OPDC Local Plan – Draft Plan for Regulation 19 Consultation 2017

Duty to Co-operate Background Paper

(May 2018)

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1. Introduction to the Duty to Co-operate

1.1. Section 33A of the Localism Act[1] amended the Planning and Compulsory Purchase Act 2004 (2004 Act), by inserting a new legal requirement[2] referred to as the 'Duty to Co-operate'.

1.2. The Duty to Co-operate (DtC) places a legal duty on local planning authorities, county councils in England and other prescribed bodies engage constructively, actively and on an ongoing basis to develop development plan documents, including activities that prepare the way or support the activities of preparing development plan documents, in respect of strategic matters.

1.3. The Old Oak and Park Royal Development Corporation (OPDC) was established as a local planning authority in April 2015, and OPDC's Local Plan is a Development Plan Document (DPD), therefore the Duty to Co-operate generally applies to the preparation of this document.

1.4. The Duty to Co-operate specifically relates to 'strategic matters' which are defined as follows:

- sustainable development or use of land that has or would have a significant impact on at least two planning areas, in particular in connection with sustainable development or use of land for or in connection with strategic infrastructure which has or would have a significant impact on at least two planning areas, and
- sustainable development or use of land in a two-tier area if the development or use— (i) is a county matter, or (ii) has or would have a significant impact on a county matter.

1.5. Paragraph 156 of the National Planning Policy Framework (NPPF) also outlines strategic priorities that a local plan should have strategic policies to cover. They include:

- The homes and jobs needed in the area;
- The provision of retail, leisure and other commercial development;
- The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and the provision of minerals and energy (including heat);
- The provision of health, security, community and cultural infrastructure and other local facilities; and
- Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

1.6. In accordance with the NPPF (paragraph 159), public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out above.

1.7. The NPPF (paragraph 179) also highlights the need for local planning authorities to work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and are reflected in individual local plans. Joint working should allow local planning authorities to work together to meet development requirements that cannot be wholly met within a single local planning area. Local

[1] Section 110
[2] Section 33A

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planning authorities should also take account of different geographic areas, including travel-to-work areas. Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development and infrastructure (paragraphs 162 and 180).

1.8. Cooperation should be a continuous process of engagement, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development. Local planning authorities are expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This evidence could include:

- joint research and evidence gathering to define the scope of the Local Plan, assess policy impacts and assemble the necessary material to support policy choices.
- Plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy.

1.9. A Planning Inspector can consider whether this duty has been complied with in the examination of planning documents.

1.10. The preparation of Local Plans is governed by the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended). This sets out a list of prescribed bodies that the Duty to Co-operate applies to, which includes:

- the Environment Agency
- the Historic Buildings and Monuments Commission for England (known as Historic England)
- Natural England
- the Mayor of London
- the Civil Aviation Authority
- the Homes and Communities Agency
- each clinical commissioning group established under section 14D of the National Health Service Act 2006
- the National Health Service Commissioning Board
- the Office of Rail Regulation
- Transport for London
- each Integrated Transport Authority
- each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
- the Marine Management Organisation.

1.11. As advised in the Planning Practice Guidance, the duty to cooperate is not a duty to agree. However, local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.

1.12. The purpose of this paper is to provide information on the constructive, active and continuous process of engagement which has underpinned the preparation of OPDC's Local Plan. This is a 'live' document and its contents will be regularly updated throughout the ongoing preparation of the Local Plan.

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2. Our Strategic context

2.1. OPDC's boundary (See Appendix 1) spans 650 hectares, and includes parts of the London Boroughs of Brent, Ealing and Hammersmith and Fulham, in West London. The boundary covers both the Old Oak and Park Royal Opportunity Areas identified in the Mayor's London Plan (2016), and described in more detail in the Old Oak and Park Royal Opportunity Area Planning Framework (2015). Collectively, these two Opportunity Areas are identified as having the potential to accommodate 25,500 new homes and 65,000 jobs which would constitute London and the UK's largest regeneration project.

2.2. Within the boundary, there are three notable character areas: Old Oak, Park Royal and Wormwood Scrubs; and cross-cutting elements which dissect these areas, such as the canal, railways and road infrastructure.

2.3. Today, the Old Oak area is dominated by rail lines and related land uses south of the Grand Union Canal, with large industrial sites to the north. However, the OPDC area and particularly Old Oak, is set to be transformed in 2026 with the opening of Old Oak Station. The new station will connect Crossrail and National Rail services to the newly built High Speed 2 (HS2) line in a station nearly the size of Waterloo, accommodating approximately 250,000 passengers a day. The HS2 line will dramatically improve accessibility and capacity between London and a number of Britain's major cities, serving millions of people, in order to boost economic growth. The Elizabeth line, currently being constructed by Crossrail, will stretch over 60 miles from Reading and Heathrow in the west across to Shenfield and Abbey Wood in the east. It will stop at 40 stations – including Old Oak Common station - and serve approximately 200 million people each year. When it becomes operational in 2018, it will transform travel across the city and the south east, and provide new capacity on London's transport network. As a direct consequence of being part of these nationally and regionally significant infrastructure projects, Old Oak will be within 10 minutes journey time of London Heathrow, the City and the West End and 38 minutes of Birmingham.

2.4. Central Government also own the majority (over 75%) of the core development area in Old Oak and this strong public sector interest provides opportunities for the public sector to act as a coordinator and potential master developer. OPDC is working closely with both Central Government and HS2 Ltd to facilitate and co-ordinate development. This has resulted in a Memorandum of Understanding (MoU) between Central Government, the Mayor of London and OPDC which secures an agreement in principle to transfer all public sector and central Government owned brownfield land around Old Oak to OPDC for redevelopment.

2.5. Centred on this new transport superhub, the London Plan identifies that development of Old Oak could deliver a minimum 24,000 homes and 55,000 jobs. The Government's investment in transport infrastructure is critical to supporting the scale and phasing of new development being planned here; but the success of this area is also dependent on the delivery of new and upgraded local stations (such as Hythe Road, Old Oak Common Lane, Willesden Junction and North Acton), walking and cycling connections, along with enhancements to bus infrastructure.

2.6. Old Oak and Park Royal accommodates around 1,700 businesses employing 43,100 workers, the majority of these are concentrated in Park Royal. Services provided across the OPDC area are vital to the functioning of the sub regional and London's economy. In total they contribute £2.1 billion in GVA to the UK economy.

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2.7. To the west of Old Oak is the Park Royal. Spanning 450 hectares, Park Royal is London's largest industrial estate. It is strategically located, with access to the A40 and A406 and a number of London underground stations surrounding its perimeter; close proximity to central London is also a key advantage for businesses located there. Park Royal has attracted a number of specialisms to the area, including food manufacturing, transport and logistics and film/TV and media related creative industries. A good proportion of the employees also live locally, and having access to local supply chains/markets are key advantage for businesses, so this area is also particularly important for the local economy.

2.8. Currently, Park Royal faces a number of challenges. The area is structured on a street network that reflects its varied and continually evolving pattern of growth and redevelopment. It suffers from high levels of road congestion generated by the area's industrial functions, movement network and reliance on private vehicular transport to get to work. The strategic roads and railways create a wall of infrastructure which create barriers to movement and affect the legibility of the area. The public realm is often dominated by parking and poor quality materials/layouts with limited active frontages, and there are also existing issues relating to utilities infrastructure that will continue to impact on the functioning of the area if not addressed in the short-term. The pattern of land ownership in Park Royal is more complex than Old Oak - it is largely in mixed private ownership with the exception of Central Middlesex Hospital which is owned by the London North West healthcare NHS trust.

2.9. The Mayor's London Plan (2016) identifies that through redevelopment and intensification, Park Royal has the potential to deliver an additional 10,000 jobs and a minimum of 1,500 new homes. This will be particularly challenging given the issues highlighted above.

2.10. Collectively, Old Oak and Park Royal will be delivering the highest quantum of new homes and jobs in the capital. This scale of development will serve a wider strategic role, in helping to meet London's and sub regional housing needs, and its economic influences are particularly significant for West London, but also London as a whole.

2.11. Wormwood Scrubs, covering almost 68 hectares is located at the south of the Old Oak area, is a major recreational and environmental asset for the area; with Little Wormwood Scrubs located outside the area to the east. There are also some small public and private open dotted around the OPDC area. Wormwood Scrubs is the largest open space in the London borough of Hammersmith & Fulham and is a green lung that provides people and wildlife with the opportunity to enjoy green open space.

2.12. Wormwood Scrubs open space is managed by the Wormwood Scrubs Charitable Trust. It is protected by the Wormwood Scrubs Act 1879, the Commons Act 2006 and as Metropolitan Open Land (MOL) in the London Plan, which affords the Scrubs the same level of protection as Metropolitan Green Belt. The Ministry of Defence have rights to access and use the Scrubs, but a key priority, in line with the MOL status, is to ensure the Scrubs is accessible to all Londoners. Given the scale of development planned in Old Oak, it is recognised that there will be an increase in users and in the interest of coherent planning and to ensure that local people have access to the Scrubs, there is a need to consider the potential impacts on Wormwood Scrubs of these new users.

2.13. The whole area is heavily defined by the network of railways and busy arterial roads which run through and adjacent to the area. As well as defining boundaries, these features also act as social and physical barriers resulting in poor connectivity and

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between Old Oak, Park Royal and surrounding areas. New development has the opportunity to overcome this severance and knit together this part of west London. The OPDC area is also in close proximity to other Opportunity Areas including White City, Wembley and Kensal Canalside and other large-scale development sites such as Acton, Ealing and Alperton. The scale of transformation planned in the OPDC area will act as a further catalyst for the regeneration of these surrounding areas and help to unlock additional development and growth.

2.14. The Grand Union Canal is a key historic feature which runs through both Old Oak and Park Royal, but also crosses other London boroughs and as it travels between London and Birmingham. It is an environmental site of metropolitan importance and a significant amenity asset providing a valuable part of the green and blue infrastructure network.

2.15. OPDC is bounded by St Marys Cemetery and Kensal Green Cemetery, located in the Royal Borough of Kensington and Chelsea, and designated as a Grade I Registered Park and Garden. There are also other heritage assets within and surrounding OPDC's area. As such, developments will be required to achieve the highest standards of design.

2.16. A number of established residential neighbourhoods, including Harlesden, North Kensington, Acton, Stonebridge and Alperton surround the boundary. The wider region contains a number of areas within the 10% most deprived nationally, primarily to the north and south-west. Deprivation is more pronounced in access to housing and services, levels of income and employment and crime levels. The two established Town Centres at Harlesden and East Acton act as important hubs for their respective communities, providing a wide range of community services. There are a number of community facilities in close proximity to the boundary and these help to serve the needs of the existing workers and residents in the OPDC area.

2.17. The area's public transport access will provide significant opportunities to create high density development, which will have benefits in terms of optimising the delivery of homes and jobs; but it also create its own challenges which need to be addressed and mitigated. A minimum of 25,500 new homes and 65,000 business will generate its own demands for new infrastructure, such as new schools and health care provision, and on existing resources in the area, such as the roads, railways and open spaces which need to be planned for and mitigated, particularly at the local level.

2.18. Some of the potential impacts are also more wide ranging, such as those related to the use of shared environmental management infrastructure and climate change. A particularly relevant examples for Old Oak and Park Royal are water/drainage resources, such as the Grand Union Canal and wastewater infrastructure.

3. Demonstrating compliance with the Duty to Co-operate

Relationship with the London Plan

3.1. OPDC's role is defined by the Old Oak and Park Royal Development Corporation (Planning Functions) Order 2015. This confers all relevant planning powers within a defined area (see Appendix 1), including those relating to plan making, to OPDC. The requirement for Local Plans to be in general conformity with the London Plan applies equally to OPDC's Local Plan. Within London, the Planning Practice Guidance states that the degree of cooperation needed between boroughs will

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depend on the extent to which strategic issues have already been addressed in the London Plan.

3.2. With regard to this, the London Plan sets out a range of strategic matters which involve or apply to the OPDC area which have already been addressed in the London Plan. For example, the London identifies Old Oak and Park Royal as an Opportunity Area and sets out an indicative homes and jobs target for the OPDC area, in the same way that it sets a target for each London Borough, providing a strategic approach to housing delivery with which each Local Plan must conform. Therefore, the extent of co-operation can be proportionate to the fact that the London Plan has already agreed the opportunity and indicative capacity for development.

Relationship with other duty to co-operate bodies

3.3. Other prescribed bodies are leading plans and programmes which affect the OPDC area; for example, TfL is leading the development and delivery of the two proposed London Overground stations. In cases such as this, these prescribed bodies should be engaging with OPDC as, whilst OPDC is not involved in directing the proposals, we will still be key stakeholder in this process. There are a number of projects where this is taking place and OPDC has been working collaboratively with TfL and other transport providers to ensure the proposals they are developing are in line with the vision for Old Oak and Park Royal.

Timing

3.4. The duty requires active and sustained engagement. Local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies. It is unlikely that this could be satisfied by formal consultation activities alone. Cooperation should continue until plans are submitted for examination and beyond, into delivery and review. Part 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) sets out the procedure for the production of Local Plans. OPDC's Local Plan process is illustrated below:



3.5. OPDC commenced the production of the Local Plan after being established on 1st April 2015, and discussions with stakeholders to develop the Plan as part of the Duty to Co-operate have been ongoing since.

3.6. The purpose of this paper is to provide information on the constructive, active and continuous process of engagement which has underpinned the preparation of OPDC's Local Plan. This is a 'live' document and its contents will be regularly updated throughout the ongoing preparation of the Local Plan.

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Establishing cooperation arrangements

3.7. The engagement activities undertaken by OPDC so far, go beyond formal consultation and include regular meetings, involvement in the preparation of joint evidence base, and early and ongoing discussions on policy development and to share findings from emerging evidence base. More detailed information on these activities is included in Appendix 2 and 3.

