

6

DESIGN



Design

This chapter contains policies addressing the following policy themes:

- D1: Strategic Policy for design
- D2: Streets and public realm
- D3: Public open space
- D4: New buildings
- D5: Alterations and extensions
- D6: Heritage
- D7: Amenity
- D8: Inclusive design

Questions:

QDa: Are there any other design policy themes that you think OPDC's Local Plan should be addressing?

QDb: Do you agree with the chapter's preferred policy options? If not, what might you change?

QDc: Are there any other policy alternatives that could replace the chapter's preferred policies?

You can provide comments directly through:

opdc.commonplace.is

EVIDENCE BASE

Table 4: Design Evidence base

Supporting study	Description	Status
OPDC Industrial Land Review (ILR)	Assesses the current and future supply and demand for industrial land within Old Oak and Park Royal.	Draft completed
OPDC Development Capacity Study	A study looking at the capacity of the OPDC area to accommodate new homes and jobs.	Draft completed
OPDC Character Note	Sets out suggested character areas within and around Old Oak and Park Royal.	To be developed
OPDC Walking, cycling, streets and public realm strategy	A strategy setting out recommendations for the public realm, public open space and walking and cycling infrastructure for the OPDC area.	To be developed
OPDC Green Infrastructure Strategy	A strategy reviewing existing GI assets, future GI requirements, and identifying opportunities for improving function, connectivity and integration with other infrastructure.	To be developed
OPDC Smart Strategy Interim Report	Sets out key challenges, opportunities and recommendations in relation to emerging smart technology.	Draft completed
HE Old Oak Outline Historic Assessment & Addendum	Assessment of the historic character and appearance of Old Oak.	Completed
OPDC Park Royal Heritage Assessment	Assessment of the historic character and appearance of Park Royal alongside identification of local views.	To be developed
OPDC Views Study	Identification of local views within and around the OPDC area	To be developed

D1: Strategic policy for design

KEY ISSUES

1. Creating a series of new connected places informed by existing positive elements of character to create a sense of place, such as the Grand Union Canal, is of critical importance.
2. It is important that new development achieves the highest standards of design and placemaking.

POLICY CONTEXT

National

6.1 The National Planning Policy Framework (NPPF) states that planning authorities should:

- develop policies based on an understanding and evaluation of its defining characteristics; and
- develop policies to provide guidance for establishing a strong sense of place, that respond to the local character and history, while not preventing or discouraging innovation.

Regional

6.2 The London Plan recognises the importance of placemaking. This sets out a series of design related policies, which provide comprehensive guidance for delivering Lifetime Neighbourhoods and for development to help reinforce or enhance the character,

legibility, permeability and accessibility of neighbourhoods. The London Plan also provides guidance for architecture and building design alongside guidance for development to build on the positive elements of character and have regard to the form, function, structure, scale, mass and orientation of a place.

6.3 The Mayor's Old Oak and Park Royal OAPF principle D5 provides guidance for placemaking alongside a series of place-specific visions and objectives.

PREFERRED POLICY OPTION

Proposals will be supported where they demonstrate the delivery of exemplar world class architectural and landscape design quality that:

- a) responds to and enhances positive elements of existing local character and context; and
- b) contributes to creating new character areas for places and neighbourhoods for locations within Old Oak, where appropriate.

JUSTIFICATION

6.4 In delivering exemplar world class design and successful placemaking, development should consider its relationship to the surrounding context, specifically by positively responding to local views, its relationship with existing and proposed surrounding development and spaces and ensuring it contributes to the creation of a welcoming and outward looking environment.

6.5 By recognising existing positive elements of the local character and context to inform existing and evolving character areas, a sense of place for different areas can be nurtured. The size and scale of development within Old Oak and the contrasting characters of Park Royal and Wormwood Scrubs will enable a series of distinctive neighbourhoods to emerge that exhibit specific characters that have been informed by existing character and by new exceptionally designed places with mix of uses and activities. Where appropriate, there will be opportunities for development to help inform the development of new character areas, specifically within Old Oak.

6.6 Alongside character, context is a critical element in creating a connected and coherent set of places. Context is defined by the GLA Character & Context SPG as “the way in which places, sites and spaces inter-relate with one another whether physically, functionally or visually, or the way in which they are experienced sequentially and understood”. As such proposals should provide relevant information in demonstrating how it is seeking to respond to the existing and envisaged local context.

6.7 The OPDC Place Review Group has been established to advise on the production of planning policy documents and development proposals. Applicants will be encouraged to present proposals to the group for consideration.

6.8 OPDC is developing a Character Study which will be used to inform the next version of the draft Local Plan.

ALTERNATIVE POLICY OPTION

6.9 Alternative policy options are not considered to be appropriate in light of the comprehensive and detailed regional guidance provided by the London Plan and Old Oak and Park Royal Opportunity Area Planning Framework.

