OPDC REGULATION 19(2) SECOND REVISED DRAFT LOCAL PLAN

WORD VERSION

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Chair's Foreword

I am delighted to introduce this ~~new~~ second revised draft Local Plan to you for public consultation.

Regeneration across Old Oak and Park Royal over the next twenty years provides an unprecedented opportunity to bring tangible benefits to the quality of life of both local people and Londoners alike.

Old Oak will be transformed with the opening of Old Oak Common station in 2026 and become one of London's most accessible destinations. This provides us with the impetus to deliver a new part of London, built on the principle of mixed use, high density development supported by excellent public transport.

Park Royal today, is London's largest industrial estate, employing over 43,000 people. This new revised draft Local Plan supports the protection of this vital industrial estate that is a key part of the economy of London. It also details how the area can be strengthened and intensified to ensure it continues to remain successful in an increasingly competitive and globalising world.

The Local Plan sets out how we will ensure that new development is of a high quality. It supports health and well-being through the delivery of new parks, a protected Wormwood Scrubs, healthy streets and a range of complementary town centre uses. It promotes exemplary standards of environmental sustainability by supporting low and zero carbon development, the re-use of materials, the sharing economy and smart technology. It supports the creation of new jobs across a range of sectors and income levels, to deliver a fairer economy. Importantly, it supports the creation of lifetime neighbourhoods through the delivery of a range of housing types and affordability whilst ensuring new and improved ancillary uses such as schools, health centres and community spaces are provided in a timely manner.

Across both Old and Park Royal, this second~~new~~ revised draft Local Plan supports the delivery of a series of high quality neighbourhoods and spaces that future generations of Londoners will be proud of. Development will take its cue from the areas' existing neighbourhoods, spaces and heritage, including the valued ecological spaces of Wormwood Scrubs and the Grand Union Canal.

This ~~new~~ second revised draft Local Plan builds significantly on the ~~1st~~ revised draft, incorporating changes to address stakeholder comments, and align with new evidence, the new draft London Plan and changes to national policy guidance ~~and is supported by more detailed evidence and more ambitious standards for how development can help support OPDC in its aspiration to create a truly remarkable new place for London.~~ .

I welcome your comments on this important document that will be used to shape the regeneration of this part of London over the next 20 years.

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Reason: To reflect the status of this document.

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1 INTRODUCTION

When and How to Respond

1.1 Public consultation runs from ~~29 xx~~14 June to ~~11 xx~~26 ~~September 2017~~July 2018

~~1.2 Respond via the online response form www.bit.ly/OPDCReg19~~

~~1.3~~ 1.2 Respond by email to: localplan@opdc.london.gov.uk.

1.3 Respond by post to: OPDC Local Plan Consultation, Old Oak and Park Royal Development Corporation, City Hall, Queen's Walk, London SE1 2AA

How does this consultation relate to the first Regulation 19 consultation?

1.4 This consultation is a second Regulation 19 consultation.

1.5 OPDC will continue to consider responses to the first Regulation 19 consultation as Regulation 19 comments for the purposes of the Independent Examination. These responses will be submitted as Regulation 19 consultation comments for consideration by the independent Planning Inspector.

1.6 Responses submitted for this second Regulation 19 consultation will also be submitted as Regulation 19 consultation comments for consideration by the independent Planning Inspector.

What should you be making comments on?

Respondents should focus comments on changes made to the Revised Draft Local Plan and changes to existing and new supporting studies. A tracked changed version of this Second Revised Draft Local Plan has been produced which identifies these changes. The Summary of Supporting Studies document identifies where new supporting studies have been produced and where changes that have been made to existing supporting studies.

HOW TO FIND OUT MORE

Visit our Website

~~1.4~~ 1.7 All Local Plan consultation documents can be read and downloaded from: www.london.gov.uk/OPDClocalplan

~~You can also send us your comments via our quick response online form or download the full form to email us a longer consultation response.~~

View a Hard Copy

~~1.5~~ 1.8 Paper copies of this draft Local Plan and its supporting studies are available to view during normal office hours at the following locations:

a) Brent Civic Centre, Engineers Way, Wembley, HA9 0AF;
b) City Hall, Queens Walk, London, SE1 2AA;
c) Ealing Council Offices, Perceval House, 14/16 Uxbridge Road, W5 2HL;
d) Hammersmith Town Hall, King Street, W6 9JU;
e) Harlesden Library, Craven Park Road, NW10 8SE; and

Commented [TC4]: Specific amendment.
Reason: to reflect new consultation dates.

Commented [TC5]: Specific amendment.
Reason: To reflect that consultation comments will not be accepted via this method for the 2nd revised draft Local Plan consultation, due to a lack of use of this format as part of previous consultations.

Commented [TC6]: Specific amendment.
Reason: To reflect the new requirements of the 2nd revised draft Local plan consultation

Commented [TC7]: Specific amendment.
Reason: To reflect that consultation comments will not be accepted via this method for the 2nd revised draft Local Plan consultation, due to a lack of use of this format as part of previous consultations.

f) The ~~CoClub~~Collective, ~~The Perfume Factory, 140 Wales Farm Rd, North Acton W3 6UG~~Nash House, Old Oak Lane, NW10 6FF

Commented [TC8]: Specific amendment.
Reason: To reflect changes to the venues where hard copies are provided, due to the closure of the CoClub.

1.9 Alternatively, hard copies of this Local Plan can be made available on request by contacting OPDC, either via email or by post (see above).

BACKGROUND TO OPDC

~~1.6~~ 1.10 The following sections provide details on the background of OPDC and the legal status of the Local Plan. Further details on the legal status, policy status and background context to the area can be found in the appendix.

~~1.7~~ 1.11 The Mayor of London established the Old Oak and Park Royal Development Corporation (OPDC) on 1 April 2015 as a 'Mayoral Development Corporation' under powers of the Localism Act (2011). OPDC is the second of its kind in London, the first being the London Legacy Development Corporation (LLDC).

~~1.8~~ 1.12 The OPDC has a number of key aims, including:

a) transforming one of London's most inaccessible areas into a well-connected, world-class transport interchange;
b) enabling delivery of new housing and commercial development, surrounded by sustainable and thriving neighbourhoods and valued open space;
c) protecting, strengthening and intensifying ~~and strengthening~~ Park Royal; and`
d) protecting and improving Wormwood Scrubs.

~~1.9~~ 1.13 OPDC is the local planning authority for the area and as such is responsible for plan-making including the production of a Local Plan. The OPDC Local Plan sets out OPDC's strategy for the sustainable development of its area as a whole, including the general amount, type and location of new development it considers could take place and the policies to which applications for planning permission should conform.

~~1.10~~ 1.14 Its planning powers, including preparing and implementing the Local Plan, represent one part of the OPDC's role as a Mayoral Development Corporation. Working with its partners, including the host Boroughs of Brent, Ealing and Hammersmith & Fulham and the local community, OPDC will help implement projects and bring about change that will help meet the Corporation's key aims.

STATUS OF THE PLAN

Legal Status

~~1.11~~ 1.15 This document is a Development Plan Document (DPD) and is part of the Government's planning policy system introduced by the Planning and Compulsory Purchase Act 2004.

~~1.12~~ 1.16 Part 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the procedure for the production of Local Plans. This version of the Local Plan constitutes the consultation required under Regulation 19~~.~~ and is the second Regulation 19 consultation.

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Reason: To reflect the status of this document.

Policy Status

~~1.13~~ 1.17 Alongside the National Planning Policy Framework (NPPF), London Plan, Old Oak and Park Royal Opportunity Area Planning Framework, West London Waste Plan DPD, any 'made' Neighbourhood Plans and any adopted Supplementary Planning Documents (SPDs), OPDC's Local Plan, once adopted, will be a key planning policy document against which planning applications within the OPDC area will be assessed (see figure 1.2).

~~1.14~~ 1.18 The policies in this Local Plan are consistent with the version of the National Planning Policy Framework (NPPF) published in 2012 and are in general conformity with the London Plan (2016) and the new Draft London Plan (2017). Further, the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) adopted by the Mayor in November 2015 as Supplementary Planning Guidance (SPG) to the London Plan has helped to inform the policy themes and policies in this Local Plan.

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Reason: To reflect changes in national and regional policy.

~~1.15~~ 1.19 In order to keep the OPDC Local Plan spatial and succinct, thise Local Plan does not seek to repeat policies already contained in the NPPF and London Plan save for where such policies are particular to the area or type of development proposed or it is of particular importance to reflect them. This Local Plan should therefore be read in conjunction with the NPPF, the associated National Planning Practice Guidance (NPPG) and the London Plan.

~~1.16~~ 1.20 When considering development proposals, the OPDC will take a positive approach that reflects the overall presumption in favour of sustainable development contained in the NPPF and will work with applicants to secure development that improves the environmental social and economic well-being of its area. Planning applications that accord with the policies in the Local Plan will be approved unless material considerations indicate otherwise

~~1.17~~ 1.21 The strategic policies, place policies and delivery and implementation policies (chapters 3, 4 and 11) form OPDC's strategic policies for the area and establish the framework for fulfilling the spatial vision for the future of the OPDC area. The strategic policies dovetail with the OPDC's corporate priorities and outline how the OPDC area will be transformed over the plan period.

~~1.18~~ 1.22 Chapters 3, 4 and 11 will be treated as OPDC's strategic policies when considering the general conformity of neighbourhood planning policies.

Relationship with the High Speed Rail (London- West Midlands) Act (2017)

~~1.19~~ 1.23 High Speed 2 (HS2) is the Government's proposal for a new, high speed north-south railway. Phase One of the scheme will connect London to the West Midlands and will run through the OPDC area. Part of the project involves delivery of the new station at Old Oak Common where there will be a connection to the Elizabeth Line and the national rail services.

~~1.20~~ 1.24 The High Speed Rail (London- West Midlands) Act (2017) grants deemed planning permission for phase 1 of the HS2 project. Matters such as the principle for the railway works, their limits, and matters of principle relating to mitigation are determined through the Parliamentary Act, rather than the normal Town and Country Planning Act process. The level of detailed design necessary to enable the development to be constructed has yet to be carried out, so the deemed planning permission is subject to a series of items that require the approval of local planning authorities on the route, known as Schedule 17 approvals. OPDC as the planning authority for the Old Oak and Park Royal area will be responsible for such approvals. The considerations of any approvals for works to be carried out in relation to Phase One of HS2 are limited to those set out in Schedule 17.

2. SPATIAL VISION

Old Oak and Park Royal will be a highly connected part of London, playing an important role in shaping west London's future and driving national economic growth.

It will comprise a network of places including an innovative industrial area in Park Royal and a high-density new vibrant part of London at Old Oak. It will be home to a diverse and intense mix of uses, places and people.

Development will pioneer international excellence in sustainability, health and wellbeing and design quality to deliver tangible benefits for both local communities and London.

Thinking Big

1. High quality design will be showcased as part of new development, that will set new international standards in accessible and inclusive high density commercial, industrial and residential development and open space design and management.
2. 2. Old Oak will become a major new London centre providing high-density mixed use development, that will shape west London and support London's continued growth.
3. The area will become a destination for people from across London and the UK that will be home to a mix of cultural and leisure uses.
4. Old Oak will be the major transport hub for London, providing a gateway to London, the UK and beyond.
5. Wormwood Scrubs will be accessible MOL that will continue to perform its role as a ~~district and~~ metropolitan park.
6. It will be an exemplar in healthy and sustainable large-scale development.
7. Park Royal will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth.

Going Local

8. Local economies will be supported by creating opportunities for local businesses to access new markets and provide a mix of employment space to support new business growth.
9. The areas' existing rich social, cultural and built environmental and heritage assets such as Wormwood Scrubs, Kensal Green Cemetery the Grand Union Canal and the Rolls Royce Factory will be conserved and enhanced.
10. An attractive built environment will be created comprising a network of new and enhanced places enabling people to enjoy good quality streets, open spaces and well-designed buildings that complement surrounding neighbourhoods.
11. A mix of new homes will be delivered at different prices including affordable housing for local people.
12. Benefits from development will be generated for local people.
13. New development will connect local existing and new communities and neighbourhoods in the surrounding areas through high quality walking, cycling, public transport and vehicular links.
14. Life chances and fairness will be improved for existing and future communities, with new development providing opportunities to enhance health and well-being, access to skills, education and social infrastructure.
15. Day-to-day quality of life will be enhanced for local people by enabling a sense of ownership, empowerment, safety and provision of convenient access to town centre uses, shops, GPs, schools, nature and parks, community facilities, leisure and sports.

Commented [PF1]: Chapter wide amendments

Amendment: Homes and jobs targets updated.
Reason: To reflect updated development capacity and phasing evidence base.

Amendment: Minor error corrections for spelling, grammar and referencing.
Reason: To provide correct spelling, grammar and referencing.

Commented [PF2]: Regulation 19(1) consultation amendment.
Reference: SV20
Reason: To refer to existing communities

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Supporting Text

1.1 The Spatial Vision is OPDC's vision for what the different places of Old Oak, Park Royal and Wormwood Scrubs would be like in twenty years at the end of the 'plan period'. It both leads and is informed by the policy content of the Local Plan to set out how the OPDC area is intended to benefit people, the economy and the built and natural environment at the local, London and national scale.

1.2 The Spatial Vision is comprised of the overarching Vision Statement and the Vision Narratives ~~of~~ - 'thinking big' and 'going local'. The ~~Spatial~~ Vision Statement provides an overarching view of the future. The ~~Spatial~~ Vision narratives provide further ~~definition~~ information on the proposed outcomes of this development, 'thinking big' ~~–~~ at ~~both~~ the national and regional scale ~~by 'thinking big'. Importantly~~and 'going local', setting out how ~~then sets out how~~ local people would benefit from change and how neighbourhoods would improve.

1.3 These three elements provide the structure and the key themes for the policies in this Local Plan. The objectives for how the Spatial Vision will be delivered are embedded in the Strategic Policies and Place Policies that, alongside the Development Management Policies will drive and guide future development and Supplementary Planning Documents.

Opportunities and Challenges

1.4 The delivery of the spatial vision is complex and gives rise to a number of opportunities and challenges. The role of the spatial vision and supporting policies is to clearly articulate how OPDC will work with a variety of stakeholders to capitalise on the opportunities, mitigate the challenges and set out the parameters that will create a socially, environmentally and economically sustainable community in Old Oak and Park Royal.

1.5 Figure 2.1 identifies some of these key opportunities and challenges facing the delivery of the spatial vision, which are addressed in the spatial vision itself and policies in this Plan.

Figure 2.1: Opportunities and Challenges

Innovation	Old Oak and Park Royal can set new standards for creating high quality, high density cities. Fundamental to this will be ensuring innovative solutions are embedded into the design, construction and operation of the buildings, public realm and infrastructure ~~in the area~~. The development of Old Oak and Park Royal will span many decades, meaning that the area can be at the vanguard of incorporating appropriate technologies that support the creation of sustainable communities by being smart from the start.
Economic Growth	Alongside a protected and strengthened Park Royal, the area has the capacity to deliver ~~a minimum of 71,600~~40,400 new jobs~~, of which a minimum 64,200xxx could be delivered in~~ over the next 20 years ~~of this Local Plan~~. This development potential could bring enormous rewards for the national, regional and local economy, generating billions in Gross Value Added (GVA) and provide local people with opportunities for lifelong learning and employment across a range of skills and sectors.
Transit Oriented Development	The success of this area will to some extent be dependent on being able to encourage residents and workers in the area to leave their cars at home and walk, cycle or use public transport for the majority of journeys. The new Old Oak Common station will provide the impetus for this, but other new (Hythe Road and Old Oak Common Lane) and

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Reason: To reflect updated information in the Development Capacity Study.

	improved rail stations (such Willesden Junction and North Acton) and new and improved walking and cycling connections, along with enhancements to bus infrastructure will help to improve the areas public transport accessibility level (PTAL) and provide people with a choice of high quality sustainable transport modes. Alongside the implementation of traffic reduction strategies, this will assist in delivering the mode share targets set out in the Mayor's Transport Strategy.
Place Making	Regeneration of the area provides significant opportunities to celebrate heritage ~~to~~ and enhance existing and create new neighbourhoods, providing locals and Londoners with new places to live, work, visit and play. However, there are also substantial challenges to place making resulting from the area's topography, severance caused by existing infrastructure, the phased approach to delivery and the scale of development planned that will need to be managed and early development opportunities will need to be carefully integrated within long-term development proposals. ~~.~~
Grand Union Canal and Wormwood Scrubs	The Grand Union Canal is a key historic feature in the area and provides a valuable green and blue link. Development will provide opportunities to consider how the canal can be enhanced as a green ~~and blue~~ link and as an important feature in the approach to place making. Wormwood Scrubs is one of London's larger open spaces. It acts as an important green lung that provides people and wildlife with the opportunity to enjoy green open space. Development in Old Oak provides opportunities to enhance access to it and to provide sensitive enhancements so that it can be enjoyed by more Londoners and fulfil its~~the~~ role of a ~~district and~~ metropolitan park ~~for the area~~.
Health and Wellbeing	In recent decades society has become more obese and more stressed and these trends are predicted to continue. ~~In the development of the Old Oak and Park Royal area, i~~It will be important to create places that support active and healthy lifestyles. This can be achieved through the creation of Healthy Streets and a high quality public realm, multi-functional open space and through providing facilities that support social interaction.
Park Royal	The Park Royal Industrial Estate is a vital cog in the London economy and OPDC will work to protect, ~~intensify and~~ strengthen and intensify the role of Park Royal as a Strategic Industrial Location. However, the nature of industry in London will continue to change and Park Royal needs to be able to continue to respond to these changes to remain competitive. Regeneration in Old Oak presents a dichotomy for the estate. Park Royal can serve to support the needs of development in Old Oak, by providing ancillary service~~s support~~. This includes the potential for a circular economy, looking at ways that things used in Old Oak can be recycled and repurposed by businesses in Park Royal. However, regeneration in Old Oak could result in rent increases and increased pressure on infrastructure which if not managed could undermine what makes Park Royal a success.
Diversity of Housing	The OPDC area is capable of accommodating a minimum ~~26,900~~26,500~~xxx~~ homes, of which a minimum 20,100~~xxx~~~~22,350~~ could be delivered in the next 20 years ~~covered by this Plan~~. It is important that these meet the housing needs of locals and Londoners and are provided over a range of tenures and housing types, including much

Commented [PF4]: Regulation 19(1) consultation amendment.
Reference:SV9
Reason: To illustrate linkages with the Mayor's Transport Strategy.

Commented [PF5]: Regulation 19(1) consultation amendment.
Reference: SV17
Reason: To ensure phasing of development is coordinated.

Commented [TC6]: Regulation 19(1) consultation amendment.
Reference: SV8
Reason: To define linkages with the Mayor's aspirations to deliver Healthy Streets.

Commented [PF7]: Specific amendment.
Reason: To reflect updated information in the Development Capacity Study.

	needed affordable housing, private sale, rented, student and extra care housing with some ~~some~~ shared living. The scale of this regeneration project provides a substantial opportunity to meet these needs, but the complexity of developing the area also presents significant challenges to the viability of meeting the needs of everyone and particularly those on lower incomes.
Higher Density Development	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. However, if not appropriately designed and managed, high densities can present challenges in terms of its potential impacts on the transport network, townscape, on climate change and the local environment, community services and on health and well-being.
Competing Demand for Space	By consequence of the high density nature of development, space in the Old Oak and Park Royal area will be at a premium. This will create challenges in terms of securing adequate open space and space for servicing. However, the intensity of use also provides opportunities to capitalise on economies of scale and take innovative approaches to the provision of services and infrastructure. This could include taking a system of systems approach where services are pooled or shared to deliver greater efficiencies.
Climate Change	Climate change is an issue facing the entire planet and is not confined solely to Old Oak and Park Royal. Addressing climate change is not without its challenges with the density of development being proposed. The ambition should be to place this development project at the vanguard of demonstrating how cities can reduce the effects of climate change through the design of development, the built environment and infrastructure provision.
Adaptability	The regeneration of the area will occur over a number of decades. The phased approach to development is likely to mean that the streets and buildings built today might not be fit for purpose 20 years from now. Technological advances such as driverless cars and smart technology are also likely to fundamentally change the way that we plan, design and operate cities in the future. It will therefore be important that the development in Old Oak and Park Royal is designed with flexibility and adaptability in mind.
Deliverability	The scale of development and infrastructure required to support this presents significant challenges to the deliverability of development. For the first ten years of the Local Plan, HS2 Ltd will use a number of development plots to construct the HS2 line and station at Old Oak, which could impact on the developability and deliverability of adjacent plots. Further, there are challenging sites such as the Elizabeth Line Depot, which will either require relocation or decking to enable development to be brought forward and other sites which could have significant land contamination, impacting on development viability.
Managing Traffic and Construction	The Old Oak and Park Royal area ~~does already~~ suffers from significant congestion. Without appropriate management, this will be further exacerbated during development's construction and through its operation, having detrimental impacts on the environment and particularly on air quality and noise and vibration. Providing high quality

	options for sustainable transport and construction and the re-use and repurposing of materials will be critical to mitigating these impacts.

3. STRATEGIC POLICIES

POLICY SP1: CATALYST FOR GROWTH

Our proposed outcome

A world-class transport super-hub at Old Oak Common, supporting the creation of a new part of London that acts as a catalyst for growth at national, regional and local levels.

~~**Development across the OPDC area should**~~**Proposals should:**

a) support the delivery of the new strategic transport hub and interchange at Old Oak Common;

b) support the delivery of a new part of London, which is both a destination and a gateway to London and the rest of the UK;

c) provid~~e~~e a range of land uses in accordance with relevant land use policies, that:

i. promotes and supports London's role as a global city and position as the world's economic and cultural capital;

ii. complements, supports and shapes west London's growth; and

iii. contributes to meeting local needs and complements surrounding centres.

Supporting Text

1.1 ~~The planned Old Oak Common station will set the regeneration plans at Old Oak apart from other regeneration projects in the country. Old Oak Common~~The ~~High Speed Rail (London-West Midlands) Act illustrates that this~~ station is set to become the second biggest rail station in London and the largest sub-surface station to have ever been built in the UK. ~~It will provide access to High Speed 2 (HS2), the Elizabeth Line and the Great Western Main Line. The High Speed Rail Act gained Royal Assent in 2017 and sets the parameters for the construction of the station and track at Old Oak Common station.~~ The station will support the wider Old Oak ~~Opportunity Area~~area in becoming a new strategic destination ~~- , that will be~~ 10 minutes from Heathrow and the West End. It will also provide a transport interchange to other airports and to the rest of the UK, including places such as Birmingham, Bristol, Leeds, Manchester and Sheffield.

1.2 ~~This new station will be a catalyst for growth.~~ This new station~~It~~ provides the opportunity to set new standards for optimising sustainable transit orientated development that can strengthen London's position as a global city and help to deliver much needed new homes and jobs. To enable this, proposals should support the timely delivery of this station, ensuring it is properly embedded into its surroundings and that the station and surrounding land provide~~s~~ a range and quantum of uses that capitalise on the improved access to public transport. This will ensure that the benefits to the UK, London and for local communities are maximised.

Commented [TC1]: Chapter wide amendments

Amendment: A proposed outcome has been inserted for each policy.
Reason: to provide greater clarity about the proposed objective for each policy.

Amendment: The supporting text to each policy has, where feasible, been shortened.
Reason: To remove repetition with policy or supporting text covered elsewhere in the Local Plan and to ensure that supporting text is only provided where it is required to supplement the policy.
Reference: TC370

Amendment: Minor error corrections for spelling, grammar and referencing.
Reason: To provide correct spelling, grammar and referencing.

Amendment: Old Oak High Street major town centre renamed as Old Oak major town centre
Reason: To reflect amendments to phasing and location of key routes.

Amendment: Old Oak High Street renamed as Old Oak Street
Reason: To reflect amendments to phasing of development and distribution of land uses during the plan period

Commented [TC2]: Specific amendment.
Reason: To align with London Plan policy GG5(F).

Commented [PF3]: Specific amendment.
Reason: To avoid repetition with the Introduction Chapter.

Commented [PF4]: Specific amendment.
Reason: To avoid repetition with the Introduction Chapter.

1.3 The development potential across Old Oak and Park Royal offers significant potential to deliver new homes, jobs and supporting ancillary uses. The Mayor's London Plan identifies that the OPDC area can deliver a minimum 25,500 homes and 65,000 jobs, making it one of London and the UK's largest regeneration projects. 20,1000 of these homes and 40,400 of these jobs can be delivered within the next 20 years of this Local Plan (see policies SP4 and SP5). ~~This development can make a significant contribution to London and the UK's need for new homes across a range of types and affordabilities as well as new jobs across a range of sectors and skills. The scale of development also provides opportunities to deliver town centre and large-scale catalyst uses, that would add to and diversify London's economic and cultural offer. These uses would also offer facilities for existing and new residents and workers.~~

~~1.4~~ The successful regeneration of Old Oak and Park Royal ~~will~~ can offer significant benefits for the wider w~~W~~est London sub-region. ~~To optimise these benefits, new development will need to complement the wider network of town centres. The policies in this Local Plan set out the various ways in which development can help support this.~~

~~1.5 OPDC's more immediate context contains some of the most deprived areas in the country. Locations such as Harlesden and Stonebridge are ranked within the top 10% most deprived wards nationally and have issues with income deprivation and health. It is important that development at Old Oak and Park Royal brings tangible benifits for local communities and offers life improving opportunities.~~

~~1.6 Within the more immediate area there are some significant development opportunities. The OPDC area is in close proximity to other Opportunity Areas including White City, Wembley and Kensal Canalside and other large development areas such as Acton, Ealing and Alperton.~~

~~1.7 Rail and road infrastructure within and bordering the OPDC area currently separate many of the communities bordering the OPDC area. New development has the opportunity to overcome this severance and knit together this part of west London. The scale of transformation planned in the OPDC area can further spur their regeneration and help to unlock additional development and growth.~~

~~1.8~~ ~~1.4 OPDC will work with local authorities, landowners and communities across the area to achieve the successful integration of the OPDC area into the wider hinterland.~~ Below is a list of the ~~those largescale areas for regeneration~~areas in the wider region where joint working will be required to ensure that the benefits of ~~the~~ regeneration can be fully captured.

a) White City Opportunity Area is currently being transformed with the expansion of Westfield, development of Imperial College's White City Campus and redevelopment of the BBC Television Centre. The White City OAPF was published in 2013 and development in this area is well underway. Coordinated public realm improvements could deliver better connectivity between the OPDC area and White City. Economic synergies will also be explored such as the potential for Imperial College to continue to grow its west London campus into the OPDC area;
b) Harlesden Town Centre is a designated District Town Centre, providing ~~much needed~~ town centre facilities for people living in the area. The centre and its surroundings currently suffer from economic deprivation, falling within the top 10% most deprived wards nationally when measured against the Index of Multiple Deprivation (2015). Improved connections between it and the OPDC area provide significant opportunities for residents and businesses in Harlesden to benefit from regeneration. OPDC and Brent Council have established a Willesden Junction Steering Group~~Harlesden sub-group~~ to coordinate projects and strategies for the area;

Commented [TC5]: Specific amendment.
Reason: To align with new housing and jobs capacity figures

Commented [PF6]: Specific amendment.
Reason: To avoid repetition with the Spatial Vision Narratives and Place Policies.

Commented [PF7]: Specific amendment.
Reason: To avoid repetition with policy SP6.

Commented [PF8]: Specific amendment.
Reason: To avoid repetition with the Background and Context Appendix.

Commented [TC9]: Specific amendment.
Reason: To reflect revised titling of this group

c) Kensal Canalside Opportunity Area is immediately to the east of the OPDC area and is identified in the London Plan as having the capacity to deliver 2,000 new jobs and a minimum of 3,500 new homes. The Royal Borough of Kensington and Chelsea are lobbying the Mayor of London and TfL for a new Elizabeth Line station at Kensal, which could further increase the area's development capacity. The station's delivery is not yet committed but feasibility work is underway. There will be opportunities to improve connections between Kensal Canalside and the OPDC area and OPDC will work with the Royal Borough of Kensington and Chelsea to explore ways that this can be achieved;

d) Alperton located to the west of the OPDC area in Brent has been identified as a 'Housing Zone' by the Mayor of London with additional funding for the delivery of affordable housing. The Alperton Hhousing zZone is identified as having the capacity to deliver over 3,000 homes;

e) Wembley Opportunity Area is less than 2 miles from the OPDC area and is west London's second largest Opportunity Area after Old Oak, with capacity ~~. Wembley has the potential~~ to deliver ~~11,500~~14,000 homes and 1~~1~~3,0~~5~~00 jobs. OPDC is working with Brent Council to explore o~~In the future, Wembley could potentially be better connected to Old Oak through the provision of a spur to the West Coast Main Line, but there are also other o~~pportunities ~~for more short-term solutions~~ to better connect Wembley to the OPDC area; and

f) Centres in the wider area such as Ealing, Southall, Acton, Wembley, Hammersmith and Kensington, will be influenced by the scale of development proposed at Old Oak and Park Royal. There is a need for close collaboration with the surrounding and host local authorities to consider what these influences might be and ensure that measures are taken to capture opportunities and ~~mitigate any potential impacts~~to ensure there are not any significant adverse impacts on the vitality and viability of these centres.

Commented [TC10]: Regulation 19(1) consultation amendment.
Reference: SP1/4
Reason: To recognise that feasibility work into the delivery of Kensal Canalside station is underway.

Commented [TC11]: Specific amendment.
Reason: To reflect revised homes and jobs targets for this Opportunity Area

Commented [PF12]: Specific amendment.
Reason: This option is no longer supported as a transport project by DfT or TfL.

Commented [TC13]: Regulation 19(1) consultation amendment.
Reference: SP1/8
Reason: To reflect the wording in the NPPF requiring proposals to not result in significant adverse impacts (para 27).

DRAFT

POLICY SP2: GOOD GROWTH

Our proposed outcome

Delivering a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability.