3.8. A key element of the function and purpose of the OPDC is to co-ordinate strategic development opportunities which are planned across administrative boundaries, in this case, performing the function of a local planning authority over an area that includes parts of three different London boroughs. However, the function and purpose of OPDC is limited in certain areas, for example the boroughs are still responsible as the housing authority, education authority, highways authority or municipal waste authority for their areas. This means that ongoing co-operation is likely on a number of areas to ensure future delivery.

3.9. The governance and structure of the organisation at a decision making level and the wider mechanisms that are in place for cooperation between the boroughs and the OPDC have been and continue to be crucial elements of meeting the Duty to Cooperate. Meeting groups and governance arrangements have been established by OPDC to facilitate sharing information, to discuss emerging ideas and proposals and as part of formal decision making processes. These governance arrangements are described below.

OPDC Board

3.10. OPDC's Board has been in operation since March 2015. The OPDC Board is responsible for governing the OPDC. Their general responsibilities include:

- providing leadership, advice and support
- setting strategic direction and overall policy
- monitoring standards, performance and corporate governance
- representing the OPDC with other stakeholders

3.11. The Board comprises industry and community leaders, bringing skills and backgrounds in the following:

- business
- transport
- local government
- regeneration
- finance
- marketing
- education

3.12. OPDC's Board provides a specific context in which the three boroughs have representation and thereby direct involvement in relevant decision making processes. The scheme of delegation for decision making requires that formal planning policy decisions are made by the Board, including approval of documents prepared for consultation and for final adoption decisions.

OPDC Planning Committee

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3.13. The OPDC Board has appointed a Planning Committee to ensure that decisions on planning applications are made in an open, transparent and impartial manner.

3.14. The Planning Decisions Committee has eight committee members, including:

- a Chairman who is also a member of the OPDC Board
- three independent members
- four elected local councillors (including two appointed by the London Borough of Hammersmith and Fulham and one each from the London Boroughs of Brent and Ealing) who have been recommended by the three boroughs whose boundaries falls within the OPDC area.

3.15. The formal role of the committee is confined to enabling the transparent, efficient and effective discharge of the Old Oak and park Royal Development Corporation's functions to determine planning applications and to respond to consultation on applications on which the Corporation is a consultee. However, planning policy documents are considered by the committee before the Board considers reports for formal decision making purposes. The views of the Planning Decisions Committee are reported to the Board in each case so that these can be taken into consideration at the time the Board makes its decision.

3.16. Appendix 4 sets out the key decisions made to date and demonstrates the effectiveness of partnership working with boroughs as part of the Local Plan process so far.

GLA

3.17. The OPDC is a functional body of the Greater London Authority, and as such the Mayor and London Assembly have oversight. GLA officers are also involved in regular briefings and projects related to OPDC's Local Plan (see Appendix 2 and 3).

<u>Other internal working arrangements</u>

3.18. In addition to more formal governance arrangements above, OPDC has directly established groups to discuss work streams and activities relevant to the development of planning policy (see below).

Duty to Co-operate (Project Team) meetings

3.19. A project team meeting group was established by OPDC. Regular meetings were set up (usually every 2 weeks) in order to provide updates on emerging planning matters within the OPDC area and as a forum for discussion and an opportunity for attendees to help influence and shape policy in advance of formal consultation. The meetings are attended by officers from:

- OPDC
- London Borough of Hammersmith and Fulham
- London Borough of Ealing
- London Borough of Brent
- Royal Borough of Kensington and Chelsea
- Greater London Authority (GLA)
- Transport for London (TFL)

3.20. In accordance with the Duty to Cooperate, OPDC has been working closely with these authorities and prescribed bodies in the ongoing development of the Local

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Plan. Feedback received from DtC partners played a key role in the production of both the Regulation 18 Local Plan and Regulation 19 versions of the Local Plan.

Project Steering groups

3.21. Independently from the Duty to Co-operate meetings, separate, time limited steering groups were also used as a forum to develop and share emerging Local Plan evidence base. This provided opportunities for more detailed discussions on the scope and approach taken forward in the evidence base. The steering groups have often consisted of representatives from the London Boroughs of Hammersmith and Fulham, Ealing, Brent and the Royal Borough of Kensington and Chelsea, the Greater London Authority (GLA) and Transport for London (TFL). Further information on this is provided in Appendix 2 and 3.

OPDC Panels

3.22. A number of time-limited stakeholder engagement forums/panels have been set up to inform OPDC's work as policies and programmes have been developed. These groups are dependent on the OPDC's work programme and hence are changeable and only meet when required. The current list of panels include:

- PLACE Review Group
- Transport Panel
- Housing Panel
- Environmental and Utilities Panel
- Public Sector Advisory Panel
- Public Sector Land Owners Forum

<u>External working arrangements</u>

3.23. OPDC also participates in following external meeting groups:

- West London Alliance
- London Waste Planning Forum
- Association of London Borough Planning Officers
- West London Chief Planning Officers Group
- West London Transport Planners (West Trans) Group

<u>Involvement of Duty to Cooperate bodies</u>

3.24. These co-operation arrangements have provided both formal and informal opportunities for each of the Duty to Co-operate bodies to input and comment on aspects of the Local Plan approach and evidence base. Appendix 2 and 3 demonstrate evidence of this. In addition to this, the Consultation Report provides an overall picture of formal consultation carried out that has included the prescribed bodies relevant to the Duty to Cooperate and explains how matters raised through consultation have been taken onto account. The Consultation Report provides a response to each point raised and identifies how these views have been taken into consideration and whether a change has been made to the Plan as a result. Where any matter raised has not resulted in a change the reason for this is also set out. A summary of engagement with these bodies is set out in Table 1.

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Table 1: Summary of engagement with Duty to Co-operate bodies

	Category	Organisation	Engagement Activity Correspondence sent	Meetings	Formal response sent to OPDC	Notes
1	Prescribed body	Environment Agency	✓	✓	✓	Response received confirming DtC activities.
2	Prescribed body	Historic England	✓	✓	✓	Response received confirming DtC activities.
3	Prescribed body	Natural England	✓	✓		
4	Prescribed body	Mayor of London	✓	✓	✓	
5	Prescribed body	Civil Aviation Authority	✓			
6	Prescribed body	Homes and Communities Agency	N/A	N/A	N/A	See Engagement with 4. Response received confirming DtC activities.
7	Prescribed body	NHS Brent CCG	✓	✓	✓	Engagement with the North West London Collaboration of CCGs
8	Prescribed body	NHS Ealing CCG	✓	✓	✓	Engagement with the North West London Collaboration of CCGs
9	Prescribed body	NHS Hammersmith and Fulham CCG	✓	✓	✓	Engagement with the North West London Collaboration of CCGs
10	Prescribed body	NHS West London (incl. RBKC) CCG	✓	✓	✓	
11	Prescribed body	NHS England	✓			See Engagement with 7-10
12	Prescribed body	Transport for London	✓	✓	✓	Response received confirming DtC activities.
13	Prescribed body	Highways England	✓			
14	Prescribed body	The Marine Management Organisation	✓			
15	Prescribed body	The Office of Rail Regulation	✓			
16	Prescribed body	London LEP	✓	✓	N/A	See Engagement with 4. Response received confirming

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						DtC activities.

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4. Identifying strategic planning priorities

4.1. As mentioned elsewhere, in accordance with section 33A of the Localism Act, the Duty to Co-operate specifically relates to 'strategic matters' which are defined as follows:

- sustainable development or use of land that has or would have a significant impact on at least two planning areas, in particular in connection with sustainable development or use of land for or in connection with strategic infrastructure which has or would have a significant impact on at least two planning areas, and
- sustainable development or use of land in a two-tier area if the development or use— (i) is a county matter, or (ii) has or would have a significant impact on a county matter.

4.2. S33A does not explicitly state which issues could be a strategic matter, so OPDC has also had regard to guidance in the NPPF, particularly the following list of strategic priorities for Local Plan (para 156):

- The homes and jobs needed in the area;
- The provision of retail, leisure and other commercial development;
- The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and the provision of minerals and energy (including heat);
- The provision of health, security, community and cultural infrastructure and other local facilities; and
- Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

4.3. The NPPF states that "public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156" (para 178). Therefore, the NPPF priorities have been used as a starting point to assess what could be considered as a strategic matter for the purposes of S33A. However, engagement with stakeholders, including prescribed duty to co-operate bodies, has helped to identify more focussed issues which we have been co-operating on.

4.4. Appendix 2 includes more details to demonstrate how OPDC have addressed each NPPF strategic priority area and the extent of activities undertaken as part of meeting the Duty, the bodies involved (also see Appendix 5 for a Glossary of key bodies involved) as well as a summary of what has been achieved and next steps for ongoing cooperation.

5. Conclusions and next steps

5.1. Given the prescribed function of OPDC and the structures in place to facilitate cooperation, it is considered that robust mechanisms have been put in place to ensure that the Duty to Cooperate is met in the development of the Local Plan so far and that these arrangements will continue to aid on-going cooperation in the implementation of the Local Plan.

5.2. Work and discussions on issues identified have helped to shape the content of the Local Plan and its evidence base. Additional comments will be sought as part of the formal consultation on the Regulation 19 Local Plan. Representatives received will help inform the version of the Plan submitted to the Secretary of State later this year. In the lead up to this, OPDC will continue with ongoing cooperation activities and

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prepare a Duty to Co-operate Statement to accompany the Submission Local Plan. This is a 'live' document and its contents (and engagement activities referred to) will be regularly updated throughout the ongoing preparation of the Local Plan.

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Stonebridge Park
LB Brent
Harlesden
Willesden Junction
Hanger Lane
Kensal Gree
Park Royal
RBKC
North Acton
LB Ealing
East Acton
LB H&F

Appendix 2 – Duty to Co-operate Activities[3]

NPPF strategic priority: The homes and jobs needed in the area

Homes

Background

A2.1 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority (see Appendix 3)

- SP4
- H1 - H10

A2.2 The following evidence base has been developed which relates to this topic area (see Appendix 3):

- Old Oak and Park Royal Development Corporation Strategic Housing Market Assessment Local Plan Supporting Study
- Affordable Housing Viability Assessment
- Gypsy and Travellers Accommodation Needs Assessment

A2.3 OPDC has been worked collaboratively with the three local planning authorities (Brent, Ealing and Hammersmith and Fulham), together with the Greater London Authority (GLA) in developing an understanding of future housing needs as part of developing the Strategic Housing Market Assessment.

A2.4 OPDC commissioned consultants Opinion Research Services (ORS) in September 2015 to prepare a Strategic Housing Market Assessment (SHMA) in order to look at this issue in greater detail.

A2.5 The SHMA identified the relevant housing market area and provides an analysis of housing market trends, including the current balance between supply and demand.

A2.6 The Study included the following key outputs:

- Current number of households with an unmet housing need.
- Total future number of households during Local Plan period.
- Number of households who cannot afford market housing.
- Analysis of housing mix requirements of the future households.
- Specific housing requirements such as older people and shared housing.

A2.7 The SHMA identifies the housing market area to be used to assess the Objectively Assessed Needs (OAN) for housing.

A2.8 Housing Market Areas reflect "the key functional linkages between places where people live and work". The SHMA first identified the objectively assessed housing need on the land within OPDC's boundary as would usually be the case for a local authority in identifying its housing market area for determining housing need. Based on this approach, and assessing need arising from the area's current population is 7,000 people and 2,800 households, the SHMA identified a need for only new 1,200 homes over the Local Plan period (2017 to 2037). However, given the scale of this Mayoral Opportunity Area, it is not considered appropriate to assess housing within

[3] This section will be updated regularly to reflect ongoing discussions or to correct/amend as appropriate.

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OPDC's boundary alone. Therefore the SHMA and housing market area has been extended to include the combined area of the London Boroughs of Brent, Ealing and Hammersmith & Fulham. Based on this revised SHMA area, the need is for 99,000 new homes over the Local Plan period (2017 to 2037).

A2.9 OPDC has primarily been working with London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham and the GLA because the identified housing market area covers the 3 boroughs, and this sits within the wider London housing market. OPDC has been working with Brent, Ealing, Hammersmith and Fulham and the GLA to consider the level of development that can be accommodated in the area, and contributions towards the objectively assessed need (OAN) as far as is consistent with national policies, as set out in the National Planning Policy Framework (NPPF). Projecting forward, the total need identified (99,900 new homes) is likely to be exceeded by a combination of OPDC delivery of 20,100 homes (based on the development capacity for sites in OPDC's area set out in the Development Capacity Study) plus the London Boroughs of Brent, Ealing and Hammersmith & Fulham meeting their respective London Plan housing delivery targets over the next 20 years.

A2.10 OPDC developed a Development Capacity Study to support the Regulation 19(1) Revised Draft Local Plan. This meets the requirements of National planning practice guidance for developing a Housing and Economic Land Availability Assessment to define a development capacity for the OPDC area. This information was presented to the London Boroughs of Brent, Ealing and Hammersmith & Fulham at OPDC duty to cooperate meetings.

A2.11 National planning practice guidance sets out the requirements for local planning authorities to assess the need for traveller sites and plan for an appropriate level of supply. OPDC has complied with this by undertaking such an assessment.

A2.12 The assessment confirmed that there is one public site at Bashley Road providing 24 pitches within the OPDC area. This site also falls within the London Borough of Ealingl. As this is the case, the current and future accommodation needs associated with this site has been discussed with London Borough of Ealing and Oxfordshire County Council as they manage the site.

A2.13 Opinion Research Services (ORS) were commissioned by OPDC in October 2015 to complete a robust and up-to-date needs assessment of accommodation for Gypsies and Travellers to 2031. To complete this, stakeholder engagement was undertaken with all three local planning authorities (Brent, Ealing and Hammersmith and Fulham) and Oxfordshire County Council who manage the site. This helped to develop an understanding of the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population across the whole OPDC area and the identified housing market area.