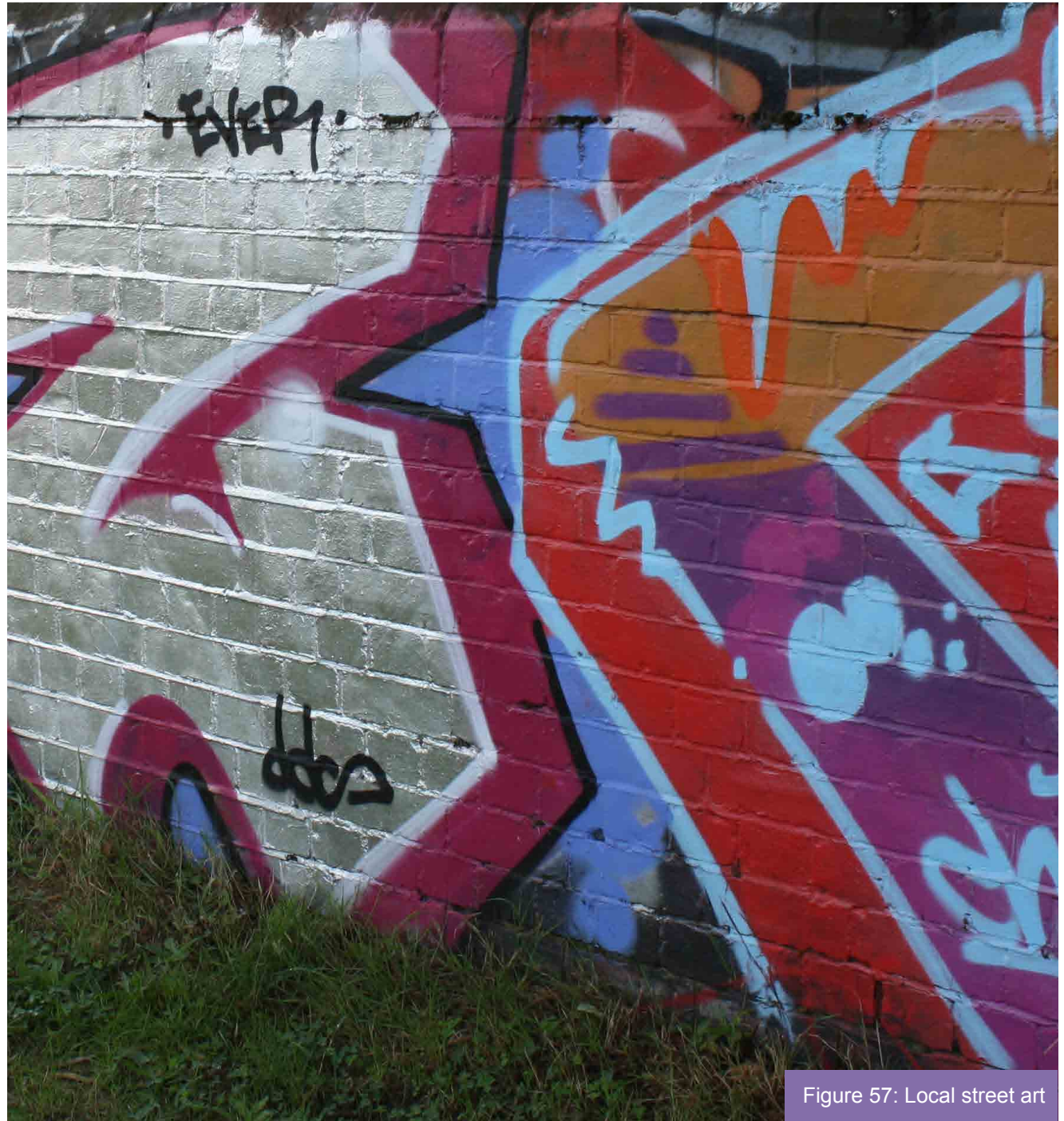


Figure 57: Local street art

D2: Streets and public realm

KEY ISSUES

1. High density development must be supported by a high quality, flexible public realm that fulfils a range of needs and delivers successful and distinctive places and neighbourhoods.

POLICY CONTEXT

National

6.10 The NPPF identifies that:

- development should establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.
- policies for managing advertisements should be efficient, effective and simple and should only manage their impact on buildings or on their surroundings and in the interests of amenity and public safety.
- development should deliver places which promote clear and legible pedestrian routes that encourage the active and use of public areas.

6.11 The National Planning Policy Guidance provides detailed guidance for managing advertisements to supplement the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Regional

6.12 The London Plan provides guidance for streets and public realm. This sets out a series of comprehensive design related policies including:

- extensive and detailed guidance for delivering secure, accessible, inclusive, connected, legible public realm that relates to the local context including heritage. This requires the public realm to incorporate the highest quality design, landscaping, planting, street furniture and surfaces. Specifically, development is required to support the legibility of the public realm and it should have clearly defined purposes and an uncluttered appearance. Opportunities for high quality public art and greening are supported.
- guidance to deliver a safe and secure environment in London that is resilient to emergencies and supports opportunities for designing out crime.
- guidance for the delivery of child play space and informal recreation.

6.13 The Mayor's Old Oak and Park Royal OAPF principle D1 and OO2 provides guidance for delivering new and improved streets and public realm.

PREFERRED POLICY OPTION

- a) OPDC will work with stakeholders to deliver an exemplarily designed, welcoming, safe, resilient, flexible, inclusive and sustainable public realm network that facilitates the use and enjoyment of spaces while responding to local character and integrating with surrounding areas.
- b) Proposals will be required to:
 - i. contribute to, or improve, the network of streets as set out in the Places Chapter;
 - ii. contribute to connecting places together and breaking down severance;
 - iii. contribute to improving the quality of existing and creating new public realm;
 - iv. deliver public realm and street furniture that responds to and / or contributes to the delivery of new and improved local character areas;
 - v. be supported by a clear and robust public realm management and maintenance strategy;
 - vi. support wayfinding, in particular

- to key destinations;
- vii. enable the coordinated design, delivery and management of utilities infrastructure and emerging technology; and
- viii. demonstrate engagement with the Mayor's Office for Policing and Crime, the local Metropolitan Police Crime Prevention Design Advisor and other relevant emergency services.

- c) Proposals for advertisements will be required to have a:
 - i. positive impact on associated buildings and surroundings; and
 - ii. neutral or positive contribution to amenity and public safety.