Proposals should ~~support the delivery of the spatial vision by establishing high standards for sustainable development at appropriately high densities, by~~:

a) **~~creating~~ create vibrant, mixed and inclusive lifetime neighbourhoods.**

b) **deliver~~ing~~ a low carbon and environmentally resilient development, that is adaptive to and resilient to climate change;**

c) **deliver~~ing~~ the highest standards of place making, urban design and architecture;**

d) **~~deliver~~ensure the~~ing~~ robust and feasible ~~solutions for the~~ ongoing management of ~~buildings, infrastructure and public and private spaces~~the built environment;**

e) **promot~~e~~ing and deliver~~ing~~ efficiency and effectiveness in advanced construction;**

f) **design~~ing~~, construct~~ing~~ and manag~~e~~ing a smart and resilient city;**

g) **promot~~e~~ing resource efficiency and the principles of the circular and sharing economy; and**

h) **proactively ~~engaging~~ engage with and deliver~~ing~~ benefits ~~to~~for local communities.**

Supporting Text

~~1.9 Over the last century, our planet has undergone an unparalleled economic, social and environmental transformation. As a global city, London is at the forefront of having to address the challenges this presents. However, London's wealth and skilled workforce make it a place where new development can lead the way in tackling the diverse array of issues that our planet is facing and ensure that development delivers good growth in accordance with the Mayor's City for All Londoners publication.~~

~~1.10~~ 1.5 the OPDC area can fulfil a vital role in helping to meet London's growth sustainably. It is imperative that given the scale of development envisaged, it achieves high standards of sustainability in terms of design, delivery, operation and management. This can be particularly challenging at high densities, but it is through high density, transit orientated development that some of the greatest sustainability benefits can be realised. The policies in this Local Plan~~, along with OPDC's supporting evidence,~~ set out the approach for how development in the OPDC area can deliver internationally recognised best practice standards in these policy areas, delivering excellence and innovation in how cities of the future are planned, delivered and operated.

~~1.11~~ 1.6 ~~London's changing demographics will need to be considered as part of new development in Old Oak and Park Royal.~~ Lifetime neighbourhoods extol the principles of community cohesion and empowerment, access and inclusivity, mixed use neighbourhoods, safety and security, respect of diversity, affordability and choice ~~for~~ of housing. OPDC will ensure new development ~~work with developers to~~ embeds these principles ~~into proposals~~ from the outset. Further details on how this will be achieved are included throughout this Local Plan~~approaches to delivering lifetime neighbourhoods are contained in the Housing, Design and Town Centre and Community Uses chapters and across the Places chapters~~.

Commented [TC14]: Specific amendment.
Reason: To clarify specific requirements for proposals

Commented [PF15]: Specific amendment.
Reason: To shorten supporting text

Commented [TC16]: Specific amendment.
Reason: To clarify that requirements for lifetime neighbourhoods are embedded across all the chapters of the local plan.

DRAFT

~~1.12~~ 1.7 New development will need to consider and demonstrate how ~~best~~ it can best address the substantial environmental challenges facing the planet~~. It will be important for new development to learn from current and past practices, both good and bad~~. Requirements are set out in~~. OPDC has produced an Environmental Standards Study, that has assessed other regeneration projects to help develop a series of environmental standards, which have been embedded throughout the Local Plan's policies.~~ the Environment and Utilities chapter, providing locally specific policies that build on policies and standards in the Mayor's London Plan and London Environment Strategy. The application of these environmental policies and standards will understandably be challenging. ~~and i~~In applying these, regard would always need to be given to the viability of development~~, in accordance with the requirements of the National Planning Policy Framework (NPPF) and the need to deliver housing, affordable housing and the level and type of infrastructure required to support the needs of development~~(see Policy DI1).

~~1.13~~ 1.8 The marked change in public transport access makes the brownfield site at Old Oak a suitable location for new high density development. Buildings at high density must be of the highest quality (see Policy SP9) to ensure that potential place making and environmental challenges are addressed ~~(see the Design and Environment and Utilities chapters). Quality urban design and architecture is a highly important aspect that helps support place making, identity and community pride.~~ OPDC's Precedents Study ~~and Environmental Standards Study~~ identifies a range of high quality, well-designed schemes that are considered to achieve these policy aspirations. High density development in Park Royal SIL will be different to in Old Oak, but OPDC's Park Royal Intensification Study demonstrates how the Park Royal Industrial Estate could be regenerated to increase floorspace and provide additional jobs, to support Mayoral targets to deliver an additional 10,000 jobs in Park Royal ~~across the estate~~.

~~1.14~~ 1.9 High quality urban design is not just about ~~the~~ planning, design and delivery ~~phases~~. Appropriate arrangements must be put in place to ensure ~~the~~ long ~~-~~term success ~~of this regeneration project~~. Materials in buildings, streets, spaces and infrastructure should be designed to last and these elements need to be robust, resilient and coordinated. OPDC will work with developers to appropriately secure arrangements for the successful long-term management of the area to ensure that design quality maintains good growth and supports lifetime neighbourhoods.

~~1.15~~ 1.10 A lack of speed, innovation and skills within the construction industry has impacted on the ability to deliver new homes and jobs at pace. However, increasing efficiency and effectiveness in advanced construction techniques can help to speed up delivery and would be supported. This innovation could help OPDC exceed its homes and jobs targets (see policies SP4 and SP5). This may include ~~approaches~~ precision manufacturing techniques such as modular off-site construction, 3D printing of materials and automation.

~~1.16~~ 1.11 The proliferation of technology and transformational change to our environment and society will require cities and development that are designed with flexibility in mind. Buildings and infrastructure will need to stand the test of time and so far as is possible, be future proofed and adaptable. Development proposals will be expected to consider how buildings, land uses and spaces may need to adapt over ~~their lifetimes to meet changing requirements, whilst delivering a range of benefits and services~~time. OPDC's Smart Strategy ~~also~~ identifies how innovations in technology could be practically embedded within development. Policy EU11 in the Environment and Utilities chapter sets out OPDC's expectations for how development proposals should plan for, and future-proof for, innovations in technology.

Commented [TC17]: Specific amendment.
Reason: To reduce repetition in supporting text and to reference new standards in the London Plan and London Environment Strategy

Commented [TC18]: Specific amendment.
Reason: To reduce unnecessary repetition in the supporting text.

Commented [TC19]: Specific amendment.
Reason: To reduce supporting text

Commented [TC20]: Specific amendment.
Reason: To reduce supporting text

DRAFT

1.12 Creating high quality environments that are resource efficient is part of the world-wide development agenda. The benefits of resource efficient design includes reduced carbon emissions, lower operating costs, better build quality, healthier lifestyles, more social integration and less reliance on scarce ~~imported~~ resources. Resource efficiency should be addressed through careful design ~~of infrastructure, buildings, roads, public realm and parks~~, with management and maintenance considerations factored in from the start. Development should consider how it would fit into a wider integrated system ~~across the area and where appropriate, take a coordinated approach to design, delivery, operation and management of development~~(see Policy SP10). ~~The requirements for this approach are expanded further in Policy SP10~~. ~~Behavioural change is also an important prerequisite of resource efficiency. Changing behaviour is easiest where provision of infrastructure and services (transport, mixed use development, public realm etc.) offers people the opportunity to make low carbon lifestyle choices. Opportunities to promote the sharing economy as a way to increase resource utilisation could also build stronger networks within communities.~~

Commented [TC21]: Specific amendment.
Reason: To reduce supporting text

Commented [TC22]: Specific amendment.
Reason: To avoid repetition with the Environmental Chapter and shorten supporting text.

~~1.17~~ 1.13 OPDC has developed a Circular and Sharing Economy Study, which identifies specific measures that would support a shift to a more resource and space efficient place. Further details of how development proposals are expected to contribute to this are included in Policy EU7 and the recommendations from the Circular and Sharing Economy Study are embedded throughout the policies of thi~~s~~e Local Plan.

~~1.18~~ 1.14 Places are shaped by people and to ensure success, there is a need for ongoing dialogue with the communities and politicians that live and work in and around the area, to achieve active participation in place making. OPDC will strongly encourage developers to engage in a genuine and fair manner with the local community at a sufficiently early stage in the design of a development proposal, to enable local people to share their insight and knowledge. This open approach ensures local people are more informed and able to feed into the discussion around the challenging trade-offs that may be required (see Policy DI1). ~~for different planning application proposals, in particular, the need for new housing (including affordable housing), design and infrastructure. This fosters a strong working relationship between developers and communities. OPDC will also expect developers to engage early with OPDC and OPDC's Place Review Group. OPDC also operates a proactive and flexible pre-application engagement process.~~ OPDC's Statement of Community Involvement (SCI) sets out in further detail how developers should engage with OPDC and local communities and further policy requirements for community engagement and participation are set out in Policy DI3.~~.~~

Commented [TC23]: Specific amendment.
Reason: To avoid repetition with Policy D1.

Commented [TC24]: Specific amendment.
Reason: To reference further detail provided in Policy DI3.

DRAFT

POLICY SP3: IMPROVING HEALTH AND REDUCING HEALTH INEQUALITIES

Our proposed outcome

Creating a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities.

Proposals should ~~support the delivery of the spatial vision by~~:

a) **improv~~e~~ing health and reduc~~e~~ing health inequalities;**

b) **design~~ing~~ and operat~~ing~~e internal and external spaces ~~within development~~ to improve health and wellbeing, reduce health inequalities and enable healthy lifestyles.**

c) **ensur~~e~~ing adequate access to facilities and services that support health, wellbeing and healthy lifestyles; and**

d) **undertak~~e~~ing Health Impact Assessments (HIAs) as part of major development proposals, to assess the development's impacts on health. HIAs should include recommendations to mitigate any negative impacts of major developments on health and should be conducted early enough in the ~~application~~ planning process to influence the design and/or implementation of the proposal.**

Supporting Text

~~1.19~~ 1.15 There are marked health inequalities across London, such that people living in London's more deprived neighbourhoods have shorter life expectancy and spend a greater proportion of their lives in ill-health than those living in wealthier areas. It is recognised that our health and wellbeing is influenced by a wide range of determinants, including the physical and social environment. Planning decisions shape the physical environment and can therefore help promote healthy or unhealthy lifestyles. For example, access to open space and nature can enhance mental and physical health, promote physical activity, social interaction and employee satisfaction and productivity.

~~1.20~~ 1.16 The successful regeneration of the OPDC area will in part be judged on the future health, well-being and quality of life of the people living, working and visiting the area. Development proposals in the OPDC area ~~will be required to ensure~~should therefore demonstrably ~~that development~~ contribute~~s positively~~ to improved ~~the~~ health and wellbeing~~, of those living and working in the area.~~

~~1.21~~ 1.17 The quality of the outdoor environment is a major determinant of peoples' health, well-being and ability to live active and healthy lifestyles. Development will be expected to contribute towards a healthy place by ~~creating a~~delivering Healthy Streets that support active travel and a modal shift to more sustainable transport modes ~~walkable and cyclable city~~ (see Policy SP7), with environmental impacts appropriately mitigated (see Policies EU4, EU5 and EU13), supported by a network of easily accessible and inclusive buildings, social and community facilities (see Policies SP4 and SP5), open spaces and active play for all ages (see Policy SP8). Social interaction and development that supports shared learning will also contribute towards a healthier and happier society.

Commented [TC25]: Regulation 19(1) consultation amendment.
Reference: SP3/3, SP3/21
Reason: To recognise the Healthy Streets approach.

Commented [TC26]: Regulation 19(1) consultation amendment.
Reference: SP3/7
Reason: To recognised environmental impacts need to be appropriately mitigated.

DRAFT

~~1.22~~ 1.18 It is estimated1 ~~-~~that in developed countries people spend around 90% of their time indoors. Research shows that poor indoor air quality and poor quality daylighting, sound insulation, thermal comfort and internal design of buildings can have negative impacts on health and well-being. This can result in physical complaints, poor mental health and reduce quality of life and productivity. Applicants will be expected to work positively with OPDC and other key stakeholders to ensure that internal spaces are designed to ~~deliver~~ achieve a high quality environment ~~for people living, working and visiting the area~~. Factors such as air and water quality, daylight and sunlight, noise mitigation measures and access to open space and community services where people can interact and share ideas and facilities will be important factors to consider and further details on OPDC's requirements for this can be found in c~~C~~hapters 5 (Design) and 6 (Environment and Utilities).

~~1.23~~ 1.19 Health impact assessments (HIAs) help to ensure that health and wellbeing are fully considered as part of new development proposals. The process looks at the positive and negative impacts of a development as well as assessing the indirect implications for the wider community. The aim is to identify the main impacts and seek to maximise benefits and mitigate or avoid potential adverse impacts. HIAs should be undertaken at the earliest stage possible to ensure that any required alterations to proposals can be made with minimal disruption.

DRAFT

POLICY SP4: THRIVING COMMUNITIES

Our proposed outcome

Creating sustainable communities by providing a range of housing types and affordabilities, that meet local needs and that contributes to strategic needs. This will be supported by a range of high quality social infrastructure facilities that serve the current and future community.

Proposals should ~~support the delivery of the spatial vision by~~ promot~~ing~~e lifetime neighbourhoods, social cohesion and the integration of new and existing communities through:

a) **Protecting existing and providing new homes that help to meet a local and London-wide need by:**
   i. **providing a range of housing tenures, types and sizes that deliver mixed and inclusive communities; and**
   ii. **delivering at least ~~22,350~~20,100 additional homes between 2018-38 and supporting the attainment of an overarching 50% affordable housing target, measured in habitable rooms and subject to viability.**

b) **Delivering and/or contributing to new high quality social infrastructure and protecting and improving existing, ~~that~~ to meet~~s~~ the needs of the population in terms of its location, scale and phasing.**

Supporting Text

~~1.24~~ 1.20 The area's public transport access, coupled with the reservoir of ~~supply of~~ brownfield land mean Old Oak and Park Royal can make a significant contribution towards meeting ~~local and London-wide~~ housing needs. The London Plan identifies that the Old Oak and Park Royal Opportunity Areas have the capacity to deliver a minimum ~~new~~ of 25,500 new homes. OPDC's Development Capacity Study demonstrates ~~how this can be achieved and identifies~~ that at least 20,100 new homes ~~minimum of 22,350 of these~~ are deliverable within the Local Plan period (2018-38). This quantum of housing enables OPDC to meet its objectively assessed need as well as contribute towards meeting housing need in the London Boroughs of Brent, Ealing and Hammersmith and Fulham and London-wide housing need (see Policy H1 and figure x).

~~1.25~~ 1.21 Delivering this quantum of housing across the OPDC area will require high density living and working and mixed use development with layering of uses. However, building at high density does not remove the need for a diversity and mix of housing types and sizes. OPDC's Strategic Housing Market Assessment (SHMA) ~~and the GLA's SHMA respectively~~ identifies~~y~~ the need for approximately 50% of homes to be affordable and within this, there is a significant need for affordable family housing. To ~~support this~~meet this need, development proposals will be expected to contribute towards ~~meeting the~~an overarching target to deliver 50% affordable housing, measured in habitable rooms. Given the complexity of developing land across this ~~area~~ challenging brownfield site and the level of infrastructure needed to unlock development, viability on individual planning applications will need to be considered in detail (see Policy H2) ~~and~~ to inform and determine the level of affordable housing that can be delivered on each site. ~~Further details on OPDC's approach to affordable housing is set out in Policy H2.~~

Commented [TC27]: Specific amendment.
Reason: To reflect new homes targets in the Development Capacity Study

Commented [CH28]: Regulation 19(1) consultation amendment.
Reference: SP4/13
Reason: to clarify that NPPF requirements for meeting OAN can be met in addition to meeting city-wide housing needs

DRAFT

~~1.26~~ 1.22 There is also a need for a variety of types of homes. This will ~~,~~ includ~~ing~~e housing to own and rent, at a range of values, homes to meet the needs of small and large families and specialised housing that would meet the needs of particular groups such as older people, disabled people, students and gypsies and travellers. OPDC will require delivery of a mix of homes to meet these varying needs and to support a mixed and balanced community, ~~supporting~~ that will ensure community cohesion and lifetime neighbourhoods. These different forms of housing should be mixed across the area and potentially within buildings. This can help to integrate different sections of the community and can have benefits in terms of space efficiency. The Humanitas scheme in Deventer, Holland provides a recent example of how the approach to mixing housing typologies could be further developed (see OPDC Precedents Study). The Housing Chapter also provides further policies for the delivery of a variety of housing types within the OPDC area.

~~1.27~~ 1.23 An important element for the integration of existing and new communities will be the design, phasing and location of new social infrastructure and improvements to existing social infrastructure, where required. These facilities, if designed to a high quality, will act as meeting points for residents, workers and visitors and will help to foster a strong sense of community and pride. They can also support interaction between different ethnicities, age groups, faiths, sexualities and cultures. OPDC will work with developers and service providers to ensure that new and improved facilities can meet the needs arising from development in the OPDC area in a phased manner and~~,~~ to ensure that facilities complement existing provision. Further details on the approach to social infrastructure can be found in Policy TCC4 and in the Places Chapter.

Commented [TC29]: Specific amendment.
Reason: To clarify that some social infrastructure maybe delivered through enhancements to existing infrastructure.

DRAFT

POLICY SP5: ECONOMIC RESILIENCE

Our proposed outcome

A strong, resilient and diverse economy, that allows existing businesses to thrive and grow and supports the introduction of new businesses to the area. A fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.

Proposals should ~~support the delivery of the spatial vision by facilitating the delivery of a sustainable, robust, resilient and fair economy that supports the delivery of 67,900 new jobs between 2018-38, across a range of employment sectors and skill levels, by~~:

a) support the delivery of 40,400 new jobs between 2018-38;

~~a)~~b) protect~~ing~~, strengthen~~ing~~ and intensify~~ing~~ the Strategic Industrial Location (SIL) in Park Royal;~~:~~

~~b)~~c) creat~~e~~~~ing~~ a new major commercial ~~hub~~ centre around Old Oak Common station;

~~c)~~d) deliver~~ing~~ a range of appropriate employment uses within designated town centres;

~~d)~~e) support~~ing~~ the provision of small workspaces across ~~both~~ Old Oak and Park Royal;

~~e)~~f) provi~~de~~~~ding~~ employment space across a range of sizes, types, tenures, forms and affordabilities;

~~f)~~g) design~~ing~~ ~~proposals~~ employment space to ensure ~~they are~~it is flexible and adaptable to changing needs;

~~g)~~h) secur~~e~~~~ing~~ employment and training opportunities for local people and procurement opportunities for local businesses; and

~~h)~~i) strongly encouraging contractors and building occupants to sign up to the London Living Wage.

Supporting ~~Studies~~Text

~~1.28~~ 1.24 The OPDC area is currently home to 1,700 businesses, employing 43,100 workers across a range of employment sectors and skills levels1. Today the area generates £2.1 billion annually in gross value added (GVA) to the UK economy. The area is home to a diverse range of economic sectors, with particular sector strengths in logistics, car repair and sales and food production; over 30% of London's food is produced within the OPDC area. The area also has a growing creative sector.

~~1.29~~ 1.25 The scale of change planned across the OPDC area will ~~is set to~~ make a significant contribution to the local, regional and national economy. The area has ~~the~~ capacity to accommodate ~~69,700~~60,700 ~~net additional~~new jobs, 40,400 new jobs ~~jobs; 67,900 of these could be delivered within the Local Plan period (2018-38)2~~over the next 20 years. It is estimated that these new jobs ~~additional jobs~~ could generate a minimum £7.6 billion GVA per annum to the UK economy, thereby driving economic prosperity both locally and nationally.

1.26 The diversity of character across the OPDC area will support the delivery of a range of employment ~~sectors and different skills~~opportunities. Park Royal is London's largest industrial estate and is designated as a Strategic Industrial Location (SIL) in the London Plan. Protecting the SIL in Park Royal is vital to the London economy and opportunities should be taken to intensify its use where feasible (see Policy E1).

Commented [TC30]: Specific amendment.
Reason: To reflect new jobs targets in the Development Capacity Study

Commented [TC31]: Regulation 19(1) consultation amendment.
Reference: SP5/25
Reason: To clarify job capacity relates to new jobs.

Commented [KT32]: Regulation 19(1) consultation amendment.
Reference: SP5/25
Reason: To clarify job capacity relates to new jobs.

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1.27 Outside of SIL, the focus will be on creating a vibrant range of employment uses as part of mixed use development, focussed on the creation of a major new commercial centre around the new Old Oak Common station. This new commercial centre will be able to capitalise on the station's excellent future connections to the Midlands and the north of England, Central London and Canary Wharf, and its easy access to Heathrow and Gatwick Airports. It will make a significant contribution to London's commercial space pipeline, at a time when other large commercial projects in London at a time when other current major regeneration schemes would be completed, or nearing completion, such as Kings Cross, Paddington and White City. This new commercial centre will be supplemented by further employment uses consisting of:

- town centre uses within OPDC's new town centre hierarchy (see Policy SP6); and
- provision of smaller employment spaces that could provide relocation opportunities for businesses affected by redevelopment (see Policy E2).
-

~~1.30 Within Old Oak, the focus is to provide a new commercial hub around Old Oak Common Station with new town centres at Old Oak High Street, North Acton and Atlas Roundabout (see Policy SP6). The commercial hub at Old Oak would be able to access an employee catchment of millions, through access to the Elizabeth Line, National Rail, HS2 and by virtue of the new Old Oak Common Lane station, the London Overground. OPDC's Future Employment Growth Sectors Study shows that this commercial hub would be attractive to a range of sectors, particularly business and professional services, Information and Communications Technology (ICT), media and creative services, food retail and low carbon.~~

1.28 The communities around OPDC suffer from significant economic deprivation with higher than average unemployment rates, lower than average skills levels and high levels of income deprivation. Located in what is currently a deprived part of London, OPDC will expect development proposals to ensure that the increase in employment opportunities benefit local people (see Policy E24).

1.29 Across both Old Oak and Park Royal, OPDC will promote and secure a range of employment spaces sizes and land uses, that support a variety of employment sectors and that provide employment opportunities over a range of skills levels. This will enable local people and Londoners to access a genuine choice of career paths. ~~the delivery of~~Securing small business spaces and low-cost/affordable workspace will be vital to supporting the establishment and growth of new businesses in the area ~~, both within identified employment locations and also within more residential led areas of the development, subject to their impact on amenity being appropriately mitigated~~ (see Policy E3).

~~1.31 Figure xx shows the sectors likely to continue to grow and/or establish in the OPDC area over the next 20-30 years. These sectors reflect that the area will be able to build on the success of the established industries in the area and establish new sectors positioning Old Oak and Park Royal as a diverse, resilient and innovative employment location. OPDC will work with developers, local businesses and other stakeholders to consider ways that existing businesses can remain competitive and expand and that emerging sectors can be attracted to the area and can be supported and sustained.~~

~~1.32~~

Commented [PF33]: Specific amendment.
Reason: To align with amended policies E1 and E2 and to emphasise the key role of the new commercial centre

Commented [PF34]: Specific amendment.
Reason: To avoid repetition with Policy P2.

Commented [TC35]: Specific amendment.
Reason: Relocated from below to aid the flow of the supporting text.

Commented [PF36]: Specific amendment.
Reason: To align with amended policies E1 and E2.

Commented [PF37]: Specific amendment.
Reason: To align with policy E3.

~~1.33 Park Royal is London's largest industrial estate and is designated as a Strategic Industrial Location (SIL) in the London Plan. Protecting the SIL in Park Royal is vital to the London economy and opportunities should be taken to intensify its use where feasible. New jobs in Park Royal Neighbourhood Centre will also further supplement Park Royal's employment offer. In Old Oak, land is being de-designated from SIL (approximately 87 hectares) in order to support the redevelopment of new homes and jobs. This is shown on figure 9.2, page 230. More detailed information on this in provided in OPDC's Industrial Land Review.~~

~~1.34 New employment will be encouraged across a variety of sectors, providing employment to a range of skills levels that will enable local people and Londoners to access a genuine choice of career paths. To support this, OPDC will seek a range of employment space sizes, typologies forms and affordabilities that will help to strengthen and diversify the local and London economy. More details on OPDC's requirements for this can be found in Policies E2 and E3.~~

~~1.35 The sectors likely1 to experience growth in Old Oak and Park Royal over the next 20-30 years are indicated in Figure 9.3 (Employment Chapter). These sectors reflect that the area will be able to build on the success of the established industries in the area and establish new sectors positioning Old Oak and Park Royal as a diverse, resilient and innovative employment location. OPDC will work with developers, local businesses and other stakeholders to consider ways that existing businesses can remain competitive and expand and that emerging sectors can be attracted to the area and can be supported and sustained.~~

Commented [PF38]: Specific amendment.
Reason: To avoid repetition with policies E1 and E2.

~~1.36~~ Building a successful new part of London will require employment provision that is resilient and flexible to changing economic cycles and ways of working. OPDC will work with developers to ensure that employment space is provided to be readily adaptable in terms of its size and fit out.

~~1.37~~ 1.30 ~~The communities around OPDC suffer from significant economic deprivation with higher than average unemployment rates, lower than average skills levels and high levels of income deprivation. Located in what is currently a deprived part of London, OPDC will expect development proposals to ensure that the increase in employment opportunities benefit local people and support economic fairness, by providing employment opportunities over a range of sectors and skills levels, including provision of affordable workspace. More details on OPDC's requirements for this can be found in Policy E3.~~

Commented [TC39]: Specific amendment.
Reason: Relocated above to aid the flow of the supporting text.

Commented [PF40]: Specific amendment.
Reason: To avoid repetition with policy E3.

~~1.38~~ 1.31 OPDC is ~~also~~ working closely with educational institutions, developers, surrounding local authorities and other public, private and third sector bodies to ensure that programmes are put in place to support local training and employment initiatives, both during and post construction. ~~The requirements associated with this are contained in Policy E5.~~ OPDC is also keen to enable local businesses to benefit from procurement opportunities and is developing a local business directory to support this ambition.

Commented [TC41]: Specific amendment.
Reason: To recognise further work underway by OPDC.

~~1.39~~ 1.32 High property costs and living costs mean that in-work poverty is a key issue for Londoners. Paying the London Living Wage is a step that~~they~~ can be taken to address the problem of in-work poverty. Evidence shows3 that as well as benefitting workers, paying the London Living Wage benefits business, reducing absenteeism and sick leave, helping with staff recruitment and retention, boosting staff morale and productivity and improving brand awareness. OPDC will work with the host local authorities, business groups and businesses in the area to support the implementation of the London Living Wage across all business sectors in the OPDC area and through the planning process, will work with developers to ensure that contractors and business occupants of new developments are signing up to the London Living Wage. Informatives on the London Living Wage will be provided on planning decision notices.

Commented [TC42]: Specific amendment.
Reason: To clarify implementation

DRAFT

SP6: PLACES AND DESTINATIONS

Our proposed outcome

Creating a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres.

Proposals should ~~support the delivery of the spatial vision by~~:

a) **support~~ing~~ a coordinated and phased approach to place making that:**
   i. **creates a series of high quality and distinctive places and clusters as set out in chapter 4;**
   ii. **delivers a range of meanwhile and catalyst uses; and**
   iii. **supports the creation of a new ~~c~~Cultural ~~q~~Quarter in Old Oak;**

b) **deliver~~ing~~ and support~~ing~~ a new town centre hierarchy, that offers a range of town centre uses, serving the needs of the development and that complements surrounding town centres. Proposals should support the delivery of the following hierarchy:**
   i. **Old Oak ~~High Street~~ – a ~~new~~ major town centre across Old Oak, that delivers a wide range of town centre and community uses. The policy requirements for this centre can be found in policies ~~SP7,~~ P1, P2, P3, P7, P8 and P11;**
   ii. **North Acton – a neighbourhood town centre, focussed around North Acton station, Victoria Road and along Portal Way. The policy requirements for the centre can be found in Policy P7C1;**
   iii. **Park Royal Centre – a neighbourhood town centre in the heart of the Park Royal Industrial Estate. The policy requirements for the centre can be found in Policy P6; and**
   iv. **Atlas Junction – a neighbourhood town centre serving existing and new communities around Old Oak Lane, Old Oak Common Lane and Victoria Road. The ~~P~~policy requirements for this centre can be found in Policy P8C1.**

SUPPORTING TEXT

~~1.40~~ 1.33 ~~Although only 650 hectares in size, there is a~~there is a variance across the OPDC area in terms of land use, transport access, environment, topography, communities and heritage. ~~This variation presents opportunities for new development to create vibrant and distinct places and clusters that respond to these features.~~ It will be important that development ~~provides~~ continues this variety in character, which will help to ~~ranging from quiet or residential areas through to bustling town centres and a new major commercial hub. This variation in character will be critical to~~ foster~~ing~~ communities and creat~~e~~ing a sense of identity and pride.

~~1.41~~ 1.34 To support this, chapter 4 (Places) identifies 12 places, with associated policies. Within these places, the Local Plan also identifies a series of 'clusters', which are characterised as locations that are likely to attract higher footfall and/or have a particular use and as such, warrant more detailed policy. ~~These places and clusters celebrate their respective distinctiveness in terms of current context and future development approaches.~~

Commented [TC43]: Regulation 19(1) consultation amendment.
Reference: SP6/8
Reason: to ensure that place-making is high quality.

DRAFT

~~1.42~~ ~~1.35~~ Within the Places and Clusters, proposals should support the delivery of a series of distinct but connected neighbourhoods. ~~This will help foster a unique character and support place making.~~ Neighbourhood planning can play a key role in helping to inform the character of these neighbourhoods (see Policy DI3).

~~1.43~~ ~~The Local Plan also identifies a series of larger sites that are likely to come forward for development and contribute to OPDC's homes and jobs targets. Known as Site Allocations (see Policy SP10), these are located within relevant Places and set minimum homes and jobs targets for these sites.~~

Commented [PF44]: Specific amendment.
Reason: To avoid repetition with policy SP10.

~~1.44~~ ~~1.36~~ The comprehensive redevelopment of Old Oak and intensification of Park Royal will take many years. ~~It is important that during redevelopment, new and enhanced places can continue to function.~~To support place making, ~~Active places will be achieved by~~ it will be important to ensur~~e~~ing that development phasing establishes a range of activity early on ~~and creates a high quality environment, in terms of the design quality of buildings, infrastructure and the public realm~~. To support the early activation of new neighbourhoods, meanwhile and catalyst uses could play an important role, especially where they help to establish the long-term character of the area.