A2.14 This study used the new planning definition of gypsies and travelling showpeople to identify the need for additional pitch provision over the Local Plan period. The GTANA identified that there is no current need for additional pitches for gypsies and travellers in the area and who meet the new planning requirement that they still travel for work. An addendum has considered the capacity for additional pitch provision to meet the needs identified in the Joint Royal Borough of Kensington & Chelsea and Hammersmith & Fulham GTANA.

Engagement activities

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A2.15 Activities related to the constructive, active and ongoing engagement with duty to cooperate bodies and decision making as part of the preparation of the Local Plan and associated evidence base are outlined below:

Activity: Sharing of information, including borough SHMAs and specifications, to help support the preparation of the specification for the OPDC SHMA. The methodology used has been in accordance with government guidance on compiling SHMAs and this has also been used by the boroughs when undertaking their own studies. Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, Royal Borough of Kensington and Chelsea Comment: Specification for SHMA was prepared taking into account this information, and consultants were successfully appointed. Date: July 2015
Activity: OPDC duty to co-operate meetings Partners involved: see paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 18th August 2015, 29th September 2015, 10th November 2015, 16th February 2016, 7th May 2016, 5th July 2016, 25th October 2016
Activity: Informal engagement on draft Regulation 18 policies for comment Partners involved :London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Stakeholders invited to comment in advance of consultation Date: 18th August 2015
Activity: Interviews with borough officers Partners involved :London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, Royal Borough of Kensington and Chelsea and Oxfordshire County Council Comment: Gathered information from partners as part of primary research to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in the OPDC area. This was used to inform the findings in the report. Date: As described in the GTANA report
Activity: Formal consultation on the Draft Local Plan and associated Draft GTANA and SHMA Partners involved: For details on who was consulted please see Consultation Statement. Comment: The contents of the GTANA become public. DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the GTANA and housing policies. Information on how representations have been considered is included in the Consultation Statement. Date: 4th February – 31st March 2016, including housing workshop on 17th March 2016
Activity: Stakeholder event to present and discuss Draft SHMA Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, OPDC Housing Panel and GLA. Comment: The Comments of the SHMA are shared. DtC Partners involved and stakeholders have an opportunity to ask questions and discuss the emerging Comments of the SHMA. Date: 29th January 2016
Activity: Review of revised SHMA following consultation on Regulation 18 Draft local Plan. Partners involved: GLA, London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: This included revisions to the report as a result of comments received from DtC partners. The most recent GLA population projections were used as agreed by the GLA. Dates : July to September 2016
Activity: Meeting with borough housing officer

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Partners involved: London Borough of Brent Comment: Provided an update on the SHMA and policy development to help inform the next version of the Local Plan. As a result of issues raised related to affordable housing nominations, separate meetings have been held. Date: 4th August 2016
Activity: Meeting with borough housing officer Partners involved: London Borough of Ealing Comment: Provided an update on the SHMA and policy development to help inform the next version of the Local Plan. As a result of issues raised related to affordable housing nominations, separate meetings have been held. Date: 4th August 2016
Activity: Meeting with borough housing officer Partners involved: West London Housing Strategy Officers Meeting Comment: Provided an update on the SHMA and policy development to help inform the next version of the Local Plan. As a result of issues raised related to affordable housing nominations, separate meetings have been held. Date: 7th September 2016
Activity: Report and Presentation to Housing Panel on the key issues arising from the Regulation 18 consultation Partners involved: Housing Panel members Comment: Opportunity to discuss key issues related to viability Date: 26th October 2016
Activity: Meeting with borough housing officer Partners involved: London Borough of Hammersmith and Fulham Comment: Provided an update on the SHMA and policy development to help inform the next version of the Local Plan. As a result of issues raised related to affordable housing nominations, separate meetings have been held. Date: 23rd November 2016
Activity: Informal engagement on the draft Regulation 19 Local Plan Housing policy with boroughs Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Changes were made to the draft policies where relevant and appropriate in light of comments received. Date: 9th March 2017
Activity: Informal consultation on the draft Regulation 19 Local Plan Housing policy at Mayoral Advisers meeting Partners involved: Greater London Authority Comment: Changes were made to the draft policies where relevant and appropriate in light of comments received. Date: 21st March 2017
Activity: Meeting with Greater London Authority Partners involved: Greater London Authority Comment: Review of outputs of Affordable Housing Viability Assessment Date: 22nd March 2017
Activity: Meeting with Greater London Authority Partners involved: Greater London Authority Comment: Review of outputs of Affordable Housing Viability Assessment Date: 3rd May 2017
Activity: Meeting on London's city-wide Strategic Housing Market Assessment Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, Greater London Authority Comment: Review of draft outputs from London Strategic Housing Market Assessment, key evidence base for Draft New London Plan

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Date: 15th May 2017
Activity: OPDC Housing Panel Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Received feedback on draft policies Date: 12th July 2017
Activity: Meeting with borough housing officer Partners involved: London Borough of Brent Comment: Discussion on proposals for an affordable housing nominations policy Date: 3rd August 2017
Activity: Meeting with borough housing officer Partners involved: London Borough of Ealing Comment: Discussion on proposals for an affordable housing nominations policy Date: 4th August 2017
Activity: Meeting with borough housing officer Partners involved: London Borough of Hammersmith & Fulham Comment: Discussion on proposals for an affordable housing nominations policy Date: 18th August 2017
Activity: OPDC Housing Panel Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Discussion on proposals for an affordable housing nominations policy Date: 13th September 2017
Activity: Meeting with borough housing officers Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Discussion on proposals for an affordable housing nominations policy Date: 21st November 2017
Activity: West London SHMA inception meeting Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Commencement of sub-regional SHMA to which OPDC's SHMA will be updated and contribute to Date: 16th January 2018
Activity: OPDC duty to co-operate meetings Partners involved: see paragraph 3.19 Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, proposed amendments and next steps to address these. Discussion included GTANA Date: 23rd January 2018
Activity: OPDC Housing Panel Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, Greater London Authority Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, including housing policies, and proposed amendments and next steps. Date: 23rd February 2018

Summary and Next Steps

A2.16 To date, engagement activities have led to the successful completion of the SHMA and Gypsy and Travellers Accommodation Needs Assessment (GTANA) with input from London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham.

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A2.17 The SHMA defined a single market area, which covers Brent, Ealing and Hammersmith and Fulham. This stimulated discussions/briefings on the level of objectively assessed need across the area and what opportunities there are for OPDC to contribute towards meeting these needs. The SHMA conclusions have informed policy through ongoing discussion and constructive feedback with the strategic partners. The SHMA findings were used to inform policy drafting, and early draft policies were presented for discussion and have been amended where relevant and appropriate in light of comments received. This is also the case for the GTANA.

A2.18 Ongoing co-operation is likely to cover the following areas:

- The SHMA highlights the anticipated level of housing demand. OPDC is the local planning authority and can therefore plan and facilitate the delivery of housing within its area, but the boroughs remain the local housing authorities for their respective areas. OPDC will work with the local housing authorities to ensure that new housing delivered can help them meet their statutory housing responsibilities. Increasing the housing supply is not just about building new homes on brownfield land. Empty homes can undermine housing supply and negatively impact on residents in the surrounding area.
- OPDC will work with the London Boroughs of Brent, Ealing and Hammersmith and Fulham to agree a joint protocol to identify empty and work to bring empty properties back into habitable use.
- Ongoing work on updating the OPDC SHMA evidence base through the West London Alliance SHMA programme.
- The Self-build and Custom Housebuilding Act 2015 places a duty on relevant authorities to keep a register of serviced plots of land to build houses upon. Through the Duty to Cooperate, OPDC will work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham to ensure that the area is also meeting the needs of people wishing to self-build or custom-build their own home.
- Continued engagement with London Borough of Ealing as they review options for maintaining the existing site.
- OPDC will continue to work with the London Boroughs of Brent, Ealing and Hammersmith and Fulham to ensure development capacity of the OPDC area is updated with developments awarding planning permission by the boroughs under any relevant scheme of delegation.

<u>Jobs/Commercial</u>

Background

A2.19 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority (see Appendix 3)

- SP5
- E1 – E5

A2.20 The following evidence base has been developed which relates to this strategic priority (see Appendix 3):

- Park Royal Atlas
- Park Royal Intensification Study
- Future Employment Growth Sectors Study
- Industrial Land Review
- Industrial Estates Study
- Retail and Leisure Needs Study

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A2.21 The Park Royal Industrial Estate is London's largest industrial estate and a vital cog in the London economy. The OPDC are employs 43,100 people and 1,700 businesses, the majority of which are within the Park Royal Industrial area and live in the surrounding areas. Given its local and wider significance, OPDC is planning to protect, intensify and strengthen the role of Park Royal as a Strategic Industrial Location.

A2.22 Alongside a protected and strengthened Park Royal, the area has the capacity to deliver a minimum 40,400 jobs in the next 20 years of the Local Plan. This development potential could bring enormous rewards for the national, regional and local economy, generating billions in Gross Value Added (GVA). The number of new jobs delivered would also provide opportunities for lifelong learning and employment across a range of skills and sectors for the residential communities in the area, including existing residents and up to 60,000 new residents within OPDC's boundary, as well as other communities in the surrounding boroughs.

A2.23 Currently, a significant number of employees either live within or in suburbs adjacent to OPDC's area. Within a 5km radius, the majority of employees travel from Brent (approximately 60%) and Ealing (approximately 30%). Housing Market Areas also reflect "the key functional linkages between places where people live and work". The SHMA housing market area includes the 3 host boroughs, so this geography is also relevant to understanding the local labour market.

A2.24 OPDC has been engaging partners to develop the economic policies and strategy for the area. The boroughs are key stakeholders which influence the economic market in OPDC's area, including contributions to the overall supply of industrial/employment land and therefore influence local supply and demand as well as being a key source of local labour.

Engagement activities

A2.25 Activities related to the constructive, active and ongoing engagement with duty to cooperate bodies and decision making as part of the preparation of the Local Plan and associated evidence base are outlined below:

Activity: OPDC duty to co-operate meetings Partners involved: see paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 18th August 2015, 27th October 2015, 25th October 2016
Activity: Informal engagement on draft Regulation 18 policies for comment Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Stakeholders invited to comment in advance of consultation Date: 18th March 2015, 27th October 2015
Activity: Stakeholder workshops on the Future Employment Growth Sectors Study Partners involved: GLA, London Borough of Brent, West London Alliance, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: The emerging findings were shared with partners. DtC partners and stakeholders have an opportunity to provide comments. Date: 29th July 2016
Activity: Formal consultation on the Draft Local Plan and associated Draft Industrial Land Review (ILR) and Development Capacity Study

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Partners involved: For details on who was consulted please see Consultation Statement. Comment: The contents of the ILR and projected number of jobs and employment sites become public as part of the Development Capacity Study. DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the ILR and employment policies. Information on how representations have been considered is included in the Consultation Statement. Date: 4th February – 31st March 2016, including an Employment focussed workshop on 3rd March 2016
Activity: Stakeholder workshops on the Future Employment Growth Sectors Study Partners involved: GLA, London Borough of Hammersmith and Fulham Comment: The emerging recommendations were shared with partners. DtC partners and stakeholders have an opportunity to provide comments. Date: 3rd October 2016
Activity: Informal engagement on draft Regulation 19 Local Plan Employment policy with boroughs Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Relevant and appropriate amendments were made to the draft policies in light of comments received. Date: 21st March 2017
Activity: Park Royal Intensification workshop Partners involved: London Borough of Ealing Comment: Opportunity to comment on emerging findings of the Study in order to help shape recommendations Date: 4th April 2017
Activity: Formal consultation on the Revised Local Plan and associated evidence base Partners involved: For details on who was consulted please see Consultation Statement. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the employment policies. Information on how representations have been considered is included in the Consultation Statement. Date: 29th June – 11th September 2017. Overview of employment policies given to attendees of DtC project meeting on 8th August.
Activity: OPDC duty to co-operate meetings Partners involved: see paragraph 3.19 Comment: Attendees briefed on key issues arising out of Regulation 19 Local Plan, proposed amendments and next steps to address these. Discussion included employment policies. Date: 23rd January 2018
Activity: Informal meeting with GLA officer on London LEP Partners involved: GLA Comment: Shared update on OPDC Local Plan and received update on LEP work programme. Date: 15th March 2018
Activity: West London Employment Land Review led by LBE and LBB Partners involved: London Borough of Brent, London Borough of Ealing Comment: Feedback given on the scope and methodology of the study based on relevant completed OPDC studies Date: 30th April 2018
See also activities under *NPPF strategic priority: The provision of retail, leisure and other commercial development*

Summary and Next Steps

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A2.26 To date, engagement activities have led to the successful completion of evidence base documents (listed above). The conclusions from the evidence base have informed policy development, which has also been subject to ongoing discussion and constructive feedback with the strategic partners. Early draft policies were presented for discussion and have been amended where relevant and appropriate in light of comments received.

A2.27 Although not a strategic matter, ongoing co-operation is likely to cover the following:

- OPDC will work with the surrounding boroughs to develop an approach to securing local labour, skills and employment contributions and the implementation and ongoing review of relevant delivery mechanisms.

NPPF strategic priority: The provision of retail, leisure and other commercial development

Background

A2.28 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority (see Appendix 3)

- SP5
- TCC1 – TCC5

A2.29 The following evidence base has been developed which relates to this strategic priority:

- Retail and Leisure Needs Study
- Healthy Town Centres Study
- Sports Courts and Swimming Pools Study
- Cultural Principles
- Catalyst Uses Study

A2.30 The current development plan as it applies to the OPDC area lays the foundations for new town centres to be provided as part of the large-scale comprehensive regeneration of Old Oak and Park Royal. At the heart of this is the principle articulated in the OAPF that the new town centres should meet the needs of the development whilst having regard to the role and function of the existing hierarchy of centres.