Figure 58: Enhanced public realm



Figure 59: Windrush Square, Brixton

JUSTIFICATION

6.14 The quality and functioning of the public realm is critical in fostering successful places. The public realm provides an important location for social interaction and movement. Further guidance relating to this policy will be provided within the forthcoming OPDC Public Realm SPD.

6.15 The use of appropriate robust materials and the quality of detailed design of the public realm will play a key role in strengthening local identities. To support this, management and maintenance strategies should be provided.

6.16 Street frontages are key in helping buildings frame the public realm and providing a sense of enclosure. The frequency of their frontages along streets can inform the character of the area with regular entrances positioned to provide ease of use.

6.17 To enable the effective management of the public realm and management of utilities infrastructure (including emerging technology) the public realm should be designed to facilitate easy access to subsurface utility infrastructure.

6.18 Emerging and future technology

may enable the public realm to be used and managed more efficiently and this should be encouraged through flexible design and the use of technology, as appropriate. This may include the use of sensors to help understand how spaces are used and can be better organised to support local communities.

6.19 Advertisements can come in a range of formats. They can include digital, illuminated and large-scale shrouds which could potentially have a negative impact on amenity and public safety if not managed and designed appropriately to address these impacts.

6.20 Integrating security and resilience for emergency requirements are important but the impact on wider context and character should also be considered. Early engagement with the Mayor's Office for Policing and Crime, the local Metropolitan Police Crime Prevention Design Advisor and other relevant emergency services will be encouraged.

6.21 The OPDC Walking, Cycling, Streets and Public Realm Strategy will inform the next version of the draft Local Plan.

ALTERNATIVE POLICY OPTION

6.22 In light of the strong national and regional guidance and the requirement of the London Plan to deliver optimum development densities supported by high quality public realm, alternative policy options were not considered to be appropriate.

Questions:

QD2a: Are there other key routes that should be added to the public realm network?

You can provide comments directly through:

opdc.commonplace.is



Figure 60: Integrating services



Figure 61: Below ground waste management



Figure 62: Integrating elements of play



Figure 63: Green and hard landscaping

D3: Open space

KEY ISSUES

1. Sufficient amounts of high quality open space that delivers a range of functions needs to be provided within Old Oak and Park Royal to support the area and to promote the health and well-being of existing and new residents and workers.
2. There are existing open spaces that should be sensitively enhanced, where agreed.

POLICY CONTEXT

National

6.23 The NPPF identifies that:

- access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- policies are required to be based on assessments of the need for open space and opportunities for provision which identify quantitative or qualitative deficiencies in open space.
- open space is protected unless it is considered to be surplus, is better replaced or the development is for alternative sports and recreation provision.

Regional

6.24 The London Plan provides guidance

for open spaces. This sets out policies including:

- benchmark standards for child play space for a range of ages.
- requiring that the strongest protection for Metropolitan Open Land to prevent inappropriate development except in very special circumstances.
- the Mayor's support for new public open space to address areas of deficiency and resist the loss of protected open spaces unless better quality provision is made locally.

6.25 The Mayor's All London Green Grid SPG provides supplementary guidance to the London Plan and considers the delivery of green infrastructure across London. The Mayor's Housing SPG provides guidance for the design of communal open space alongside the design and size of private open space. The Mayor's Play and Informal Recreation SPG provides guidance for child play space.

6.26 The Mayor's Old Oak and Park Royal OAPF principle OO3 provides guidance for the location of new public open spaces including Grand Union Square, Old Oak Square, station squares, small open spaces and towpath linear spaces.

PREFERRED POLICY OPTION

a) OPDC will work with stakeholders to create a network of public open spaces by:

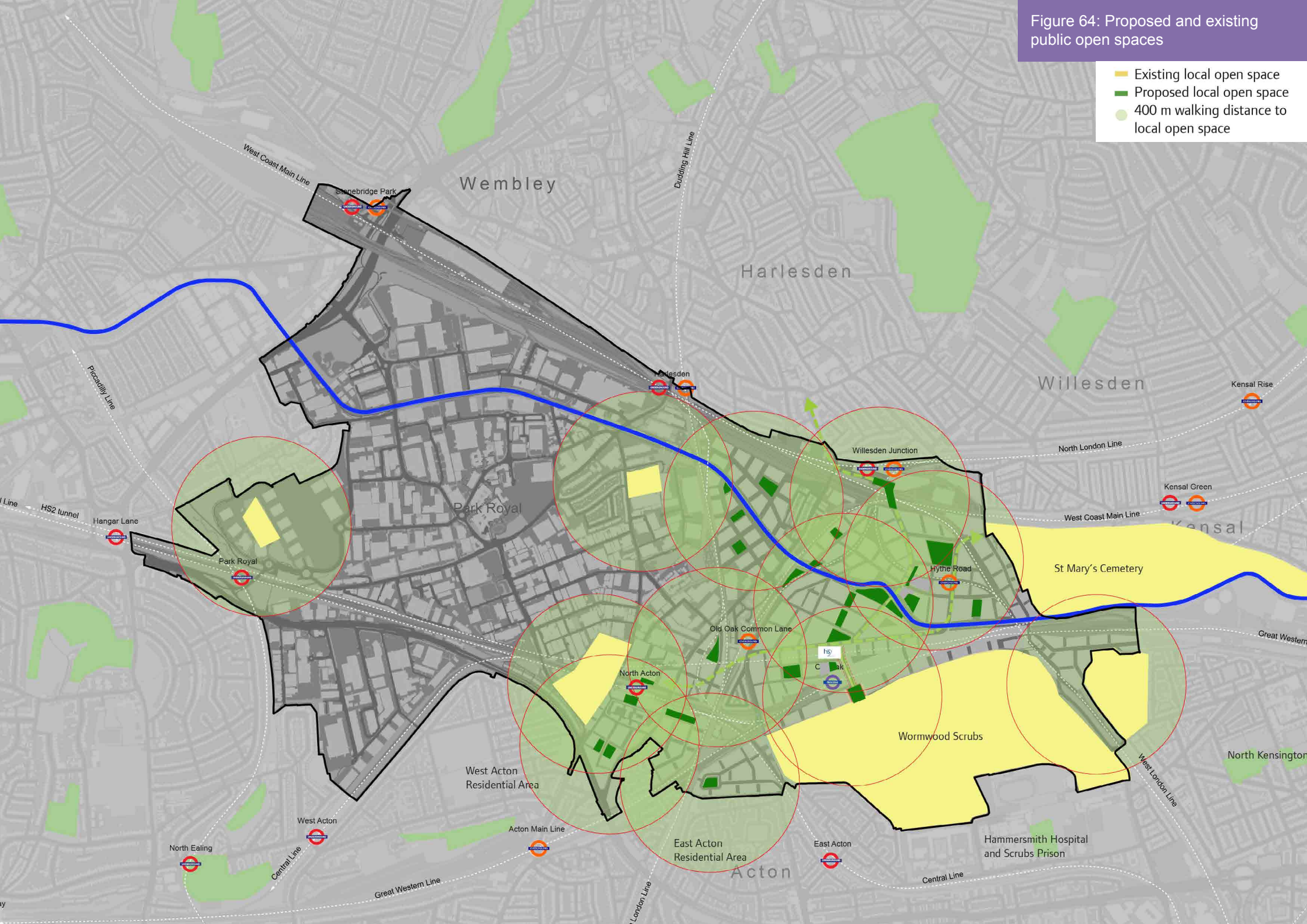
- i. safeguarding and / or enhancing existing public open spaces; and
- ii. creating and connecting new public open spaces to meet identified need.