~~1.45~~ ~~1.37~~ Meanwhile uses will help create a sense of place and provide services for new and existing residents and employees. They can also provide opportunities for entrepreneurs and start-ups and help existing businesses to expand. OPDC's Precedents Study provides case study examples of how the provision of early uses such as open space, culture, art, retail and business space can support this. However, there is a risk that these uses can often be pushed out once more permanent structures are built. OPDC is keen to ensure that these occupiers are ~~not lost and that mechanisms are put in place to ensure that these businesses can~~provided opportunities to occupy spaces within new developments into the long term (see Policy TCC9).

~~1.46~~ ~~1.38~~ Catalyst uses1 that range in size from small to large can help draw people into the area and help it to become a recognised and successful part of London where people want to live, work and~~,~~ visit ~~and play~~. Such uses could include culture, sports, leisure, business, education or health facilities. The new station at Old Oak Common will ~~in~~ itself, be a major catalyst for the regeneration of the area; however, given the scale of regeneration in the OPDC area, it is likely that a range of supporting catalyst uses could be secured that complement one another and help bring a range of different people to the area at different times. Regeneration in Kings Cross and in the London Legacy Development Corporation (LLDC) provide useful precedents for how a range of early phase catalysts can support place making. ~~In Kings Cross, this has included the Francis Crick Institute (see figure 3.7) and University of the Arts London, while in the LLDC a range of catalyst use facilities have been delivered including the London Stadium, London Aquatics Centre, Here-East, Westfield, and the planned Cultural and Education District.~~ The criteria for the consideration of catalyst uses are included in Policy TCC8.

Commented [PF45]: Specific amendment.
Reason: To avoid repetition with place policies.

~~1.47~~ ~~1.39~~ OPDC's Cultural Principles document sets out how the OPDC area~~,~~ and in particular Old Oak, could play a significant role in supporting the Mayor's aspirations to promote London as the world's cultural and arts capital as set out in the Mayor's Draft Culture Strategy. This could be achieved by supporting new and enhanced catalyst, cultural, arts, night~~-~~time and meanwhile uses. OPDC will work with the GLA, neighbouring local authorities and developers to ensure that cultural provision in the area supports the creation of a new ~~c~~Cultural ~~q~~Quarter in Old Oak that can complement nearby cultural clusters and contribute to London's wider cultural offer.

DRAFT

1.40 A key facet to place- -making in the OPDC area will be the location, role and function of its town centres. The town centre hierarchy consists of four centres (see figure 3.4), serving the needs of its existing and future residents, workers and visitors. The hierarchy consists of a new major town centre in Old Oak , ~~, called Old Oak High Street~~ and three neighbourhood town centres: two new centres at North Acton and Atlas Junction and the continuation and expansion of Park Royal Centre. Each town centre will have its own character and mix of uses that support social interaction and thriving communities. OPDC's town centre hierarchy will need to ensure it maintains its resilience and adaptiveness to changes in the way services are provided, in accordance with Policy SP2.

~~1.48~~

~~i.~~ Old Oak ~~High Street~~Major Town Centre will play a particularly important role in place making and in creating an identity. ~~Achieving the right design, delivery and operation of this street is vital to the long term success of the OPDC area and integration with its surroundings.~~

~~Proposals should contribute to and support the delivery of a well-defined, active and positive Old Oak High Street frontage. Development along the High Street will need to deliver a range of town centre uses to serve the needs of those living, working and visiting Old Oak. The High Street will become a focal point for social interaction and integration. The High Street's function and character change and vary along its length in response to changing local character. The character of the High Street within the commercial hub around Old Oak Common station will be different to its character within Old Oak North, where development will be residential led. Further details on how development will be expected to support and deliver this can be found in the place policies for Old Oak South (P1), Old Oak North (P2), North Acton and Acton Wells (P7),Old Oak Lane and Old Oak Common Lane (P8) and Willesden Junction (P11). Details on how proposals should support the delivery of the High Street as a key early route in the OPDC area are contained in Policy SP7.~~

Old Oak ~~High~~ Major Town Centre~~Street~~ does not yet exist, but its identification arises from the current projects for homes, jobs and interchange passengers in Old Oak. ~~The associated town~~This proposed new major town centre ~~need arising from the proposed town centre network~~ is considered to complement the wider town centre network2.

~~1.49~~ 1.41 It is important to set the trajectory and scale for this new centre now to ensure the provision of town centre uses are aligned with the planned number of homes and jobs. This will allow both the OPDC Local Plan and those of neighbouring authorities to plan for the consequences of ~~a~~ this new centre.

~~1.50~~ 1.42 Early development phases to the north of the Grand Union Canal will be expected to accord with this designation. When Old Oak Common station is operational, a significant portion of the centre is likely to have been built and/or planned. At this point, OPDC will be able to better understand the functioning of the centre and whether there may be a need to re-consider the designation of the centre as a metropolitan town centre. Any re-designation would need to be undertaken as part of a future Local Plan review and in line with the requirements of the NPPF and London Plan.

Commented [PF46]: Specific amendment.
Reason: To avoid repetition with policy TCC1 and place policies.

~~1.51~~ 1.43 OPDC has also designated neighbourhood centres in North Acton, Park Royal and Atlas Junction, to serve the local communities of workers and residents in and around these locations. Similar~~il~~y to Old Oak ~~High Street~~, the North Acton and Atlas Junction ~~stations~~ centres are not yet established neighbourhood town centres. This Local Plan sets the trajectory for the future scale of these centres and development proposals will be required to contribute towards their delivery. Park Royal Centre was previously designated in Ealing's Local Plan. OPDC supports this centre's continued growth, to support the envisaged increase in jobs and homes in Park Royal. Details on the function and character of each of the designated centres can be found in the following policies in the Places Chapter (chapter 4):

a) Old Oak ~~High Street~~ (Policies P1, P2, P3, P7, P8 and P11);
b) North Acton (P7);
c) Park Royal Centre (P6); and
d) Atlas Junction (P8).

~~1.52~~ 1.44 Whilst this policy promotes flexibility to be able to respond to changing circumstances, it is also recognised that the delivery of these new town centres cannot proceed unchecked and policies in Chapter 10 set out controls to ensure that these new town centres provide for needs and support the existing town centre hierarchy.

Commented [TC47]: Regulation 19(1) consultation amendment.
Reference: SP6/3
Reason: To correctly refer to centres.

DRAFT

POLICY SP7: CONNECTING PEOPLE AND PLACES

Our proposed outcome

Delivering a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport.

Proposals should ~~support the delivery of the spatial vision by creating or~~ contribut~~e~~ing to a high quality, safe and accessible movement network which:

a) **delivers sufficient transport infrastructure ~~required~~ to support the planned growth in the OPDC area;**

~~a)~~

b) **supports the delivery of OPDC's Sustainable Transport Hierarchy by:**
   i. **minimising the need to travel;**
   ii. **~~promoting~~ delivering healthy streets, that appropriately prioritise walking and cycling to encourage active travel;**
   iii. **delivering a high quality, frequent, reliable and well connected public transport network, that optimises Public Transport Accessibility Levels (PTALs);**
   iv. **~~minimising the need for~~discouraging the use of private motorised vehicles and limiting car parking;**
   v. **ensuring the efficient servicing of ~~land uses~~sites; and**
   vi. **supporting the successful functioning and operation of the Park Royal Industrial Estate, by implementing~~through~~ carefully planned servicing arrangements;**

c) **delivers an efficient, safe and accessible transport network that embraces innovations in technology;**

d) **embeds transport infrastructure into the built environment and carefully plans and coordinates utility infrastructure provision as part of the delivery of the transport network;**

e) **delivers and/or contributes to a new and enhanced street network that connects the Places of Old Oak and Park Royal together and connects into the surrounding areas including:**
   i. **enhancements to existing streets;**
   ii. **a new movement network across Old Oak comprised of the key ~~streets~~ routes ~~of Old Oak High Street, Park Road, Grand Union Street and Wormwood Scrubs Street~~as shown in figure xx;**
   iii. **new connections to Old Oak Common Station ~~for when it opens if proven to be feasible and if it does not affect its timely and cost effective delivery~~; and**
   iv. **new and enhanced pedestrian and cycle connections into Wormwood Scrubs;**

f) **supports upgrades to the strategic road network and Transport for London Road Network, including the A40 and A406;**

g) **supports delivery of ~~a new~~ Old Oak ~~High~~ Street and Park Road:~~, by ensuring:~~**
   i. **as early as is feasible and practicable;as new though routes for walking cycling and where feasible, buses and providing access only for private vehicles;**
   ii. **as active streets, providing town centre, employment and community uses and primary shopping areas at the intersections with other key routes and around rail stations; and**

Commented [PF48]: Specific amendment.
Reason: To reflect Health Streets approach and align with policy T4.

Commented [PF49]: Specific amendment.
Reason: To align with policy D3.

Commented [TC50]: Specific amendment.
Reason: To clarify implementation of policy.

DRAFT

i. primary shopping areas are focussed directly onto the street, around rail stations and at key junctions with other key routes;

ii.iii. it seamlessly connects the five stations of Old Oak Common, Willesden Junction and Hythe Road, Old Oak Common Lane and North Acton to surrounding neighbourhoods;

iii. the street is delivered as early as is feasible and practicable;

iv. it delivers continuity along the street in terms of street widths and a high quality public realm;

v. it delivers a high quality movement route for walking, cycling and where feasible, buses and other vehicles;

vi. it includes a range of high quality green infrastructure, including mature tree planting and where feasible, waterspaces that are integrated into wider green infrastructure networks; and

vii. it optimises the levels of daylight and sunlight that the street receives and minimises other negative environmental impacts such as wind and urban heat island effect;

h) supports the delivery of a new Park Road, that:

i. connects Old Oak Common Lane to Scrubs Lane;

ii. provides an early all modes connection between Old Oak South and Old Oak North;

iii. is an active street, including town centre uses at locations identified in the places chapter; and

iv. includes workspaces and meanwhile town centre uses at the ground floor along its length; and

i)h) **promotes the use of the Grand Union Canal as a movement route.**

SUPPORTING TEXT

1.53 1.45 The ambition is to create a state of the art transport network that increases the area's public transport accessibility level to enable an optimised approach to development that can help support the economic sustainability of the UK, London and the local economy. There is an opportunity to deliver a transport network that achieves exemplar standards of environmental sustainability and enables people to live active and healthy lifestyles and deliver on the Mayor's mode share target for over 80% of journeys in London to be made by walking, cycling or public transport.

1.54 To achieve tThis will require a significant amount of new transport infrastructure. Figure 3.8 identifies some of the key transport interventions required to unlock the regeneration of this part of London.

Commented [TC51]: Specific amendment.
Reason: To reflect outputs from the Old Oak North Masterplan Framework Principles

Commented [TC52]: Specific amendment.
Reason: To remove repetition with the place policies.

Commented [PF53]: Specific amendment.
Reason: To avoid repetition with policies D2 and T1.

Commented [PF54]: Specific amendment.
Reason: To avoid repetition with policies SP8 and EU2.

Commented [PF55]: Specific amendment.
Reason: To avoid repetition with Policy D6.

Commented [PF56]: Specific amendment.
Reason: To reflect updated connectivity evidence base.

Commented [PF57]: Specific amendment.
Reason: To reflect updated land use distribution evidence base.

Commented [PF58]: Specific amendment.
Reason: To avoid repetition with policy TCC9.

Commented [PF59]: Specific amendment.
Reason: To reflect the Mayor's Transport Strategy aspirations.

DRAFT

1.46 The planned Old Oak Common station is central to transforming the transport accessibility of the area. The scale of change in transport accessibility will be unique and provides an unparalleled ~~catalyst~~ opportunity for transit orientated development. ~~New and improved stations will provide~~The station will offer fast and frequent connections nationally to Birmingham and Manchester via HS2, to the west country via the Great Western Main Line, and regionally and locally to Heathrow, Ealing, ~~and~~ the West End and ~~,~~ the City via the Elizabeth Line~~, and locally, to nearby communities such as Acton, Ealing and Paddington via the Great West Main Line~~. Existing and ~~proposed~~ potential London Overground stations at Willesden Junction, Hythe Road and Old Oak Common Lane and enhancements to London Underground stations within the area, will further supplement this, providing connections to Acton, White City, Richmond, Clapham Junction and Stratford. The transport enhancements in Old Oak need to enable the area to achieve a minimum PTAL of 6b to support an optimised approach to development (see policies P1 and P2). In Park Royal, enhancements to the bus network will also increase the area's PTAL.

1.47 In addition to these known proposals for enhanced rail services, OPDC will also support other future proposals for rail services and stations serving the OPDC area, where this helps to improve public transport access and does not undermine the timely delivery of homes and jobs targets in the area.

~~1.55~~

~~1.56~~ 1.48 OPDC will work with a variety of stakeholders to support the delivery of new and enhanced rail stations and services. It will be important to ensure that rail stations are well connected into their surroundings, can support surrounding development and achieve high standards of design that contributes to place making and a sense of arrival (see Policy T5). As part of this, it will be important to provide a seamless interchange between transport modes and stations and the surrounding street network.

~~1.57~~ 1.49 It is important that these large-scale transport projects are also supported by a range of more localised projects. These include new and enhanced bus routes and frequencies and improved walking and cycling environments. Further details can be found in the Transport chapter and OPDC's Infrastructure Delivery Plan (IDP).

1.50 ~~New development will need to support the delivery of new and enhanced transport infrastructure.~~ OPDC's Sustainable Transport Hierarchy (see figure 3.9) promotes the creation of Healthy Streets and a transition to an environmentally sustainable city. The priority is to minimise people's need to travel and need for and use of private vehicles. This approach is supported through other ~~strategic~~ policies in this plan, which promote the creation of a high density and highly compact, layered ~~–~~city form that puts local services within easy reach. The Healthy Streets Approach will be championed to ensure that where people do need to travel, they choose healthy, environmentally friendly ways to do so (see Policy T1). This should be achieved by delivering a high quality, attractive, accessible and inclusive public realm that not only provides people with the choice to walk and cycle but that actively incentivises these more sustainable types of movement–, through the quality of the environment and supporting infrastructure (see Policy D2).

Commented [TC60]: Specific amendment.
Reason: To reflect that the transport network needs to optimise PTAL levels.

Commented [TC61]: Specific amendment.
Reason: To acknowledge the potential for other rail lines and services to help support enhanced PTALs in the area.

DRAFT

1.51 It is recognised that for certain operations, such as servicing, deliveries and construction, it will be more challenging to adhere to the hierarchy. Businesses are likely to require some vehicle movement by road, particularly for servicing and deliveries and while this will need to be supported, the impacts from their movements will need to be carefully planned so as to mitigate any negative impacts (see Policy T7). Proactive strategies that reduce the need to travel, in particular for employees, will need to be implemented. OPDC is working with a variety of stakeholders to develop approaches for how businesses can work together to consider the consolidation of servicing and deliveries. This includes encouraging new models that reduce traffic and the trialling of new technologies, such as cloud based freight consolidation, drones and automated vehicles.

1.52 Given the scale of development planned for the area, construction will be a huge challenge. Reducing the need to travel will again be important for this. OPDC has developed a Construction and Logistics Strategy. This sets out mechanisms to minimise construction impacts by coordinating approaches to construction management and ensuring the utilisation of more sustainable transport modes, where necessary. OPDC's Circular and Sharing Economy Study also sets out a number of approaches to support the re-use of construction waste (see Policies EU6, EU7 and EU8).

Commented [TC62]: Specific amendment.
Reason: Relocated from further down in the supporting text so that the supporting text follows the ordering of the policy.

~~1.58 Delivering Healthy Streets will play an important role in supporting OPDC's Sustainable Transport Hierarchy and help to improve health and reduce health inequalities, in accordance with Policy SP3. The health benefits resulting from well-designed streets goes far beyond the physical activity that people get walking and cycling in the city. Figure 7.2 (Transport Chapter) identifies the ways that Healthy Streets can function from a wider health and well-being perspective. Further details on OPDC's approach to Healthy Streets can be found in Policy T1.~~

Commented [PF63]: Specific amendment.
Reason: To avoid repetition with policy SP3.

~~1.59~~ To support the sustainable regeneration of the area, development will be required to deliver and/or contribute to the creation of a series of high quality and accessible streets, connecting the area seamlessly with its surroundings. This will ensure that existing and future communities can benefit from the transport improvements, services and employment opportunities on offer in the OPDC area and vice versa. Figure 3.8 identifies the movement hierarchy in the OPDC area. In Park Royal, the focus will be on enhancing the function of the streets for all modes and improving their environment. In Old Oak, Scrubs Lane, Old Oak Lane, Old Oak Common Lane and Victoria Road are home to existing residential communities and businesses. They will be an important location for early development phases and development along these routes will play a key role in helping to knit together existing and new communities in the area. A new street network should be arranged to connect to these existing streets together and provide improved connectivity, focussed on the 3 new key routes of Old Oak ~~High~~ Street, Park Road and Wormwood Scrubs Street. The exact location and design of these new streets will need to be informed over time through more detailed work. ~~OPDC's Public Realm, Walking and Cycling Strategy identifies that new development should support the delivery of four new key routes:~~

~~1.60 Old Oak High Street;~~

~~1.61 Park Road;~~

~~1.62 Grand Union Street; and~~

~~1.63~~ 1.53 ~~Wormwood Scrubs Street~~

~~1.64 Each route will have a specific character and function that development proposals will need to contribute towards. The exact location and design of these new streets will need to be informed over time through more detailed work.~~

~~1.65 Ensuring new connections to Old Oak Common station for its planned opening in 2026 will ensure that existing communities and the people living and working in the new planned development in the Places of Old Oak and Park Royal will be able to access this station from the outset. Connections to this station should accommodate pedestrian, cycle, bus and other vehicles and should deliver the principles of the Healthy Streets approach where feasible.~~

~~1.66 New and improved connections into Wormwood Scrubs will be supported in principle and where they accord with other policies in the plan with regards design, transport and environmental impacts. Such connections will ensure that both existing and future communities will be able to access this important ecological and open space.~~

~~1.67~~ 1.54 Old Oak ~~High~~ Street will play a particularly important role in improving connectivity across the area, supporting place making and facilitating an optimised approach to regeneration. ~~The High Street1 will need to overcome significant barriers created by topography and infrastructure to create a new artery through the area. The High~~ Old Oak Street will connect ~~the~~ Old Oak's ~~five~~ rail stations ~~of Old Oak Common, Willesden Junction and Hythe Road, Old Oak Common Lane and North Acton~~. It will also connect to surrounding destinations, including Harlesden Town Centre, the Grand Union Canal and Wormwood Scrubs. Old Oak Street will need to overcome significant barriers created by topography and infrastructure to create a new artery through the area, meaning that the street will not be capable of accommodating all modes along its length, but where it is feasible to do so, its delivery as an all modes route should be prioritised, but with access only provided for private vehicles.

~~1.68~~ 1.55 The complete delivery of the ~~High~~ Old Oak Street may take many years. Development sites and new ~~rail~~ infrastructure (including rail) should facilitate, or where appropriate not preclude, its delivery by demonstrating how they help its longer term delivery. Early delivery of ~~the High~~Old Oak Street would be supported where it is demonstrated to be feasible. This approach would ensure surrounding areas can access the development area of Old Oak and new transport infrastructure as soon as is practically possible. ~~The High~~Old Oak Street ~~will need to~~should be animated with positive and active frontages where possible. This may include early meanwhile uses that help to animate this route in advance of comprehensive redevelopment. Primary shopping areas have not been indicated on OPDC's Policies Map as the exact alignment of ~~the High~~Old Oak Street and other streets is not yet fixed ~~and appropriate location for primary shopping areas may need to flex~~. However, when delivering ~~the High~~Old Oak Street, primary shopping areas should ~~front directly onto the street,~~ be clustered around rail stations, and at junctions with key routes such as ~~Grand Union Street~~Park Road, Old Oak Common Lane, Victoria Road and Harrow Road ~~and Park Road~~.

Commented [PF64]: Specific amendment.
Reason: To reflect updated connectivity evidence base from the Old Oak North Development Framework Principles

Commented [TC65]: Specific amendment.
Reason: Text re-ordered and amended for clarification.

~~1.69 The High Street crosses many 'places' (see chapter 4). Its character will vary; however, providing continuity along the length of the street in respect of its design and public realm, will be important in achieving a coherent place. This includes providing high quality and comfortable access to stations, an accessible and inclusive environment, consistent street widths and a detailed design approach that contributes to a unique sense of place, that prioritises walking, cycling and where feasible, bus routes and servicing. The High Street can make an important contribution to the area's green infrastructure network2. To support this, proposals will be expected to contribute to a high quality network of green and blue spaces along its length. This could include delivering a linear green boulevard. Provision should be made for a high quality of SuDS, mature tree planting and waterspaces, which can help to celebrate features such as the Grand Union Canal and historic Stamford Brook watercourse.~~

~~1.70 As a key public space within the development, proposals should ensure that the High Street has a high quality of amenity. As a major new town centre, tall buildings and high density development along the High Street will be supported. Development should seek to minimise their impacts on the daylight and sunlight levels of the street. Careful consideration should also be given to the impacts on other microclimate measures, such as wind turbulence, solar glare and urban heat island effect.~~

1.56 Park Road will be a key east-west route providing an important early ~~all modes~~ connection between Scrubs Lane and Old Oak Common Lane for pedestrians, cyclists and buses and access only for private vehicles. The Place policies (chapter 4) identify the ~~broad~~ locations along this route for town centre uses, but as a key early ~~connector~~ route, there will also be opportunities along Park Road for workspaces and other meanwhile town centre uses, delivered in advance of Old Oak ~~High~~ Street.

~~1.71~~ 1.57 Wormwood Scrubs Street's delivery is reliant on development being brought forward on the Intercity Express Programme (IEP) depot site. Whilst mixed use development on this site would be supported in principle, it has not been identified as a site allocation (see Table xx) and development on the site within the plan period may not happen given the existing rail uses. However, development on adjacent sites should not preclude the future delivery of this key route.

~~1.72~~ 1.58 Further details on the function and character of the other routes identified across Old Oak and Park Royal in Figure 3.8 can be found in the Places chapter (chapter 4) and in Policy T1. Routes will need to function effectively as movement corridors and also play an important role in shaping the identity of the area, supporting place making and realising OPDC's environmental sustainability ambitions for the area by promoting walking and cycling opportunities.

~~1.73 In accordance with the Sustainable Transport Hierarchy, development proposals will be expected to minimise the use of private vehicles as much as possible. This will be achieved by creating a high quality public transport and street network that incentivises walking and cycling, by minimising levels of car parking, promoting vehicle sharing to minimise the numbers of trips for those that do need to travel by private vehicle and by preventing through routes for private vehicles. It will mean that more space can be dedicated to the provision of a high quality public realm and green infrastructure, providing further benefits for health and well-being and the environment.~~

Commented [PF66]: Specific amendment.
Reason: To avoid repetition with policies D2, D3 and T1.

Commented [PF67]: Specific amendment.
Reason: To avoid repetition with policy SP8.

Commented [PF68]: Specific amendment.
Reason: To avoid repetition with policies D5 and D6.

Commented [PF69]: Specific amendment.
Reason: To reflect updated connectivity evidence base as part of Old Oak North Development Framework Principles.

Commented [PF70]: Specific amendment.
Reason: To recognise long-term potential for delivering Wormwood Scrubs Street.

Commented [PF71]: Specific amendment.
Reason: To avoid repetition with Healthy Streets approach and policy T1.

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~~1.74 It is recognised that for certain operations, such as servicing, deliveries and construction, it will be more challenging to adhere to the hierarchy. Businesses are likely to require some vehicle movement by road, particularly for servicing and deliveries and this should be supported but also carefully planned so as to mitigate any negative impacts (see Policy T7). Proactive strategies that reduce the need to travel, in particular for employees, will need to be implemented. OPDC is working with a variety of stakeholders to develop approaches for how businesses can work together to consider the consolidation of servicing and deliveries. This includes encouraging new models that reduce traffic and the trialling of new technologies, such as cloud based freight consolidation, drones and automated vehicles. For Park Royal in particular, the Park Royal Transport Strategy identifies how a series of transport interventions, such as improving the public realm and the walking and cycling environment, can incentivise those that do not need to travel by car to travel on more sustainable transport modes.~~

Commented [PF72]: Specific amendment.
Reason: To avoid repetition with policy T7 and place policies.

~~1.75 Given the scale of development planned for the area, construction will be a huge challenge. Reducing the need to travel will again be important for this. OPDC is working with TfL to develop a Construction and Logistics Strategy, which will set out mechanisms to minimise construction impacts by coordinating approaches to construction management and ensuring the utilisation of more sustainable transport modes, where necessary. OPDC's Circular and Sharing Economy Strategy also sets out a number of approaches to support the re-use of construction waste (see Policies EU6, EU7 and EU8).~~

Commented [PF73]: Specific amendment.
Reason: To avoid repetition with policy T8 and the Environment Chapter.

~~1.76 New pieces of transport infrastructure need to seamlessly integrate into the development. This means ensuring that new movement infrastructure serves to improve connectivity, legibility and place making. It should not create new barriers to movement and it should contribute to and integrate with the public realm and built form. A coordinated approach to the delivery of transport infrastructure is strongly encouraged given the scale of new intervention envisaged by this Local Plan. When delivering new transport infrastructure, developers should engage early with OPDC so that consideration can be given to whether coordinated approaches can be taken to the delivery of utilities infrastructure, in accordance with Policy SP10.~~

Commented [PF74]: Specific amendment.
Reason: To avoid repetition with policy DI1.

~~1.77~~ 1.59 The Grand Union Canal (Figure 3.10) is an important feature on the OPDC landscape. The canal is a well-used movement corridor, with the towpath providing convenient access for pedestrians and cyclists to both Old Oak and Park Royal and which provides excellent connections to the east and west. The canal is also popular with residential barges and there are a number of permanent and temporary moorings in the area. Historically, the canal was a key movement corridor for freight and OPDC is working with the Canal and River Trust, TfL, local authorities and developers to consider the potential for increased water-borne movement, including freight. Development proposals either side of the canal will also be required to improve access to the canal for pedestrians. Further details on how proposals should support this are provided in the Place polices (~~chapter 4~~see Policy P3).

POLICY SP8: GREEN INFRASTRUCTURE AND OPEN SPACE

Our proposed outcome

Contributing to the All London Green Grid by delivering new and enhanced green infrastructure and open spaces that provide for a range of functions, serving people and nature across the OPDC area.

Proposals should ~~support the delivery of the spatial vision and~~ deliver and/or positively contribute towards a varied, well-designed, integrated and high quality green infrastructure and open space network, by:

a) **providing for the needs of people living, working and visiting the area by:**
   i. **conserving and enhancing existing green infrastructure and open spaces identified in the Policies map. Any loss or relocation should accord with the requirements of Policy EU1;**
   ii. **providing sensitive enhancements and improvements to access existing open spaces; and**
   iii. **appropriately providing and/or positively contributing to new green infrastructure and open spaces, that meet the needs of the development in terms of their quantum, quality, access and function, including delivering 30% of the developable area outside of Strategic Industrial Locations (SIL) as publicly accessible open space in accordance with Policy EU1, including delivering 3 new local parks in Old Oak, each of at least 2ha;**

b) **improving the ecology of the area and ensuring an overall net gain in biodiversity by:**
   i. **conserving and enhancing existing biodiversity habitats. Any loss or relocation should accord with the requirements of Policy EU2; and**
   ii. **delivering and/or positively contributing to new biodiversity habitats.**

c) **successfully integrating with the wider green infrastructure and open space network~~s~~, including the Grand Union Canal, Wormwood Scrubs~~,~~ and All London Green Grid ~~and Blue Ribbon Network~~; and**

d) **ensuring that major development proposals are ~~accompanied by a~~delivered in accordance with an appropriate Green Infrastructure and Open Space Strategy and Management Plan.**

Commented [PF75]: Specific amendment.
Reason: To reflect updated terminology with the Draft New London Plan.

SUPPORTING TEXT

~~1.78~~ 1.60 Green infrastructure refers to the network of green spaces and water spaces and the way in which they are planned, designed and managed to provide a range of functions and benefits which are illustrated in figure 3.11. It includes open spaces such as parks, gardens, other spaces such as green roofs and walls, rain gardens (vegetated sustainable drainage systems (SuDS)) and trees within the public realm and 'blue' spaces such as waterways, ponds and fountains. Open space can also include more civic spaces such as station squares.

~~1.79~~ 1.61 The benefits of green infrastructure and open space can only be fully realised through the delivery of an appropriate quantum, quality and range of green infrastructure and open space and ensuring its appropriate maintenance and management over time. Green infrastructure and open space therefore needs to be carefully designed and integrated into the area and recognised as an essential part of the development.

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~~1.80~~ 1.62 There are a substantial number of existing green infrastructure and open space assets in the OPDC area, such as the Grand Union Canal, Wormwood Scrubs Park, Acton Cemetery and Wesley Playing Fields, whilst beyond the boundary are important spaces such as St. Mary's, Kensal Cemetery and Little Wormwood Scrubs. There are also a number of railway embankments and cuttings, which although not publicly accessible, provide green corridors through the site and are an important asset for wildlife.

~~1.81~~ 1.63 Figure 6.3 identifies the green infrastructure and open space assets in the OPDC area, including Sites of Importance for Nature Conservation (SINCs). These spaces should be conserved and enhanced, except for in exceptional circumstances where any loss is considered necessary to facilitate the comprehensive redevelopment of the area and where a proposed development can clearly demonstrate that the functions and benefits of the existing asset are being reprovided to an equal higher standard (see Policies EU1 and EU2). OPDC will support proposals for sensitive enhancements and improved access to existing spaces and will look to secure planning contributions to support this. ~~OPDC will also support enhanced access to existing spaces.~~

~~1.82~~ 1.64 Delivery of new open space and green infrastructure to serve the needs of both people and nature will be of paramount importance. ~~OPDC's Environmental Standards Study has looked at other major regeneration projects in London and identifies that given the proposed densities and aspirations in the Spatial Vision for development to create a high quality, sustainable and healthy development, a minimum of~~ 30% of the developable area outside of SIL should be provided as high quality publicly accessible open space. The priority within this should be the delivery of three new local parks of at least 2ha, across the Old Oak North and Old Oak South places. Figure 3.11 identifies indicative locations for these new local parks, as well as other new publicly accessible open spaces to be delivered in the OPDC area. Further details on the requirements for open space provision can be found in the places chapter ~~(Policies P1, P2, P3),~~ and in Policy EU1 (Open Space) ~~in the Environment and Utilities chapter~~and in OPDC's Infrastructure Delivery Plan (IDP). Development should also ensure that the regeneration of the area delivers a net overall increase in urban greening, to ensure that the area is biodiversity positive (see Policy EU2). ~~Further details on the requirements in relation to urban greening and biodiversity are set out in Policy EU2.~~

Commented [PF76]: Specific amendment.
Reason: To avoid repetition with policy EU1.