A2.31 The quantitative analysis undertaken has identified the need for 68,500 sqm (gross) floorspace in the period to 2037 arising from a combination of future resident and worker expenditure, as well as inflow expenditure to the OPDC area, primarily driven by the new transport interchange. The impact of this quantum of floorspace on existing centres, including the nearby centres in the surrounding boroughs, has been assessed and, given the scale of growth forecast for those centres over the plan period. It is considered that based on current forecasts the impacts of this scale of development will be within the bounds of acceptability. There are also opportunities to harness benefits arising from the development in the OPDC area for existing centres.

A2.32 Ensuring that development proposals consider the impact on the Harlesden town centre, has been raised as a particular issue by London Borough of Brent. However, OPDC has been working with a wider range of partners who have been identified based on the potential catchment of the new town centre. Key partners have included London Borough of Brent, London Borough of Ealing, Hammersmith & Fulham

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Council, Royal Borough of Kensington and Chelsea and the GLA. The Old Oak and Park Royal Retail and Leisure Needs Study has been developed in close cooperation with these partners.

Engagement activities

A2.33 Activities related to the constructive, active and ongoing engagement with duty to cooperate bodies and decision making as part of the preparation of the Local Plan and associated evidence base are outlined below:

Activity: OPDC duty to co-operate meetings Partners involved: see paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 1st September 2015, 14th September 2015, 16th February 2016, 1st March 2016, 5th July 2016, 13th September 2016, 23rd January 2018, 20th February 2018
Activity: Informal engagement on draft Regulation 18 policies for comment Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Stakeholders invited to comment in advance of consultation Date: 1st September 2015, 14th September 2015
Activity: Joint project working group established for the production of the Retail and Leisure Needs Study Partners involved: London Borough of Hammersmith and Fulham, London Borough of Brent, London Borough of Ealing, Royal Borough of Kensington and Chelsea Comment: RLNS methodology and study progressed through discussion and co-operation Dates: 22nd May 2015
Activity: Joint project working group established for the production of the Retail and Leisure Needs Study Partners involved: Royal Borough of Kensington and Chelsea Comment: RLNS methodology and study progressed through discussion and co-operation Dates: 9th June 2015
Activity: Joint project working group meeting for the production of the Retail and Leisure Needs Study Partners involved: London Borough of Hammersmith and Fulham, London Borough of Brent, London Borough of Ealing, Royal Borough of Kensington and Chelsea Comment: RLNS methodology and study progressed through discussion and co-operation Dates: 16th July 2015
Activity: Joint project working group meeting for the production of the Retail and Leisure Needs Study Partners involved: London Borough of Hammersmith and Fulham, London Borough of Brent, London Borough of Ealing, Royal Borough of Kensington and Chelsea Comment: RLNS methodology and study progressed through discussion and co-operation Dates: 17th August 2015
Activity: Formal consultation on the Draft Local Plan and associated RLNS and Development Capacity Study Partners involved: For details on who was consulted please see Consultation Statement. Comment: The contents of the RLNS and projected number of jobs and employment sites become public as part of the Development Capacity Study. DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Brent, Ealing and Royal Borough of Kensington and Chelsea commented on retail related matters. Information on how representations have been considered is included in the Consultation Statement.

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Date: 4th February – 31st March 2016, including an Community Infrastructure workshop on 13th February 2016
Activity: Informal engagement on draft Regulation 19 policies for comment Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Relevant and appropriate amendments were made to the draft policies in light of comments received. Date: 8th November 2016, 21st March 2017
Activity: Formal consultation on the Revised Local Plan and associated evidence base Partners involved: For details on who was consulted please see Consultation Statement. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the employment policies. Information on how representations have been considered is included in the Consultation Statement. Date: 29th June – 11th September 2017. Overview of Town Centre policies given to attendees of DtC project meeting on 8th August 2017.

Summary and next steps

A2.34 The Retail and Leisure Needs Study has been updated where appropriate and relevant taking into account the responses. Additional measures to help mitigate any potential impacts to the Harlesden town centre have been incorporated. These changes to the policy have been developed in discussion with London Borough of Brent.

A2.35 Ongoing co-operation is likely to cover the following:

- OPDC working with LB Brent with regards to securing the submission of Harlesden Enhancement Strategies.

NPPF strategic priority: The provision of infrastructure for waste management

Background

A2.36 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority (see Appendix 3)

- EU6 – EU7

A2.37 The following evidence base has been developed which relates to this:

- Waste Apportionment Study
- Waste Technical Paper
- Waste Management Strategy
- Waste Guidance for High Density Development

A2.38 There are a number of waste sites located in within the London Boroughs of Brent, Ealing and Hammersmith & Fulham which now fall within the boundary of the Old Oak and Park Royal Development Corporation (OPDC).

A2.39 As well as being a Local Planning Authority (LPA), OPDC is a Waste Planning Authority (WPA) for the area and is therefore responsible for preparing a waste local plan either individually or as part of a joint plan. In line with the London Plan, where a Mayoral Development Corporation (MDC) exists or is established within a borough, the MDC is required to co-operate with the borough to ensure that their apportionment requirements are met. OPDC has therefore been working with the

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GLA and the London Boroughs of Brent, Ealing and Hammersmith & Fulham to deliver a comprehensive and integrated approach to waste management.

A2.40 Some of the waste sites in the Old Oak area are going to be subject to transformational change and redevelopment in order to realise the planned growth of homes and jobs. OPDC has been working in partnership and consulted waste planning authorities to try understand the implications of this and how this might affect waste management capacity across the area. This has resulted in co-operation to adopt the West London Waste Plan and evidence base to demonstrate that there will be sufficient capacity and sites available to manage waste.

A2.41 OPDC acknowledges that planning for waste is a key issue and has therefore been working with a number of waste planning authorities, not just the 3 host boroughs, in order to identify sustainable solutions for waste management across the area. Strategic partners are listed below.

A2.42 OPDC worked jointly with the London Boroughs of Brent, Ealing, Harrow, Hounslow, Hillingdon and Richmond upon Thames (all constituent boroughs of the West London Waste Authority) to prepare the West London Waste Plan (WLWP). The WLWP:

- details the estimated amounts for the different types of waste that will be produced in West London up to 2031;
- identifies and protects the current sites to help deal with that waste, including two sites within the OPDC that are safeguarded for waste use;
- identifies the shortfall of capacity needed over the life of the Plan (to 2031); and
- allocates a set of sites to meet the shortfall which are preferred for waste related development.

A2.43 Successful co-operation on this led to the WLWP being adopted as part of OPDC's Local Plan.

A2.44 OPDC agreed to work with Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth (all constituent boroughs of the Western Riverside Waste authority) to prepare a joint waste technical paper. The purpose of this work was to provide an up-to-date waste evidence base to support boroughs to meeting their respective waste apportionment targets. This work has also helped to identify waste imports and exports to other waste planning areas. This work identifies the Old Oak Sidings (Powerday) site as a key site capable of meeting the apportionment target for LBHF. Optimising the use of this site could generate surplus capacity relative to apportionment which is the subject of ongoing discussion with the Western Riverside Waste authority (WRWA) waste planning boroughs.

A2.45 Key partners have been identified based on waste disposal authority areas, or because of the significant role they play in strategic waste policy development and/or regulation, including but not limited to:

- West London Waste Plan boroughs (Brent, Ealing, Harrow, Hounslow, Hillingdon and Richmond upon Thames)
- Western Riverside Waste Authority planning authorities (Royal Borough of Kensington & Chelsea, Hammersmith & Fulham, Lambeth and Wandsworth)
- GLA
- Environment Agency

A2.46 A key area of focus has been on working in partnership to clarify OPDC's approach to supporting boroughs to meet their waste management apportionments.

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A2.47 OPDC also participates in the London Waste Planning Forum so that updates on OPDC's Local Plan can be discussed in wider group of local authority representatives, including authorities outside of London.

A2.48 The WRWA WPAs to Waste Planning Authorities who were identified in the draft Waste Technical Paper as importing and exporting waste from the WRWA area in respect of waste planning. Further to this Waste Planning Authorities were also consulted at the Regulation 19 stage.

Engagement activities

A2.49 Activities related to the constructive, active and ongoing engagement with duty to cooperate bodies, including formal and informal consultation, is outlined below.

Activity: OPDC duty to co-operate meetings Partners involved: see paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 18th August 2015, 13th October 2015, 24th November 2015, 7th February 2017
Activity: Informal engagement on draft Regulation 18 policies for comment Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Stakeholders invited to comment in advance of consultation Date: 29th September 2015
Activity: OPDC approval to adopt the West London Waste Plan Partners involved: Brent, Ealing, Harrow, Hounslow, Hillingdon and Richmond upon Thames Comment: OPDC accepted as an equal partner in the WLWP, including the identification of two waste sites in its area. OPDC's commitment to implementing a joint waste plan was confirmed through its adoption as part of OPDC's Local Plan. This Comment demonstrates OPDC's contribution towards helping Brent and London Borough of Ealing meet their waste apportionment targets. Date: 28th July 2015
Activity: WRWA WPA Waste Apportionments Engagement Statement Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth Comment: OPDC agree to work with the Western Riverside waste planning group to consider waste matters. Date: published in December 2015
Activity: Formal consultation on the Draft Local Plan and Waste Strategy Partners involved: For details on who was consulted please see Consultation Statement. Comment: Information on how representations have been considered is included in the Consultation Statement. Key issues raised include the approach to existing waste sites, with general support for relocations, and retention of Powerday. Date: 4th February – 31st March 2016
Activity: Agreement on the brief to commission a joint WRWA WPA Waste Technical Paper Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth. Comment: OPDC accepted as an equal partner in the study and all boroughs involved confirmed full involvement in the project. Date: 19th July 2016
Activity: Officer meeting of WRWA WPA group to discuss appointment of consultants Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of

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Hammersmith & Fulham, Lambeth and Wandsworth. Comment: Antithesis commissioned to carry out the WRWA Waste Technical Paper Date: August 2016
Activity: Officer steering group to progress the WRWA WPA Waste Technical Paper Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth. Comment: Drafts of the Waste Technical Paper were agreed through discussion and co-operation. Date: September 2016 (inception meeting), November 2016 (Draft Report stage), January 2017
Activity: WRWA Waste Technical Paper Presentation to the London Waste Planning Forum Partners involved: North London Waste Plan, Environment Agency, RB Kensington and Chelsea, City of London, LB Hammersmith & Fulham, SEWPAG & EoEWTAB, LB Richmond, LB Lambeth, LB Haringey, LB Lewisham, LB Ealing, LB Hillingdon, GLA. Western Riverside Waste Authority (WRWA), LB Barnet Comment: Opportunity for waste planning authorities to comment on findings of the WRWA Waste Technical Paper, including information on main waste imports and exports between different areas. Date: 25th January 2017
Activity: WRWA WPAs / GLA Meeting on Waste Technical Paper Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth, GLA Comment: Discussed approach in the Waste Technical Paper with the GLA. GLA commented on Powerday capacity assumptions. OPDC to initiate discussions with Powerday Operators. Date: 3rd February 2017
Activity: Informal engagement on draft Regulation 19 policies for comment Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Draft policies were shared with officers. Relevant and appropriate amendments were made to the draft policies in light of comments received. Date: 7th Feb 2017, March 2017
Activity: WRWA WPAs Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth. Comment: Ongoing discussions about joint work arrangements including a draft Memorandum of Understanding. Date: March 2017 - ongoing
Activity: Formal consultation on the Revised Local Plan and associated evidence base Partners involved: For details on who was consulted please see Consultation Statement. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the waste policies. Information on how representations have been considered is included in the Consultation Statement. Date: 29th June – 11th September 2017. Overview of Environment policies discussed at DtC project meeting on 22nd August 2017.
Activity: WRWA WPAs meeting Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth. Comment: Discussed revised draft Memorandum of Understanding and approach to updating assumptions for Powerday site. Date: 18 July 2017
Activity: Shared updates to Powerday assumptions Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, RBKC

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Comment: Relevant and appropriate amendments were made in light of comments received. Date:
Activity: WRWA WPAs / GLA Meeting Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth, GLA Comment: Main areas of discussion included the updated Powerday capacity assumptions and new Draft London Plan. Date: 8 December 2017
Activity: WRWA WPAs meeting Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth. Comment: Discussed progress on Local Plans and next steps. Date: 13 March 2018

Summary and next steps

A2.50 This co-operation has led to the adoption of a joint West London Waste Plan (WLWP), which in turn has demonstrates that cross borough issues regarding waste have been resolved with respect to boroughs included in the WLWP area.

A2.51 A shared evidence base (Waste Technical Paper) has been developed between the WRWA waste planning authorities. OPDC and LBHF have worked together to develop appropriate approaches for waste in the OPDC area and also to consider OPDC's contribution towards LBHF's waste apportionment target. OPDC will also work with the Western Riverside waste planning authorities as part of an officer steering group to consider opportunities for further joint work arrangements.

A2.52 It is noted that a new Draft London Plan was published in December 2017. The new draft London Plan proposes to update the apportionment targets, with targets reduced for Hammersmith and Fulham, but increased for Brent and Ealing. The new draft London Plan does not propose a separate apportionment target for OPDC and OPDC is supportive of this approach.

A2.53 OPDC's Local Plan is supporting host boroughs to meet the targets in the 2016 London Plan or in their adopted Local Plans. However, the potential need for a future review of waste policy, if changes are required in order to help host boroughs to meet higher waste apportionment targets, is identified in OPDC's Local Plan.

A2.54 Ongoing co-operation is anticipated between OPDC and relevant boroughs to undertake further work to establish if the two host boroughs with increased apportionments can meet the increased requirement within their area. Engagement will also continue with other relevant authorities.

NPPF strategic priority: The provision of infrastructure for transport

A2.55 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority (see Appendix 3)

- SP1
- SP7
- T1-T9

A2.56 The following evidence base is included as part of the Local Plan evidence base:

- Old Oak Strategic Transport Strategy
- Park Royal Transport Strategy

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- Willesden Junction Station Feasibility Study
- North Acton station study
- Old Oak and Park Royal Construction and Logistics Strategy
- Walking, Cycling and Public Realm Study
- Bus Strategy
- A40 Study
- Car Parking study

A2.57 Transport for London (TfL) and the Department for Transport are the organisations responsible for identifying the requirements for, and delivering, new strategic infrastructure within the OPDC area. They have been leading on and progressing with plans for two new London Overground stations and a new High Speed rail station.