b) Proposals will be required to:

- i. deliver, improve and / or contribute to the delivery of new public open spaces identified in the Places Chapter;
- ii. deliver public and communal open spaces that are supported by a clear and robust management and maintenance strategy;
- iii. deliver temporary public open spaces that contribute to the vitality, character and activation of an area and supports the delivery of permanent development;
- iv. enhance existing public open space; and
- v. deliver private and communal open space to support the needs of residents.

Figure 64: Proposed and existing public open spaces

- Existing local open space
- Proposed local open space
- 400 m walking distance to local open space



JUSTIFICATION

6.27 Old Oak and Park Royal currently have limited provision of public open space. To meet the needs of existing and future residents, workers and visitors, new spaces need to be provided and existing open spaces protected and / or enhanced in consultation with relevant stakeholders. New public open spaces have been identified within the Places Chapter.

6.28 OPDC will work with stakeholders to explore whether onsite public open space should be delivered on major development sites in addition to the public open spaces identified in the Places Chapter. These should be coordinated with the surrounding provision of existing and proposed public, communal and private open spaces to deliver a coherent and connected open space network. Further information will be provided in the forthcoming OPDC Public Realm SPD.

6.29 Enhancement of existing public and communal open space will be considered in relation to its size, function, quality and character.

ALTERNATIVE POLICY OPTION

6.30 In light of the strong national and regional guidance and the requirement of the London Plan to deliver optimum development densities supported by high quality public open space, alternative policy options were not considered to be appropriate.

Questions:

QD3a: What sort of uses could be encouraged in the different open spaces across Old Oak and Park Royal?

QD3b: Should the proposed policy consider prioritising the delivery of public open space provision ahead of private open space provision?

You can provide comments directly through:

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Figure 65: Old Oak Park



Figure 66: Civic spaces

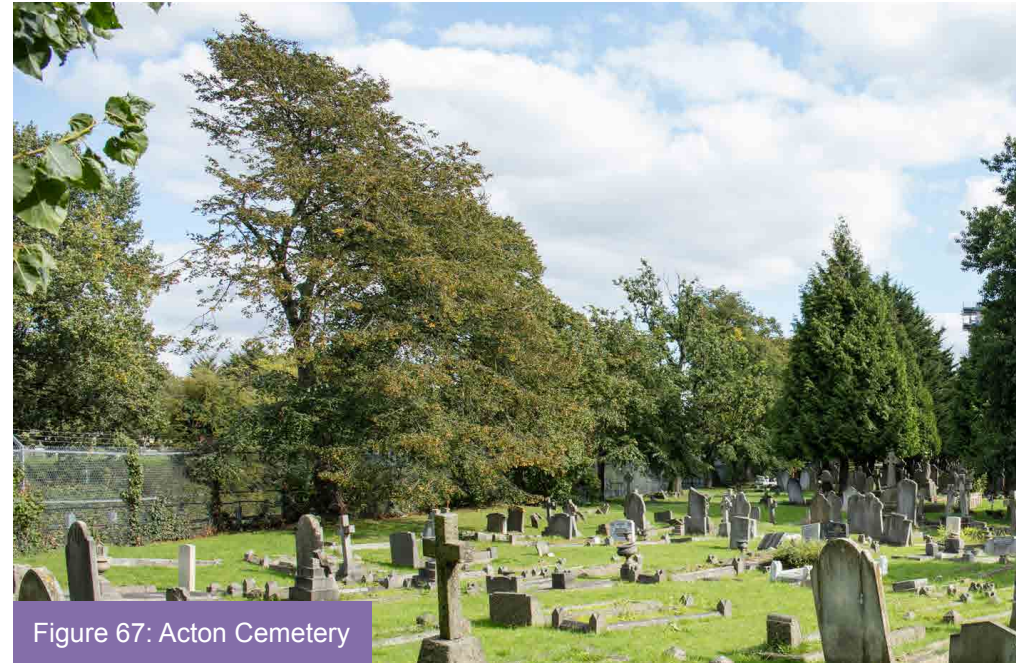


Figure 67: Acton Cemetery



Figure 68: Russell Square



Figure 69: Child playspace, Queen Elizabeth Olympic Park

D4: New buildings

KEY ISSUES

1. New housing, employment uses, town centre uses and social infrastructure should to be delivered at high densities to:
 - take advantage of the access to future excellent public transport accessibility;
 - create a thriving new part of London comprised of a series of neighbourhoods; and
 - contribute to addressing London's housing needs.
2. New industrial workspaces need to be delivered at higher densities than the existing industrial typologies to:
 - support further intensification of Park Royal; and
 - support economic growth in the local and London economies.
3. Building at high density will require exceptional design standards and high quality materials to:
 - achieve a sense of place; and
 - achieve high quality local environments for occupants.
4. In the London Plan, Old Oak and Park

Royal are identified as locations where tall buildings are appropriate. Tall buildings can play a positive role in creating a sense of place, but should be designed to the highest standards and located in the right places to mitigate negative impacts on surrounding areas.

POLICY CONTEXT

National

6.31 The NPPF identifies that:

- good design is indivisible from good planning, and should contribute positively to making places better for people;
- decisions should aim to ensure that development optimises the potential of the site to accommodate development and is visually attractive as a result of good architecture and appropriate landscaping;
- policies should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative; and
- policies should promote or reinforce local distinctiveness.

6.32 NPPG requires that development should give careful consideration to details and materials. Specifically, it requires that materials should be practical, durable, affordable and attractive.

Regional

6.33 The London Plan provides guidance for design. This sets out policies including:

- extensive and detailed guidance on architecture of new buildings and their relationship with their surroundings. Specifically it provides guidance in relation to delivering the highest architectural quality, scale, details and materials, climate change mitigation and adaptation, relationship with the street and indoor/outdoor spaces and flexibility. It also provides guidance for designing out crime and resilience to emergencies.
- specific criteria for tall and large buildings, directing them to Opportunity Areas. Tall buildings are defined in the London Plan as “those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor”.
- specific guidance for the quality and design of housing and is supplemented by the Mayor's Housing SPG.

6.34 The Old Oak and Park Royal OAPF principle OO4 provides guidance for the indicative arrangement of density across Old Oak.

PREFERRED POLICY OPTION

Design

- a) OPDC will work with partners and stakeholders to promote the delivery of world-class exemplarily designed and sustainable new buildings.

Density

- b) Proposals will be required to:
 - i. deliver densities in accordance with those identified in OSP4, the employment policies and the Places Chapter, that contribute to delivering high quality environments for all;
 - ii. demonstrate successful delivery of social infrastructure, other relevant uses and building servicing within a high density context;

Tall buildings

- c) Proposals for tall buildings will be required to:
 - i. accord with OSP4;
 - ii. contribute to the delivery of a visually engaging and coherent skyline;
 - iii. accord with relevant guidance for RAF Northolt safeguarding zones.
 - iv. achieve the highest standards of

design; and
v. be mindful of their surrounding context.

Local views

- d) Proposals will be required to demonstrate how they provide positive contributions to the character and composition of local views.

Materials

- e) Proposals will be required to comprise details and materials that:
 - i. are robust and durable;
 - ii. complement positive elements of the existing character; and
 - iii. positively contribute to the development of a new coherent character and series of places.

JUSTIFICATION

6.35 The delivery of world class sustainable architecture that responds to existing and emerging character and context, while exploring the potential to deliver a new local character, is fundamental to the successful regeneration of Old Oak and Park Royal.