~~1.83~~ 1.65 London is supported by an existing network of green infrastructure and open space, known as the 'All London Green Grid' ~~and 'Blue Ribbon Network'~~. OPDC will work with neighbouring local authorities to ensure that a coordinated approach is taken to green infrastructure and open space delivery. ~~d~~Development proposals ~~within OPDC~~ should contribute to this network to ensure that their contribution to quality of life, to the environment and to the economy can be maximised.

~~1.84~~ 1.66 Wormwood Scrubs ~~Common~~ Park is Metropolitan Open Land (MOL). At over 68 hectares, it is of the scale of a Metropolitan Park as defined in the Mayor's London Plan. Creating an integrated green network that connects and enhances access from Old Oak and Park Royal to this space, whilst also managing visitor pressures and enhancing its functionality, will be critical in order that it can function as a space that can serve residents, workers and visitors from across the area, including within the OPDC area. Sensitive enhancements and improved access will be very important, whilst also maintaining and enhancing the site's ecological and wider ecosystem service benefits (see Policy P12).

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~~1.85~~ 1.67 Providing high quality new green infrastructure and accessible open space can be challenging at high densities, where particular consideration will need to be given to providing adequate sunlight and daylight into new open spaces, to ensure they are of a high quality that will provide residents with meaningful open space. To address this, ~~developers~~ applicants will be expected to consider green infrastructure and open space provision early in the design process, in terms of its spatial layout, functionality, quality of design and microclimate and long-term management arrangements. Innovative solutions that incorporate green infrastructure into building fabric and design as well as other infrastructure assets, such as transport, will also need to be considered.

~~1.86~~ 1.68 To support the delivery of this strategic policy, major development proposals will be required to submit a Green Infrastructure and Open Space Strategy and Management Plan (GIOSSMP). This should identify how the proposals accord with the requirements of Policy SP8, as well as the associated open space and biodiversity and urban greening policies in the Environment and Utilities chapter (Policies EU1 and EU2). The GIOSSMP, should as a minimum include:

a) an assessment of current green infrastructure and biodiversity and measures that will be taken to conserve and enhance it;
b) the location, phasing, quantum, access and function of green infrastructure and open space;
c) how the ~~proposed~~ proposal's green infrastructure provision provides a range of benefits, including urban cooling, air quality enhancement, surface water management, biodiversity, noise mitigation, healthy lifestyles, recreation and amenity and cycling and walking;
d) how the proposal's green infrastructure provision contributes to and fits in with the wider area-wide green infrastructure network;
e) the quality of green infrastructure provision in terms of its ~~Green Space Factor and Green Points System~~Urban Greening Factor score (further details on this can be found in Policy EU2); and
f) arrangements for the management and upkeep of green infrastructure provision, including longer term revenue funding.

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POLICY SP9: BUILT ENVIRONMENT

Our proposed outcome

Delivering a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage.

~~Improvinglocal rankingPositive results from OPDC's Quantitative Tracking Survey, covered via questions relating to attractiveness of the area, feeling same from crime and satisfaction with the area as a place to live and work;~~

~~3. , covered via questions relating to the internal and external design quality of buildings and the public realm;~~

~~4. 100% of streets at a 1:20 incline or better;56Number of d~~

Proposals should ~~support the delivery of our proposed outcome and measures of success the spatial vision by~~ optimis~~e~~ing development in a sustainable manner, that:

a) delivers buildings, public realm and infrastructure of the highest design quality and architecture, that:

- **i. positively responds to context and enhances local character and identity;**
- **ii. responds appropriately to the setting of sensitive locations identified in figure ~~3.14~~xx, including designated and undesignated heritage assets, open spaces and existing residential communities and ensuring that these help shape local character and townscape;**
- **iii. ensures appropriate standards of amenity;**
- **iv. delivers a safe and secure environment;**
- **v. incorporates high quality public realm ~~and~~ with active and positive street frontages;**
- **vi. demonstrates a high standard of accessible and inclusive design;**
- **vii. comprises of attractive, resilient and sustainable materials; and**
- **viii. demonstrates high levels of sustainable design, construction and operation;**

b) delivers high densities and a range of building heights, including tall buildings ~~as an appropriate form of development~~in the locations identified in figure xx.~~:~~

- ~~**i. in locations identified in the places and/or clusters policies; and/or**~~
- ~~**ii. in areas where there are high levels of existing or planned public transport accessibility.**~~

SUPPORTING TEXT

~~1.87~~ 1.69 The built environment is an important determinant in how well a society integrates. If designed and managed to a high quality it can help to improve quality of life, increase productivity, enhance health and well-being and educational attainment. It can also help to reduce the occurrence of crime, ensure long-term resilience and greater environmental sustainability and help to bring people together from different ages, ethnicities and socio-economic backgrounds.

Commented [TC77]: Specific amendment.
Reason: To align with New Draft London Plan requirements and Tall Buildings Statement supporting study.

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~~1.88~~ ~~1.70~~ Thanks to the area's current and future access to public transport, the Old Oak and Park Royal area can make a significant contribution to local and regional growth. Development of the area needs to ~~be optimised~~make the best use of land to fully capture and realise the benefits of regeneration and growth. However, it is important that this optimised approach to development is sustainable and acceptable in terms of its impacts on infrastructure, the environment, health and well-being, character and heritage and that it complements growth in the surrounding area and the wider London region.

Commented [PF78]: Specific amendment.
Reason: To align with Draft New London Plan terminology.

~~1.89~~ ~~1.71~~ In accordance with Policy SP2, OPDC will require regeneration in Old Oak and Park Royal to set high standards for design quality and architecture. Design quality covers a broad range of uses and can ~~mean different things to different people~~be subjective, in particular ~~around~~ in respect of architectural treatment and building height. However, there are some core strands to achieving high quality design and outstanding architecture, outlined below and in further detail in the Place policies (chapter 4) and Design policies (chapter 5), which OPDC will expect to see delivered and clearly demonstrated as part of any development proposal, regardless of scale, density or use.

~~1.90~~ ~~1.72~~ In order to create a high quality place, integrated into its surroundings, development in Old Oak and Park Royal will be expected to respond to existing local character, create new character and deliver a high quality townscape. OPDC's Character Areas Study identifies the positive elements of the area's character which development should respect and respond appropriately to. Policies D2 and D4 further elaborate on OPDC's requirements for development to create a high quality townscape and place-specific policy guidance is~~. This is further expanded upon~~ provided in the Places chapter (chapter 4).

1.73 OPDC's Heritage Strategy identifies that Old Oak and Park Royal has a rich social, cultural and built heritage. There are a number of statutory listed buildings, as well as existing and proposed conservation areas and ~~locally listed buildings~~Local Heritage Listings within and around the OPDC area (see figure 3.14). This includes assets such as St. Mary's and Kensal cemeteries, the latter of which is a Grade 1 listed registered park and garden, and the Grand Union Canal, the majority of which is covered by conservation areas. Development should look to conserve this heritage and enhance its setting. Policy D8 provides further policy guidance on how development proposals should appropriately respond to heritage assets and place specific guidance is provided within ~~chapter 4~~the ~~(~~Places chapter (chapter 4).

Commented [PF79]: Specific amendment.
Reason: To reflect existing designated heritage assets.

~~1.91~~ 1.74 Figure x also identifies other sensitive locations such as open spaces and existing residential communities. ~~Development should look to respond appropriately to these sensitive locations. Consideration would need to be given to issues such as amenity and character.~~ Further details on OPDC's expectations in relation to this can be found in the design chapter and specifically policies D4 (Well-designed buildings), D5 (Tall buildings) and D6 (Amenity). Further policy guidance, where relevant, is also provided in the place policies (see chapter 4).

Commented [PF80]: Specific amendment.
Reason: To avoid repetition with policies D4, D5, D6 and Draft New London Plan policy D8.

Commented [PF81]: Specific amendment.
Reason: Relocated from below to better reflect the structure of the policy.

~~1.92~~ 1.75 Ensuring good standards of amenity is not just a matter for sensitive locations. Amenity covers issues such as daylight, sunlight and overshadowing, privacy, climate, air quality and noise. Good amenity ~~can have~~has a positive impact on health and well-being and it will therefore be important ~~for development to minimise impacts on the~~to deliver appropriate standards of amenity of existing and future residents and workers. OPDC's detailed policy requirements for protection of amenity are provided in Policy D6.

Commented [TC82]: Specific amendment.
Reason: To strengthen requirements for appropriate standards of amenity, in accordance with the policy

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1.76 Safety and security can have an impact on the quality of the built environment. As such, buildings, public realm and infrastructure will need to contribute to improving safety, reducing crime and the fear of crime. OPDC's detailed policy requirements for delivering a balanced approach between security and design of development are provided in Policies D2 and D4.

~~1.93~~ 1.77 Development in the OPDC area needs to deliver a high quality of public realm, framed by well-designed buildings with active and positive street frontages. In taking a high quality approach to the design of the built environment, proposals should ensure that the street network, open spaces and buildings ~~and spaces~~ are designed to be accessible and inclusive for all. Further details on OPDC's requirements for creating an inclusive and accessible development can be found in Policy D3. To ensure a high quality of design, proposals should also make use of high quality and resilient materials, which where feasible, ~~are also~~should be sustainably sourced. Consideration should also be given to the complementarity of materials with that of neighbouring developments. Further information on OPDC's requirements for this can be found in policies D1, D2, D4 and EU8.

~~1.94~~ 1.78 In accordance with Policy SP2, development should deliver a high quality design that is environmentally sustainable. OPDC's Environmental Standards Study has investigated the specific context of the Old Oak and Park Royal area and detailed a series of environmental standards that development in the OPDC area should look to achieve. These standards have been embedded throughout the Local Plan and in particular, in chapters 4-7.

1.79 The proposed level of investment in transport infrastructure and the planned public transport accessibility improvements, on a brownfield site in zone 2/3 west London, provides a strong ~~support~~ rationale for the design and delivery of new high density development including new tall buildings in appropriate locations. Outside of SIL, modelling shows that in order to achieve the homes and jobs targets for the area, development will likely deliver average residential densities of 450 units per hectare. However, local context, character and environmental impacts are important factors to consider in the design process meaning development will be expected to deliver a range of densities and building heights, for example, responding with lower densities and building heights close to more sensitive locations and providing increased densities and building heights away from these sensitive locations and in areas of high public transport accessibility. Where appropriate, the Places policies set out more specificity about appropriate building heights, but in many parts of the area, there is a need for flexibility in the approach to achieving homes and jobs targets (see chapter 4).

1.80 As part of the response to achieving the homes and jobs targets and to make the best use of land, tall buildings will be an appropriate form of development in principle within parts of the OPDC area. Tall buildings are defined in OPDC's evidence base as buildings providing 15 or more residential storeys or being above 48 metres above ground level. Figure xx shows the locations within the OPDC area where tall buildings have been identified to be appropriate in principle. Any proposal for a tall building would however, need to be assessed on its own merits and would need respond appropriately to identified sensitive locations and accord with all other relevant policies within OPDC's Local Plan (including policies P5 and P7), the Mayor's London Plan and any other relevant material planning considerations.

~~1. The highest densities should be focussed around and close to public transport access and in appropriate locations identified in the Places chapter.~~

Commented [PF83]: Specific amendment.
Reason: To reflect requirements of Draft New London Plan policy D8 and Tall Buildings Statement supporting study.

1.95 The OPDC area is also a suitable location for tall buildings. Tall buildings provide opportunities to increase densities and catalyse on increased connectivity, occupy smaller footprints and free up more space for public realm. They can also help create variation in the skyline and if designed well and in the right location, can make a positive contribution to the townscape and character of a place. However, they can also impact on sensitive locations and on microclimate. OPDC considers that certain locations in the OPDC area may be appropriate for tall buildings, such as around and close to public transport hubs and locations identified in the Places chapter (see Chapter 4). Any proposal for a tall building would need to accord with the requirements of OPDC's tall buildings policy (Policy D5). Proposals would also need to assess their impact on key views identified in OPDC's Views Study, as required by Policy D7 (Key Views).

Commented [PF84]: Specific amendment.
Reason: Removed and replaced with above paragraphs to reflect requirements of Draft New London Plan policy D8.

1.96

Figure 3.14 identifies sensitive locations within and around the OPDC area, which includes heritage assets, open spaces and existing residential communities. OPDC's Heritage Strategy has identified a number of heritage assets within and bordering the OPDC area, which includes assets such as St. Mary's and Kensal cemeteries, the latter of which is a Grade 1 listed registered park and garden, and the Grand Union Canal, the majority of which is covered by a Conservation Area. Development will be expected to respond appropriately to these heritage assets, as well as nearby open spaces, such as Wormwood Scrubs, and residential communities. Consideration would need to be given to issues such as amenity and character. Further details on OPDC's expectations in relation to this can be found in the design chapter and specifically policies D4 (Well-designed buildings), D6 (Amenity) and D8 (Heritage). Further policy guidance, where relevant, is also provided in the place policies (see chapter 4).

Commented [PF85]: Specific amendment.
Reason: Condensed and relocated above to better reflect policy structure.

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POLICY SP10: INTEGRATED DELIVERY

Our proposed outcome

Delivering development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land.

Proposals should ~~support the delivery of the spatial vision by~~ enabl~~ing~~e a comprehensive and integrated approach to the delivery of development and infrastructure that:

a) **supports and brings forward development in accordance with, or in advance of, the phasing identified in figure ~~3.16~~XX, to support OPDC's homes and jobs targets, particularly through the redevelopment of sites identified for redevelopment in the first 10 years and/or Site Allocations in table xx;**

~~a)~~b) **ensures that an optimised and comprehensive approach is taken to the development of the Site Allocations in table xx, so that the Site Allocation homes and non-residential floorspace targets can be met or exceeded; ~~ensures comprehensive development of each site allocation that seeks to exceed identified homes and jobs figures;~~**

~~b)~~c) **contributes appropriately and proportionately towards required infrastructure identified in OPDC's Infrastructure Delivery Plan (IDP), at a rate and scale sufficient to support the area's development and growth;**

~~c)~~d) **where applicable, connects into area-wide infrastructure and enables the connection of others into such infrastructure;**

~~d)~~e) **safeguards land required to deliver area-wide and site-specific infrastructure identified in OPDC's IDP and/or policies in the Local Plan;**

~~e)~~f) **is appropriately phased to fit in with the programmed delivery of other development and infrastructure for the area and that impacts, including construction and servicing, are planned in a complementary manner and provide appropriate mitigation;**

~~f)~~g) **supports an integrated and comprehensive approach to the design, construction and management of the proposed development;**

~~g)~~h) **is appropriately designed so that the built form complements and does not unduly restrict development on adjacent and connected sites; and**

~~h)~~i) **where appropriate, is accompanied by an Infrastructure Delivery Strategy.**

SUPPORTING TEXT

Commented [PF86]: Specific amendment.
Reason: To align with relocation of site allocations into Policy SP10 and clarify aspiration to exceed targets for site allocations.

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~~1.97~~ ~~1.81~~ The redevelopment and regeneration of the OPDC area will be challenging. Within the Old Oak area, a number of large-scale operations need to be relocated, reconfigured and/or decked over. A significant amount of infrastructure is needed to unlock the development potential of the ~~site~~area. There will be substantial amounts of planning, construction and operational activities all likely to be taking place concurrently. This will happen against the backdrop of the continued operation of businesses across Park Royal and Old Oak, as well as demographic and social change, economic cycles and climate change. Taking a coordinated approach to the development of the land and infrastructure within the area~~,~~ will help optimise the development opportunity, in terms of densities, levels of affordable housing and better place making. ~~Where landowners are unable to assemble land, to facilitate a comprehensive rather than a piecemeal approach to the delivery,~~ OPDC will consider the use of its compulsory purchase powers to ~~assist in scheme delivery~~facilitate comprehensive regeneration, in accordance with Policy DI4.

Commented [TC87]: Specific amendment.
Reason: To appropriately reflect CPO powers and tie into Policy DI4.

~~1.98~~ 1.82 The timing and phasing of delivery will be a critical factor in the successful regeneration of the Old Oak and Park Royal area. Figure 3.16 identifies OPDC's development trajectory. This has been informed by:

a) OPDC's Development Capacity Study for the area, which has assessed the capacity for new homes and jobs; and
b) OPDC's Absorption Rate Study, which assesses typical delivery rates across London over recent years, including delivery rates in other large regeneration schemes. Given the scale of the site, the research concludes that there are multiple delivery markets within Old Oak and Park Royal.

~~1.99~~ 1.83 This work has informed OPDC's housing and jobs targets contained in Policies SP4 and SP5. To support the achievement of these targets, the Local Plan designates 'Site Allocations' (see Table xx). Site Allocations are used to help OPDC demonstrate its supply of land for new housing, commercial and industrial floorspace. The housing and commercial or industrial floorspace ~~figures~~targets are expressed as minimums, whereas jobs figures are indicative. The figures for each site allocation should be read alongside the capacity figures for new homes and jobs stated for each place within the places chapter. ~~Site Allocations are sites of particular importance to OPDC realising its annual homes target, as set out in Policy H1.~~ Site Allocations have been identified for:

Commented [PF88]: Specific amendment.
Reason: Relocated from the Places Chapter to demonstrate relationship between site allocations in their role to demonstrate delivery of homes and jobs.

a) sites are anticipated to come forward in the first 10 years and that would make a significant contribution to OPDC achieving its homes target, by delivering over 100 homes; and/or
b) sites are anticipated to be brought forward between 11-20 years and that would make a major contribution to OPDC achieving its homes target, by delivering over 1,000 homes; and/or
c) sites are anticipated to deliver a minimum of 10,000 sqm of commercial and/or industrial floorspace during the plan period.

1.84 OPDC's Site Allocations are shown on figure ~~4.2~~xx and are included on OPDC's Policies Map. Where required, ~~P~~policy guidance for ~~each~~ site allocations has been provided ~~is contained~~ in the Places chapter (chapter 4).

Commented [PF89]: Specific amendment.
Reason: Relocated from the Places Chapter to demonstrate relationship between site allocations in their role to demonstrate delivery of homes and jobs.

~~1.100~~

~~1.101~~ 1.85 Figure 11.3 shows indicative public and private land ownership within the OPDC area. Over the first ten years of the Local Plan period, the majority of development is likely to occur on land in North Acton, in the western parts of Park Royal and to the north of the Grand Union Canal in Old Oak North, along Scrubs Lane and on some sites along Old Oak Lane and Old Oak Common Lane. This will primarily be on land unencumbered by HS2's and others' construction requirements or land required for transport functions. OPDC will work with stakeholders and landowners to support them in bringing forward land for early development and will, where appropriate, consider the use of its compulsory purchase powers to facilitate land assembly to enable more timely and comprehensive regeneration. Further details on how OPDC will support early delivery can be found in the Delivery and Implementation chapter (chapter 11).

~~1.102~~ 1.86 In the latter 10 years of the plan period, delivery on the public sector land around the planned Old Oak Common Station and~~,~~ its associated construction sites ~~and on the Elizabeth Line Depot and sidings site~~, would become the primary supply of land for development. Here, the public sector will need to play a key role in coordinating and enabling the delivery of this land. OPDC will work closely with landowners, developers and service providers to develop strategies to support the release of this land for development in line with the policies in the Local Plan, which may include the use of compulsory purchase powers to ensure greater certainty of delivery of development, in accordance with Policy DI4.

~~1.103~~ 1.87 There is also land within the core development area at Old Oak that may be redeveloped at some point in the future, subject to resolving issues around current operational uses. This includes sites such as the Elizabeth Line Depot and sidings site, Intercity Express Programme (IEP) depot and London Overground Rail Operations Ltd (LOROL) depot. These sites do not currently contribute to the homes and jobs figures currently identified as being delivered within the 20 year life of this Local Plan, but were a suitable solution to their earlier delivery to be found, OPDC would be supportive of mixed use development on these sites. Further information is included in the Place policies.

~~1.104~~ 1.88 Development on many of the sites in the OPDC area will be challenging and involves the relocation, reconfiguration and/or decking over of existing businesses and infrastructure. ~~I~~ In addition, significant provision of new infrastructure is also needed to unlock development and overcome severance. Table 11.1 in the Delivery and Implementation chapter provides more detail on these challenges and the arrangements needed to tackle these and ensure coordinated development in a timely fashion. OPDC will consider the use of compulsory purchase powers to assist in the timely delivery of development, in accordance with Policy DI4.

~~1.105~~ 1.89 A significant amount of new and/or enhanced infrastructure will be required to unlock the regeneration of the area. Details on OPDC's infrastructure requirements are in OPDC's Infrastructure Delivery Plan (IDP). Developers will be expected to engage early with OPDC and with infrastructure service providers to discuss infrastructure requirements. Some infrastructure will relate to a particular site, whilst some will relate to the wider area. It is important that each development provides a fair contribution towards both site-specific and area-wide infrastructure. Alongside this, the impacts arising from the development across the area will need to be coordinated and adequately mitigated. Where required, OPDC will consider the use of compulsory purchase powers to assist in the timely delivery of infrastructure and development supporting that infrastructure, in accordance with Policy DI4. ~~Details on OPDC's infrastructure requirements are in OPDC's Infrastructure Delivery Plan (IDP).~~

Commented [TC90]: Specific amendment.
Reason: To appropriately reflect CPO powers and tie into Policy DI4.

Commented [TC91]: Specific amendment.
Reason: To appropriately reflect CPO powers and tie into Policy DI4.

Commented [TC92]: Specific amendment.
Reason: To reflect support for the potential earlier delivery of these sites.

Commented [PF93]: Specific amendment.
Reason: Relocated from below to better reflect policy structure.

Commented [PF94]: Specific amendment.
Reason: Relocated to better reflect policy structure.

Commented [TC95]: Regulation 19(1) consultation amendment.
Reference: SP10/9
Reason: To require developers to hold early discussions with infrastructure service providers.

Commented [PF96]: Specific amendment.
Reason: Relocated from below to better reflect policy structure.

DRAFT

~~1.106~~ 1.90 Area wide infrastructure will require a ~~multi-developer approach to delivery and will require OPDC, developers, service provides and other~~ variety of stakeholders to work in collaboration with one another to secure timely delivery. Particular examples include:

a) Infrastructure including sewerage, water supply, drainage, power and heat, telecommunications, public transport provision, streets, bridges, underpasses, public realm and art and strategic green space provision;
b) Social infrastructure including schools, healthcare, library provision, community centres, sports and leisure centres, childcare facilities, emergency services facilities, community recycling centres; and
c) Design, construction (including treatment of contamination), servicing and operation/management.

~~1.107~~ 1.91 In relation to infrastructure, developers will be required to demonstrate to OPDC how infrastructure both above and below ground is being considered and in particular, how it can work with site-specific and/or area-wide strategies planned by OPDC or other landowners and/or developers. For smaller developments, this is likely to result in requirements to facilitate the delivery of or connect into key pieces of infrastructure, whereas for larger developments, there are likely to be requirements for direct delivery and/or contributions towards infrastructure.

~~1.108~~ 1.92 In relation to social infrastructure, developers will be required to contribute appropriately and proportionately towards the required site specific and, as applicable, area~~site~~-wide infrastructure and community facilities to support the area's development and growth.

~~1.109~~ 1.93 Where there are different landowning interests involved in a development proposal, or the proposal is part of a wider site allocation or masterplan area, site-wide and area-wide infrastructure will need to be based on an equitable equalisation mechanism. In some instances, for relevant types of infrastructure the Community Infrastructure Levy may provide this mechanism, but where contributions will be via in-kind infrastructure or secured by planning obligations, an equitable equalisation mechanism for such provision or contributions will be required by the relevant landowning interests to allow development to proceed. The mechanism would be applied to development brought forward in advance of, but reliant upon infrastructure, to the development delivering the infrastructure and to any future development relying on that infrastructure, where a retrospective pooling mechanism would be employed to secure necessary contributions. In such instances, an Infrastructure Delivery Strategy should be provided by an applicant for a development proposal that sets out an overarching framework for infrastructure delivery and provides suitable confirmation that infrastructure provision is being jointly and comprehensively planned and delivered accordingly. Such an Infrastructure Delivery Strategy should:

a) demonstrate that the development would:
    i. contribute towards a comprehensive infrastructure plan for the wider site or area;
    ii. ensure its impacts are mitigated; and
    iii. not prejudice and help facilitate the delivery of future development of the wider site or area;
b) include a list of the wider site or area-wide infrastructure elements, details of how and where the infrastructure would be delivered or funded (including costs, levels of funding and timings); and a high-level phasing strategy; and
    iv. cover those elements of infrastructure to be provided:
    v. solely by one development site to meet their own needs;
    vi. on one site but serve the wider site or area;

Commented [PF97]: Regulation 19(1) consultation amendment.
Reference: SP10/6 and TCC4/6
Reason: To clarify the workings of the equitable equalisation mechanism and retrospective pooling mechanism.

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vii. off-site;
viii. via funding by an alternative means (e.g. CIL).

1.94 OPDC will monitor delivery of development and infrastructure through its Authority Monitoring Report. Delays to the delivery of sites and/or infrastructure or decisions not to proceed with the delivery key pieces of critical infrastructure, required to enable the attainment of homes and jobs targets, would trigger a need for a review of OPDC's Local Plan policies.

1.95 In terms of design, construction and the operation, management and maintenance of development, developers should engage early with OPDC, other developers and stakeholders in the area to consider how these issues can be considered in a joined up way. At an early stage, thought needs to be given to how the design of a scheme complements adjacent development. A key component of this will be allowing for an optimised approach to development on surrounding sites and demonstrating this through the pre-application process, where multiple development options may need to be considered. This is necessary to ensure development on one site does not preclude the optimised delivery of development on another site. Applicants will need to demonstrate how proposals complement the wider regeneration project, in terms of their use and built form. ~~Where development delivery is being pursued on a piecemeal basis, rather than comprehensively, OPDC will consider the use of its compulsory purchase powers to assemble sites where this is in support of OPDC's wider regeneration ambitions for the site.~~

~~1.110~~

~~1.111~~ 1.96 Applicants should also consider other opportunities for joint working, which can help to deliver sustainable development. During construction, there will be opportunities for joint working to manage impacts on amenity and the highway network. There are opportunities here for sharing construction management sites and contamination treatment (see policies T8 and EU13). Post construction, developers will need to consider how management, maintenance and servicing arrangements align with that of adjacent developments. Again, there may be opportunities here to consider a joined up approach to ensure that a high quality place is created, in a cost effective fashion.

Commented [PF98]: Regulation 19(1) consultation amendment.
Reference: DI1/10
Reason: To clarify need to review Local Plan if critical pieces of infrastructure are not delivered which fundamentally affect attainment of homes and jobs targets.

Commented [PF99]: Specific amendment.
Reason: Relocated above to better reflect policy structure.

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		Place Policy	Over 100 net additional housing units over the first ten years of the plan period	Over 1000 net additional housing units during the 11 to 20 years of the plan period	Over 10,000sqm of commercial floorsapce (including a range of A and B Use Classes) over the plan period	Jobs resulting from the provision of commercial floorspace over the plan period
1	**Old Oak Common Station and surroundings**	P1	0	350	178400	15,200
2	**Car Giant**	P2/P10	5,300		48800	2650
3	**The Triangle Business Centre**	P2	600	0	2800	160
4	**EMR**	P2	1100	0	21330	1100
5	**First Central and surroundings**	P4	1200	0	1200	60
6	**Bashley Road Metal Refinery**	P5	0	0	30100	500
7	**40-54a Minerva Road**	P5	0	0	12300	700
8	**Park Royal ASDA**	P6	500	0	23000	1400
9	**247 Acton Lane**	P6	141	0	0	0
10	**Boden House**	P7	250	50	7600	600
11	**Acton Wells East**	P7	0	1200	17,200	1500
12	**Holbrook House**	P7	280	0	100	5
13	**Victoria Industrial Estate**	P7	400	700	6500	400
14	**Perfume Factory North**	P7	300	0	1400	87
15	**Perfume Factory South**	P7	286	0	4970	430
16	**The Portal**	P7	350	0	550	50
17	**2 Portal Way**	P7	380	0	5300	300
18	**3 Portal Way**	P7	100	0	3600	230
19	**Portal West**	P7	578	0	3200	200
20	**Algerian Embassy**	P7	200	0	3600	300
21	**Willesden Junction Maintenance Depot**	P8	100	0	400	30
22	**Westway Estate**	P8	0	1000	4800	300
23	**Oaklands**	P8	605	0	3500	200
24	**Oaklands North**	P8	200	0	1000	90

Commented [PF100]: Regulation 19(1) consultation amendment.
Reference: SA/1
Reason: To reflect information in the updated Development Capacity Study based on development management information.

25	**Old Oak Common Lane sites**	P8	200	0	2800	180
26	**Channel Gate**	P9	0	0	124000	7600
27	**Harrow Road**	P10	200	500	8100	400
28	**Cumberland Business Park**	P10	300	0	1800	110
29	**Mitre Yard**	P10	200	0	1123	66
30	**North Kensington Gate South**	P10	164	0	750	50
31	**Mitre Wharf**	P10	100	0	420	20
32	**Big Yellow Storage (Scrubs Lane)**	P10	150	0	1100	60
33	**Tea Crate**	P10	150	0	1100	60
34	**Mitre Industrial Estate**	P10	100	100	1100	60

Commented [PF101]: Regulation 19(1) consultation amendment.
Reference: SA/6
Reason: To reflect information in the updated Development Capacity Study based on development management information.

Commented [PF102]: Specific amendment.
Reason: Updated capacity, phasing and referencing to reflect information in the updated Development Capacity Study.