A2.58 TfL is a prescribed body under the Duty to Co-operate and therefore TfL is required to cooperate with local planning authorities, such as OPDC, on strategic matters.

A2.59 HS2 Ltd is an executive non-departmental public body, sponsored by the Department for Transport . They are responsible for developing and promoting the new high speed rail station in Old Oak, which received Royal Assent on 23rd February 2017 (The High Speed Rail (London – West Midlands) Act 2017).

A2.60 Both TfL and HS2 play a critical role in delivering infrastructure which will support the development of Old Oak, so OPDC has been working collaboratively with these organisations to provide updates on the proposals for Old Oak and Park Royal to ensure these are taken into account and that work led by TfL and HS2 are developed in line with the vision for Old Oak and Park Royal.

A2.61 To effectively understand and mitigate local transport impacts, separate Old Oak and Park Royal Transport strategies have been prepared. In addition to this, more detailed strategies have been developed; focusing on Willesden Junction and North Acton stations, bus improvements, construction and walking, cycling and public realm.

A2.62 The range of stakeholders that have been involved in producing these strategies includes TfL and the 3 host boroughs – London Borough of Hammersmith & Fulham, London Borough of Brent and London Borough of Ealing. These key partners have been identified based on the significant role they play in transport strategy and/or as infrastructure providers and their statutory responsibilities as the highway authorities in the OPDC area. Key issues raised through the engagement include:

- Implementation of rail proposals
- The design of stations
- Overstation development
- Levels of traffic including construction traffic
- Connections scoping
- Adequate provision for buses
- The ability to relocate or deck over rail depots

Engagement activities

A2.63 A list of activities is set out below:

Activity: Regular meeting with TfL to discuss emerging findings and resolve issues

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Partners involved: see paragraph 3.19 Comment: An opportunity to discuss emerging findings and resolve key issues relating to the Local Plan. Changes were made where relevant and appropriate. Dates: Early 2016 to current day
Activity: OPDC duty to co-operate meetings Partners involved: see paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 13th October 2015, 16th February 2016, 26th April 2016, 11th October 2016, 6th December 2016
Activity: Informal engagement on draft Regulation 18 policies for comment Partners involved :London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Stakeholders invited to comment in advance of consultation Date: 13th October 2015
Activity: OPDC part of client and stakeholder group helping to steer the Willesden Junction Station Feasibility Study Partners involved: See Appendix 3 Comment: TfL, OPDC and the London Borough of Brent commissioned a GRIP 2 Feasibility Study to investigate the impact of these developments on Willesden Junction Station and Interchange, and to develop proposals to respond to these. As part of the project, OPDC helped evaluate options and information was shared with wider stakeholders via the OPDC Strategic Transport Panel and OPDC Place Review. Date: April 2016 – April 2017
Activity: OPDC part of client and stakeholder group helping to steer the North Acton Station Feasibility Study Partners involved: See Appendix 3 Comment: TfL, OPDC and the London Borough of Ealing commissioned a feasibility study to investigate the impact of developments on North Acton Station, and to develop proposals to respond to these. Date: Jan 2016 – May 2018
Activity: OPDC part of steering group to progress the Old Oak Strategic Transport Strategy Partners involved: See Appendix 3 Comment: This study was undertaken by Transport for London, with partners and in consultation with HS2 and Network Rail. It considers the transport impacts of an additional 24,000 homes and 55,000 jobs being provided at Old Oak Common. OPDC's role focussed on working in partnership to share information and develop/refine the methodology and options. Date: TfL organised weekly meetings to discuss progress with stakeholders including OPDC
Activity: Engagement on OPDC's Park Royal Transport Study Partners involved: See Appendix 3 Comment: Jointly commissioned by the OPDC and TfL. Workshops held with partners to develop an agreed vision, objectives and to score for interventions for Park Royal's transport network. Given the importance of the A40 in providing connections to the motorway network, Heathrow airport and Central London, representatives from the OPDC and TfL were formed into the A40 Study stakeholder working group. Date: July 2015 - January 2016
Activity: Engagement on OPDC's Walking, Cycling and Public Realm Study Partners involved: See Appendix 3 Comment: Jointly commissioned by the OPDC and TfL - makes a series of recommendations for the creation of a coherent and resilient street network and public realm for Old Oak and Park Royal, from a walking, cycling and public realm perspective. As part of the project, OPDC helped evaluate options and shared updates on the progress of

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the work and opportunity for questions and discussion Date: May 2016, November 2016, February 2017
Activity: Working in partnership on a Construction and Logistics Strategy. Partners involved: TfL, London Borough of Hammersmith and Fulham, London Borough of Brent, London Borough of Ealing Comment: Sharing of information with TfL to help develop the specification for, and completion of, the Construction and Logistics Strategy. Date: January 2016 to May 2018
Activity: OPDC participation in meetings organised by Transport for London to progress the Bus strategy Partners involved: TfL Comment: Sharing of information with TfL to help support the preparation of the bus strategy. Date: January 2016 to March 2017
Activity: OPDC participation in meetings organised by Transport for London to progress the A40 study Partners involved: TfL Comment: Sharing of information with TfL to help support the preparation of the A40 study. Date: January 2016 to August 2016
Activity: Informal engagement on draft Regulation 19 policies for comment Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Changes were made to the draft policies where relevant and appropriate in light of comments received. Date: 11th October 2016, 6th December 2016, 21st March 2017
Activity: Formal consultation on the Revised Local Plan and associated evidence base Partners involved: For details on who was consulted please see Consultation Statement. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the employment policies. Information on how representations have been considered is included in the Consultation Statement. Date: 29th June – 11th September 2017. Overview of Transport policies given to attendees of DtC project meeting on 25th July 2017.

Summary and next steps

A2.64 Collaborative working and knowledge sharing to agree principles/recommendations for the movement network for the Old and Park Royal. OPDC has been working with stakeholders to ensure the proposed transport infrastructure being delivered by other partners is aligned to the OPDC Old Oak and Park Royal vision.

A2.65 Through collaborative working with a range of stakeholders, OPDC has produced a comprehensive evidence base for the transport policies within the Local Plan.

NPPF strategic priority: The provision of infrastructure for telecommunications

A2.66 New telecommunications infrastructure will be developed wholly within OPDC area's and delivered in tandem with development. It is not considered to be a cross boundary matter or an issue which will have a significant impact. Therefore, this is not considered to be a key issue which needs detailed consideration as part of this paper.

NPPF strategic priority: The provision of infrastructure for water supply, waste water, flood risk and coastal change management

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Background

A2.67 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority (see Appendix 3)

- EU3

A2.68 The following evidence base is included as part of the Local Plan evidence base:

- Integrated Water Management Strategy
- Utilities Study

A2.69 The growth proposed for the Old Oak Common and Park Royal Opportunity Area is of such considerable scale that it will require a step change in the provision of water supply, wastewater treatment and water infrastructure. The range of challenges include an acute lack of capacity within the drainage infrastructure, areas of surface water and sewer flooding risk locally and in neighbouring areas outside of OPDC's boundary, and an increasing deficit of available water to meet demand. The growth across all Opportunity Areas sharing the same drainage and water supply infrastructure has the potential to impact on this.

A2.70 Within the context of these constraints, several water management measures were considered and developed, and this process included input from a range of stakeholders with an influence on how water will be managed and used in the area.

A2.71 OPDC has been engaging with the following key partners as they have statutory responsibilities for water management as flood authorities:

- Environment Agency;
- London Borough of Brent;
- London Borough of Hammersmith and Fulham (LBHF);
- London Borough of Ealing;
- RB Kensington and Chelsea

A2.72 In addition, OPDC have been cooperating with Thames Water as the statutory undertaker for the water and sewage infrastructure.

Engagement activities

Activity: Meeting of the Integrated Water Management Strategy (IWMS) working group Partners involved: GLA; Thames Water Utilities Ltd; Environment Agency; London Borough of Brent; , LB Brent, LB Ealing, LB Hammersmith and RB Fulham Kensington & Chelsea. Comment: The main high level aims of the IWMS were identified and agreed through consultation with the Steering Group Date: 23rd July 2015
Activity: Meeting of the Integrated Water Management Strategy (IWMS) working group Partners involved: GLA; Thames Water Utilities Ltd; Environment Agency; LB Brent, LB Ealing, LB Hammersmith and RB Fulham Kensington & Chelsea. Comment: The main high level aims of the IWMS were identified and agreed through consultation with the Steering Group Date: 22nd September 2015
Activity: Integrated Water Management Strategy (IWMS) Options Workshop Partners involved: GLA; Thames Water Utilities Ltd; Environment Agency; LB Brent, LB Ealing, LB Hammersmith and RB Fulham Kensington & Chelsea, Canal and River Trust Comment: Options in IWMS discussed with stakeholders. Date: 12th November 2015

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Activity: OPDC duty to co-operate meetings Partners involved: See paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates : 29th September 2015, 16th February 2016, 7th February 2017
Activity: OPDC commissioned Thames Water to prepare a Network Impact Assessment as part of Stage 2 Utilities Study Partner: Thames Water Comment: Work was developed to establish the extent of reinforcement works that will be required to accommodate the additional potable water demand of the development. Water recycling options have been identified and appraised, in order to establish the preferred method of reducing the impact of the development on the existing water resources by reducing potable water demand. Date:
Activity: Verifying data with Thames Water as part of Stage 2 Utilities Study Partner: Thames Water Comment: Thames Water has been consulted to verify the reduction in peak surface water discharge rate that will be required to create capacity with the existing combined sewer network, to accommodate additional foul flows generated by the development. Preliminary calculations have also been prepared to estimate the volume of attenuation storage that will be required within each sub-catchment of the site to achieve the required reduction in surface water runoff. Date: Completed and incorporated as part of the Integrated Water Management Study
Activity: Working with Canal and River Trust on Discharge Assessment as part of Stage 2 Utilities Study Partner: The Canal and River Trust Comment: CrT commissioned to produce a Discharge Assessment to establish the feasibility of discharging surface water to the Grand Union Canal, in order to reduce the volume of surface water entering the combined sewer system that will require treatment at the Beckton Sewage Treatment Works. Date: Completed and incorporated as part of the Integrated Water Management Study
Activity: Formal consultation on the Draft Local Plan and emerging Environment policies Partners involved: For details on who was consulted please see Consultation Statement. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Kensington and Chelsea, Canal and River Trust, Thames Water and Environment Agency commented on related matters. Information on how representations have been considered is included in the Consultation Statement. Date: 4th February – 31st March 2016
Activity: Grand Union Canal workshop Partners involved: Historic England, Canal and River Trust, TfL, HS2 Limited, LB Brent, LB Ealing and LB Hammersmith and Fulham Kensington & Chelsea. Comment: Gathered information regarding the current and planned activities of organisations present at workshops, general information and approach to planning for the Grand Union Canal and adjacent areas. Date: 19 July and 6 October 2016
Activity: Informal consultation on the Regulation 19 Local Plan policy for comment Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Changes were made to the draft policies where relevant and appropriate in light of comments received. Date: March 2017
See other activities under *NPPF strategic priority: Climate change mitigation and adaptation;*

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conservation and enhancement of the natural environment

Summary and next steps

A2.73 All partners have worked together in developing an evidence base supporting a shared position on the standards in relation to water utilities infrastructure. The stating point is a shared understanding about the current situation, which is as follows:

- The existing water supply network will be unable to provide sufficient capacity for the development. Thames Water has undertaken a Network Impact Assessment, which defines the extent of network reinforcement works that are required to supply the proposed development

A2.74 There is no capacity within the network for surface water drainage. Development needs to achieve greenfield run-off rates. To achieve this, OPDC should adopt a sequential policy, looking to minimise and re-use water, connect into strategic SuDs, if feasible drain into the Grand Union Canal, use on-site SuDS and if on-site, prioritise vegetated SuDS.

A2.75 Constructive engagement has resulted in supportive responses being received on the Draft Local Plan.

NPPF strategic priority: The provision of minerals

A2.76 The OPDC area is not currently covered Department for Business, Energy and Industrial Strategy licences allowing companies to search for minerals, including unconventional oil and gas and to the best of OPDC's knowledge, the geology of the area is unlikely to be suitable for shale gas production. There is a minor possibility of ballast and other materials being discovered during investigation or construction works which could become a useful resource over the duration of the project. As there is limited prospect of this taking place, it is not considered to be a key issue which needs detailed consideration as part of this paper.

NPPF strategic priority: The provision of energy (including heat)

A2.77 OPDC has been primarily engaging with a number of partners to develop evidence base as part of the Utilities Study (see Appendix 3) including:

- Greater London Authority (GLA);
- Environment Agency;
- UK Power Networks (UKPN);
- Scottish and Southern Energy (SSE);
- National Grid (Gas) (NGG);

These have been identified as particularly appropriate as they are infrastructure providers, have access to land in the area which is relevant to energy generation, or are key prescribed bodies.

A2.78 Based on evidence as part of the Utilities Study, it is anticipated that new energy infrastructure will be developed on sites wholly within OPDC area's and it is not considered to be a cross boundary matter or an issue which will have a significant impact. Therefore, this is not considered to be a key issue which needs detailed consideration as part of this paper. Further work to test the feasibility of energy generation options was also undertaken.

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A2.79
NPPF strategic priority: The provision of health facilities

Background

A2.80 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority (see Appendix 3)

- SP3
- TCC4

A2.81 The following evidence base is included as part of the Local Plan evidence base:

- Social Infrastructure Needs Study

A2.82 OPDC will need to ensure that development in Old Oak and Park Royal is supported by adequate health infrastructure. There are a range of stakeholders with different responsibilities for planning, funding and commissioning types of health care provision, including NHS England, Clinical Commissioning Groups and Public Health in local authorities. OPDC have been engaging with these stakeholders to discuss their vision and preferred model of service delivery for health care provision in the OPDC area. OPDC has been working with partners to prepare additional evidence and agree the strategy to meet identified infrastructure needs.

