements and pollution. However, although this has been mentioned, no transport plan includes details of the use of water transport. There is the opportunity for establishing a number of convenient loading and consolidation sites, and including the use of conveyors.</li> </ul>	

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Regents Canal Network	<p>1. Additional Consultation, (paragraph 1.9.3, page 6) of the Scoping Report says “An important element of the IIA, HIA and EqlA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.”</p> <p>We note that we have not been approached by OPDC officers regarding the scoping report and know no others that have been. (NB this was discussed at the GUA meeting on 7th October). We would very much like to know - who have been identified as key representatives, what was the process for their identification and have any of those identified been advised of this.</p>	<p>OPDC's Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC's website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>

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Regents Canal Network	2. Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC's Issues & Options Local Plan has not been proactively provided.	<p>The SEA Directive requires OPDC to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The Consultation Bodies are Historic England, Natural England and the Environment Agency.</p> <p>To enable a wider range of stakeholders to input into the Local Plan development process from an early stage, OPDC considered it appropriate to exceed legislative requirement and invite interested parties to submit comments.</p> <p>All stakeholders on OPDC's consultation database were contacted via email on 4 September 2015 and a copy was placed on OPDC's website.</p> <p>OPDC is in week 30 of a 25-30 year project. The statutory function as a local planning authority means that staffing has focused on a team that will progress evidence base for policies and ensure robust processes are in place to manage planning applications. The Strategy and Programmes team, including Communications and Engagement, is still embryonic; therefore, your patience is appreciated while the Corporation</p>

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		<p>continues to staff up to serve local residents and businesses, meet groups to forge relationships and works to set-up a community group.</p> <p>On 12 October, OPDC Communications and Planning officers presented to a small group of GUA members to start these meetings and to explain how local communities can get involved in the planning process. OPDC convened a second meeting with GUA members on 3 November to discuss the Scoping Report and wider Local Plan process with a public workshop on the vision and objectives held on 30 November prior to the Local Plan consultation in early 2016.</p>

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Regents Canal Network	<p>The European Assessment Directive or the European Union requires that realistic alternatives are assessed. Recent legal judgements have also asserted the importance of public authorities consulting upon arguable yet discarded options.</p> <p>We ask that community-based alternatives – set out in the following Vision and Objectives are assessed, with positive and negative effects identified, and included in the OPDC's Issues &amp; Options Local Plan.</p>	<p>The provided community-based vision and objectives provide a comprehensive and detailed range of suggestions which are being used to directly inform the draft Local Plan proposed vision and objectives. Where the suggestions are more relevant for policy options, these have also been used to inform the development of these options.</p> <p>As the provided community-based vision and objectives have directly and positively informed the development of the draft OPDC Local Plan, that will be subject to the IIA, a separate IIA on these is not considered necessary.</p> <p>Following a public workshop on the vision and objectives on 30 November, further community input has been provided into the development of the vision and objectives.</p> <p>As agreed at the workshop, feedback on this work and how the provided community-based vision and objectives have informed the Local Plan will be provided in January 2016. There will also be subsequent opportunity to comment on the vision and objectives during the first Local Plan consultation from February 2016.</p>



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Regents Canal Network	<p>3. A key issue for all section of the community in and around the OPDC is the impact of a 30 year construction period – including issues of dust, noise, vibration and pollution, and ability of the boroughs to meet the potential accommodation, facilities and amenity needs of construction workers. This has not been fully considered in the report. It must be fully identified and planned for as quite separate IIA and Local Plan objectives.</p>	<p>Agree. Amendments to be made:</p> <p>Key Sustainability issues and opportunities  Health (p.25) – “Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on communities - including both psychological and physical effects.”  Air quality (p.26) – “The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities.”  Transportation (p.32) – “Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.”</p> <p>Draft IIA Objectives and sub-objectives  “4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods.  § Consider the impact of construction on local infrastructure on local businesses</p>