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4. PLACES

INTRODUCTION

1.1 This chapter provides spatial guidance for 12 places within the OPDC area. Although only 650 hectares in size, there is hugea diversity across the area in terms of land use, transport access, environment, topography, communities and heritage which reflects the diversity of the built environment of Old Oak and Park Royal. Each place is different with regard to its existing character and future opportunities and challenges.

1.2 1.1 This diversity provides opportunities for new development to create a range of new and enhanced existing, locally distinctive places.

1.3 1.2 As such,Policies in this chapter provides specific guidance for each place at a greater level of detail than the Strategic Policies in Chapter 3 and the Development Management policies later in the Local Plan. Places have been defined by the existing character and context, future potential, land ownership and in response to recommendations by the community.

1.4 1.3 Within these places, a series of 'clusters' are identified. Clusters are characterised as locations that are likely to attract higher footfall and/or have a particular use and as such,that warrants more detailed policy. These places and clusters celebrate their respective distinctiveness in terms of their current context and future development approaches.

1.5 1.4 For each place and cluster, a vision, policy and diagram is provided. These are individual to each location but should be read in conjunction with other policies in the Local Plan.

1.6 1.5 Place and cluster policies are accompanied by a series of larger sitessite allocations that are likely to come forward for development and contribute to OPDC's homes and jobs targets. Known as Site Allocations, tThese set job capacity targets and minimum homes targets for these sites. See page 50Policy SP10 in chapter 3 for further information.

SITE ALLOCATIONS

What is the purpose of site allocations?

Site Allocations are used to help OPDC demonstrate its supply of land for new housing and commercial and industrial floorspace. For housing,The housing and commercial or industrial floorspace figures are expressed as minimums, whereas jobs figures are indicative and for commercial floorspace and jobs they are indicative capacities. The figures defined for each site allocation should be read alongside the capacity figures for new homes and jobs stated for each place.

How have site allocations been identified?

Site allocations have been identified based on information set out in OPDC's Development Capacity Study. They have been identified where:

sites are anticipated to come forward in the first 10 years and that would make a significant contribution to OPDC achieving its homes target, by delivering over 100 homes;

Commented [PF1]: Chapter wide amendments

Amendment: Homes and jobs targets updated.
Reason: To reflect updated development capacity and phasing evidence base.

Amendment: Place and Cluster visions shortened.
Reason: To avoid repetition with Place and Cluster policies.

Amendment: Development and Phasing policies relocated to beginning of each place policy.
Reason: To provide a stronger visual relationship between Development and Phasing policies and Land Use policies.

Amendment: Non place-specific or cluster-specific policies removed.
Reason: To avoid repetition with Strategic Policies and Development Management policies.

Amendment: Remove references in place policies to proposed heritage designations.
Reason: To reflect status of existing and proposed heritage designations.

Amendment: Social infrastructure requirements updated.
Reason: To reflect updated social infrastructure requirements evidence base.

Amendment: Supporting text which repeats policy removed.
Reason: To avoid repetition between policy and supporting text.

Amendment: Minor error corrections for spelling, grammar and referencing.
Reason: To provide correct spelling, grammar and referencing.

Amendment: Old Oak High Street major town centre renamed as Old Oak major town centre
Reason: To reflect amendments to phasing and location of key routes.

Amendment: Alternative descriptions to key routes removed and replaced with 'key routes'
Reason: To standardise terminology.

Amendment: Key route network amended including Old Oak High Street now shown as Old Oak Street.
Reason: To reflect outputs of the Old Oak North Development Framework Principles.

Amendment: Site allocations relocated to policy SP10 to demonstrate relationship between site allocations, in their role to demonstrate delivery of homes and jobs, and guidance for delivery set out in policy SP10.

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~~sites~~ are ~~anticipated to be brought forward between 11-20 years and that would make a major contribution to OPDC achieving its homes target, by delivering over 1,000 homes; and/or~~

~~sites~~ are ~~anticipated to be brought forward during the plan period and that would make a major contribution to OPDC achieving its jobs target by delivering over 10,000 square metres of commerical~~commercial and/or ~~industrial~~ floorspace (including A and B-Classes).~~

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POLICY P1: OLD OAK SOUTH

VISION

Old Oak South will deliver a new commercial centre for west London, centred on the integrated world-class Old Oak Common Station. Away from the station, mixed-use development will deliver a range of town centre uses ~~along Old Oak High Street~~ and new homes. This ~~place~~ area will accommodate high densities ~~with~~and tall buildings ~~around the Old Oak Common station and Old Oak High Street and~~with development will~~also~~ responding appropriately to, and celebrating,e the area's unique railway heritage, the Grand Union Canal and the locally cherished Wormwood Scrubs.

~~V1. Old Oak South will be centred on an exceptionally-designed, world-class Old Oak Common Station. The largest sub-surface station ever built in the UK provides a once in a life time regeneration opportunity to act as a catalyst for the delivery of a new commercial hub that will support London's growth and role as a global city. It will also ensure that Old Oak South becomes part of a new major town centre.~~

~~V2. Old Oak Common Station will be a major transport interchange delivering excellent local, regional and national connections. The station will integrate comfortably with the surrounding street network, interchange facilities, land uses and multi-functional open civic spaces. There will be new Local Parks, integrated with new station public realm and / or other squares, canalside spaces and a network of new smaller spaces. Development will facilitate new links to Wormwood Scrubs with streets and spaces embedding and showcasing green infrastructure.~~

~~V3. A new commercial hub home to tall buildings will deliver a range of employment spaces over and / or adjacent to the station along with new town centre uses and new residential uses on the upper floors.~~

~~V4. Old Oak High Street will be the focus of a major new town centre that connects directly into North Acton, Old Oak North and areas beyond. This new town centre will be delivered over the lifetime of the plan. If proven to be feasible early delivery of the High Street could help to fully integrate Old Oak Common Station into its surroundings once opened. New connections to the east, west and south will also play an important role in connecting the station into its surroundings.~~

~~V5. Away from areas around the station, Old Oak South will include a mix of high density residential, employment, cultural and community uses; designed as a vibrant network of new neighbourhoods. Development will celebrate the area's unique railway heritage, the Grand Union Canal and the locally cherished Wormwood Scrubs.~~

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

Development and Phasing

a) Supporting the comprehensive redevelopment of Old Oak South by working positively with stakeholders;

b) ~~Working positively with the Department for Transport and High Speed 2 Limited to facilitate the delivery of Old Oak Common Station in accordance with the High Speed Rail (London – West Midlands) Act 2017;~~

c) ~~to support~~Supporting the relocation, reconfiguration and/or development, over and around, existing and future railway infrastructure including:

   i. ~~the~~ Old Oak Common Station and tracks; and

Commented [TC2]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [KT3]: Specific amendment.
Reason: Relocated to P1C1

Commented [TC4]: Specific amendment.
Reason: Relocated from below

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ii. ~~and~~ in the longer term, the Elizabeth Line Depot, sidings and the Intercity Express Programme Depot, where feasible.~~;~~

~~Supporting the delivery of early connections to Old Oak Common Station, including the coordinated delivery of Old Oak High Street, and other publicly accessible open spaces where feasible and where they support the timely and cost effective delivery of Old Oak Common Station;~~

Land Uses

d) **Supporting the creation of a thriving** ~~network of~~ **mixed use, high-density** ~~neighbourhoods~~ place **that contributes to the delivery of:**

i. ~~41,300~~15,200 **new jobs and a minimum of** 3503,000 **new homes** in the plan period; and

~~i.~~ii. 34,000 new jobs and a minimum of 4,100 new homes for the full development period.

~~b)~~e) **Establishing a commercial** ~~hub~~ centre **around Old Oak Common Station** ~~and along Old Oak High Street~~ major town centre**, that supports London's growth, by delivering a significant amount of** Use Class **B1**a **floorspace;**

~~c)~~f) **Contributing to the delivery of Old Oak** ~~High Street~~ **major town centre by delivering a range of** ~~permanent~~ **town centre uses, including top-up convenience stores, cafés, bars, restaurants, social infrastructure**, business hotels **and comparison retailers, that meet needs of employees, residents and interchange passengers** ~~along the High Street and within and around Old Oak Common Station~~**;**

~~d) Contributing to the establishment of a canalside food and beverage quarter along the Grand Union Canal by focusing the delivery of A3 and A4 uses at crossings of major key routes;~~

~~e)~~g) **Contributing to the activation of** this place~~Old Oak South~~ **and creation of a** ~~c~~C**ultural** Oquarter in Old Oak, ~~by supporting the delivery of~~delivering **cultural and catalyst uses** ~~along, or close to,~~within **Old Oak** ~~High Street major town centre and other areas of good public transport access~~South**;**

~~f) Focusing the delivery of business hotels in accessible locations around Old Oak Common Station and along Old Oak High Street;~~

~~g) Supporting neighbouring Harlesden district town centre by including a Harlesden Enhancement Strategy within any submitted Town Centre Uses Statement where the proposal in Old Oak South provides over 5,000 sqm of town centre uses;~~

~~h) Encouraging the early activation of Old Oak South by delivering a range of meanwhile active uses across Old Oak South in particular along new routes that connect into Old Oak Common Station;~~

Public Realm and Movement

h) **Contributing to and/or enabling, the delivery of a permeable, inclusive and accessible street network** as shown in figure ~~x~~4.2;

i) Delivering active and positive frontages along the edge of the Elizabeth Line Depot ~~by:~~where feasible;

~~i. where feasible, contributing to, and enabling, the delivery of the new major key routes of Old Oak High Street, Grand Union Street, Park Road and in the longer term, Wormwood Scrubs Street;~~

~~ii. contributing to the delivery of new and improved walking and cycling routes to Old Oak North, Wormwood Scrubs, Old Oak Common Lane, Acton Wells, the Grand Union Canal, and within the surrounds of Old Oak Common Station to Wormwood Scrubs;~~

~~working positively with stakeholders to deliver new crossings over and/or under railway infrastructure and the Grand Union Canal; and~~

~~integrating Old Oak Common Station and Old Oak Common Lane Station with the public realm, street network and transport interchange facilities.~~

Green Infrastructure and the Environment

Commented [PF5]: Specific amendment.
Reason: To avoid repetition with below public realm and movement policies.

Commented [PF6]: Regulation 19(1) consultation amendment.
Reference: P1/2, P1/20, P1/28
Reason: To reflected updated homes and jobs capacity information.

Commented [PF7]: Specific amendment.
Reason: To provide clarity for amount of development within the plan period and full development period.

Commented [PF8]: Specific amendment.
Reason: To reflect amended phasing of the Elizabeth Line Depot and avoid repetition of policy P1.

Commented [TC9]: Specific amendment.
Reason: Relocated to Policy TCC1 for clarity and removed to avoid repetition with Policy TCC9.

Commented [PF10]: Specific amendment.
Reason: To help to deliver a high quality public realm.

Commented [PF11]: Specific amendment.
Reason: To avoid repetition with policy SP7. This information is provided in supporting text to this policy

Commented [PF12]: Specific amendment.
Reason: To avoid repetition with SP7 and T1.

Commented [PF13]: Specific amendment.
Reason: To avoid repetition with policy T5.

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j) **Delivering a high quality, well-connected, network of multifunctional publicly accessible open spaces, including:**

i. **the Old Oak South Local Park ~~provided~~ of a minimum of 2 hectares in size, provided as a series of connected spaces~~ across the Elizabeth Line Depot and areas surrounding Old Oak Common Station~~;**

ii. **Grand Union Canal Local Park provided between Old Oak North and Old Oak South including the Canal Park and Birchwood Nature Reserve that are linked by bridges and is a minimum of 2 hectares in size;**

iii. **~~supporting the delivery of~~ a publicly accessible open space over the western portion of the HS2 Station Box if demonstrated to be feasible; and**

~~ii. the canalside Local Park along the Grand Union Canal provided between Old Oak North and Old Oak South;~~

~~iii. supporting the delivery of a publicly accessible open space over the western portion of the HS2 Station Box if demonstrated to be feasible;~~

iv. **enhancing the Birchwood Nature Reserve if retained in its current location, or reprovided in accordance with policies EU1 and EU2~~;~~ ~~and~~**

~~v. integrating green spaces and other green infrastructure along Old Oak High Street, Park Road and other streets.~~

Heritage and Character

k) **Strengthening local identity and character by:**

i. **conserving and enhancing the Grand Union Canal Conservation Area and its setting; and**

ii. **ensuring future local character is informed by the area's existing character including the historic railways~~, and~~ Grand Union Canal, Wormwood Scrubs and surrounding residential areas.**

Building Heights

l) **Contributing to a variety of building heights that respond to public transport access and sensitive locations by:**

i. **supporting the delivery of ~~the tall~~est buildings in Old Oak South in accordance with Policies SP9, D5 around Old Oak Common Station where feasible and where relevant, subject to HS2 operational constraints and where enabling works for such building works are included within the HS2 scope and any enabling works that are included within the High Speed Rail (London - West Midlands) Act 2017;**

~~ii. delivering a range of building heights including tall buildings at points of the greatest activity across Old Oak South with a focus on Old Oak High Street;~~

~~iii. delivering heights of generally 6 to 8 storeys fronting directly onto the Grand Union Canal with opportunities for tall buildings at key crossing points such as Old Oak High Street, Park Road and Grand Union Street;~~

~~iv.~~ii. **appropriately responding to existing residential areas, including Wells House Road, Shaftesbury Gardens and Midland Terrace; and**

~~v.~~iii. **appropriately responding to Wormwood Scrubs as Metropolitan Open Land.**

~~Infrastructure~~

~~m) Supporting local, regional and national connectivity by ensuring the timely delivery of Old Oak Common Station and associated interchange facilities as integral parts of the built environment;~~

~~n) Enabling comprehensive development and supporting sustainable communities by contributing to the delivery of infrastructure requirements as set out in the OPDC Infrastructure Delivery Plan, including a:~~

Commented [PF14]: Specific amendment.
Reason: To avoid repetition with policy P3.

Commented [PF15]: Specific amendment.
Reason: Relocated above.

Commented [PF16]: Specific amendment.
Reason: To avoid repetition with policies EU1 and EU2

Commented [PF17]: Specific amendment.
Reason: To provide consistent terminology with policy D5.

Commented [PF18]: Specific amendment.
Reason: To avoid repetition with amended guidance directly above.

Commented [PF19]: Specific amendment.
Reason: To reflect Draft New London Plan requirements for the location and definition of tall buildings.

Commented [PF20]: Specific amendment.
Reason: To avoid repetition with policy P3.

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~~i. new primary school;~~

~~ii. new community hub facility; and~~

~~iii. new public access sports and leisure centre.~~

~~Development and Phasing~~

~~o) Supporting the comprehensive redevelopment of Old Oak South by working positively with stakeholders to support the relocation, reconfiguration and/or development, over and around, existing and future railway infrastructure including the Old Oak Common Station and tracks, Elizabeth Line Depot and sidings, and the Intercity Express Programme Depot, where feasible;~~

~~p) Working positively with the Department for Transport and High Speed 2 Limited to facilitate the delivery of Old Oak Common Station in accordance with the High Speed Rail (London – West Midlands) Act 2017;~~

~~q) Supporting the delivery of early connections to Old Oak Common Station, including the coordinated delivery of Old Oak High Street, and other publicly accessible open spaces where feasible and where they support the timely and cost effective delivery of Old Oak Common Station;~~

~~r) Ensuring different phases of development contribute to the delivery of a network of distinct, but related, neighbourhoods; and~~

~~s) Ensuring public transport access supports comprehensive high density development.~~

SUPPORTING TEXT

~~1.7~~ 1.6 Old Oak South sits between Wormwood Scrubs in the south and the Grand Union Canal in the north. The area is currently dominated by railway infrastructure. These pieces of existing infrastructure sever the area from its surroundings. Old Oak Common Station is set to open in 2026 and will make Old Oak South one of the best connected locations in London. The station will be one of the largest transport interchanges in the country and will be the largest sub-surface station ever built in the UK, providing access to the HS2 line, Elizabeth Line and the Great Western Main Line alongside local connections to the London Overground, buses, walking and cycling networks and taxis.

1.7 There are a number of challenges that need to be addressed in delivering the vision for Old Oak South. In particular, coordinating and facilitating development and infrastructure at locations around Old Oak Common Station. Other significant challenges include addressing the environmental and design impacts of building at high density in a constrained place whilst also managing the impacts on surrounding sensitive locations.

~~1.8 London Plan policy and national guidance seek to optimise development at transport interchanges and on brownfield land. As such, the station will act as a major catalyst for the development of the OPDC area, placing Old Oak South at the heart of one of the UK's largest regeneration projects, with the opportunity to become a new London destination. In light of this, high density and tall buildings delivering a range of uses will be appropriate. Large scale redevelopment in Old Oak South will bring meaningful benefits to the UK and London economies and importantly to local communities living and working in and around the area.~~

~~There are a number of challenges that need to be addressed in delivering the vision for Old Oak South. In particular, coordinating and facilitating development and infrastructure at locations around Old Oak Common Station and the Elizabeth Line Depot and sidings. Other significant challenges include addressing the environmental and design impacts of building at high density in a constrained place whilst also managing the impacts on surrounding sensitive locations.~~

~~1.9~~ 1.8 Early development in Old Oak South will be supported. However, it is likely that most of development in Old Oak South will be delivered after the opening of Old Oak Common Station in 2026 and development on the Elizabeth depot and sidings and IEP depot is not envisaged to commence until beyond the Local Plan period ~~(2038)~~.

Commented [PF21]: Specific amendment.
Reason: To avoid repetition with policy SP6.

Commented [PF22]: Specific amendment.
Reason: To avoid repetition with policy SP7.

Commented [PF23]: Specific amendment.
Reason: To avoid repetition with Introduction chapter.

Commented [PF24]: Specific amendment.
Reason: To provide clarity regarding implementation of policies beyond the plan period.

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~~1.10~~ 1.9 The excellent public transport access provided by the new Old Oak Common Station provides the opportunity to deliver a minimum of ~~3,000~~350 new homes during the plan period1 within high density mixed use development across the area in a range of building heights. Old Oak South also has capacity to deliver ~~41,300~~15,200 new jobs2 across new commercial, retail and leisure uses, within the plan period. 4,100 new homes 34,000 new jobs are also currently envisaged to the delivered during the full development period. OPDC will work with stakeholders to support early delivery, including seeking earlier development of the Elizabeth Line Depot if demonstrated to be feasible. These~~is~~ ~~would~~development quantums make~~provide~~ a significant contribution to achieving the Mayor's London Plan target ~~for Old Oak~~ to deliver ~~6~~5~~5~~,000 new jobs. This capacity has the potential to be increased subject to securing grade separation. OPDC will work with the Department of Transport and HS~~igh Speed~~ 2 Ltd to explore opportunities for non-preclusion of grade separation to support the delivery of Old Oak Common Station.

~~1.11~~ 1.10 Old Oak South has the opportunity to become a new commercial centre~~hub~~3 that supports London's economic growth and role as a global city. This potential is driven by the areas excellent future connections to the Midlands and the north of England, Central London and Canary Wharf, and ~~also~~ its easy access to Heathrow and Gatwick Airports. Key sectors that will likely be attracted to this new accessible brownfield site ~~in zones 2 and 3~~ will include ICT, media and creative services, professional and financial services and life sciences4. To support this, new development should enable delivery of a significant amount of new flexible B1a employment space. ~~The future design and planning of commercial buildings should respond to the form and typology of commercial uses at that time, but should pioneer new and innovative practices that would ensure Old Oak South is considered as an attractive commercial location.~~

~~1.12~~ 1.11 This ~~hub~~ commercial centre will likely be delivered following the opening of Old Oak Common station (2026). This timing puts Old Oak South in a~~n~~ strong~~unparalleled~~ position to contribute to London's commercial floorspace pipeline, at a time when other current major regeneration schemes would be completed, or nearing completion, such as Kings Cross, Paddington and White City.

~~1.13~~ 1.12 Old Oak South will also be home to part of the new Old Oak~~a~~ major ~~new~~ town centre~~, along with new social infrastructure and hotel uses~~. Town centre uses should be focused in the town centre as depicted in figure x3.8. ~~and around Old Oak Common Station (see policy P1C1), along Old Oak High Street and at busy locations alongside the Grand Union Canal.~~ Town centre uses should also complement and connect with other sections of this new town centre located within Old Oak North and ~~Acton Wells~~North Acton and Acton Wells (P7).

~~It will be important that this major town centre complements the surrounding network of town centres, including Harlesden, North Acton, Atlas Junction, Park Royal Centre and Shepherds Bush to the south. Old Oak South sits in close proximity to Harlesden district town centre. To support the functioning of this established town centre, a Harlesden Enhancement Strategy is required for applications over 5,000 sqm of town centre uses. Proposals should be discussed with OPDC and the London Borough of Brent, and coordinated with the Harlesden Town Centre Manager, prior to submission and should include (but not be limited to):~~

~~details of how proposed links with Harlesden would be designed, delivered and their timescales; and~~
~~the scale of potential financial contributions to mitigate any impacts, including details on how they will contribute to the implementation of the Harlesden Action and Investment Plan including what monies are proposed to be spent on (for example, public realm improvements, shop front initiatives, marketing strategies).~~

Cultural, meanwhile and catalyst uses ~~will~~ can play an important role in supporting the development of this new major town centre destination and Cc~~c~~ultural ~~q~~Quarter ~~and would be supported where they accord with other policies in the Development Plan~~ in Old Oak (see Policy SP6). ~~Meanwhile uses will play a positive role in activating the land around and within the station when it opens, but in advance of comprehensive redevelopment across Old Oak South (see Policy TCC9).~~

Commented [PF25]: Specific amendment.
Reason: To reflect ongoing exploration of grade separation.

Commented [PF26]: Specific amendment.
Reason: To avoid repetition with policies E1 and E2.

Commented [PF27]: Specific amendment.
Reason: To avoid repetition with the policy.

Commented [PF28]: Regulation 19(1) consultation amendment.
Reference: TC307, F359
Reason: Relocated to Policy TCC1 for clarity.

Commented [PF29]: Specific amendment.
Reason: To avoid repetition with policy TCC9

~~1.14~~ 1.13 The area is currently isolated from neighbouring locations by railway infrastructure, level changes and the Grand Union Canal. Significant challenges to movement are also presented by the proposed and existing railway infrastructure of Old Oak Common Station, the Elizabeth Line Depot and sidings and the Intercity Express Programme (IEP) Depot.

~~1.15~~ 1.14 Comprehensive redevelopment should deliver a diversity of legible and comfortable streets and spaces that reflect the future intensity of use. New development should help to connect Old Oak South and the station into the wider movement network5. This will enable local people to access the extensive range of new uses, services, open spaces and employment opportunities. The key routes within the new movement network to be delivered during the plan period are Old Oak ~~High~~ Street (including the green bridge to Wormwood Scrubs), ~~Grand Union Street~~ and Park Road. The delivery of Wormwood Scrubs Street is expected to take place after the plan period and is contingent on the redevelopment of the IEP Depot. Although outside of the plan period, development proposals should appropriately safeguard Wormwood Scrubs Street's future delivery.

~~1.16~~ 1.15 The delivery of connections to Old Oak Common Station from the surrounding places will be critical in fully connecting Old Oak South into its surroundings in a clear and legible manner. Connections to Old Oak North will be particularly important after the opening of the station to enable ~~the expected 8,000~~ people ~~at weekday morning peak hours~~ to ~~transfer between the~~reach Old Oak Common Station ~~and Hythe Road Station 6~~. Delivering Old Oak Street as a high quality route will be particularly important for connectivity. ~~The form and roles of these routes will likely vary, helping to strengthen local identity and will be an important place for social interaction and town centre uses. To support a potential connection with the existing Chiltern Line services, development should safeguard land to enable access to Chiltern Railway Services and wider regional connections.~~

~~1.17~~ Equally important will be providing a new ~~sensitive routes~~green ~~bridge~~ to Wormwood Scrubs off Old Oak Street, to enable communities to access this important area of Metropolitan Open Land~~, District Park~~ and Metropolitan Park. In addition, Old Oak Common Station should not preclude a connection to the south in the future. Any connection will need to consider how it will cross and provide passive provision for future development on the IEP Depot. ~~Other routes may include a green bridge to the east from Old Oak North and additional routes around the station.~~

~~1.18~~ 1.16 ~~The movement network provides the opportunity to integrate green infrastructure into streets, open spaces and the public realm. This approach will ensure that the valuable open spaces across Old Oak South are maximised to perform a variety of roles to support such a large and diverse population, while also providing climate change resilience. These spaces will include station public realm and / or other squares adjoining Old Oak Common Station and two Local Parks. Open spaces to the west of Old Oak Common Station will only be feasible subject to HS2 operational constraints. Delivery of all these spaces will support OPDC's target to deliver 30% of the development area as publicly accessible open space (see Policy SP8).~~

Commented [PF30]: Specific amendment.
Reason: To reflect updated connectivity evidence base.

Commented [PF31]: Specific amendment.
Reason: To focus on providing access to Old Oak Common Station.

Commented [PF32]: Specific amendment.
Reason: To avoid repetition with policies SP2 and SP7.

Commented [PF33]: Specific amendment.
Reason: To avoid repetition with policies SP2 and SP7.

Commented [PF34]: Regulation 19(1) consultation amendment.
Reference: P12/19
Reason: To confirm the form of the connection across the Intercity Express Depot has yet to be defined.

Commented [PF35]: Specific amendment.
Reason: To avoid repetition with policies EU1 and EU2.

Commented [PF36]: Specific amendment.
Reason: To avoid repetition with policies EU1 and EU2.

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1.19 1.17 The canalside Local Park will be an important feature in informing local character. It will also perform a range of roles, including leisure, walking and cycling routes, canalside activities and social uses. It may continue to include the Birchwood Nature Reserve, alongside other canalside spaces in Old Oak South and Old Oak North. To support these roles, the Grand Union Canal Local Park is envisaged to include green landscaping, civic spaces of Grand Union Square aand a range of outdoor leisure facilities. Within Old Oak South, 30% of developable land should be publicly accessible open space. This can be achieved through the delivery of the new Old Oeak South Local Park (please refer to Policy SP8 for the area of search for this park), enhancements to the Birchwood Nature Reserve (as part of the Grand Union Canal Local Park – see Policy P3) and a range of other spaces. The character of the Old Oak South Local Park will differ from the park along the canal. It will comprise a number of connected open spaces ranging from hard landscaped station squares with civic functions to green pocket parks. Open spaces to the west of Old Oak Common Station will only be feasible subject to HS2 operational constraints. These spaces will be delivered over the long-term and likely beyond the plan period.

1.20 Historically Old Oak South has been characterised by the Grand Union Canal, railway infrastructure and nearby Wells House Road and Wormwood Scrubs and areas used to support the functioning of the railway7. This rich canalside and railway heritage provides an opportunity to inform the design character of new development which can conserve and enhance the area's unique heritage offer. To the north and south of Old Oak South, the context provided by Wells House Road, the Grand Union Canal and Wormwood Scrubs should also help to inform the future character of development.

London Plan policy and national guidance seek to optimise development at transport interchanges and on brownfield land. As such, the station will act as a major catalyst for the development of the OPDC area, placing Old Oak South at the heart of one of the UK's largest regeneration projects, with the opportunity to become a new London destination. In light of this, high densities and tall buildings delivering a range of uses will be appropriate. Old Oak South is a brownfield site and will have unparalleled access to excellent public transport facilities. This presents a unique opportunity to build at high density that should include a range of building heights, including tall buildings across this place. In designing and locating tall buildings, the tallest buildings should be focused around Old Oak Common Station subject to HS2 operational constraints and where enabling works for such building works are included within the HS2 scope. Tall buildings should also be located along Old Oak High Street at key town centre destinations, and at other points of the greatest activity across Old Oak South. These locations will need to be determined through more detailed site specific design work. There may also be opportunities for tall buildings in other locations and these would need to be considered in line with policies in the London Plan and the design, housing and environmental policies in this Local Plan.

1.18 It is important that the existing context helps to shape building heights across the area. Development should respond appropriately to surrounding sensitive locations. In areas along the Grand Union Canal, the appropriate response for development is toshould deliver buildings fronting directly onto the canal and the canalside park that are generally 6 to 8 storeys8, which respond more sensitively to its designations as a conservation area and Site of Importance for Nature Conservation. However, along the canal there will be opportunities for some tall buildings at key crossings to support legibility. Alongside Wormwood Scrubs, development should respond to the its character of theas Metropolitan Open Land, and development close to existing residential areas should ensure that it does not result in an over-bearing mass of buildings. Historically Old Oak South has been characterised by the Grand Union Canal railway infrastructure and nearby Wells House Road and Wormwood Scrubs7. This rich heritage provides an opportunity to inform the character of new development which can conserve and enhance the area's unique heritage offer.

Commented [PF37]: Specific amendment.
Reason: To avoid repetition with policy P3.

Commented [PF38]: Specific amendment.
Reason: To provide clarity regarding implementation of policies beyond the plan period.

Commented [PF39]: Specific amendment.
Reason: To avoid repetition with policies SP9 and D8.

Commented [PF40]: Specific amendment.
Reason: To avoid repetition with Introduction chapter.

Commented [PF41]: Specific amendment.
Reason: To avoid repetition with policies SP9, D5 and London Plan policies.

Commented [PF42]: Specific amendment.
Reason: To avoid repetition with policy P3.

Commented [PF43]: Specific amendment.
Reason: To avoid repetition with policies SP9 and D8.

The creation of a new commercial ~~hub~~centre, major town centre and high density mixed use neighbourhoods will necessitate the provision of a substantial amount of ~~social and physical~~ infrastructure. OPDC's IDP identifies the likely requirements for ~~social i~~infrastructure in the area. A significant amount of social infrastructure will be required. Current population and child yield projections indicate that there is a need to deliver one community hub, one supernursery, and a sports centre in Old Oak South. ~~-~~These requirements are based on current population and child yield projections, which could change over time thereby impacting on the size and type of facilities required (see Policy TCC4). ~~OPDC will work closely with stakeholders, including land owners, to facilitate their delivery and it will also update the IDP regularly as appropriate to ensure that it reflects the development requirements of the area.~~Proposals should appropriately safeguard land for and contribute to and/or deliver these and other infrastructure requirements set out in the IDP, in accordance with Policy~~,~~ SP10.