A2.83 OPDC has been engaging with NHS England, Clinical Commissioning Groups, Public Health in LB Brent, Ealing and Hammersmith and Fulham. These partners have key responsibilities to support the planning and delivery of services in the OPDC area. OPDC's Social Infrastructure Needs Study has been developed based on close working arrangements with these partners.

Engagement activities

Activity: OPDC duty to co-operate meetings Partners involved: See paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and/or evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. New evidence base was commissioned as a result of this engagement. Dates : 24th November 2015, 5th July 2016, 19th July 2016, 11th October 2016, 8th November 2016, 20th February 2018
Activity: Informal engagement on draft Regulation 18 policies for comment Partners involved :London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Stakeholders invited to comment in advance of consultation Date: 24th November 2015
Activity: Formal consultation on the Draft Local Plan and emerging Social Infrastructure policies Partners involved: For details on who was consulted please see Consultation Statement. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Information on how representations have been considered is included in the Consultation Statement. Date: 4th February – 31st March 2016
Activity: Meeting with Hammersmith & Fulham CCG and Head of Strategic Estate Development for Central London, Hammersmith and Fulham, Hounslow and West London CCGs. Partners involved :Hammersmith & Fulham CCG

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Comment: Provided an update on OPDC's Local Plan, including the number of homes and jobs proposed, the phasing of development and the findings in the DIFS Study 2015. OPDC and Hammersmith & Fulham CCG agreed to continue to work together to model future needs for health care provision. Date: 31st August 2016
Activity: Meeting with Hammersmith & Fulham CCG Partners involved :Hammersmith & Fulham CCG Comment: Hammersmith & Fulham CCG set out their strategic aims for the delivery of health care in H&F, potential options for future health provision for OPDC residents, and options to increase current primary care capacity to support the early developments. Date: 14th October 2016
Activity: Meeting with Director of Public Health Ealing Partners involved :London Borough of Ealing Comment: Agreed that the CCGs are best placed to decide the health infrastructure required in the OPDC Area. Date: 29th November 2016
ctivity: Meeting with Director of Public Health Tri-borough Partners involved :London Borough of Hammersmith and Fulham Comment: Agreed that the CCGs are best placed to decide the health infrastructure required in the OPDC Area. Date: 30th November 2016
Activity: Health Infrastructure Workshop Partners involved : Ealing CCG; Central London, H&F, Hounslow & West London CCGs; Brent, Harrow, Hillingdon and Ealing CCGs; H&F CCG; HUDU; Triborough Public Health. Comment: The CCGs agreed to work with local authority partners to develop the service model for the new population in the OPDC area in order to determine the health facilities required to deliver the service model. Date: 24th January 2017
Activity: Meeting with Director of Public Health Brent Partners involved :London Borough of Brent Comment: Agreed that the CCGs are best placed to decide the health infrastructure required in the OPDC Area. OPDC offered to give presentation to the Brent Health and Wellbeing Board but offer declined at this stage. Date: 6th February 2017
Update: CCGs provided their preferred high level option for the provision of primary health facilities Partners involved :Hammersmith & Fulham CCG, Ealing CCG, Brent CCG Comment: The CCGs preferred option is a large primary care facility to provide services for 50,000 residents Date: 9th March 2017
Activity: Presentation at Ealing Health and Wellbeing Board (HWBB) Partners involved :Ealing CCG, London Borough of Ealing, Imperial College Healthcare NHS Trust, London North West Healthcare NHS Trust, West London Mental Health Trust, Comment: OPDC will continue to provide Ealing HWBB with an update six monthly or more frequently if required. Date: 15th March 2017
Activity: Informal consultation on the draft Regulation 19 Local Plan Social Infrastructure policy with boroughs Partners involved: see paragraph 3.19 Comment: Opportunity for officers to comment on policies in advance of consultation Date: 8th November 2016, 21st March 2017
Activity: Meeting with NHS Property Services Ltd Partners involved: NHS Property Services Ltd Comment: Agreed that the CCG Strategic Estates Leads in NWL would be OPDC's main

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points of contact for planning primary and community care facilities. Date: 31st May 2017
Activity: Meeting with Imperial College Health Partners (ICHP) Partners involved: ICHP Comment: NWL CCGs commissioned ICHP to support NWL CCGs to agree a health service delivery strategy for the OPDC Area. OPDC met with ICHP to provide background information on the development and to set out the detail that OPDC requires from the CCGs for the Social Infrastructure Needs Study and the Local Plan. Date: 15th December 2017
Activity: Teleconference with Imperial College Health Partners Partners involved: Imperial College Health Partners Comment: OPDC asked that the CCGs confirm the methodology that they are using to calculate the floorspace requirements for the primary and community care facility required in Old Oak. Date: 16th February 2018
Activity: Meeting with representative of the NWL CCGs and Imperial College Health Partners Partners involved: Central London, Hammersmith and Fulham, Hounslow and West London CCGs, Imperial College Health Partners Comment: NWL CCGs agreed that they would base the floorspace requirements for the primary and community care facility on the specifications in Health Building Note 11-01 (published by Department of Health in 2013). The CCGs agreed to provide OPDC with their modelling figures in April. Date: 14th March 2018
Activity: Telephone meeting with Acting Head of Primary Care Commissioning, NHS England – London Region Partners involved: NHS England – London Region Comment: NHS England explained the application process for a new NHS Pharmacy and the process required to commission a new NHS dental practice. It is expected that the demand for opticians in the OPDC Area would be market driven as they are private businesses. Date: 22nd March 2018
Activity: Meeting with NWL CCGs Partners involved: Brent CCG, Central London CCG, Ealing CCG, Hammersmith & Fulham CCG, Harrow CCG, Hillingdon CCG, Hounslow CCG, and West London CCG Comment: The CCGs agreed that population growth in the first phase of Old Oak North and South can be accommodated by increasing the capacity in existing infrastructure. All phases of the population growth in North Acton and Park Royal can be accommodated by capacity in the new Park Royal Medical Practice and increasing the capacity in other existing infrastructure. Phases 2-4 of population growth in Old Oak North and South will be accommodated by delivering a new primary and community care health facility in Old Oak. Date: 24th April 2018
Activity: The CCGs provided their updated modelling for the floorspace requirements for the primary and community care health facility in Old Oak. Partners involved: NWL CCGs Date: 30th April 2018

Summary and next steps

A2.84 OPDC and Brent, Ealing and Hammersmith and Fulham CCGs have agreed the approach to modelling the increased demand for health care infrastructure. Increased demand for primary care resulting from the early stages of development will be met through the development of a primary care facility (Park Royal Medical Practice) located within Central Middlesex Hospital and the expansion of

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Hammersmith Centre for Health, Willesden Centre for Health and Care, and Cloister Road Surgery.

A2.85 The CCGs' high level preference for infrastructure to meet the needs arising from the remainder of the development is for one large primary care facility located in Old Oak.

A2.86 Key points of contact have been established to allow for follow up discussion on section 106 negotiations and the development of the section 106 supplementary planning document.

NPPF strategic priority: The provision of security infrastructure

A2.87 The provision of security infrastructure has been considered in the Local Plan but no specific measures are identified so there are no quantifiable infrastructure requirements or associated impacts. It is not considered to be a cross boundary matter or an issue which will have a significant impact. Therefore, this is not considered to be a key issue which needs detailed consideration as part of this paper.

NPPF strategic priority: Conservation and enhancement of the natural and the historic environment

Background

A2.88 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority (see Appendix 3)

- SP9
- D8

A2.89 The following evidence base is included as part of the Local Plan evidence base:

- Historic England Old Oak Outline Historic Area Assessment (2015)
- OPDC Heritage Strategy (2017)
- OPDC Views Study (2017)
- OPDC Integrated Impact Assessment (2017)
- OPDC Character Study (2017)
- OPDC Scrubs Lane Development Framework (2017)
- OPDC Cumberland Park Factory Conservation Area Appraisal Report (2017)
- LB Ealing Canalside Conservation Area Appraisal (2008) and Management Plan (2008)
- LB Hammersmith and Fulham St. Mary's Conservation Area Character Profile (2004)
- RB Kensington and Chelsea Kensal Green Cemetery Conservation Area Proposals Statement (2003)

A2.90 There are a number of heritage assets outside of the OPDC area and within Old Oak and Park Royal. St. Mary's Conservation Area, Cumberland Park Factory Conservation Area, Canalside Conservation Area, Grade II Listed Brent Viaduct, Grade II Kenmont Primary School, the Rolls Royce Building and Kensal Green Cemetery Grade I Listed Registered Park and Garden (also a conservation area) are considered to be the most significant. Within Kensal Green Cemetery there are a high number of statutory listed structures and including some which are identified by Historic England to be at risk.

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A2.91 The impact of development on the surrounding heritage assets and settings needs to be carefully managed. Issues with respect to heritage assets and views are addressed in OPDC's Local Plan. OPDC has engaged with the following key partners on this issue:

- London Borough of Hammersmith and Fulham
- London Borough of Brent
- London Borough of Ealing
- Royal Borough of Kensington & Chelsea
- Greater London Authority
- Historic England
- Canal and River Trust
- TfL
- HS2

These partners have been identified as they include local planning authorities which surround OPDC's area and have heritage assets in the locality. It also includes agencies which have responsibilities for conservation.

A2.92 Key issues raised through the engagement process include suggestions for potential heritage assets that warrant protection, support for OPDC identifying a local heritage list and the need for additional information on the location of tall buildings in certain areas.

Engagement activities

Activity: OPDC duty to co-operate meetings Partners involved: See paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and/or evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates: 18th August 2015, 27th October 2015, 24th November 2015,12th April 2016, 24th May 2016, 8th November 2016, 19th September 2017
Activity: Informal engagement on draft Regulation 18 policies for comment Partners involved :London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Stakeholders invited to comment in advance of consultation Date: 24th November 2015
Activity: Formal consultation on the Draft Local Plan and emerging Environment policies Partners involved: For details on who was consulted please see Consultation Statement. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Royal Borough Kensington and Chelsea, London Borough of Hammersmith and Fulham and London Borough of Brent as well as Historic England commented on related matters. Information on how representations have been considered is included in the Consultation Statement. Date: 4th February – 31st March 2016
Activity: Assessment of existing historic environment of Old Oak and immediate areas informed by a series of meetings. Partners involved :Historic England Comment: Gathered information regarding local existing heritage assets to inform the publication of the Old Oak Common Outline Historic Area Assessment used to inform Regulation 18 and Regulation 19 versions of the Local Plan. Date: 4 February 2016

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Activity: Define an approach for conserving and enhancing the historic environment including local heritage designations and views. A series of meetings were held as part of the Duty to Cooperate regular meetings with the boroughs. Specific meeting held with Historic England on 1 June 2016. Workshop with Partners and community groups held on 20 July. Partners involved :Historic England, LB Brent, LB Ealing, LB Hammersmith and Fulham and RB Kensington & Chelsea Comment: Gathered information regarding local existing and potential future heritage assets. This information has been used to inform the OPDC Heritage Strategy as evidence base for the heritage policies of the Regulation 19 version of the Local Plan to conserve and enhance heritage assets within and around the OPDC area. Date: May 2017
Activity: Define local heritage views to conserve and enhance heritage assets within and around the OPDC area. A series of meetings were held as part of the Duty to Cooperate regular meetings with the boroughs Partners involved :LB Brent, LB Ealing, LB Hammersmith and Fulham and RB Kensington & Chelsea Comment: Gathered information to identify heritage views within and around the OPDC area. This information has been used to inform the OPDC Views Study as evidence base for the key views policies of the Regulation 19 version of the Local Plan to conserve and enhance heritage assets within and around the OPDC area. Date: May 2017
Activity: Explore an approach for conserving and enhancing the Kensal Green Cemetery and its setting to define of local views and potential development principles. Meetings held with Historic England and RB Kensington & Chelsea to define scope (22 November 2016 and 11 January 2017) Partners involved :Historic England, RB Kensington & Chelsea Comment: Discussions carried out to inform emerging scope of for the Kensal Green Cemetery Views Study. This will inform future planning policy and wider OPDC design work. Date: Ongoing
Activity: Define an approach for conserving and enhancing the historic significance of the Grand Union Canal, including the designated portions of the Grand Union Canal Conservation Area, while supporting other roles of the canal (including transport, amenity and biodiversity). Two workshops were held with a range of stakeholders including Historic England, Canal and River Trust, TfL, HS2 Limited, LB Brent, LB Ealing and LB Hammersmith and Fulham Kensington & Chelsea. Comment: Gathered information regarding the current and planned activities of organisations present at workshops, general information and approach to planning for the Grand Union Canal and adjacent areas. Date: 19 July and 6 October 2016
Activity: Development and consultation on OPDC's Local Heritage Listings Partners involved: LB Brent, LB Ealing, LB Hammersmith and Fulham and RB Kensington & Chelsea Comment: Discussions carried out to inform consultation on OPDC's Local Heritage Listings. Date: 20th February 2017
Activity: Informal consultation on the draft Regulation 19 Local Plan Design policy for comment with OPDC Project Team Partners involved :London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Changes were made to the draft policies where relevant and appropriate in light of comments received. Date: 8th November 2016, 22nd November 2016, March 2017
Activity: Informal consultation on the draft Regulation 19(2) Local Plan Heritage policy for comment with OPDC Project Team Partners involved: Historic England

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Comment: Changes were made to the draft policies where relevant and appropriate in light of comments received. Date: 4th August 2017 and 9 November 2017
Also see activities under *NPPF strategic priority: Climate change mitigation and adaptation; conservation and enhancement of the natural environment*

Summary and next steps

A2.93 As a result of discussions with, and consultation responses from, stakeholders the Regulation 19(2) Second Revised Draft Local Plan's Heritage Policy has been strengthened in relation to designated heritage assets.