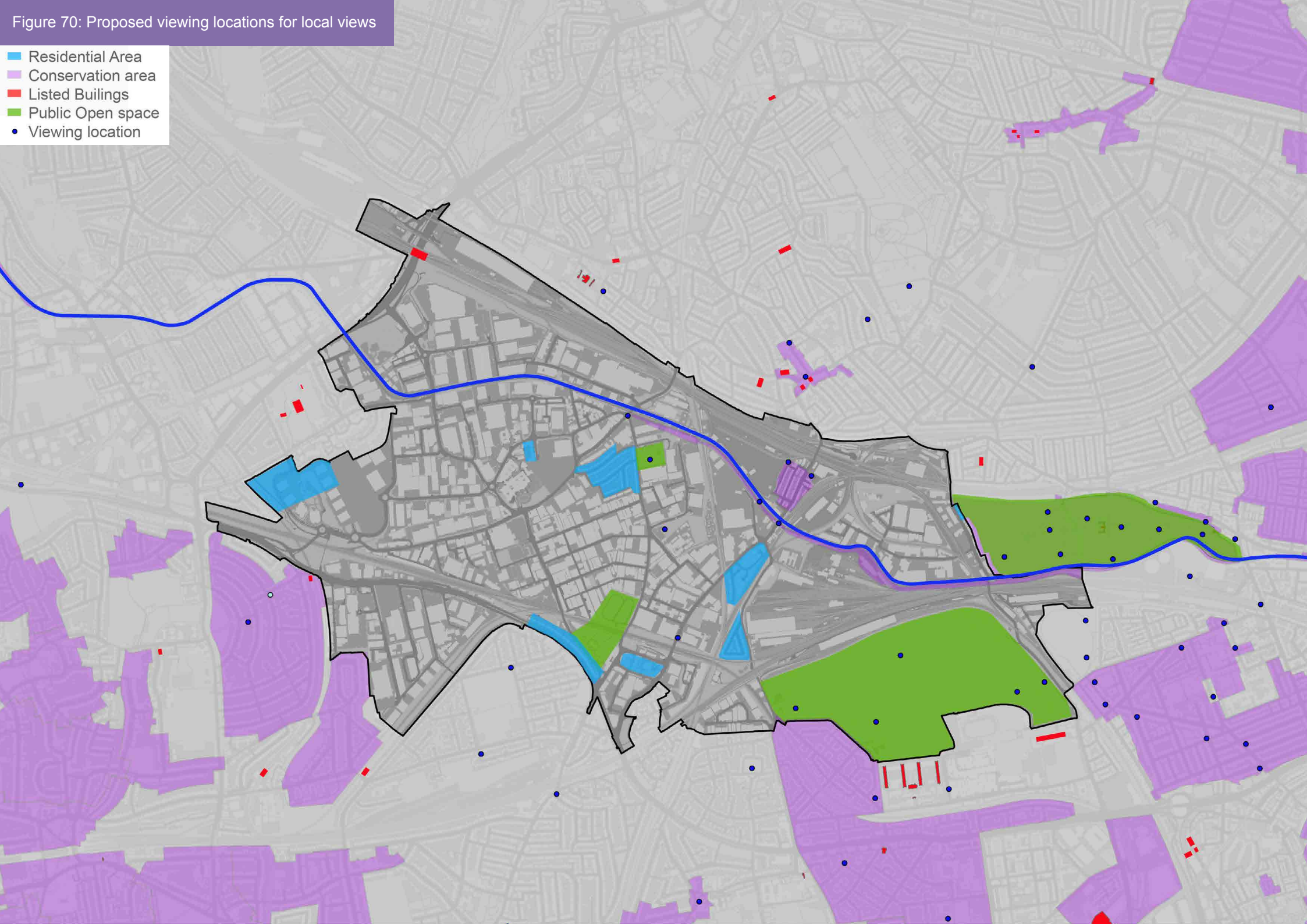
6.36 The potential for optimising development will likely require the delivery of high density development for housing, employment uses and social infrastructure. Elements of this may require the integration of primary schools and health services into the envelopes of high density developments which will require innovative design and management approaches. In delivering high density housing, proposals should consider how variants of perimeter block typologies can optimise the density of development.

6.37 Servicing of buildings, particularly for mixed use buildings, can have a specific impact on building design and the public realm. Where appropriate, proposals should demonstrate how coordination of servicing facilities will be delivered.

6.38 As set out in OSP4, high density development can include tall buildings, as long as such proposals accord with locational guidance, achieve the highest standards of design, are mindful of their surrounding context, delivers a moment of interest and accord with the requirements set out in national guidance, the London Plan and the draft preferred policy options in this draft Local Plan.

Figure 70: Proposed viewing locations for local views

- Residential Area
- Conservation area
- Listed Buildings
- Public Open space
- Viewing location



6.39 The delivery of buildings will impact on the character of surrounding areas and should enhance the skyline. Any proposals of 91.4m above ground level should consult the Defence Infrastructure Organisation.

6.40 Local views from within and outside Old Oak and Park Royal can help positively shape the local skyline, provide visual interest and contribute to delivering high levels of amenity while informing the local character and identity of the area. Specific consideration will be given to how the massing and elevational treatments of development contributes to views. These views are those taken from existing residential communities, existing town centres, along the Grand Union Canal, public open spaces and heritage assets (including conservation areas). OPDC will be developing these in further detail to inform the next version of the draft Local Plan in consultation with the community and stakeholders. In demonstrating how views accord with the proposed policy option, proposals should include verified daytime, evening and night-time views that consider tree

coverage.

6.41 Details and materials that complement not only positive elements of existing character but also inform new evolving character, while considering maintenance requirements, will play a key role in delivering successful and resilient places.

6.42 An important element of creating a high quality place is ensuring that development is resilient to terrorism, specifically for development in busy areas such as town centres, catalyst uses and stations. Development proposals should have regard to the appropriate guidance published by the National Counter Terrorism Security Office, Centre for the Protection of National Infrastructure and liaise with the Counter Terrorism Security Advisors.

ALTERNATIVE POLICY OPTION

6.43 In light of the detailed national and regional guidance, specific alternative policies were not considered to be appropriate.

Questions:

QD4a: Are there any additional criteria and/or elements to the proposed policy option for tall buildings and London Plan policies which should be considered?

QD4b: Where should key views by identified from? What should they be focused on?

You can provide comments directly through:

opdc.commonplace.is

D5: Alterations and extensions

KEY ISSUES

1. Alterations to existing buildings can negatively impact the character of an area if not managed appropriately.

POLICY CONTEXT

National

6.44 A significant amount of different types of alterations are allowed by legislation known as permitted development rights.

Regional

6.45 The London Plan provides limited specific guidance for managing alterations and shop fronts that is not managed by other general policies.

PREFERRED POLICY OPTION

- a) Proposals for alterations and extensions will be required to:
 - i. respect and / or improve the architectural quality of the existing building and the character of its setting;
 - ii. be appropriate to the scale, form, height and mass of the existing building and any surrounding buildings;
 - iii. relate sympathetically to any other sensitive sites that will be affected; and
 - iv. have neutral or positive impact on local views.
- b) Proposals for replacement shopfronts or alterations to existing shopfronts will be required to:
 - i. relate sympathetically to the upper parts of the building and the part of the shopfront to be retained in terms of the design and materials;
 - ii. not result in the loss or partial loss of shopfronts which are of architectural interest; and
 - iii. provide open and active frontages to the public realm.

JUSTIFICATION

6.46 Alterations and extensions can affect the character of a building and its surrounding area. If they are not designed appropriately, both major and minor works have the potential to undermine the contribution of an existing building to its immediate surroundings or the pattern of development in a wider area. Proposals to alter existing buildings must therefore ensure proposed extensions or alterations relate sympathetically to their context and achieve a high standard of design. Proposals should demonstrate how elements considered to be of positive value to local character have been included and / or reflected in their design.