~~1.21 The regeneration of Old Oak South generates a need for a primary school. Based on current phasing, the most appropriate site to deliver a school is either the Old Oak Common station site and surrounds or on the Elizabeth Line Depot and sidings. This primary school is not required for a number of years and the most appropriate site will need to be kept under review. Any alternative site would need be agreed with by OPDC and the service provider in accordance with policy TCC4. Further details on the specification and the approach to the provision of this facility (including alternative arrangements) are set out in Policy TCC4. Studies9 also identify the need for the on-site provision of sports and leisure facilities and community hubs. A sports and leisure centre, including a 25m swimming pool, is currently envisaged to be delivered in this place with another centre being delivered in Old Oak North. If feasible, this provision could be delivered as a single centre in either place including the delivery of a 50m swimming pool.~~

Commented [PF44]: Specific amendment.
Reason: To provide clarity regarding implementation of policies beyond the plan period.

~~1.22 Further details on the requirements for the sports and leisure centre can be found in Policy TCC5 and the community centre hub in Policy TCC4. In accordance with Policy SP10, an equitable equalisation mechanism will be applied to the delivery of any on-site social infrastructure, to ensure even sharing of the costs of delivering the facility. OPDC will also employ a retrospective pooling contribution mechanism, to provide additional planning contributions towards delivery of the facility from other appropriate developments (see policy TCC4).~~

~~Early development in Old Oak South will be supported. However, given the majority of the sites in the area include the Intercity Express Programme Depot, Old Oak Common Station and Elizabeth Line Depot and sidings it is likely that most of development in Old Oak South will be delivered after the opening of Old Oak Common Station in 2026.~~

Commented [PF45]: Specific amendment.
Reason: To avoid repetition of policy SP10.

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POLICY P1C1: OLD OAK COMMON STATION CLUSTER

VISION

V1. Old Oak Common station will be a state of the art, exceptionally designed, 21st century multi-modal transport interchange. It will become a destination at the heart of a new major town centre and commercial ~~hub~~ centre for London. ~~Seamlessly~~ Set within high quality public open spaces and highly connected~~integrated~~ into its surroundings, the station will be a catalyst for growth locally, across London and the UK.

POLICY

OPDC will work positively and proactively with High Speed 2 and all stakeholders to support the delivery of Old Oak Common Station and associated works in accordance with the High Speed Rail (London – West Midlands) Act 2017. Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:

~~Design and Heritage~~

~~a) Supporting the delivery of an exceptional, world-class, 21st century station and station public realm and / or other squares, inspired by the UK's railway history and that reflects local railway character.~~

Development and Phasing

b) Working positively with the Department for Transport and High Speed 2 Limited to facilitate the delivery of Old Oak Common Station in accordance with the High Speed Rail (London – West Midlands) Act 2017;

~~b)~~c) Supporting the timely delivery of an exceptionally designed, world-class, 21st century station and~~,~~ associated public realm and publicly accessible ~~/ or other squares~~open spaces;

d) Supporting the integration of the station with surrounding areas by ensuring it is designed to be resilient and adaptable to respond to a surrounding changing context including the longer-term redevelopment of Elizabeth Line Depot and sidings and Intercity Express Programme Depot, a new street network, new public open spaces and interchange facilities;

e) Supporting the design and operation of the station by ensuring it pioneers and responds to technological innovation and behavioural change.

Land Uses

b) Ensuring the station's design and its surrounds support Old Oak becoming a new commercial centre, part of Old Oak major town centre, Cultural Quarter and home to high density housing; and

~~b)~~ Ensuring the station is a destination where people want to spend time by ~~:~~

c) clustering permanent and meanwhile town centre uses within and around the station~~; and~~;

~~i. clustering permanent and meanwhile town centre and employment uses around the station.~~

Public Realm and Movement

d) Integrating the station within the wider movement network, across all phases, by delivering legible, accessible, comfortable and 24-hour public routes through and to the station;

e) Ensuring the station delivers, contributes to and/or enables the delivery o~~f new station~~ public realm that connects seamlessly with the wider street and open space network including ensuring that the vertical and horizontal alignments of routes and entrances optimise this wider integration ~~including Old Oak High Street, Grand Union Street and Wormwood Scrubs Street.~~;

f) Providing a high quality transport interchange by:

Commented [PF46]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [TC47]: Specific amendment.
Reason: Relocated from Policy P1

Commented [TC48]: Specific amendment.
Reason: Relocated from below to aid the flow of the policy and supporting text

Commented [PF49]: Specific amendment.
Reason: To shorten the policy.

Commented [PF50]: Specific amendment.
Reason: To support access to the station.

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i. **delivering an efficient and seamless journey from street to platform;**

ii. **ensuring the station and associated public realm, movement routes and ~~/ or other squares~~open spaces are designed for high amounts walking and cycling movement and deliver clear routes; and**

iii. **locating and distributing station transport interchange facilities ~~as predefined by the High Speed Rail (London – West Midlands) Act 2017 scheme and exploring opportunities for non-preclusion of other interchange facilities, such as on Old Oak High Street~~in appropriate locations to adequately serve the station and to support the effective integration of the station within surrounding public realm and movement network, whilst ensuring that the surrounding public realm is not vehicle dominated ~~and Grand Union Street~~; ~~;~~**

g) Creating a high quality environment by focusing the delivery of public art within Old Oak Common Station and surrounding ~~the station~~ public realm and publicly accessible ~~/ or~~ open spaces~~other squares~~;

Green Infrastructure and the Environment

~~**h) Working with landowners to ensure development around Old Oak Common Station contributes to the delivery of new station public realm and / or other squares that successfully accommodate transport interchange facilities, support wider connectivity and provide space for social and leisure activities;**~~

h) ~~Demonstrating how the station public realm and / or other squares could contribute to the delivery of a Local Park within the Old Oak South .~~Providing a series of high quality publicly accessible open spaces around the station;

i) Demonstrating how the station public realm and publicly accessible open spaces contribute to the delivery of the Old Oak South Local Park;

~~**j) Ensuring new station public realm and / or other squares are connected into the wider network of open spaces across Old Oak South;**~~

~~k)~~j) Ensuring new station public realm ~~and / or other squares~~and public open spaces provide good levels of large canopy tree planting, green infrastructure and facilities for outside relaxation and socialising in areas with the highest amount of daylight and direct sunlight; and

~~**l) Ensuring the delivery of the station supports a coordinated approach to the design and use of open spaces;**~~

~~m)~~k) Providing access to nature and delivering green infrastructure within the design of the station and ~~, station~~ associated public realm and ~~/ or other squares~~ publicly accessible open spaces in accordance ~~with OPDC's Environmental Standards and the~~with Policies SP8, EU1 and EU2 and HS2 Ltd's Commitments to Sustainability.~~;~~

~~**Development and Phasing**~~

~~**Supporting the integration of the station with surrounding areas by ensuring it is designed to be resilient and adaptable to respond to a surrounding changing context including the Elizabeth Line Depot and sidings, Intercity Express Programme Depot, delivery of Old Oak High Street and other routes, location of open spaces and interchange facilities;**~~

~~**Ensuring the station's design and its surrounds support Old Oak becoming a new commercial hub, part of a new major town centre, cultural quarter and home to high density housing that optimises development in response to the place's public transport accessibility and significant investment in the area;**~~

~~**Supporting the design and operation of the station by ensuring it pioneers and responds to technological innovation and behavioural change.**~~

Commented [TC51]: Specific amendment.
Reason: To reflect the need to adequately serve the station and the need for it to effectively integrate with surrounding public realm and connections.

Commented [PF52]: Specific amendment.
Reason: To avoid repetition with policy T5.

Commented [PF53]: Specific amendment.
Reason: To avoid repetition with policies EU1 and EU2.

Commented [TC54]: Specific amendment.
Reason: To reference relevant policies.

Commented [TC55]: Specific amendment.
Reason: Relocated to the start of the policy to aid the flow of the policy and supporting text

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SUPPORTING TEXT

1.19 Old Oak Common Station will be one of the largest sub-surface station to have ever been built in the UK and will be a high profile transport interchange that provides access to an expanded Heathrow and beyond.

1.20 The station will be one of the defining features in Old Oak in terms of its design and role as a nationally significant transport interchange. It will support Old Oak in becoming a destination for a range of commercial, town centre, catalyst and residential uses. As such it is important that the station design is coordinated and integrates with development sites around it.

1.21 The Old Oak Common Station will serve High Speed 2, the Elizabeth Line and Great West Mainline. OPDC will work positively, proactively and transparently with relevant stakeholders including the Department for Transport, High Speed 2, Network Rail and Transport for London to support the timely delivery of the Old Oak Common Station, associated works and the comprehensive regeneration of Old Oak South. OPDC will also work with transport operators to appropriately safeguard land for other supported rail connections into the station. At the time of publication of this Local Plan, this include the proposed Chiltern Line services. Please see OPDC's IDP for up-to-date requirements for safeguarding.

~~1.23~~ 1.22 The delivery of Old Oak Common station and its associated public realm and infrastructure has been approved by Government through the ~~The~~ High Speed Rail (London – West Midlands) Act 2017, which gained Royal Assent in February 2017 ("the Act"). The Act defines the powers, Act limits (including land to be acquired and used), and sets the scope of High Speed 2 ("HS2") Limited. To support the delivery of the Act, an associated planning regime (Schedule 17) has been developed. This establishes the approvals process and sets out the grounds for OPDC to determine submissions for proposals such as construction arrangements, plans and specifications of proposed buildings and restoration of sites. It enables OPDC to work with HS2 to modify the design or external appearance of the building to preserve the local environment or local amenity. The consideration on any approval for works to be carried out in relation to Phase One of HS2 are limited to those set out in Schedule 17. OPDC recognises the extent of High Speed 2 Limited's powers, land interests and scope as set out in the Act.

Commented [PF56]: Specific amendment.
Reason: To clarify role of OPDC in implementing Schedule 17.

~~1.24 1.1 OPDC will work positively, proactively and transparently with relevant stakeholders including the Department for Transport, High Speed 2, Network Rail and Transport for London to support the delivery of the Old Oak Common Station, associated works and the comprehensive regeneration of Old Oak South.~~

~~1.25 Old Oak Common Station will be a major catalyst for the regeneration of Old Oak and Park Royal. It will help establish Old Oak South as a new commercial hub centre and part of a new major town centre. It will also help to unlock the associated economic benefits and the significant number of new homes and jobs that can be delivered.~~

Commented [PF57]: Specific amendment.
Reason: To avoid repetition with supporting text to policy P2.

~~1.26 1.1 The station will be one of the defining features in Old Oak in terms of its design and role as a nationally significant transport interchange. It will support Old Oak in becoming a destination for a range of commercial, town centre, catalyst and residential uses. As such it is important that the station design is coordinated and integrates with development sites around it.~~

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~~1.27~~ 1.23 ~~Old Oak Common Station will be one of the largest sub-surface station to have ever been built in the UK and will be a high profile transport interchange that provides access to an expanded Heathrow and beyond.~~ To reflect the station's significance, its design quality should be exceptional and will be expected to deliver inspiring spaces, structures and buildings. The station will partially sit on the Great Western Main Line, a line that was engineered by the famous Isambard Kingdom Brunel. This heritage provides an excellent opportunity to reflect both the UK's proud railway heritage and the area's local railway character in the future design of this new station. The station should be informed by best practice and should pioneer ~~emerging trends,~~ smart city concepts. ~~and should complement other new stations along the HS2 line. As part of this, environmental sustainability will need to be a central component in its development to deliver OPDC's environmental policies (see Environment and Utilities Chapter).~~ This could include providing gateless access to platforms to support walking and cycling routes within and through the station.

~~1.28~~ 1.24 Permanent and meanwhile active uses (managed through policy TCC9) within and around the station will play an important role in helping the station to be outward looking and establish it as an integral part of Old Oak ~~High Street~~ major town centre. How these uses and adjacent public realm are designed will be critical in activating the station public realm and / or other squares, internal spaces and adjacent areas. ~~The station and associated spaces will need to be activated once the station is open alongside meeting the needs of residents, employees and passengers in later stages.~~

~~1.29~~ 1.25 The High Speed Rail (London – West Midlands) Act 2017 scheme currently sets out that Old Oak Common station will be designed to provide interchange facilities for 54,366 passengers which does not consider proposed development within the OPDC area. To help inform the design of Old Oak South, TfL have carried out modelling which identifies that in 2031 approximately 250,000 passengers per day will interchange within the station and 42,000 passengers will leave the station to interchange with other modes. As such, the layout of the movement routes within and around the station needs to support local permeability and legibility. The station should be designed for non-preclusion to allow for modifications to enable these routes to be ~~made~~ delivered at a later date.

~~1.30~~ 1.26 Topographical changes could have a negative impact on the quality of the public realm, ~~new routes~~ if not appropriately ~~integrated~~considered and addressed early in the design of the station. ~~A key component of this will be working with~~OPDC will work with HS2 ~~Limited~~ Ltd to ensure station entrances established by the Act and any future entrances are integrated with the surrounding street network. This will also include defining opportunities for delivering, contributing and / or enabling other entrances and routes in the form of direct and / or passive provision. ~~To support people reaching other destinations, other transport interchange facilities such as cycle parking, bus stops and pick-up points should, in the long term, be located on to Old Oak Common Station northern station square and Old Oak High Street2.~~

~~1.31~~ 1.27 Public art provides many social and cultural benefits. It can also support place making and inform local identity. To maximise the impacts of these benefits, public art should be located within Old Oak Common Station and ~~the station~~within its associated public realm and public open spaces~~/ or other squares~~, where significant numbers of people can enjoy and experience it.

Commented [PF58]: Specific amendment.
Reason: To avoid repetition with policy EU9

Commented [PF59]: Specific amendment.
Reason: To illustrate smart city concepts relevant to train stations.

Commented [PF60]: Specific amendment.
Reason: To avoid repetition with policies EU1 and EU2

Commented [TC61]: Regulation 19(1) consultation amendment.
Reference: P1C1/5
Reason: To clarify modelling date.

Commented [TC62]: Regulation 19(1) consultation amendment.
Reference: P9/13
Reason: To clarify modelling date.

Commented [TC63]: Specific amendment.
Reason: To align with policy T4.

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~~1.32 The development opportunities~~Development on and around the station ~~provide an opportunity to~~should support the delivery of publicly accessible open spaces that support the high levels of passengers interchanging between modes while providing spaces for people to spend time and make use of the uses at Old Oak Common Station3. Given the high levels of use of these spaces, it is anticipated that they will need to include significant amounts of hard landscaping. However, t~~T~~hese spaces can also contribute to the provision of urban greening and the delivery of the Old Oak South Local Park. Open spaces and public realm in this location will be used by a variety of people living and working and visiting the station and surrounding area. Consideration should be given the resilient design of features in these spaces and to the optimisation of levels of daylight and sunlight into these spaces to enable the provision of high quality green infrastructure and to ensure that they are inviting spaces where people wish to spend time.

Commented [PF64]: Specific amendment.
Reason: To align with policy EU2.

~~1.33~~ 1.28 ~~The scheduled opening of Old Oak Common Station in 2026 provides the opportunity for the design and operation of the station to support technological innovation. A potential opportunity for this may be providing gateless access to platforms to support walking and cycling routes within and through the station.~~

Commented [PF65]: Specific amendment.
Reason: Relocated and condensed to above paragraph.

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POLICY P2: OLD OAK NORTH

VISION

New connections will unlock Old Oak North to support the early delivery of a high density residential-led place. Neighbourhoods within Old Oak North will contain a diverse mix of homes alongside new employment spaces, cultural uses, social infrastructure, town centre uses and the Grand Union Canal food and beverage quarter. These uses, publicly accessible open spaces and the area's heritage, including the Grand Union Canal and the Rolls Royce Building, will ensure Old Oak North is a vibrant new place, that people will want to live in, work in and visit.

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

Land Uses

a) Supporting the creation of a thriving, mixed use, high-density place that contributes to the delivery of a minimum of 6,500 new homes and 3,600 new jobs during the plan period including early delivery of 2,800 new homes towards OPDC's 0-10 year housing supply;

b) Contributing to the delivery of a range of town centre uses along key routes, at Harlesden Place, at the potential Hythe Road Station and along the Grand Union Canal to deliver the Grand Union Canal food and beverage quarter;

~~Contributing to the provision of a range of homes across the place including:~~

- ~~focusing a higher amount of family-sized housing around Old Oak Gardens and Stamford Gardens; and~~
- ~~focusing a higher amount of smaller housing units around the Rolls Royce Building.~~

c) Supporting the local economy by delivering a range of high quality employment workspaces across Old Oak North including:

i. along the key routes of Old Oak Street and Park Road;

ii. within and around the Rolls Royce Building to support its role as an SME business hub; and

iii. B1c uses along the ground floor fronting on to the Haul Road.

Infrastructure

d) Ssafeguarding land for and contributing to and/or delivering the West London Line on a raised viaduct;

e) Ssupporting the reduction or where feasible, the removal of remaining railway embankment slopes where this can contribute to the delivery of optimised development;

f) Ssupporting and contributing to the delivery of a potential new Hythe Road London Overground Station and associated transport functions;

Public realm and movement

g) Contributing to, and enabling, the delivery of a high quality, legible, permeable, inclusive and accessible street network by:

i. ensuring timely access to existing and/or new public transport to achieve the highest Public Transport Accessibility Level to support high density development;

ii. contributing to, and enabling, the delivery of the key routes shown in figure x;

Commented [PF66]: Policy wide amendment

Amendment: Full policy has been replaced.
Reason: To reflect recommendations of the Old Oak North Development Framework Principles.

Commented [PF67]: Regulation 19(1) consultation amendment.
Reference: P2/37 and P2/8
Reason: To provide flexibility for location of different residential unit sizes.

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iii. delivering excellent permeability for all transport modes, including double decker buses, across the West London Line; and

iv. retaining and/or providing sufficient access capacity to Old Oak Sidings and European Metal Recycling sites while in operation.

Green infrastructure and the environment

h) Contributing to and / or delivering a high quality, well-used, well-connected, network of multifunctional publicly accessible open spaces across Old Oak North. This should include:

i. Old Oak North Local Park of a minimum 2 hectares in size;

ii. Grand Union Canal Local Park provided between Old Oak North and Old Oak South including the Canal Park and Birchwood Nature Reserve that are linked by bridges and is of a minimum of 2 hectares in size;

iii. Rolls Royce Yard;

iv. supporting the delivery of new multi-functional canal basins and waterspaces where they provide amenity, leisure and sustainable drainage functions; and

v. where retained, contributing to the enhancement of railway embankments to increase visual amenity and to provide biodiversity value in accordance with policy EU2.

i) Locating sensitive uses away from pollution sources and mitigating the impacts of noise and air pollution generated by rail and road transport and Old Oak Sidings waste facility;

j) Making efficient use of Old Oak Sidings by:

i. safeguarding the site for continued use as a waste management site;

ii. supporting and/or enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area, where this accords with other relevant policies including Policy EU4; and

iii. supporting the delivery of an integrated utility hub on the site.

Heritage and character

k) Strengthening local identity and character by:

i. conserving and enhancing heritage assets including the Grand Union Canal Conservation Area, Grade I Listed Kensal Green Cemetery Registered Park and Garden, the Rolls Royce Building and their settings; and

ii. ensuring future local character is informed by the area's existing heritage including the railways, Grand Union Canal and industrial heritage to deliver a network of locally distinctive neighbourhoods.

Building heights

l) Contributing to a variety of building heights that respond to public transport access and sensitive locations by:

i. supporting the delivery of tall buildings in Old Oak North in accordance with Policies SP9 and D5;

ii. delivering increased heights and massing near to railway lines to mitigate impacts on the public realm and residential amenity;

iii. appropriately responding to the existing residential area of the Island Triangle; and

iv. appropriately responding to the Grand Union Canal and its roles as set out in Policy P3.

Commented [PF68]: Regulation 19(1) consultation amendment.
Reference: P8/19
Reason: To strengthen guidance on supporting air quality.

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SUPPORTING TEXT

1.30 Old Oak North is located between the Grand Union Canal in the south and Willesden Junction and Harlesden to the north. The area is currently home to a large car manufacturing and retail business, a range of light industrial uses, creative industries, waste management facilities at Old Oak Sidings and the European Metal Recycling site and land that is required for rail purposes.

1.31 Today, access into Old Oak North is very poor with only one vehicular route at Hythe Road and three low quality walking routes from Willesden Junction Station, a pedestrian bridge over the Grand Union Canal and along Hythe Road from Scrubs Lane. Access is restricted by significant amounts of rail lines and the Grand Union Canal.

1.32 The arrival of Old Oak Common Station in 2026, coupled with access and capacity improvements to Willesden Junction Station and a new street and bus network will all significantly improve public transport access. Modelling shows that these enhancements could deliver a high Public Transport Accessibility Level (PTAL) of 6a or 6b – the highest public transport access categories. London Plan policy and national guidance seeks to optimise development at transport interchanges and on accessible brownfield land. As such, the potential increase in access to public transport accessibility provides the opportunity for Old Oak North to become a high density mixed use area with a range of building heights including tall buildings.

1.33 Old Oak North will be largely unencumbered by activities associated with the construction of Old Oak Common station to the south. It also benefits from having a semi-consolidated land ownership with a limited number of land owners. This place can therefore make a significant contribution to OPDC's homes and jobs targets in the short to medium term. However, to support early delivery, a number of key challenges need to be addressed. These include delivering the West London Line viaduct, delivering new crossings across railways and the Grand Union Canal, retaining and mitigating the impacts of waste management facilities at Old Oak Sidings, managing transport impacts on the road network, ensuring the timely access to public transport at Willesden Junction and Old Oak Common Stations and ensuring the phasing of development provides the full range of uses, to meet the needs of people living and working in Old Oak.

1.34 OPDC has produced an Old Oak North Development Framework Principles (OONDFP) document to provide further detail on the area's development capacity, land use mix and infrastructure required to support the needs of development and create a high quality place. The principles within this document inform the policy for this place. OPDC will also produce an Old Oak North and Scrubs Lane Supplementary Planning Document, which will include more detailed guidance principles for the Old Oak North and Scrubs Lane places (see Policy P10).

1.35 The OONDFP identifies that to optimise development capacity and deliver high quality connected mixed use neighbourhoods, the West London Line should be delivered on a raised viaduct and the remaining embankment slopes should be reduced or where feasible, removed to increase the availability of land for development, public realm and publicly accessible open space. The delivery of the viaduct should support the delivery of a new potential Hythe Road Overground station, which would further support place-making.

1.36 Applicants should safeguard land for, and contribute appropriately to, the delivery of the viaduct and station. It is recognised that the delivery of the West London Line on a viaduct is not yet committed and will require significant joint working between OPDC, Network Rail, TfL and other landowners and relevant stakeholders. If it is agreed~~,~~ with OPDC, TfL and Network Rail~~,~~ that the West London Line cannot be delivered as a viaduct, the railway will then need to remain on the current embankment. In this situation, development would still need to deliver high quality legible, permeable and accessible routes under this embankment. These connections will also need to allow for the

passage of double decker buses under the embankment. In addition, there will be a need to deliver an additional all modes connection to Scrubs Lane to provide a high quality route to surrounding areas. The Old Oak North and Scrubs Lane SPD will provide further guidance in respect of land use and infrastructure if the delivery of the West London Line on a viaduct is proven to be infeasible.

1.37 The OONDFP identifies that the area has the capacity to deliver a minimum 6,500 new homes and 3,600 new jobs during the plan period and 7,300 homes and 3,900 new jobs across the total development period. These targets are predicated on the delivery of the West London Line on a viaduct and by reducing the land taken up by the remaining embankment slopes. If the viaduct is not delivered, or the removal of the railway embankment slopes is not shown to be feasible, this may mean be that homes and jobs targets are no longer achievable and this would trigger a review to the homes and jobs targets for this place. OPDC will monitor the requirement for this review as part of its Authority Monitoring Report.

1.38 The provision of new employment spaces will contribute to local vibrancy and job opportunities. B1 uses should be focused along key routes and within the Rolls Royce Building, which could provide space for SMEs and support the relocation of existing small businesses in the area, in accordance with Policy E3. The haul road is a suitable location for B1c uses, where residential uses at ground floor level would not be likely to be appropriate due to air quality, noise and vibration impacts.

1.39 There is also a significant need for new town centre uses within Old Oak North to meet the needs of new communities. Old Oak North will be part of the new Old Oak major town centre. The town centre within Old Oak North should~~will~~ be focused along key routes, at Harlesden Place and along the Grand Union Canal, including crossing points and around publicly accessible canalside open spaces. Harlesden Place will play~~lace~~ an important role as a key access point to Harlesden from Old Oak North and therefore will likely be a location of focused activity. Locations along the Grand Union Canal provide opportunities for leisure, eating and drinking uses (A3 and A4 Use Classes) that will benefit from the south facing orientation and canalside environment to support the creation of a food and beverage quarter. Cultural and catalyst uses in Old Oak North will also be supported and will support the creation of a Cultural Quarter in Old Oak (see Policy~~policies~~ SP6~~, TCC5 and TCC8~~). There may also be the opportunity for large-scale town centre uses or catalyst uses, which do not require significant street frontage such as theatres and cinemas, to make use of and respond to significant level changes within sites along key routes (se Policy TCC8).

1.40 Old Oak major town centre will be delivered in phases. In the interest of activating this new place from the outset, meanwhile town centre uses will be encouraged across Old Oak North, managed in accordance with Policy TCC9. Floorspace delivered for meanwhile uses should ~~therefore~~ be designed to be flexible to accommodate a range of active uses.

1.41 Old Oak North must be supported by a high quality and adaptable movement network that provides access across the area and into surrounding areas. Ensuring timely access to new and/or existing public transport will be critical to support high density development in this place. Development will need to achieve a minimum PTAL of 6b, including through improved access to Willesden Junction and Old Oak Common stations, high quality walking, cycling connections and a new bus network. This may also include a potential new Hythe Road station on the West London Line viaduct. In addition to providing access to public transport, the movement network will need to deliver the requirements for Healthy Streets including encouraging walking and cycling and integrating urban greening.

1.42 Park Road will be an early key route delivered across Old Oak North, connecting Old Oak Common Lane to Scrubs Lane. This vital piece of infrastructure should be delivered within the first 5 years of the plan period, to significantly enhance east-west connectivity and permeability and PTALs. The street will also be critical for servicing development plots along its length, which have been identified for early delivery and is key to OPDC delivering 2,800 homes and 1,900 jobs in this place during the

first ten years of the plan period. Park Road should be designed for all modes, but should not be delivered as a through route for private vehicles.

1.43 Old Oak Street may be delivered later than Park Road but will provide an important connection to Old Oak Common Station and Willesden Junction Station. Old Oak Street should be designed to be a vehicular route, where feasible, but as with Park Road, it should not be designed as a through route for private vehicles. Infrastructure studies have shown that the delivery of the northern most section of Old Oak Street across Harlesden Place to Willesden Junction is likely to be very challenging to deliver as an all modes route and at the time of the publication of this Local Plan, OPDC would support its delivery as a wide pedestrian and cycle only connection, but stakeholders should refer to OPDC's Infrastructure Delivery Plan (IDP) to find the most up-to-date position on infrastructure requirements.

1.44 Hythe Road is an existing key route and should be enhanced to become a legible connection between Scrubs Lane and Park Road. In delivering these enhancements, the final position of Hythe Road will be finalised through detailed design and must:

- enable development of adjacent sites to be optimised;
- support the delivery of utilities infrastructure corridors and support the delivery of the Canal Park;
- respond to the setting of the Rolls Royce Building; and
- safeguard a longer-term vehicle connection to Old Oak Sidings.

1.45 The alignment of Hythe Road in figure 4.7~~x~~ is indicative, based on current evidence [footnote to OONDFP]. The exact alignment of Hythe Road would need to be considered through further work undertaken as part of planning applications.

1.46 The delivery of a new high quality ~~and potentially green~~ bridge from Old Oak Street into Wormwood Scrubs will be important to enable communities in Harlesden and Old Oak North to access this Metropolitan Park and destinations beyond such as White City and Shepherd's Bush. Development in Old Oak North will need to support delivery of this bridge.

1.47 Within Old Oak North, 30% of developable land should be publicly accessible open space. This can be achieved through the delivery of the new Old Oak North Local Park to the north of the existing embankment, the Canal Park (as part of the Grand Union Canal Local Park – see Policy P3), a range of smaller open spaces, such as Rolls Royce Yard, and embedding green infrastructure into the street network (see Policies SP8 and EU1).

1.48 The variety of spaces will likely be delivered across different phases. These spaces will need to perform a range of functions~~roles~~. New open spaces and embedded green infrastructure will ~~also~~ need to play an important role in helping to manage significant drainage and surface water flooding issues across the area (see Policies EU2 and EU3).

1.49 Railway embankments in Old Oak North provide visual amenity and are identified to have biodiversity value. To support OPDC in being biodiversity positive, the removal of railway embankments would need to be managed in accordance with policy EU2.

1.50 Old Oak North has historically been a location for industrial and railway infrastructure. This history should continue to inform the character of the area as it is redeveloped. A number of heritage assets and positive elements of character have been lost during the evolution of the area but a number remain, including the Rolls Royce Building. This building provides the opportunity to be an early anchor for strengthening local identity, enabling the evolution of a new place around it.

1.51 The historic character and the surrounding context of Old Oak North provide opportunities to conserve and enhance historic assets and shape a coherent approach to building heights across the

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area. Development will need to respond appropriately to sensitive locations, including the Grand Union Canal Conservation Area (see Policy SP9) while optimising development across Old Oak North. Tall buildings would be considered appropriate in principle in accordance with Policies SP9, D5 and London Plan policies. Along railways, increased heights can help to mitigate the impact of air and noise pollution.

1.52 The delivery of development in Old Oak North and creation of a high quality place will necessitate the provision of a substantial amount of infrastructure. OPDC's IDP identifies the likely requirements for infrastructure in the area. A significant amount of social infrastructure will be required. Current population and child yield projections indicate that there is a need to deliver one 4-form entry primary school, one health hub, one supernursery, one community hub and one sports centre in Old Oak North. These requirements are based on current population and child yield projections, which could change over time thereby impacting on the size and type of facilities required (see Policy TCC4). Proposals should appropriately safeguard land for and contribute to and/or deliver these and other infrastructure requirements set out in the IDP, in accordance with Policy, SP10.