A2.94 OPDC will continue to work with boroughs and Historic England in developing heritage guidance for Local Heritage Listings and conservation areas.

NPPF strategic priority: Climate change mitigation and adaptation; conservation and enhancement of the natural environment

A2.95 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority (see Appendix 3)

- SP9
- D8

A2.96 The following evidence base is included as part of the Local Plan evidence base:

- Environmental Standards Study
- Wormwood Scrubs Survey
- Circular and sharing economy study
- Environmental Modelling Framework
- Waste Management Study
- Waste Apportionment Study
- Air Quality Study

A2.97 Climate change is a major threat to both humans' and natures' life on earth. Development and growth is often viewed as a key risk to climate change, but if well designed, delivered and operated, it can also be a key part of the response. To address this challenge, OPDC has been developing a set of aspirational but deliverable sustainability targets that are aimed at ensuring future development across the Old Oak and Park Royal sites will be exemplar in construction and operation.

A2.98 The Environmental Standards Study is the key part of the evidence base because it covers, energy, waste, materials, carbon emissions, water, air quality, green infrastructure and biodiversity, microclimate and public realm, climate resilience, noise and sustainable transport. OPDC engaged a wide range of partners to test and develop the environmental standards. Relevant statutory agencies and infrastructure providers were also involved to provide technical expertise and insight. Key partners included:

- Environment Agency
- Natural England
- London Borough of Hammersmith & Fulham
- London Borough of Brent,
- London Borough of Ealing
- RB Kensington & Chelsea

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- GLA
- Thames Water
- HS2
- TfL

A2.99 Particular issues raised include the need to provide sufficient green infrastructure, including open space, to serve the new development and concerns related to Wormwood Scrub.

Engagement activities

Activity: OPDC duty to co-operate meetings Partners involved: See paragraph 3.19 Comment: Focussed on developing the policy approach, including sharing draft policies and evidence base, through discussion and co-operation. Comments were invited as part of, and as follow up to, these meetings. Changes were made where relevant and appropriate. Dates : 15th September 2015, 29th September 2015, 13th October 2015, 24th November 2015, 10th May 2016, 16th February 2016, 13th September 2016, 7th February 2017
Activity: Informal engagement on draft Regulation 18 policies for comment Partners involved :See paragraph 3.19 Comment: Stakeholders invited to comment in advance of consultation Date: 29th September 2015
Activity: Formal consultation on the Draft Local Plan and emerging Environment policies Partners involved: For details on who was consulted please see Consultation Statement. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Hammersmith and Fulham, Brent and the Environment Agency commented on related matters. Information on how representations have been considered is included in the Consultation Statement. Date: 4th February – 31st March 2016
Activity: Workshop on Environmental Standards Study Partners involved: GLA, London Boroughs of Ealing, Brent, Hammersmith and Fulham and Royal Borough of Kensington and Chelsea, Natural England, Environment Agency, London Waste and Recycling Board (LWARB), Thames Water, HS2, Transport for London Comment: The aim of this workshop was to discuss scope of the study, site issues and opportunities, best practice, an environmental vision and targets. Four groups were formed to discuss current environmental and sustainability targets: Urban Planning, Transport, Energy, Water and Waste and Green/blue Infrastructure. The opportunity to go beyond these targets was also discussed and helped to inform the environmental vision and objectives for the proposed development. Date: 6th May 2016
Activity: Presentation of initial findings and assessment of the key issues and options Partners involved: GLA Comment: The subsequent discussion helped to steer the focus of the study, identifying the need to include sustainability issues related to daylight and sunlight, the extent of green open space and green roofs, maintenance of amenities, connectivity and examples of best practice. Date: 11th August 2016
Activity: Developing Wormwood Scrubs Survey Partners involved: London Boroughs of Ealing, Brent, Hammersmith and Fulham Comment: After discussions with the three boroughs it was agreed that the most appropriate methodology to find out local views would be in the format of a survey using technology to collate the data. Date: August – September 2017
Activity: Workshop on Environmental Standards Study

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Partners involved: GLA, London Boroughs of Hammersmith and Fulham, Environment Agency, HS2, Transport for London Comment: The aim of these workshops was to present key findings, recommendations and targets for discussion. This was followed up by sending all attendees copies of the draft topics papers which they were able to review and provide more detailed comments on. Date: 19th October 2016
Activity: Study tour and workshop on Environmental Standards Study Partners involved: GLA, Natural England, Environment Agency, Thames Water, Wildlife Trusts Comment: The aim of these workshops was to present key findings, recommendations and targets for discussion. This was followed up by sending all attendees copies of the draft topics papers which they were able to review and provide more detailed comments on. Date: 19th October 2016
Activity: Informal consultation on the draft Regulation 19 Local Plan Environment and Utilities policies for comment with OPDC Project Team Partners involved :See paragraph 3.19 Comment: Changes were made to the draft policies where relevant and appropriate in light of comments received. Date: 7th February 2017, 21st March 2017
Activity: Consultation with GLA environment team to discuss and get feedback on all the environmental policies in the draft Regulation 19 Local Plan. Comment: Changes were made to the draft policies where relevant in particular to reflect the draft London Environment Strategy and the draft London Plan. Date: 9th March 2017
Activity: Consultation with GLA environment team to discuss adoption and application of the Urban Green Space Factor Tool. Comment: Urban Green Space Factor tested and adopted by OPDC in line with GLA approach. Date: 23rd January 2018
Activity: Meeting with Environment Agency and Natural England Comment: Discussed Old Oak North Development Framework Principles and updated timetable for Local Plan Date: 23rd May 2018
Also see activities under *NPPF strategic priority: The provision of infrastructure for waste management*

Summary and next steps

A2.100 As a result of initial engagement and issues raised, OPDC worked with London Borough of Hammersmith and Fulham to gather more baseline information on the use of the Scrubs to better understand how future development could contribute to its maintenance and improvement.

A2.101 More detailed work - Environmental Standards Study – was also commissioned to explore what level of green infrastructure should be provided in Old Oak and Park Royal. The work provided a platform for discussions with a range of stakeholders about how open space needs will be met within OPDC's area. The process of co-operation and engagement informed and resulted in the successful completion of this work.

A2.102 There are existing governance arrangements in place for the management of Wormwood Scrubs. OPDC will need to continue engagement with Hammersmith and Fulham to agree any proposals to help maintain and enhance Wormwood Scrubs.

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NPPF strategic priority: The provision of community and other local facilities

Background

A2.103 OPDC has been developing the following policies in the Local Plan which are relevant to this strategic priority (see Appendix 3)

- SP4
- TCC4

A2.104 The following evidence base is included as part of the Local Plan evidence base:

- Social Infrastructure Needs Study.

A2.105 The additional homes and associated residential population will increase demands for school places in the area. The host boroughs have statutory duties around education provision including the need to ensure sufficient school places and in the coordination of funding for all publicly-funded schools in the local education authority area. The host boroughs have highlighted existing pressures which should be taken into account. The core development area, where the majority of homes will be delivered, is within the London Borough of Hammersmith and Fulham, but immediately surrounding this is Brent, Ealing and Kensington & Chelsea. A range of options were identified during the early stages of plan preparation, including on-site delivery within the OPDC area, off-site enhancements outside of the OPDC area and a mixture of both. OPDC has been working with boroughs and the GLA to prepare additional evidence and has discussed the schools that have the capacity to expand. These partners were selected because the boroughs have statutory responsibilities as local education authorities and the GLA was able to provide strategic input, including use of the child yield calculator. OPDC has been working with these partners to develop the OPDC Social Infrastructure Needs Study.

Engagement activities

Activity: Ongoing briefings on the regular OPDC duty to co-operate meetings Partners involved: See paragraph 3.19 Comment: Methodology and development of associated policies progressed through discussion and co-operation Dates: 24th November 2015, 5th July 2016, 19th July 2016, 1st March 2016, 11th October 2016, 8th November 2016, 19th September 2017, 20th February 2018
Activity: Informal engagement on draft Regulation 18 policies for comment Partners involved :London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Stakeholders invited to comment in advance of consultation Date: 24th November 2015
Activity: Formal consultation on the Draft Local Plan and emerging Social Infrastructure policies Partners involved: For details on who was consulted please see Consultation Statement. Comment: DtC partners and stakeholders have an opportunity as part of formal consultation process to provide comments on the evidence base and policies. Information on how representations have been considered is included in the Consultation Statement. Date: 4th February – 31st March 2016, including an Community Infrastructure workshop on 13th February 2016
Activity: Meeting with council officers Partners involved :London Borough of Hammersmith and Fulham Comment: Discussed and shared information to update the baseline understanding of existing school provision, including number of schools, future expansion potential, guidelines

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for new school provision. OPDC and LBHF officers agreed to work together to model future needs for school places. Date: 14th September 2016
Activity: Meeting with Hammersmith & Fulham officers Partners involved :London Borough of Hammersmith and Fulham Comment: Discussed and shared information to update the baseline understanding of existing school provision, including number of schools, future expansion potential, guidelines for new school provision. OPDC and LBHF officers agreed to work together to model future needs for school places. Date: 20th September 2016
Activity: Established and held project group meeting for the OPDC Education and Health Study Partners involved :London Borough of Hammersmith and Fulham, London Borough of Brent, London Borough of Ealing, GLA Comment: Discussed and agreed methodology for modelling future needs for school places. Date: 3rd January 2017, 28th February 2017, 25th April 2017
Activity: Held meeting with Kensington and Chelsea officers Partners involved :RBKC Comment: Discussed the projected educational need of the OPDC and how this need could be addressed. Ability of the existing schools in the vicinity of the OPDC development to expand was also discussed. Date: 8 November 2016.
Activity: Held meeting with LB Ealing officers Partners involved : London Borough of Ealing Comment: Discussed the projected educational need of the OPDC and how this need could be addressed. Ability of the existing schools in the vicinity of the OPDC development to expand was also discussed. Date: 5 December 2016.
Activity: Held meeting with GLA Economics and Education and Youth team Partners involved : GLA Comment: To discuss inputs for child yield modelling. Date: 23rd January 2017
Activity: Meeting held with LB Brent officers Partners involved :London Borough of Brent Comment: Discussed the projected educational need of the OPDC and how this need could be addressed. Ability of the existing schools in the vicinity of the OPDC development to expand was also discussed. Date: 28 February 2017.
Activity: Informal consultation on the draft Regulation 19 Local Plan Town centre and Community uses policies for comment Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Changes were made to the draft policies where relevant and appropriate in light of comments received. Date: 8th November 2016, 21st March 2017
Activity: OPDC meeting with GLA officers Partners involved: OPDC and GLA demographics Comment: Agreement on population and Child Yield modelling. Date: 14th March 2018
Activity: Assumptions meeting Partners involved: OPDC, AECOM, LBE, LBHF, LBB Comment: Assumptions to be used within the report were discussed. Following the meeting OPDC sent around minutes and an assumptions paper was distributed for agreement. Date: 21st March 2018

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Activity: LBHF further meeting with Education Officers Partners involved: OPDC, AECOM, LBHF Comment: Assumptions discussed in more detail along with off-site capacity in schools within LBHF too. Following this meeting an assumptions paper was sent round following the meeting for agreement. The Boroughs have commented and changes in our assumptions paper and subsequently the report, were made to reflect this. Date: 17th April 2018
Activity: OPDC meeting with LFB Partners involved: OPDC, AECOM LFB Comment: OPDC met London Fire Brigade to discuss assumptions in the DIFS and review for the Social Infrastructure Needs Study. Comments have been incorporated within the study. Date: 9th May 2018
Activity: OPDC meeting with Met Police Partners involved: OPDC, AECOM, Metropolitan Police Comment: OPDC met the Met Police to discuss assumptions in the DIFS and review these assumptions for the SINS. Comments have been incorporated within the study. Date: 14th May 2018

Summary and next steps

A2.106 Both OPDC and the boroughs now have a shared understanding about the anticipated growth in demand for school and early years places through a series of meetings and assumption sharing processes. We have engaged at length with LBHF in particular as they identified capacity within their existing schools at an early stage. The process of co-operation and engagement has resulted in an agreed position on offsite capacity along with the number, type and size of new schools within the OPDC area. Discussions have also helped informed the proposed locations of these new schools. Key points of contact have been established to allow for follow up discussion on section 106 negotiations and the development of the section 106 supplementary planning document.

A2.107 Boroughs are the local education authorities for OPDC's area and therefore OPDC are committed to an open and transparent dialogue with the Boroughs to respond to their needs and requirements with regards to existing school capacity, expansion and new facilities in the area.