6.47 In buildings where the windows are a valuable architectural feature of a property or group of properties, replacement windows should seek to match the original in terms of their materials, design, size, method of opening and section.

6.48 The addition of building services equipment to existing buildings should

seek to utilise internal spaces such as basements before other locations are considered.

6.49 Shopfronts have an important role in placemaking because they are the most significant interface between commercial buildings and users of the public realm. This importance will be exaggerated at Old Oak due to the planned scale of development and the need to create a high quality pedestrian environment.

6.50 Shopfronts, including specific architectural features, considered to be of architectural or historic interest should be preserved and enhanced if they are considered to provide a valuable contribution to local character and distinctiveness. New buildings that include commercial or other ground floor uses that provide access to the public should demonstrate how the design of the shopfront relates to the architecture of the building and creates a rhythm to the building street frontage. Design should also carefully consider the location, materials and robustness of alarm boxes, canopy boxes and security cameras to avoid undermining the appearance of new developments.

6.51 Solid and perforated roller shutters can have a negative impact on the

public realm. Where roller shutters are considered necessary, internal perforated shutters should be located within the shop unit.

ALTERNATIVE POLICY OPTION

1. Guidance is not provided for alterations, extensions and shopfronts.

6.52 The benefit of this approach would be the development of a streamlined local planning framework. The disadvantage would be that individual and an accumulation of unmanaged amendments to existing buildings could result in negative impacts on the local character and context.

D6: Heritage

KEY ISSUES

1. It is important that regeneration and intensification recognises the positive role that heritage and the historic environment can play in helping to shape the character of development.
2. Proposed uses within or for designated heritage assets may not be consistent with the assets' significance.

POLICY CONTEXT

National

6.53 The NPPF identifies that local planning authorities should set out a positive strategy for the conservation and enjoyment of the historic environment that considers:

- the desirability of sustaining and enhancing the significance of heritage assets;
- putting them to viable uses consistent with their conservation and the wider social, cultural, economic and environmental benefits;
- the desirability of new development making a positive contribution to local character and distinctiveness;
- undesignated heritage assets; and
- opportunities for heritage to contribute to the character of a place.

Regional

6.54 The London Plan provides guidance for design in Chapter 7. This sets out policies including:

- comprehensive and detailed guidance for heritage assets and archaeology. Specifically it identifies that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. It also requires development to conserve their significance and make provision for the protection of archaeological resources, landscapes and significant resources.
- guidance for heritage-led regeneration and seeks regeneration schemes to make use of heritage assets to stimulate environmental, economic and community.

PREFERRED POLICY OPTION

a) OPDC will work with Historic England and stakeholders to:

- i. identify, conserve, enhance and improve access to the historic environment, heritage assets and their settings where appropriate;
- ii. ensure heritage assets contribute to improving and creating a sense of place; and
- iii. address Heritage at Risk.

b) Proposals will be required to conserve and / or enhance the significance of heritage assets to contribute to successful placemaking.

Figure 71: Old Oak Common Sidings, 1923



EPW009683 © English Heritage. Aerofilms collection

Figure 72: North Acton, 1931



EPW035225 © English Heritage. Aerofilms collection

JUSTIFICATION

6.55 Heritage assets and their settings play a critical role in helping to inform placemaking and generating social, economic and environmental benefits for Old Oak and Park Royal. As such their architectural or historic special interest should be conserved and enhanced.

6.56 In 2015, Historic England published the Old Oak Outline Historic Area Assessment to inform the development of planning policy for Old Oak and the designation of local assets. Alongside this draft Local Plan, OPDC is also consulting on the designation of the proposed Cumberland Park Factory Conservation Area. The two existing designated heritage assets within the OPDC area are the Grand Union Canal Conservation Area and the Grade II Listed Brent Viaduct.

6.57 OPDC will be developing a Park Royal Heritage Assessment and a Views Study to inform the next version of the draft Local Plan which will also consider potential heritage assets within Park Royal. OPDC will use this information alongside the Old Oak Outline Historic Area Assessment to work with Historic England and stakeholders in exploring the designation of other heritage assets including the potential development of

a Local List.

6.58 Although OPDC is not responsible for the adjacent St. Mary's and Kensal Green Cemetery Conservation Areas, they contain a number of heritage assets which are identified by Historic England to be at risk. OPDC will work with Historic England and other stakeholders to remove these from the Heritage at Risk Register.

6.59 By supporting proposals which seek to promote the significance of heritage assets through beneficial reuse, assets can help to inform wider placemaking and deliver a wide range of economic benefits. The proposed designation of the Cumberland Park Factory Conservation Area aims to facilitate this aspiration and continue the legacy of employment uses and economic innovation within Old Oak.

ALTERNATIVE POLICY OPTION

6.60 In light of the strong national and regional guidance provided for managing heritage, providing alternative policy options is not considered to be appropriate.

Question:

QD6a: Do you have an opinion on the designation of the proposed Cumberland Factory Conservation Area, which is being publicly consulted on alongside this Local Plan?

You can provide comments directly through:

opdc.commonplace.is

Figure 73: Frontages of proposed Cumberland Park Factory Conservation Area



D7: Amenity

KEY ISSUES

1. Building a new part of London requires the provision of high quality amenity for building users. However, building at higher densities can have an impact on the quality of the environment for building users in and around sites if not carefully managed.

POLICY CONTEXT

National

6.61 The NPPF identifies that planning should always seek to ensure a good standard of amenity for all existing and future occupants of land and buildings as a core planning principle.