1.53 In accordance with Policy SP10, an equitable equalisation mechanism will be applied to the delivery of any on-site social infrastructure, to ensure even sharing of the costs of delivering the facility and OPDC will also employ a retrospective pooling contribution mechanism, to provide additional planning contributions towards delivery of the facility from other appropriate developments.

1.54 Old Oak Sidings waste site is capable of meeting Hammersmith and Fulham's apportionment for the London Plan period up to 2036. The site also has the potential to support the management of waste during the construction of Old Oak and potentially play a more significant role in OPDC's future waste, energy and utilities network. The Local Plan therefore safeguards the site for the plan period (see Policy EU6)7. To ensure existing and future residents are not negatively impacted on by the functioning of the waste site within Old Oak Sidings, appropriate measures should be provided within new development to mitigate environmental impacts through design, delivery and operation in accordance with Policies D6, EU4 and EU5. The 'agent of change' principles will be applied to the delivery of such measures (see policy D6).

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POLICY P2C1 GRAND UNION SQUARE CLUSTER

VISION

V1. The cultural heart of Old Oak North, Grand Union Square will be an attractive city square contributing to the Grand Union Canal Local Park. The square will celebrate the relationship between the canal, Old Oak High Street, Hythe Road Station and the Birchwood Nature Reserve and will be framed by . Located on Old Oak High Street, vibrant active uses will frame attractive spaces within the square that support social and leisure activities and the creation of a food and beverage quarter. The space will mediate a range of level changes to enable people to reach their destinations including Hythe Road Station and onto a range of new and improved canalside spaces.

POLICY

Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:

Land uses

a) Supporting the activation of Grand Union Square by:

- **clustering delivering a range of permanent and meanwhile town centre uses;**
- **i. focusing A3 and A4 uses around Grand Union Square and along the Grand Union Canal, to support the location's key role as a destination within the Old Oak Cultural Quarter and the Grand Union Canal food and beverage quarter, including catalyst uses, and employment uses around Grand Union Square, Hythe Road Station, the potential railway viaduct and on the Grand Union Canal; and**
- **ii. delivering new residential, leisure, commercial, casual and visitor moorings on the Grand Union Canal.**

Public realm and movement

b) Integrating the proposed Hythe Road Station and associated infrastructure potential viaduct within the wider public realm and movement network;

c) Providing a high quality transport interchange by:

- **i. supporting the delivery of the proposed Hythe Road London Overground Station;**
- **ii. supporting the delivery of new connections across the rail embankment and ensuring, if feasible, that connections provide for the passage of double decker buses,; including in the form of a raised viaduct, if proven to be feasible;**
- **iii. delivering an efficient and seamless journey from street to platform;**
- **iv. delivering an entrance to Hythe Road Station onto Old Oak High Street and Grand Union Square as a priority with a potential secondary entrance onto Grand Union Square;**
- **v. locating and distributing high quality interchange facilities within the station and on to Grand Union Square and Old Oak High Street; and**
- **vi. ensuring any viaduct is of a sufficient height to enable the movement of double-decker buses.**

d) Delivering a high quality public realm by:

Commented [PF69]: Specific amendment.
Reason: To reflect change in character resulting from relocation of Old Oak Street away from Grand Union Square and avoid repetition with policies elsewhere in the plan.

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i. integrating managing level changes across the square, to address any , bridge, embankment and/or and viaduct infrastructure to support the activation of the square and high quality walking and cycling routes;

ii. delivering active frontages on to Grand Union Square;

iii. ensuring the movement functions of Old Oak High Street and Hythe Road support thedemonstrably avoid adverse impacts on the activation of the square; and

iv. delivering public art within and adjacent to the proposed Hythe Road London Overground Station and within Grand Union Square.

e) Providing high quality walking and cycling access to the Grand Union canal and canalside spaces;

f) Supporting the Grand Union Canal as a continuous walking and cycling route by contributing to the delivery of a new walking and cycling access along the northern edge side of the canal and the along the southern towpath;

Green infrastructure and the environment

g) Ensuring Grand Union Square is designed to integrate with and complement other nearby publicly accessible open spaces to and contributes to the delivery of the Grand Union Canal Local Park;

h) Supporting health and well-being by:

i) ensuring the design of the squareGrand Union Square relates to the green context provided by the Birchwood Nature Reserve and forms part of the Grand Union Canal Local Park; andby

j) providing access to nature and deliveringing green infrastructure within the square and within the proposed Hythe Road Station;.

k) Contributing to the delivery of Grand Union Square by:

i. ensuring it is designed and operated as a recognisable single space;

ii. ensuring it is designed for high amounts walking and cycling movement and public transport interchange facilities;

iii. providing facilities for outside relaxation and socialising in areas with the greatest amount of daylight and direct sunlight; and

iv. delivering high quality spaces beneath the potential viaduct.

Heritage and character

l) Enhancing local character by embedding canal and railway heritage within the design and functioning of the square, canalside spaces and proposed Hythe Road Station;

Building heights

m) Supporting the functioning of Grand Union Square as a key destination within Old Oak North and as a key location on Old Oak High Street by delivering a range of heights around Grand Union Square including tall buildings to support local legibility;

Development and phasing

a) Supporting local accessibility to Old Oak South and Old Oak Common Station by contributing to the coordinated delivery of Old Oak High Street;

b) Supporting the integration of Hythe Road Station with surrounding areas to ensure it is clearly accessible from Old Oak High Street; and

c) Ensuring Grand Union Square is designed to be resilient to respond to the surrounding changing context including the delivery of Old Oak High Street and other routes, location of other open spaces and interchange facilities.

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SUPPORTING TEXT

1.34 Grand Union Square will be one of the busiest and most vibrant locations in Old Oak North, with Old Oak High Street running close to its eastthrough its centre, the Grand Union Canal positioned on its southern edge and Hythe Road Station located in its north. Its south- west facing orientation will support its role as a place for active uses including leisure, cultural, catalyst and town centre uses which provide services for the new and existing communities and support the creation of a food and beverage quarter along the canal that contributes to a new Ccultural qQuarter delivered across Old Oak.

1.35 As a destination, Grand Union Square will need to be supported by a range of permanent and meanwhile active uses. These uses will likely change over time, responding to the phased development of surrounding sites. Meanwhile uses will therefore play an important role in activating the area and strengthening local identity. Its role as a destination should be supported by the delivery of town centre uses to facilitate the establishment of Old Oak High Street major town centre and a food and beverage quarter. This should also include provision of new catalyst uses. Moorings will also play an important role in creating activity in this location and supporting the historic canalside character of Grand Union Square. New moorings should be delivered in agreement with the Canal and River Trust and local mooring associations.

1.36 New and improved north and south connections through the existing railway embankment are will be important to create enhancing permeability across the area and to knit both sides of the embankment together and creating activity in Grand Union Square. As noted in Policy P2, tThis could be in the form of a viaduct if proven to be deliverable and designed to a high quality (see Policy P2).

1.37 The design of the proposed Hythe Road Station and the associated viaduct have the potential to alsoshould contribute to the activation of Grand Union Square, and surrounding development in the early stages of development if considered holistically. To support passenger transport interchange and strengthen the station's role in place making, a station entrance should be delivered onto Old Oak High Street. Consideration should be given to the provision of a second station entrance onto and Grand Union Square. Transport interchange facilities should be located onto the Old Oak High sStreet and Grand Union Square to maximise their efficiency and support walking and cycling routes to Old Oak Common Station, Willesden Junction Station and on to Scrubs Lane and Old Oak Lane.

To enable Old Oak High Street to cross the Grand Union Canal at a gradient enabling access for all and for the public realm of Grand Union Square to relate well to the canal, tThere will likely be level changes within the square and surrounding street network, to address the challenges of crossing the Grand Union Canal and West London Line embankment. . Proposals need to deliver public realm that integrates these level changes. Consideration could be given to how these level changes could be celebrated and become a unique feature of this space. and responds well to bridge infrastructure and associated spaces to ensure these are high quality and facilitates their use for a range of activities.

1.38 Public art provides many social and cultural benefits1. It can also support place making and inform local identity. To maximise the impacts of these benefits, public art should be located within Hythe Road Station and within Grand Union Square where significant numbers of people can enjoy and experience it.

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1.39 Grand Union Square will needshould to provide a range of functions including space to socialise and enjoy the Grand Union Canal, supporting the functioning of Old Oak High Street major town centre and the proposed Hythe Road Station, spaces for cultural and catalyst uses and delivery of green infrastructure to complement the birchwood nature reserve and contribute to its role as part of the Grand Union Canal Local Park. This space will also need to form part of the larger Grand Union Canal Local Park. It will be critical for spaces across the area, specifically adjacent to and under the bridge and the viaduct to be of a high quality. Proposals should give special consideration to how to mitigate the impact of noise and vibration beneath and adjacent to the viaduct. Innovative street lighting and planting should be utilised to ensure this area is well lit, pleasant to use and complements the wider green infrastructure network.

1.40 The location of Grand Union Square and Old Oak High Street broadly follows the route of Stamford Brook2. To reflect this local heritage and strengthen local character, opportunities to deliver water space and/or features should be explored. Hythe Road Station also provides an opportunity to enhance the local railway heritage in its design and operation.

1.41 Grand Union Square and the proposed Hythe Road Station will be key destinations within Old Oak, providing access to a high quality publicly accessible open space, the London Overground network, town centre, uses and cultural and catalyst and food and beverage uses. A range of building heights will therefore be supported in this location. To support people reaching these destinations, tall building heights should be used to aid local legibility to and around the square, proposed Hythe Road Station and along Old Oak High Street. Heights will also need to respond to the Grand Union Canal as a sensitive location (see Policy SP9). In doing so, building heights should be delivered to support the functioning of the square and surrounding uses to deliver a high quality environment.

1.42 Grand Union Square and Hythe Road Station will need to consider the phasing of surrounding development in their design, delivery and operation to enable people to reach destinations, enjoy the spaces and to help strengthen the identity of area. Key elements of this will be supporting the delivery of connections that would link Old Oak North to connect directly to Old Oak Common Station for all transport modes.

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POLICY P3: GRAND UNION CANAL

VISION

The Grand Union Canal will be a defining feature of the OPDC area, shaping the character of both Old Oak and Park Royal. Moorings, open spaces and canalside activities will support its role as a livelya leisure and recreation destination. The canal's role as a transport corridor will also be optimised, while ensuring that its ecology and heritage are conserved and enhanced.

~~V1. The Grand Union Canal is a key heritage asset and will continue to be one of the defining features of both Old Oak and Park Royal and canalside destinations. It will be central in creating a new part of London in Old Oak and enhancing Park Royal as a thriving industrial location.~~

~~V2. It will be a key artery through the area, connecting into Kensal Canalside in the east and Alperton in the west. High quality walking and cycling routes will integrate comfortably with the wider street network. This movement will be complemented through the promotion and use of the canal for passenger and freight transport while seeing new and improved moorings and enhancements to its ecology.~~

~~V3. The canal will see a new Local Park delivered along its edges within Old Oak with other open spaces provided along its length. New multifunctional water spaces will bring the character of the canal into surrounding locations while providing spaces for new moorings, access to nature and sustainable drainage. New and enhanced green infrastructure will be embedded along its length, ensuring it can help the area adapt to and mitigate the impacts of climate change.~~

~~V4. Within Old Oak, new development will frame the canal with active frontages of social, leisure and town centre uses at the crossings of key streets that will support the creation of a food and beverage quarter. Positive frontages provided by housing and employment uses will front the canal in other locations. There will be opportunities for some tall buildings at key crossings to support local legibility.~~

~~V5. Within Park Royal, development will be encouraged to positively engage with the canal through improved boundary treatments, access, overlooking and safety and security measures and, if feasible, make use of the canal for freight transport. Within the Channel Gate industrial location, after its release by HS2 Limited, new high density industrial development provides the opportunity to create new open spaces and crossings, improving permeability and supporting place making.~~

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

Land uses

~~a) Contributing to the delivery of the aspirations of the Mayor of London's Blue Ribbon Network;~~

~~b)~~a) **Supporting the activation of the Grand Union Canal and canalside spaces within Old Oak by delivering:**

Commented [PF70]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF71]: Specific amendment.
Reason: To avoid repetition with London Plan policies.

i. permanent and meanwhile town centre, leisure, commercial, community and canal-related uses with active frontages in areas of higher activity including at publicly accessible open spaces and crossings of key ~~streets~~routes; and

~~i.~~

ii. residential and employment uses with positive frontages ~~of residential and employment uses~~ elsewhere.~~; and~~

b) Supporting overlooking, security and safety along the canal and canalside spaces within Park Royal and Channel Gate by delivering positive frontages~~Strategic Industrial Location compliant broad industrial type uses with positive frontages;~~

~~iii. A3 and A4 uses on the canalside adjacent to Old Oak High Street to establish a food and beverage quarter that complements other leisure and cultural uses within the OPDC area.~~

c) Delivering a range of permanent and temporary new residential, leisure, educational, cultural, commercial and visitor moorings and their supporting infrastructure along the canal;

~~and specifically in areas of higher activity including at:~~

~~Grand Union Square Cluster;~~

~~Park Road Gardens;~~

~~the Atlas Junction Cluster;~~

~~Rolls Royce Gardens;~~

~~Mitre Wharf;~~

~~Mary Seacole Gardens; and~~

~~other canalside spaces including basins and locations adjacent to crossings.~~

~~Supporting overlooking, security and safety along the canal and canalside spaces within Park Royal and Channel Gate by delivering Strategic Industrial Location compliant broad industrial type uses with positive frontages;~~

Public realm and movement

d) Supporting delivery of new and improved bridges, as shown in figure 4.10x, by working positively with stakeholders;

~~c)~~e) Connecting canalside routes with new and improved ~~canal crossings~~bridges~~, in particular at the crossings :of:~~

~~i. Old Oak High Street;~~

~~ii. Park Road;~~

~~iii. Grand Union Street;~~

~~iv. Scrubs Lane;~~

~~v. Old Oak Lane;~~

~~vi. Wesley Avenue;~~

~~vii. Acton Lane; and~~

~~viii. Abbey Road.~~

~~d)~~f) Ensuring bridge infrastructure and associated spaces are designed to be integrated into the built environment, are accessible, safe and include active and positive frontages where possible;

Commented [PF72]: Specific amendment.
Reason: To support use of publicly accessible open spaces.

Commented [PF73]: Specific amendment.
Reason: To avoid repetition with Policy P1.

Commented [PF74]: Specific amendment.
Reason: To support a range of mooring opportunities.

Commented [PF75]: Specific amendment.
Reason: Relocated to supporting text to shorten policy.

Commented [PF76]: Specific amendment.
Reason: To support delivery of new and improved bridges.

Commented [PF77]: Specific amendment.
Reason: To shorten policy specific bridges are identified in the supporting text.

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~~e)~~g) Contributing to improvements to the southern towpath in its role as part of the ~~a~~ national towing path network and as a continuous high quality east-west walking and cycling route as part of the National Cycle Network ~~and proposed TfL Quietway~~ by:

i. delivering a segregated cycling route where feasible and where not, delivering a high quality shared walking and cycling route;

~~delivering a shared walking and 2-way cycling route :~~

~~i. of a minimum 3.5 metres in width where feasible, excluding ramps to connections;~~

ii. delivering appropriate levels and types of lighting;

iii. ensuring development is integrated with the route in relation to its design, operation and location of uses; and

iv. coordinating delivery of improvements with relevant stakeholders.

~~f)~~h) Supporting local connectivity by contributing to and/or delivering a continuous local walking and cycling route along the northern side of the canal within Old Oak.

~~g)~~i) Contributing to the use of the Grand Union Canal for ~~waterbourne~~waterborne passenger, leisure and freight transport by:

i. delivering new transport related moorings, waterway access, wharfs and ancillary facilities in appropriate locations; and

ii. utilising water-borne freight transport during the construction and operation of development.

Green infrastructure and the environment

~~h)~~j) Contributing to and/or delivering a network of high quality multi-functional publicly accessible open spaces along the canal including:

i. ~~a Local Park along~~ the Grand Union Canal Local Park within Old Oak North and Old Oak South of at least 2 hectares in size, including the Birchwood Nature Reserve~~, and Grand Union Square~~Canal Park ~~and Park Road Gardens~~;

ii. other smaller open spaces;

iii. improvements to existing open spaces including Mary Seacole Gardens and Barretts Green; and

iv. multifunctional new basins and waterspaces~~.~~;

~~i)~~k) ~~Protecting~~ Conserving and enhancing the biodiversity value of the canal and the Birchwood Nature Reserve as a Site of Importance for Nature Conservation in accordance with policy EU2;

~~j)~~l) Enhancing the environmental quality and role of the canal by:

i. contributing to enhancing water quality; and

ii. enabling ~~sustainable drainage systems~~SuDS and new water infrastructure to connect to the Grand Union Canal.

Heritage and character

~~k)~~m) Strengthening local identity and character by:

i. conserving and enhancing the Grand Union Canal and St. Mary's Cemetery conservation areas and their settings and~~, locally listed buildings such as the Mitre Bridge, Grand Junction Arms Public House and Canal Cottage and their settings~~Local Heritage Listings adjacent to the canal including the Canal Cottage within Park Royal; and

Commented [PF78]: Regulation 19(1) consultation amendment:
Reference: P3/4
Reason: To reflect the character and transport roles of the towpath while recognising width restrictions to support the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal.

Commented [PF79]: Regulation 19(1) consultation amendment:
Reference: P3/4
Reason: To reflect the character and transport roles of the towpath while recognising width restrictions to support the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal.

Commented [PF80]: Specific amendment.
Reason: To clarify role of moorings for transport purposes.

Commented [PF81]: Specific amendment.
Reason: To standardise terminology with policy EU2.

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ii. **delivering a consistent and high quality palette of materials that conserves and enhances the historic canalside character.~~;~~**

Building heights

~~l)~~n) **Contributing to a variety of building heights that respond to the canal's heritage, character, biodiversity and amenity roles by delivering heights and massing that support the functioning, designations, amenity and character of the canal and canalside spaces by:**

i. **within Old Oak, delivering heights of generally 6 to 8 storeys fronting directly onto the Grand Union Canal ~~t~~with opportunities for tall buildings at key crossing points such as Old Oak ~~High~~ Street~~,~~ Park Road ~~and Grand Union Street~~, Old Oak Lane and Scrubs Lane; and**

ii. **within Park Royal, delivering appropriate heights to support the functioning and intensification of the Strategic Industrial Location.**

~~**Infrastructure**~~

~~**m) Contributing to the delivery of infrastructure requirements as set out in the Infrastructure Delivery Plan (IDP) including utilising the canal's water to generate heat for use in local decentralised energy networks;**~~

~~**n) Supporting connectivity by working positively with stakeholders to deliver high quality new and enhanced bridges across the canal that support local character including:**~~

~~**i. new walking, cycling and vehicular bridges at Park Road, Old Oak High Street, Grand Union Street, Channel Gate and a walking and cycling bridge close to Grand Union Square; and**~~

~~**ii. enhancements to existing bridges including Mitre Bridge and Old Oak Lane.**~~

Commented [PF82]: Specific amendment.
Reason: Removed to avoid duplication with public realm and movement policies above.

~~**Development and phasing**~~

~~**o) Supporting the development of high quality canalside neighbourhoods by contributing to optimising new development within adjacent places.**~~

SUPPORTING TEXT

~~1.43~~ The Paddington Arm of the Grand Union Canal was constructed in the late 18th century and is a key heritage asset within the OPDC area. ~~is an integral component of the Mayor's Blue Ribbon Network. This seeks to deliver a multifunctional network of water spaces across London that prioritises the delivery of water related uses alongside its length. The Canal and River Trust is a key stakeholder as the landowner of the canal and elements of canalside sites. Alongside the Trust, OPDC will work positively with other stakeholders, such as boating groups and other canal users, to support the delivery of these aspirations. OPDC will explore the development of a potential strategic water space strategy with relevant stakeholders, including the Canal and River Trust.~~

~~1.44 The Grand Union Canal crosses a number of places including Scrubs Lane, Old Oak North, Old Oak South, Old Oak Lane and Old Oak Common Lane, Channel Gate and Park Royal. Each of the relevant place policies provides guidance for how development should respond to the canal and its setting. However, the character of the canal should also actively inform the design and operation of development in those places.~~

Commented [PF83]: Specific amendment.
Reason: Relocated and embedded below.

~~1.45~~ 1.29 The ~~Grand Union c~~Canal ~~currently~~ performs many valuable functions including its roles as an ecology asset, as part of the All London Green Grid, conservation area, walking and cycling route and corridor for water transport. It presents the opportunity to become a focal point within the Old Oak area and for it to become the heart for new canal-related, leisure and community uses that people living and working in the area can enjoy. ~~Currently~~Within the OPDC area, the Grand Union Canal is underutilised, caused by its inaccessibility and limited natural surveillance. The development of Old Oak and intensification of Park Royal (including Channel Gate) provides the opportunity for proposals to contribute to and/or enable the enhancement of these existing functions and to deliver new roles and uses along, and on, the canal. This will help to celebrate local character and ensure the canal becomes an integral part of future redevelopment.

1.30 The Grand Union Canal crosses a number of places including Scrubs Lane, Old Oak North, Old Oak South, Old Oak Lane and Old Oak Common Lane, Channel Gate and Park Royal West. Each of the relevant place policies provides guidance for how development should respond to the canal and its setting. However, the character of the canal should also actively inform the design and operation of development in those places.

~~1.46 To support the activation of the canal, proposals should deliver permanent and meanwhile town centre, leisure and community uses with active frontages in designated town centres, defined clusters and other locations of high activity, outside of Strategic Industrial Locations (SIL), such as adjacent to key routes and publicly accessible open spaces. Specifically, p~~roposals at canalside spaces adjacent to Old Oak High Street should deliver A3 and A4 uses to establish Grand Union Square and areas to the south of the canal as food and beverage quarter supporting the delivery of a cultural quarter across Old Oak (see Policy SP6). Elsewhere, in Old Oak and Park Royal, positive frontages should be provided. These uses should reflect the character of quieter areas along the canal while continuing to support activation and natural surveillance.

1.31 Moorings play an important role in supporting the historic canalside character, in meeting housing need, ~~and~~ providing space for employment and leisure activities and increased activities. ~~These activities help to activate both the canal itself and canalside spaces. To enable this activation, n~~New permanent and temporary ~~residential, leisure, educational, cultural, visitor and commercial~~ moorings will be supported along the length of the canal with a focus at publicly accessible open spaces and other accessible locations. ~~,~~ including at:

- ~~Grand Union Square Cluste~~the Old Oak North food and beverage quarter~~r~~;
- the Atlas Junction Cluster;
- Birchwood Nature Reserve;
- Rolls Royce Yard;
- Mitre Canalside Cluster; and
- other canalside spaces including basins and locations adjacent to crossings.

~~1.47~~ 1.32 Proposals will need to be agreed with the Canal and River Trust and local mooring associations.

Commented [PF84]: Specific amendment.
Reason: To confirm its role within the All London Green Grid.

Commented [PF85]: Specific amendment.
Reason: To avoid repetition with policy.

Commented [PF86]: Specific amendment.
Reason: To shorten supporting text.

Commented [PF87]: Specific amendment.
Reason: To reflect updated street network and open space provision.

Commented [PF88]: Specific amendment.
Reason: To acknowledge the potential for moorings adjacent to the Birchwood Nature Reserve

Commented [PF89]: Specific amendment.
Reason: To standardise referencing to clusters.

1.33 A shared high quality walking and cycling route along the southern towpath. ~~with segregated cycling route running parallel to the towpath are proposed1~~ to support the route's role as part of the National Cycle Network. Along both routes, cycling calming measures will be required. Proposals should be appropriately set back to allow, where feasible, for the widening of the towpath to provide a comfortable width to accommodate both pedestrians and cyclists and to space for access ramps and other connections to surrounding areas. ~~is proposed1 to support its designation as a TfL QuietWay and as part of the National Cycle Network. Proposals will be required to contribute to the delivery of a minimum of 3.5 metres wide route in addition to access ramps and other connections to support pedestrian and cyclists as they move along the towpath. This will require proposals to provide space for the route within their site and deliver appropriate lighting that has regard to ecology. Development will need to integrate routes within their design and in the location of active and positive frontages. Of particular importance will be how the future development of the Elizabeth Line Depot and sidings will integrate with the towpath and successfully mediate levels changes.~~

~~1.48~~ 1.34 New bridges will play a critical role in supporting movement between Old Oak North and Old Oak South, supporting locally distinctive place-making and helping to activate canalside spaces. Any bridge crossings of the canal will need to be agreed with the Canal and River Trust, in addition to approvals from the relevant Highways Authority.

~~1.49~~ 1.35 The northern canalside route in Old Oak also provides an opportunity for areas within Old Oak North and Scrubs Lane to be connected by a continuous walking and cycling route. The location of this route will likely vary, running beside the canal and around buildings located directly on to the water. ~~Proposals should contribute to and/or enable these connections within their design and operation to provide accessible and inclusive routes. This will require a detailed design approach that integrates bridge infrastructure and associated spaces to ensure these elements are successfully integrated within development and the public realm as points of interest which facilitate social and leisure activities.~~

~~1.50~~ 1.36 Water transport is a sustainable mode of transport and its use will contribute to OPDC's Sustainable Transport Hierarchy (see Policy SP7). The Grand Union Canal ~~is identified to have~~has the potential to facilitate water based passenger, leisure and additional freight transport~~2~~. Currently there is limited provision of wharve~~f~~s and associated facilities to support water transport~~.~~ with only the Old Oak Sidings Wharf providing access for waterborne transport in the OPDC area. To support water transport, proposals that enhance existing wharves and deliver new wharves within both Old Oak and Park Royal will be supported. ~~As water transport is a recognised sustainable mode of transport and its use will contribute to OPDC's Sustainable Transport Hierarchy (see Policy SP7),~~ OPDC will work with providers of water transport services to coordinate their delivery. Water based transport also needs to consider impacts of biodiversity and water quality in accordance with policies EU2 and EU3.

~~1.51~~ 1.37 The Grand Union Canal ~~is identified as~~ is a Site of Importance ~~for~~to Nature Conservation (SINC)~~3~~. To ensure this role is continued and enhanced, proposals should respond positively to the canal and accord with policy EU2. The canal is a valuable asset in helping OPDC to address flooding and drainage issues. ~~Water based transport also needs to consider impacts of biodiversity and water quality in accordance with policies EU2 and EU3. To assist OPDC, and t~~To ensure accordance with policy EU3, proposals should contribute and/or deliver and enable the connection of sustainable drainage systems (SuDS) into the canal. Any water entering the canal should be of an adequate quality, according with the Water Framework Directive or any subsequent standards, in accordance with Policy EU3.~~.~~

Commented [TC90]: Regulation 19(1) consultation amendment.
Reference: P3/4
Reason: To reflect the character and transport roles of the towpath while recognising width restrictions to support the delivery of a high quality, safe and accessible walking route

Commented [PF91]: Specific amendment.
Reason: To avoid repetition with policies D2 and D3.

Commented [PF92]: Regulation 19(1) consultation amendment.
Reference: P3/9
Reason: To reflect the importance of bridges and need to engage with relevant stakeholders in their delivery.

Commented [PF93]: Specific amendment.
Reason: To provide flexibility for the route along the north of the canal.

Commented [PF94]: Specific amendment.
Reason: To avoid repetition with Policy D3 and policy above.

Commented [PF95]: Regulation 19(1) consultation amendment.
Reference: P3/28
Reason: To clarity that water based transport also needs to support biodiversity and water quality.

Commented [PF96]: Regulation 19(1) consultation amendment.
Reference: P3/28
Reason: To clarity that water based transport also needs to support biodiversity and water quality.

Commented [TC97]: Regulation 19(1) consultation amendment.
Reference: P3/25
Reason: To support improvements to the environmental quality of the cana.

~~1.52~~ ~~1.38~~ The Grand Union Canal currently has isolated pockets of open space, including the Birchwood Nature Reserve, Mary Seacole Gardens and Barretts Green. There is a need to enhance and connect these open spaces and deliver new publicly accessible canalside open spaces. Each open space will provide a different role, responding to its surrounding context. Within Old Oak, the delivery of the Grand Union Canal Local Park on both sides of the canal should provide a minimum of two hectares ~~new~~ of publicly accessible open space. The Grand Union Canal Local Park will be an important feature in informing local character. It will also perform a range of roles, including leisure, walking and cycling routes, canalside activities, community ~~and social~~ uses and providing space for food and beverage uses. To support these roles, the Grand Union Canal Local Park ~~is envisaged to~~will include green landscaping, civic space ~~at s of Grand Union Square~~ and a range of outdoor leisure facilities that will complement the different characters of the Local Parks in Old Oak North and Old Oak South. Delivery of these spaces will support OPDC's target to deliver 30% of the development area as publicly accessible open space. See Policies SP8 and EU1. ~~This will also help to connect new and existing open spaces, support health and well-being and respond to the historic open character of stretches of the canal as defined in OPDC's Heritage Strategy.~~ Where appropriate and related to a development, contributions will also be sought towards environmental enhancements along the canal.

~~1.53~~ 1.39 The development of Old Oak provides the opportunity for new water spaces in the form of basins and/or widening of the existing canal. New canal water spaces ~~will~~ must contribute to conserving and enhancing the character of the canal and must help to address drainage issues across Old Oak. The canal is also an ecology asset and new water space will contribute to enhancing its biodiversity. They can also provide additional space for uses both on the canal and on the canalside that will contribute to the canal's activation and sense of place.

~~1.54~~ 1.40 The significance of the Grand Union Canal's historic environment is reflected in its designation as a conservation area. It is one of the defining features of the OPDC area~~5~~ which is reflected in OPDC's Heritage Strategy~~, identifying the canal as a key heritage theme~~. As such, proposals should conserve and enhance the significance of the canal and canal related infrastructure such as bridges and respond positively to the canal's character in their design. Alongside the canal, there are a number of ~~proposed and existing locally listed buildings and structures~~Local Heritage Listings which should be used to inform the design of development in areas adjacent to the canal.