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Appendix 3: List of supporting studies and partners involved in their preparation

No.	Supporting Study Title	Topic area	Lead	Bodies involved in the preparation (excluding OPDC)
1	A40 Study	Transport	TFL	N/A. This Study was led/prepared by TfL not OPDC
2	Absorption Rate Study	Housing	OPDC	
3	Affordable Housing Viability Assessment	Housing	OPDC	Viability issues discussed with Housing Panel
4	Air Quality Study	Environment and utilities	OPDC	Discussed at Duty to Cooperate meeting (see invitee list in paragraph 3.19)
5	Bus Strategy	Transport	TfL	N/A. This Study was led/prepared by TfL not OPDC
6	Car Parking Study	Transport	OPDC	
7	Catalyst Uses Study	Town centres and community uses	OPDC	Discussed at Duty to Cooperate meetings (see invitee list in paragraph 3.19)
8	Character Areas Study	Design	OPDC	Discussed at Duty to Cooperate meetings (see invitee list in paragraph 3.19)
9	Circular and Sharing Economy Study	Environment and utilities	OPDC	
10	Construction and Logistics Strategy	Transport	OPDC	TfL
11	Cultural Principles	Town centres and community uses	OPDC	
12	Decontamination Study	Environment and utilities	OPDC	Environment Agency
13	Development Capacity Study	Crosscutting	OPDC	Discussed at Duty to Cooperate meetings (see invitee list in paragraph 3.19)
14	Development Infrastructure Funding Study	Crosscutting	OPDC	
15	Duty to Cooperate Statement	Crosscutting	OPDC	N/A
16	Energy, Overheating and Daylight in Tall Buildings	Environment and Utilities	OPDC	GLA
17	Environmental Modelling Framework Study	Design	OPDC	
18	Environmental Standards Study	Environment and utilities	OPDC	London Borough of Hammersmith & Fulham, London Borough of Brent, London Borough of Ealing, RB Kensington

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				& Chelsea, GLA, Environment Agency, Natural England, Thames Water, HS2, TfL
19	Future Employment Growth Sectors Study	Employment	OPDC	Brent, Ealing and Hammersmith and Fulham and GLA involved in Project Steering Group meetings.
20	Grand Union Canal Massing and Enclosure Note	Places	OPDC	
21	Gypsy and Traveller Assessment and Addendum	Housing	OPDC	London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham, RB Kensington and Chelsea and Oxfordshire County Council
22	Healthy Town Centres Study	Town centres and community uses	OPDC	
23	Heritage Strategy	Design	OPDC	Brent, Ealing and Hammersmith and Fulham interviewed and Historic England invited to workshop to inform this work.
24	Housing Evidence Statement	Housing	OPDC	
25	Industrial Estates Study	Employment	OPDC	LBB, LBE, GLA
26	Industrial Land Review and Addendum	Employment	OPDC	
27	Infrastructure Delivery Plan (IDP)	Crosscutting	OPDC	N/A. Projects listed in IDP schedule have been drawn from other supporting studies
28	Integrated Impact Assessment	Crosscutting	OPDC	N/A
29	Integrated Water Management Strategy	Environment and utilities	OPDC	GLA; Thames Water Utilities Ltd; Environment Agency; LB Brent, LB Ealing, LB Hammersmith and RB Fulham Kensington & Chelsea, Canal and River Trust
30	North Acton Station Feasibility Study	Transport	TfL	OPDC, LBE, GLA
31	North Acton Decentralised Energy Study	Utilities	OPDC/GLA/LBE	GLA (Peter North), LB Ealing
32	Old Oak North Development Framework Principles	Places	OPDC	LB Brent, LB Ealing, LB Hammersmith
33	Old Oak Outline Historic Area Assessment	Design	Historic England	
34	Old Oak Strategic Transport Study	Transport	OPDC	Transport for London, GLA,OPDC, the London Boroughs of Hammersmith & Fulham, Ealing and Brent, HS2, Network Rail
35	Park Royal Atlas	Crosscutting	GLA/OPD	TfL, LBE, LBB, LBHF

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36	Park Royal Intensification Study	Employment	OPDC	OPDC, GLA, (London Boroughs invited to stakeholder workshop)
37	Park Royal Transport Strategy	Transport	TfL/OPDC	Park Royal Business Group, London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith & Fulham, Royal Borough of Kensington and Chelsea, TfL, WestTrans
38	Post Occupancy Survey	Environment and Utilities	OPDC	GLA
39	Precedent Study	Crosscutting	OPDC	
40	Public Realm, Walking and Cycling Strategy	Transport	OPDC	Brent, Ealing and Hammersmith and Fulham, TfL
41	Retail and Leisure Needs Study and Update	Town centres and community uses	OPDC	Brent, Ealing and Hammersmith and Fulham, RBKC and GLA
42	Scrubs Lane Development Framework Principles	Places	OPDC	Discussed at Duty to Cooperate meetings (see invitee list in paragraph 3.19)
43	Sites of Importance for Nature Conservation Statement	Environment and utilities	OPDC	
44	Smart Strategy	Environment and utilities	OPDC	GLA
45	Social Infrastructure Needs Study	Town centres and community uses	OPDC	Tri-Borough Education Team, Royal Borough of Kensington & Chelsea, London Borough of Ealing, London Borough of Hammersmith, London Borough of Brent, GLA, Metropolitan Police, London Fire Brigade, CCGs (see glossary).
46	Socio-Economic Baseline Study	Crosscutting	OPDC	GLA
47	Sports Courts and Swimming Pools Study	Town centres and community uses	LBHF	N/A. This Study was led/prepared by LBHF not OPDC
48	Strategic Housing Market Assessment	Housing	OPDC	Brent, Ealing and Hammersmith and Fulham, GLA
49	Statement of Community Involvement	Crosscutting	OPDC	N/A
50	Tall Buildings Statement	Design	OPDC	GLA
51	Victoria Road and Old Oak Lane Development Framework Principles	Places	OPDC	Discussed at Duty to Cooperate meetings (see invitee list in paragraph 3.19)

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52	Views Study	Design	OPDC	
53	Waste Apportionment Study	Environment and utilities	OPDC	WRWA planning authorities involved in Technical paper which underpins this.
54	Waste Management Strategy	Environment and utilities	OPDC	
55	Waste in Tall Buildings	Environment and Utilities	OPDC	GLA, LWARB, LBHF
56	Waste Technical Paper	Environment and utilities	OPDC	LBHF, RBKC, LB Lambeth, LB Wandsworth
57	Whole Plan Viability Study	Crosscutting	OPDC	N/A
58	Willesden Junction Station Feasibility Study	Transport	TfL/OPDC /LBB	TfL, OPDC, LBB, LBHF, Network Rail
59	Wormwood Scrubs Survey	Places	OPDC	LBHF, LBB, LBE
60	Utilities Study	Environment and utilities	OPDC	GLA, UK Power Networks, Scottish and Southern Energy, National Grid (Gas), Thames Water ;Canal and River Trust; HS2 Ltd; Representatives from Powerday Limited; and Promoters and operators of the Kings Cross Heat Network, Queen Elizabeth Olympic Park Heat Network, Bunhill Heat network and the planned Lea Valley Heat network;

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Appendix 4: Key steps in the decision making process

Decision: Report to OPDC Planning Committee on the West London Waste Plan Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Planning committee recommend that Board adopt the WLWP. Date: 15th July 2015
Decision: Report to OPDC Board on the West London Waste Plan Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: OPDC Board agree to WLWP being adopted as a Development Plan Document. Date: 28th July 2015
Decision: Report to OPDC Planning Committee on the Old Oak and Park Royal Opportunity Area Planning Framework Consultation Responses Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Planning committee recommend OAPF to the OPDC Board for endorsement and recommendation that the Mayor of London adopts the OAPF as amended. Date: 2nd September 2015
Decision: Report to OPDC Board on the Old Oak and Park Royal Opportunity Area Planning Framework Consultation Responses Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Board recommends that the Mayor of London adopts the OAPF as amended. Date: 15th September 2015
Decision: Report and Presentation to OPDC Planning Committee on Draft Local Plan (Regulation 18) Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: The Planning Committee is asked to comment on the draft Local Plan, the draft Integrated Impact Assessment (IIA) and the draft Summary of Supporting Studies Document. Committee recommended that the Board agree to consult on the draft Local Plan. Date: 6th January 2016
Decision: and Presentation to OPDC Board on Draft Local Plan (Regulation 18) Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: eThe Board agreed to first stage of public consultation on the draft Local Plan (Regulation 18); be agreed, to include those changes recommended by the Planning Committee. Date: 25th January 2016
Decision: Report to OPDC Planning Committee on the key issues arising from the Regulation 18 consultation Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham Comment: Opportunity to comment on officers' proposed response to the key issues for referral to the OPDC Board and to inform the drafting of the Regulation 19 Local Plan and accompanying Statement of Consultation document. Waste apportionment and existing waste sites were identified as key issues. Date: 7th September 2016
Decision: Report and Presentation to OPDC Board on the key issues arising from the Regulation 18 consultation Partners involved: London Borough of Brent, London Borough of Ealing, London Borough of

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Hammersmith and Fulham Comment: Opportunity to comment on officers' proposed response to the key issues to inform the drafting of the Regulation 19 Local Plan and accompanying Statement of Consultation document. Date: 21st September 2016

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Appendix 5: Glossary of key bodies involved in Duty to Co-operate discussions

There are a number of organisations who have played a particularly key role in helping to identify and develop the strategic issues and priorities to be considered as part of the Local Plan and will also be key in helping in their monitoring and delivery. These include:

Clinical Commissioning Groups (CCGs)

CCGs were created following the Health and Social Care Act in 2012, and replaced Primary Care Trusts on 1 April 2013. CCGs are clinically-led statutory NHS bodies responsible for the planning and commissioning of health care services for their local area. There are a number of CCGs operating in OPDC's area including: NHS Brent CCG, NHS Ealing CCG and NHS Hammersmith and Fulham CCG. NHS West London CCG is adjacent to the boundary of the OPDC Area. NHS North West London Collaborative of Clinical Commissioning Groups (NWL CCGs) is a collaboration of NHS Brent CCG, NHS Central London CCG, NHS Ealing CCG, NHS Hammersmith & Fulham CCG, NHS Harrow CCG, NHS Hillingdon CCG, NHS Hounslow CCG, and NHS West London CCG.

London Boroughs of Brent, Ealing and Hammersmith and Fulham

OPDC has engaged with the three Councils at both an officer and member level on dealing with a number of specific issues (see Appendix 2). OPDC coordinate the Duty to Co-operate Project Team meetings which council officers regularly attend. Officers have also attended workshops and project steering groups related to a number of work streams. We have also worked together at both an officer level as constituent members of the West London Waste Plan and Western Riverside Waste area (see Western Riverside boroughs below). OPDC's planning committee and Board also include Brent, Ealing and London Borough of Hammersmith and Fulham. All of the host boroughs are responsible for performing a number of statutory functions within the OPDC area. This includes their roles as the local housing, education, highways and lead local flood authorities and for local air quality management. Therefore, we have involved relevant officers as part of the plan process and we will continue to do this to ensure that measures can be implemented and delivered.

Environment Agency

The Environment Agency's key responsibilities include regulating major industry and waste facilities, treatment of contaminated land, water quality and resources and conservation and ecology. They are also responsible for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea. OPDC has primarily worked with the EA at an officer. The Agency provided comments on policies and evidence base in advance of formal public consultation and has also been involved at all formal stages of the process to date.

Greater London Authority

The OPDC is a functional body of the Greater London Authority, and as such the Mayor and London Assembly have oversight. The Local Plan must also be in general conformity with the Mayor's London Plan. GLA officers are invited to attend the Duty to Co-operate meetings and OPDC has worked with the GLA at an officer level as part of project steering groups related to a number of work streams. The Mayor is also responsible for establishing and chairing the London Economic Action Partnership (LEAP) Board. LEAP is the Local Enterprise Partnership for London and it operates as non-incorporated consultative and advisory body. As a Mayoral appointed body with no separate independent or corporate legal status, the LEAP operates through the GLA which acts as LEAP's "accountable body".

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Historic England

Historic England is the government's statutory adviser on the historic environment, championing historic places and helping people to understand, value and care for them. Historic England is an executive non-departmental public body, sponsored by the Department for Culture, Media & Sport. OPDC has worked with Historic England at an officer level to provide comments on the identification and protection of heritage assets including the designation of the Cumberland Factory Conservation Area and they were responsible for preparing the Outline Historic Assessment of the Old Oak area.

Royal Borough of Kensington and Chelsea

OPDC engages with the Council at both an officer level on dealing with a number of specific issues (see Appendix 2) such as assessing the impact on heritage assets. OPDC coordinate the Duty to Co-operate Project Team meetings which Council officers have attended. Officers have also attended workshops and project steering groups related to a number of work streams. We have also worked together at both an officer level as a group of Western Riverside waste planning area (see Western Riverside boroughs below).

Natural England

Natural England is the government's adviser on the natural environment, providing practical scientific advice on how to look after England's landscapes and wildlife. It is an executive non-departmental public body, sponsored by the Department for Environment, Food and Rural Affairs (DEFRA). OPDC has worked with Natural England at an officer level to provide opportunities for them to comment/share ideas in advance of any formal public consultation and it has also been involved at all formal stages of the process to date.

OPDC Housing Panel

The Housing Panel was established to help inform the development of OPDC's housing strategy and related Local Plan policies to enable delivery of the potential 25,500 homes within OPDC's area. Members are invited to share ideas, best practice (national and international) and provide constructive criticism to help OPDC make progress in developing its planning policies. Members include representatives from the GLA/HCA, London Borough of Brent, London Borough of Ealing, London Borough of Hammersmith and Fulham and London Councils.

Thames Water

As the statutory water and waste water provider we have worked with Thames Water at an officer level as part of steering groups to develop the Integrated Water Management Strategy and they have been commissioned to prepare or verify evidence base with regards to utilities infrastructure. These activities have helped direct policy development. Thames Water has been involved at all formal stages of the process to date.

Transport for London (TfL)

TfL is the integrated transport authority responsible for delivering Mayor of London commitments on transport. TfL run the day-to-day operation of the Capital's public transport network and manage London's main roads, including the London Underground, A406 and A40 running through OPDC's area.

Western Riverside boroughs

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The OPDC area within Hammersmith and Fulham falls within the Western Riverside Waste Authority (WRWA) area. Western Riverside Waste Authority (WRWA) is the statutory body responsible for the management of the waste delivered to it by:

- London Borough of Hammersmith and Fulham
- Royal Borough of Kensington and Chelsea
- London Borough of Lambeth
- London Borough of Wandsworth

Each individual local authority also has separate statutory responsibilities as waste planning authorities to plan for the management of waste in their areas. OPDC has been working with the Western Riverside boroughs to understand the waste management capacity across this area.

Other bodies

As part of the Duty to Cooperate process the Council has also engaged with a number of other bodies and these include:

- Canal and River Trust
- London North West Healthcare NHS Trust
- West London Mental Health Trust
- Central and North West London NHS Foundation Trust
- London Waste Planning Forum
- HS2 Ltd
- UK Power Networks
- Scottish and Southern Energy
- National Grid

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