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		<p>and communities.</p> <p>§ Mitigate the impact of construction traffic</p> <p>11. To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p> <p>§ Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators.</p> <p>§ Minimise light pollution</p> <p>13. Increase community cohesion and reduce social exclusion</p> <p>§ Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision.</p> <p>15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</p>

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Resident	<p>1. Additional Consultation, (paragraph 1.9.3, page 6) of the Scoping Report says “An important element of the IIA, HIA and EqlA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.”</p> <p>We note that we have not been approached by OPDC officers regarding the scoping report and know no others that have been. (NB this was discussed at the GUA meeting on 7th October). We would very much like to know - who have been identified as key representatives, what was the process for their identification and have any of those identified been advised of this.</p>	<p>OPDC's Communications and Community Engagement team has been liaising with relevant community groups and stakeholders to identify key points of contact in these groups. A consultation database has been compiled on this basis and the IIA Scoping Report was sent on 4 September 2015 to all stakeholders on this database. A copy of the Scoping Report was also placed on OPDC's website. The IIA was publicly consulted on from 4 September to 9 October 2015.</p> <p>With regards to the IIA consultation, OPDC officers spoke with Amanda Souter (Resident Board Member) and Rahul Gokhale (Business Community Board Member) on 4 and 7 September and asked them to be representatives of the community in respect of the IIA. These are considered to be well placed to undertake this given their roles on the OPDC Board and wider community activities.</p>

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Resident	<p>2. Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC's Issues &amp; Options Local Plan has not been proactively provided.</p>	<p>The SEA Directive requires OPDC to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The Consultation Bodies are Historic England, Natural England and the Environment Agency.</p> <p>To enable a wider range of stakeholders to input into the Local Plan development process from an early stage, OPDC considered it appropriate to exceed legislative requirement and invite interested parties to submit comments.</p> <p>All stakeholders on OPDC's consultation database were contacted via email on 4 September 2015 and a copy was placed on OPDC's website.</p> <p>OPDC is in week 30 of a 25-30 year project. The statutory function as a local planning authority means that staffing has focused on a team that will progress evidence base for policies and ensure robust processes are in place to manage planning applications. The Strategy and Programmes team, including Communications and Engagement, is still embryonic; therefore, your patience is appreciated while the Corporation</p>

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		<p>continues to staff up to serve local residents and businesses, meet groups to forge relationships and works to set-up a community group.</p> <p>On 12 October, OPDC Communications and Planning officers presented to a small group of GUA members to start these meetings and to explain how local communities can get involved in the planning process. OPDC convened a second meeting with GUA members on 3 November to discuss the Scoping Report and wider Local Plan process with a public workshop on the vision and objectives held on 30 November prior to the Local Plan consultation in early 2016.</p>

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Resident	<p>The European Assessment Directive or the European Union requires that realistic alternatives are assessed. Recent legal judgements have also asserted the importance of public authorities consulting upon arguable yet discarded options.</p> <p>We ask that community-based alternatives – set out in the following Vision and Objectives are assessed, with positive and negative effects identified, and included in the OPDC's Issues &amp; Options Local Plan.</p>	<p>The provided community-based vision and objectives provide a comprehensive and detailed range of suggestions which are being used to directly inform the draft Local Plan proposed vision and objectives. Where the suggestions are more relevant for policy options, these have also been used to inform the development of these options.</p> <p>As the provided community-based vision and objectives have directly and positively informed the development of the draft OPDC Local Plan, that will be subject to the IIA, a separate IIA on these is not considered necessary.</p> <p>Following a public workshop on the vision and objectives on 30 November, further community input has been provided into the development of the vision and objectives.</p> <p>As agreed at the workshop, feedback on this work and how the provided community-based vision and objectives have informed the Local Plan will be provided in January 2016. There will also be subsequent opportunity to comment on the vision and objectives during the first Local Plan consultation from February 2016.</p>

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