6.62 The NPPG identifies that the scale of buildings should take account of local climatic conditions, including daylight and sunlight, wind, temperature and frost pockets.

Regional

6.63 The London Plan provides guidance for amenity. This sets out policies including:

- guidance requiring that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings with a specific reference to housing. It references the elements of amenity to be privacy, overshadowing,

wind and microclimate.

- specific guidance in relation to tall buildings not adversely affecting their surroundings also in terms of microclimate, wind turbulence, overshadowing, noise and reflected glare.

PREFERRED POLICY OPTION

a) OPDC will work with stakeholders to ensure that development delivers a high level of amenity and high quality environment for building users in and around Old Oak and Park Royal; and

b) Proposals will be required to demonstrate that they achieve appropriate levels of:

- privacy for workspaces and habitable rooms; and
- non-reflected daylight and sunlight.

JUSTIFICATION

6.64 New development and all density levels will need to deliver a high standard of amenity in terms of privacy, overshadowing, air quality, noise and light pollution, daylight/sunlight, wind and microclimate for future building users and neighbours.

6.65 During construction and operational phases, OPDC will work with stakeholders to minimise negative impacts on local communities.

6.66 Appropriate levels of privacy and daylight / sunlight are relevant to the types of use of buildings associated activities. For residential uses, this is important for habitable rooms and private open spaces. To support the amenity of building users, proposals demonstrating levels of daylight / sunlight should provide information relating to non-reflected light in accordance with relevant site layout planning for daylight and sunlight guidance.

6.67 To minimise the visual and acoustic impact of plant and services equipment, this should always be integrated into new buildings with appropriate capacity for future equipment incorporated into the design. External equipment should be sensitively sited to minimise any

visual impact, including consideration of long distance views, whilst allowing for necessary noise mitigation.

6.68 Proposed policy options for managing air quality and noise are provided in the Environment and Utilities Chapter.

ALTERNATIVE POLICY OPTION

1. London Plan policies are used to manage amenity

6.69 The benefit of this option would be the use of a London-wide standardised approach and the provision of a streamlined Local Plan. The disadvantage would be the inability for OPDC to manage specific amenity issues in relation to higher density development.

Question:

QD7a: Could policies allow a greater impact on internal residential amenity to accommodate higher densities?

You can provide comments directly through:

opdc.commonplace.is

D8: Inclusive design

KEY ISSUES

1. A number of existing destinations within Old Oak and Park Royal have restricted access including the Grand Union Canal.
2. Infrastructure and impermeable land uses across the area present barriers to movement that need to be addressed.

POLICY CONTEXT

National

6.70 The NPPF identifies that local planning authorities need to plan positively for the achievement of inclusive design for all developments, including buildings, public and private spaces and that planning policies and development should create safe and accessible environments.

6.71 Building Regulations Part M provides legislation in relation to the access to and use of buildings. This sets out requirements for accessibility for general housing, accessible and adaptable housing and wheelchair user dwellings.

Regional

6.72 The London Plan provides guidance for inclusive design. This sets out policies including:

- detailed guidance for delivering Lifetime

Neighbourhoods, requiring development to maximise the opportunity for community diversity, inclusion and cohesion.

- detailed guidance for delivering inclusive environments. Specifically it requires all new development to achieve the highest standards of accessible and inclusive design by according with a series of criteria based policies.
- requiring development delivers 10% of new housing to be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. The policy also requires all new housing to be built to Lifetime Homes Standards.

6.73 The Accessible London SPG provides further guidance on the implementation of London Plan to deliver the Mayor's aspirations for delivering an accessible environment in London, with particular emphasis on the access needs of disabled and older people.

6.74 The Housing SPG provides additional specific guidance for wheelchair housing to Building Regulations Part M to ensure new homes are designed to allow sufficient flexibility to adapt to residents' changing needs and circumstances.

PREFERRED POLICY OPTION

- a) OPDC will work with stakeholders to promote and deliver an exemplarily inclusive and accessible designed environment for Old Oak, Park Royal and Wormwood Scrubs.
- b) Proposals will be required to meet the highest standards of accessible and inclusive design by:
 - i. delivering accessible design solutions that contribute to addressing existing barriers;
 - ii. seeking to exceed latest guidance on accessible and inclusive design; and
 - iii. engaging with relevant stakeholders to inform proposals at the earliest opportunity.

JUSTIFICATION

6.75 Inclusive design is defined by the NPPF as “designing the built environment, including buildings and their surrounding spaces, to ensure that they can be accessed and used by everyone”.

6.76 In promoting the delivery of the highest quality inclusive and accessible environments, OPDC seeks to enable the creation of a series of Lifetime Neighbourhoods that meet the needs of all sections of the community, including disabled and older people. With this in mind, the OPDC Place Review Group has specific expert representation in accessible and inclusive design. OPDC will work with a range of stakeholders to achieve this aspiration including local access groups represented on the London Access Forum.

6.77 The existing network of transport infrastructure currently has a negative impact on people accessing areas within Old Oak and on-street congestion, alongside a poor quality physical environment, restricts easy movement within Park Royal. New development will play a new role in addressing these barriers to deliver inclusive and welcoming environments.

6.78 Proposals which demonstrate

how they will exceed the existing latest guidance for inclusive design for housing, commercial uses (including hotels, offices and town centre uses), infrastructure, public realm and public open spaces (including child play space) will be supported. Proposals which demonstrate engagement with relevant access groups at the earliest opportunity will be supported.

ALTERNATIVE POLICY OPTION

6.79 In light of the strong national and regional guidance provided for delivering inclusive and accessible environments, providing alternative policy options is not considered to be appropriate.



Figure 74: Accessible and green spaces



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