~~1.55~~ 1.41 To respond to the significance of the canal and its potential to inform the design of development and place making across both Old Oak and Park Royal, proposals should deliver a palette of materials that reflects the historic canalside environment and that are consistent across land ownerships in accordance with Policy SP10.

~~1.56~~ 1.42 Policy SP9 identifies the canal as a sensitive location, reflecting its existing character, use, SINC designation and conservation area status. In response to these roles, for proposals sitting directly on to the canal, buildings of ~~should generally deliver buildings fronting directly onto the Canal that are generally~~ 6 to 8 storeys~~6~~ are considered to be appropriate. However, each site will need to consider the site specific circumstances. ~~However, a~~Along the canal there will be opportunities for ~~some~~ tall buildings ~~to respond to public transport access and support legibility~~ where ~~major~~ key routes cross the canal. These taller elements need to be considered on a site by site basis and will be determined using all other relevant planning policy and material considerations. Within Park Royal, building heights ~~of proposals~~ will need to respond to OPDC's aspirations to support economic growth and job creation through the intensification of industrial floorspace7 while continuing to conserve and enhance the canal in terms of its heritage and ecology designations.

Commented [TC98]: Regulation 19(1) consultation amendment.
Reference: P3/16
Reason: To support securing contributions for environmental enhancements.

Commented [PF99]: Regulation 19(1) consultation amendment.
Reference: P3/6
Reason: To recognise the need for building heights to respond to site specific circumstances,

Commented [PF100]: Specific amendment.
Reason: To align with policy D5.

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~~1.57~~ 1.43 Unlocking the comprehensive redevelopment of Old Oak will necessitate the provision of a substantial amount of new and improved physical infrastructure along and across the Grand Union Canal. Any infrastructure adjacent to or across the canal will need to ensure that the canal's structural integrity is not compromised. ~~.~~ OPDC's IDP identifies the likely requirements for infrastructure which are based on current population projections. These could change over time impacting on the size and type of infrastructure required.

~~1.58~~ 1.44 In addition to its roles in managing flooding, the canal also provides an opportunity to generate localised heat and cooling for development in Old Oak8. Proposals should ~~prioritise~~ consider the potential use of the canal for heat and coolth generation, in accordance with Policy EU10 and in agreement with the Canal and River Trust.

~~1.59~~ 1.45 The Canal and River Trust is a key stakeholder as the landowner of the canal and elements of canalside sites. Alongside the Trust, OPDC will work positively with other stakeholders, such as boating groups and other canal users, to support the delivery of aspirations in this policy.

Commented [TC101]: Regulation 19(1) consultation amendment.
Reference: P3/14
Reason: To recognise the need to ensure development supports the stability of the canal.

POLICY P4: PARK ROYAL WEST

Commented [PF102]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

VISION

Park Royal West will continue to be London's leading location for large, medium and small industrial businesses. The protection and intensification of industrial space, along with a co-ordinated approach to infrastructure investment and delivery will improve its functionality and environment; strengthening Park Royal's competitive position, and helping businesses to grow sustainably.

~~**V1. Park Royal West will remain as London's leading location for large, medium and small businesses; the protected industrial land will accommodate a vibrant mix of industrial activities.**~~

~~**V2. A co-ordinated approach to infrastructure investment and delivery will improve its functionality and deliver wider environmental improvements; strengthening Park Royal's competitive position, and helping businesses to grow sustainably.**~~

~~**V3. Comprehensive intensification will accelerate jobs growth and support industrial innovation, making the area adaptable to the future needs of London's economy.**~~

Commented [TC103]:
Regulation 19(1) consultation amendment.
Reference: P4/6
Reason: To clarify Park Royal's status as an industrial location.

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

Land Uses

~~**a) Protecting and delivering a mix of broad industrial type uses and units suitable for a range of business sizes and industrial sectors within the Strategic Industrial Location (SIL) designation;**~~

Commented [LL104]: Specific amendment.
Reason: To avoid repetition with policies E1.

~~**b)**~~**a)** ~~**Contributing towards**~~**Delivering 3,540 ~~3,800~~ new jobs within SIL, by taking opportunities to intensify ~~the~~ use of all sites~~sites, including in line with the~~ but in particular on ~~the~~ identified ~~industrial~~ site allocations and having regard to the locations and typologies**

identified in OPDC's Park Royal Intensification Study ~~and, having regard to the~~on other sites ~~identified in locations and typologies identified in OPDC's Park Royal Intensification Study~~;

~~c)~~b) Delivering ~~400~~ 60 new jobs and a minimum 1,200 homes on sites outside of SIL, achieving early delivery of housing to contribute towards OPDC's 0-10 year housing supply, in line with the Brewery Cluster and First Central site allocation;

~~d) Protecting the Bashley Road Gypsy and Travellers site line with policy H8;~~

~~e) Safeguarding the Twyford Waste Transfer Station site to support the delivery of the West London Waste Plan (see Policy EU6);~~

Public Realm and movement

~~f)~~c) Contributing towards and / or delivering improvements to the function and quality of the transport network for all users by:

i. rationalising, minimising or removing on-street car parking, where possible and practicable, to ~~make space for~~enable walking, cycling and public realm improvements;

ii. creating new or upgraded continuous walking and cycling routes particularly along ~~main~~ key routes, to/from stations, Park Royal Centre and the Grand Canal; and

iii. supporting traffic calming measures along Chase Road;

~~iii.~~ .

d) Contributing towards and / or delivering enhanced bus infrastructure to support existing and planned bus~~ied~~ services between Park Royal, Old Oak and other key destinations;

~~g)~~e) Contributing towards and / or delivering improvements to the road network to support more efficient business operations and servicing by:

i. supporting a new vehicular, pedestrian and cycle route to link Park Royal to Channel Gate;

ii. supporting improvements to junctions to facilitate improved traffic flow, pedestrian and/or cycle enhancements; and

iii. contributing towards enhancements to the A40 and A406 which improve flow of traffic~~,~~; support the movement of freight~~,~~; and/or reduce severance.

~~h)~~f) Contributing towards and / or delivering improvements to the function and quality of the public realm for all users through:

i. enhanced street greening, public realm and active and/or positive frontages, particularly along the ~~primary movement~~key routes identified in Figure 4.~~8~~13;

ii. ~~the provision~~deliveringy of more generous pavements widths, where this does not have a significant adverse impact on the functioning of the highway; and

iii. improved wayfinding, signage and lighting, prioritising routes to/from Park Royal, ~~the Grand Union Canal,~~ Hanger Lane, Stonebridge Park and Harlesden stations; and the to/from the Grand Union Canal.~~; and the Grand Union Canal.~~

Green Infrastructure and the environment

~~i)~~g) Contributing towards and/or delivering improvements which support the creation of new publicly accessible open space in accordance with Policies SP8 and EU1, and public access into and/or the quality of existing green infrastructure assets, including:

i. Diageo Lake and Gardens;

ii. Wesley playing fields;

iii. linear spaces along the Grand Union Canal;

Commented [LL105]: Specific amendment.
Reason: To clarify that all sites should contribute towards intensification, updates to the evidence base and to reflect introduction of new industrial site allocations.

Commented [LL106]: Specific amendment.
Reason: To provide a stronger visual relationship between Development and Phasing policies and Land Use policies

Commented [LL107]: Specific amendment.
Reason: To avoid repetition with policies H8.

Commented [LL108]: Specific amendment.
Reason: To avoid repetition with policies EU6.

Commented [LL109]: Specific amendment.
Reason: To reflect recommendations in Park Royal Development Framework Principles

Commented [LL110]: Specific amendment.
Reason: To provide consistent phrasing across the Park Royal Place policies.

Commented [LL111]: Specific amendment.
Reason: To reflect recommendations in Park Royal Development Framework Principles

Commented [TC112]: Specific amendment.
Reason: To standardise terminology

Commented [LL113]: Specific amendment.
Reason: To clarify that the Grand Union Canal is also a key destination/route in Park Royal.

Commented [LL114]: Specific amendment.
Reason: To be consistent with requirements set out in Brewery Cluster Policy P4C1.

DRAFT

iv. **Green corridors along railways; and**

~~v.~~ **Metropolitan Open Land and green spaces along the A40~~; and~~**

~~vi.~~**v. ~~other nearby green spaces~~.**

~~j)~~**h) Optimising the use of roof space for food growing and embedding other green infrastructure across the area, including on-site soft landscaping and tree planting;**

~~k)~~**i) Supporting any applicable actions identified in the Thames River Basin Management Plan for the River Brent catchment;**

~~l)~~**j) Contributing to and/or delivering measures that help support OPDC, the host authorities, and where relevant TfL, to improve air quality monitoring, and overcome issues identified in Local Air Quality Focus Areas around the A40 and A406.**

Heritage and character

~~m)~~**k) Strengthening local identity and character by conserving and enhancing the Brent Viaduct and~~, ~~other identified non designated heritage assets and their settings;**

l) Ensuring local character is informed by the area's existing heritage, including the Grand Union Canal, railway and industrial heritage; and

~~n)~~**m) Supporting increased building heights where this will deliver industrial intensification and SIL compliant broad industrial type activities**

~~**Infrastructure**~~

~~**o) Contributing to the delivery of infrastructure requirements as set out in the OPDC Infrastructure Delivery Plan;**~~

~~**Development and phasing**~~

~~**p) Achieving early delivery of housing to contribute towards OPDC's 0-10 year housing supply, in line with the Brewery Cluster and First Central site allocation; and**~~

~~**q) Supporting the phased delivery of new jobs across a range of sites in Park Royal West in line with b).**~~

SUPPORTING TEXT

~~1.60~~ 1.46 Park Royal West is predominantly an area designated as a Strategic Industrial Location (SIL) where the priorities are to protect, strengthen and intensify industrial activities in line with Pp~~p~~olicy SP5 and E1. The industrial area~~,~~ as a whole~~,~~ experiences low vacancy rates and rising rent levels resulting from increased demand for industrial space across London. This demand could continue to come from a broad range of industrial sectors, but more transport intensive uses, such as transport and logistics operations, have been increasingly attracted to Park Royal West. ~~In order to address these issues, the policy seeks to protect and encourage a mix of broad industrial type uses and industrial sectors. This approach will help ensure that Park Royal can support a range of business needs and therefore be resilient, flexible and adaptable to the changing nature of industry.~~

~~1.61 The character of Park Royal West is dominated by medium grain blocks organised as autonomous industrial estates or standalone warehouses and premises. There is also a higher proportion of larger workspaces compared to the rest of Park Royal. Recent major developments have largely been focussed on medium-sized and larger business units and this growth will continue to be supported. However, smaller business units will also be required to support both emerging and established industrial sectors to grow. Proposals will need to ensure they are addressing the full range of business needs, and incorporate a mix of unit sizes for small, medium and larger businesses to meet anticipated demand.~~

Commented [LL115]: Specific amendment.
Reason: To recognise that some intensification types involve vertical extensions and stacking uses.

Commented [PF116]: Specific amendment.
Reason: To avoid repetition with policies DI1 and DI2.

Commented [LL117]: Specific amendment.
Reason: To avoid repetition with policies E1.

Commented [LL118]: Specific amendment.
Reason: To avoid repetition with policies E1.

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~~1.62~~ ~~1.47~~ Employment densities across the industrial area are ~~already~~ relatively high, but there are opportunities for further intensification to deliver ~~an~~ additional ~~jobs~~ ~~employment~~industrial floorspace and employment to contribute to ~~the~~ OPDC's ~~10,000~~ jobs target~~s for Park Royal set out in the Mayor's London Plan~~.

~~1.63~~ ~~1.48~~ OPDC has carried out work to explore ways to deliver additional floorspace and industrial jobs ~~and higher employment densities~~1. This work highlights sites and typologies where industrial intensification may be possible through vertical/horizontal extensions, internal subdivision or comprehensive redevelopment. It demonstrates that, overall, an uplift of around ~~3,800~~XXXX jobs could be achieved, although this figure is ~~highly~~ indicative and is dependent on site specific constraints. Twyford Tip, if viable and deliverable represents a significant opportunity to provide additional industrial floorspace/jobs as it is currently vacant land; ~~but~~ it should be noted that there is an extant planning permission for non compliant SIL uses on this site. The site is adjacent to the Twyford Waste and Recycling Centre which is safeguarded for waste apportionment purposes through the West London Waste Plan 2016 (see Policy EU6).

~~1.64 Appropriate developments which involve a more intensive use of land and deliver more jobs with SIL compliant uses will be supported in accordance with part b) of the policy above.~~

~~1.65 A key site in Park Royal West is Twyford Waste and Recycling Centre, on Abbey Road. This is an existing waste transfer station safeguarded in the adopted West London Waste Plan (WLWP). This site is considered to have particular potential for redevelopment for future waste capacity, including alternative forms of waste management that could result in waste moving up the waste hierarchy. As such, this site will be protected in accordance with Policy EU6.~~

~~1.66~~ ~~1.49~~ There are a number of non SIL sites within Park Royal West, including ~~the~~ First Central ~~site~~ and surrounding sites~~.~~; and the Bashley Road Gypsy and Traveller site. Further information on ~~the~~ First Central ~~site~~ and surrounding sites are set out in the First Central site allocation and Brewery Cluster (Policy P4C1). ~~and p~~Provision for Gypsy and Traveller accommodation is ~~discussed~~ addressed in the Housing chapter (policy H8).

~~1.67~~ ~~1.50~~ Critical road and rail infrastructure runs through or sits alongside Park Royal West. These provide a significant advantage for businesses and make this area a highly desirable industrial location. However, they also present a number of infrastructure related challenges:

a) The A40 (Western Avenue) and A406 (North Circular Road) provide important orbital and east-west connections into and around London, but they are often congested ~~and form a barrier to pedestrian and cycling movement between Park Royal and surrounding areas to the south and west;~~
b) The four key routes that run through Park Royal - Coronation Road/Park Royal Road/Acton Lane/Abbey Road (referred to as the 'Big X') - experience high levels of traffic; and~~.~~
c) The A40 and A406, the railway lines (London Overground, Bakerloo and West Coast Main Line) form a 'wall of infrastructure' which sever the area from its surroundings and make~~s~~ walking and cycling into Park Royal more challenging.

Commented [LL119]: Specific amendment.
Reason: To recognise that intensification has the potential to provide dual benefits of additional space and jobs.

Commented [LL120]: Specific amendment.
Reason: To recognise that intensification has the potential to provide dual benefits of additional space and jobs.

Commented [LL121]: Specific amendment.
Reason: To clarify that the Park Royal Intensification Study focuses on industrial intensification

Commented [LL122]: Specific amendment.
Reason: To reflect an update to the Park Royal Intensification Study.

Commented [LL123]: Specific amendment.
Reason: To reflect what was permitted by extant planning permission.

Commented [LL124]: Specific amendment.
Reason: To provide clear cross reference to Policy EU6.

Commented [LL125]: Specific amendment.
Reason: To avoid repetition with policy EU6

Commented [LL126]: Specific amendment.
Reason: To avoid duplication with bullet c) in this paragraph

~~1.68~~ 1.51 A key contributing factor to existing congestion levels is the high number of Park Royal's employees currently travelling to work by car – approximately 35% of the total trips made by car into Park Royal are from within a 5 km radius, which represents the average cycle trip length2. These travel patterns contribute to high levels of traffic and congestion, particularly along the Big X; they are also likely to exacerbate environmental issues such as noise, dust and poor air quality. There is an opportunity to support changes to this travel behaviour to help address these issues and improve the functioning of the road network and ensure timely business operations and deliveries. The modal shift from private car trips to public transport, walking and cycling can be achieved by:

a) ensuring there are safe, continuous, well-lit and legible routes;
b) increasing pavement widths;
c) creating and upgrading cycle lanes;
d) improving junctions to support walking and cycling; and
e) increasing bus capacity.

~~1.69~~ 1.52 The movement of goods is a critical part of industrial business operations~~,~~ and a proportion of the vehicle flows in Park Royal are attributed to this. The continued success of existing businesses is of paramount importance; however, there is an opportunity to further reduce traffic in the area through consolidated~~ion~~ delivery and servicing arrangements between businesses or increasing efficiency by reducing 'empty running' of logistics vehicles. Notwithstanding this, there are also opportunities to smooth the flow of traffic, including improvements to key junctions. Transport for London (TfL) are responsible for the A40 and A406 and the local ~~boroughs~~ authorities are responsible for other roads as the local highway authorities. OPDC will be working closely with these delivery agencies and will expect development to support the implementation of planned improvements.

~~1.70~~ 1.53 High levels of on-street parking, poor quality public realm and limited active and positive frontages negatively impact on the general quality of the environment and the sense of safety. The key routes represent the greatest opportunity to improve the functional operation and qualitative perception of the area. These routes should be enhanced by introducing additional street greening, new developments with active and/or positive frontages and delivering an attractive public realm which incorporates space for walking and cycling with a robust and consistent palette of materials.

Commented [LL127]: Specific amendment.
Reason: To be consistent with the policy text

~~1.71~~ 1.54 There are very few open spaces in Park Royal West, which is unsurprising given its long established industrial nature. Whilst there are examples of relatively high quality landscaping (Diageo Lake and Gardens), this is variable~~,~~; and much of the ~~green~~ open space is private. The lack of green infrastructure and tree coverage also contributes to enhanced Urban Heat Island (UHI) effect and localised outdoor overheating.

~~1.72~~ 1.55 Given the scarcity of open space, any existing provision must be protected and, where possible, enhanced so that it can continue to provide areas of recreation ~~and relief~~ for local residential communities and workers. Opportunities must also be taken to provide new spaces along the Grand Union Canal, within the Brewery Cluster and First Central Site Allocation and~~. Measures should also be taken~~ to ensure public access into ~~these~~ open spaces and/or providing additional greening and tree cover where possible.

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~~1.73~~ 1.56 The scale and concentration of manufacturing industry means that there is the potential for cross flows and the reuse of resources. These resources could be put to good use and support a range of activities as part of promoting the principles of the Circular and Sharing Economy (see EU7). For example, ~~t~~There is an opportunity to further support ~~this~~the food sector which is highly concentrated in Park Royal ~~and realise other Circular Economy benefits at the same time. food manufacturing is highly concentrated in Park Royal and - 30% of all the food consumed in London is produced and processed there. There is an opportunity to further support this sector and realise other benefits at the same time.~~ Organic waste generated by food manufacturing could be made into compost to grow fruit and vegetables as part of rooftop urban farming projects in Park Royal. This approach has been successfully adopted on rooftops in New York City. ~~The organic~~This waste could also be used for energy generation. A portion of the fruit and vegetables grown on rooftops will also become food waste, which can be captured ~~again~~ and used again to produce compost. In terms of other benefits, urban farming would also reduce the ~~overheating of buildings~~UHI effect, could improve the productivity of Park Royal's food manufacturing industri~~es~~ and provide a local food source for the residents of Old Oak.

1.57 The mix of industrial architectural styles present reflects the varied and continually evolving pattern of growth and redevelopment in this area. There ~~is~~ are a limited number of historically significant buildings, but the listed Brent Viaduct, Grand Union Canal Conservation Area and underlying industrial heritage make a key contribution to local identity and the historic distinctiveness of this area3. Significant potential exists to interpret and celebrate the social history of this area, by reflecting this through street/building naming and the design of public art and public realm. Heritage assets should be conserved and enhanced as part of future development in the area, ~~taking into account relevant recommendations in the evidence base~~in accordance with Policy D8. ~~Development proposals will need to respond positively to these characteristics.~~ In line with relevant typologies identified in the Park Royal Intensification Study, OPDC will support increased building heights where this will deliver industrial intensification and SIL compliant broad industrial type activities.

Commented [LL128]: Specific amendment.
Reason: To reduce unnecessary text

Commented [LL129]: Specific amendment.
Reason: To recognise that some intensification types involve vertical extensions and stacking uses.

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POLICY P4C1: BREWERY CLUSTER

VISION

V1. A high quality and legible entry point ~~from~~ into Park Royal ~~and Hanger Lane rail stations and the A40. New development will create a positive identity for and transition into, the wider Park Royal industrial area and respond to the area's rich industrial heritage.~~ New and improved walking and cycling routes, along with a concentration of local services set within an attractive public realm, will provide an area of focus and vibrancy for the new and existing residential and ~~commercial~~ employment uses in the area. ~~New employment uses will play a key role in successfully integrating this area with, and mediating between, the existing residential and industrial setting.~~

POLICY

Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:

Land uses

a) Supporting residential uses when:

i. located above ground floor along key routes; and

ii. in other locations, where they provide positive frontages onto Lakeside Drive ~~and~~, Diageo Lake and Gardens and ~~the~~ other new publicly accessible open spaces.

~~b) Restricting residential uses adjacent to SIL unless it can be demonstrated that their design and location:~~

~~i. will not compromise the ongoing functioning of the adjacent SIL uses; and~~

~~ii. provides a satisfactory level of residential amenity for occupiers of the development.~~

~~c)~~b) Delivering appropriate employment uses~~, including industrial uses adjacent to SIL,~~ with ground floor active and/or positive frontages:

i. onto key routes;

ii. along Mason's Green Lane that connects to Park Royal Station; and

iii. along Lakeside Drive.

~~d)~~c) Delivering a small quantum of local 'walk to' retail and social infrastructure uses which meet the needs of existing and new residents ~~arising from the development~~ and accords with policy TCC1;

Public realm and movement

~~e)~~d) Delivering a high quality public realm with active and/or positive frontages that successfully address the different level changes across the area;

~~f) Supporting the activation of the street with new accessible and inclusive walking/cycling routes;~~

~~g)~~e) Providing new or ~~upgraded or joining up~~improving existing walking and/or cycling routes to make high quality connections north-south and east-west, including:

i. to/from Park Royal and Hanger Lane stations, particularly improvements to the route and footbridge along Mason's Green Lane;

ii. to/from Twyford Abbey and the A406;

Commented [PF130]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF131]: Specific amendment.
Reason: To avoid duplication with policies E1 and D6.

Commented [LL132]: Specific amendment.
Reason: To recognise that there is existing residential communities.

Commented [LL133]: Specific amendment.
Reason: To avoid repetition with policy D2, T2 and T3.

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iii. **through Diageo Lake & Gardens;**

iv. **around and across Lakeside Drive; and**

v. **towards the Grand Union Canal.**

~~h)~~f) **Delivering wayfinding, signage and lighting strategies that provide legibility for routes/spaces and improve their sense of safety, prioritising routes to/from Park Royal and Hanger Lane stations;**

~~i)~~g) **Continuing the use of Coronation Road as an important vehicle access and servicing route for Park Royal;**

Green infrastructure and the environment

~~j)~~h) **Supporting the creation of new high quality publicly accessible open space that is well integrated with the wider open space network, including a new publicly accessible open space within the First Central Site Allocation;**

~~k)~~i) **Contributing towards and/or delivering improvements that support public access into and/or improve the quality of existing green infrastructure including:**

i. **Diageo Lake and Gardens Site of Nature Conservation Importance (SINC); and**

ii. **Metropolitan Open Land.**

~~l)~~j) **Contributing to and/or delivering measures that help support OPDC, the host authorities and where relevant, TfL to improve air quality monitoring, and overcome issues identified in local Air Quality Focus Areas around the A40 and A406;**

Building heights

~~m)~~k) **Contributing to a variety of building heights which respond to the context, with tall buildings and associated new publicly accessible open space focussed along Coronation Road;**

Heritage and character

~~n)~~l) **Ensuring ~~individual planning applications positively respond~~local character is informed by ~~to~~ the area's industrial heritage, using the former Guinness brewery as a historic reference point to inform the design proposals and help to reinforce a degree of local distinctiveness.~~;~~**

Commented [LL134]: Specific amendment.
Reason: To provide consistent phrasing across the policies

~~**and**~~

~~**Development and phasing**~~

~~**o) Delivering development early to contribute towards OPDC's 0-10 year housing supply.**~~

SUPPORTING TEXT

~~1.75~~ 1.59 The Brewery Cluster is focussed around a key point of entry into the industrial area from Park Royal and Hanger Lane rail stations; and to/from the A40. Coronation Road is one of the key routes as part of the wider 'Big X' network alongside Park Royal Road, Abbey Road and Acton Lane. It is a heavily trafficked route, particularly for vehicles servicing the Park Royal industrial area.

~~1.76~~ 1.60 Brewery Cluster is one of the few sites in Park Royal West which is not designated as ~~part of the Strategic Industrial Location~~SIL. Development here can be optimised to take advantage of its proximity to local rail stations and other public transport modes. A number of new development sites around the junction with Coronation Road, Lakeside Drive and Rainsford Road have been identified that can make a significant contribution to homes and jobs targets for Park Royal and help address issues in the area.

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~~1.77~~ ~~1.61~~ The quality and provision of walking and cycling routes between stations and First Central, Park Royal and to/from Twyford Abbey are key to addressing severance from the wider area and encouraging a modal shift ~~– with people using more sustainable ways of travelling to work in Park Royal~~. However, some of the routes~~, links and crossings~~ are in need of improvement. This is particularly the case for the pedestrian and cycle link between Park Royal Station and First Central (part of Mason's Green Lane) which has issues related to safety, ~~and~~ quality of the environment and legibility. A new hotel on Western Avenue provides an active frontage onto part of the link, but a greater degree of surveillance and improvements to this link are ~~is~~ required along its length.

1.62 Despite significant redevelopment in this area to provide new offices, around 500 homes and open space (known as First Central), there is very limited access to town centre and community facilities for local workers and residents ~~in this area. This is not limited to First Central.~~ Park Royal as a whole currently suffers from a lack of facilities for businesses and employees, with only one nursery, two gyms, four hotels and no conference facilities. ~~This presents a problem when trying to attract businesses into Park Royal, with some other industrial estates having more facilities available for staff and businesses. Therefore, i~~Introducing these uses could help create a more sustainable neighbourhood and business environment, with services being closer to where people live and work. ~~However, any~~Any town centre uses would need to be small-scale 'walk-to' facilities, to complement the surrounding town centre hierarchy, in accordance with Policy TCC1.

1.63 The potential success of this cluster rests on its ability to mediate between the existing residential uses and industrial uses in SIL. The introduction of new employment uses as part of mixed use approach is important. For example, small manufacturing and associated retail operations or small workshops and artist studios could complement residential uses and create a vibrant and industrious feel to this neighbourhood and help to blur a hard distinction between land uses.

~~1.78~~

~~1.79~~ 1.64 There are opportunities to deliver this mix of uses on development sites focussed along Coronation Road (First Central and Coronation Road South). New development in this location should incorporate 'walk to' ~~retail~~ A-class uses, employment and community facilities at the ground floor level to create active frontages focused around key routes and Mason's Green Lane. As part of a mixed use approach, residential uses would also appropriate above these ground floor frontages or in other locations, where this provides positive frontages onto residential focussed streets and open spaces; and does not compromise the function of the SIL in accordance with p~~P~~oliciesy D6 and E1.

~~1.80 A mix of uses is appropriate in this area, including residential, employment, town centre and social infrastructure uses. However, the potential and success of this cluster rests on its ability to mediate between the existing residential uses and industrial uses in SIL. The introduction of new employment uses as part of mixed use approach is key as they could provide help support a positive transition across these uses. For example, small manufacturing and associated retail operations or small workshops and artist studios could complement residential uses and create a vibrant and industrious feel to this neighbourhood and help to blurring a hard distinction between land uses.~~

Commented [LL135]: Specific amendment.
Reason: To avoid repetition of policy TCC1 in relation to 'walk to' services.

Commented [PF136]: Specific amendment.
Reason: Relocated from below.

Commented [LL137]: Specific amendment.
Reason: To avoid repetition of approach described in paragraph above.

1.81 1.65 A second development opportunity exists at theThe east side of Lakeside Drive directly adjoining the 'Origin' industrial development . This section of the street is currently flanked by blank industrial facades and grass verges. New development here so development should create a balance of active and/or positive street frontages on both sides of the street. Additional accommodation for SME businesses should be provided at the ground floor level, and there is potential for residential uses above. However, given its close proximity to SIL, the proposals must demonstrate that the layout and quantum of residential uses would not undermine the function of surrounding industrial uses, in accordance with Policy E1 D6, and in line with the agent of change principle, and . Proposals including residential uses would also need to demonstrate that a satisfactory level of residential amenity is provided for occupiers of the development.

1.82 1.66 Given the proximity and proposed function of these development sites, it is particularly important that aAll three sites are should be progressed in a complementary and coordinated way to ensure that the neighbourhood, as a whole, is successful.

1.83 1.1 There are significant level differences across this cluster, with the approach into the heart of this cluster being via stepped/ramp access and through an underpass. The placement of buildings and their positioning in terms of their 'fronts and backs' should have regard to the difference in levels to make sure that existing and new pedestrian and cycle routes are overlooked and can provide a pleasant environment for people moving through the area.

1.67 New and upgraded walking and cycling routes are needed through this area to connect up to the wider network. These connections will help . Further upgrades will also be required to enhance wayfinding and their sense of security, but also creatingte a more intense hub of activity and active frontages along the key routes to and from Park Royal station, increasing sense of security and supporting the vibrancy of any proposed 'walk-to' town centre uses. , particularly Mason's Green Lane, could play a key role in encouraging people to walk and cycle to and from the station. There are significant level differences across this cluster, with the approach into the heart of this cluster being via stepped/ramp access and through an underpass. The placement of buildings and their positioning in terms of their 'fronts and backs' should have regard to the difference in levels to make sure that existing and new pedestrian and cycle routes are overlooked and can provide a pleasant environment for people moving through the area.

1.84

1.85 1.68 The massing of development will need to respond to the building heights of the adjacent existing residential blocks to manage the impact on residential amenity. Focussing a taller element around the two junctions between Coronation Road and Lakeside Drive is considered appropriate supported in principle (see Policy SP9) because this location could help support wayfinding and better define the junctions. However, tThe height of buildings will be subject to detailed assessment of its impacts in accordance with all relevant policy and guidance.

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~~1.86~~ 1.69 There is a relatively good provision of open space immediately within and around the cluster, including areas of Metropolitan Open Land (MOL) but better connections are required to improve its ~~performance as~~ contribution to the All London Green Grid~~an open space network~~. There is an opportunity to provide new civic/publicly accessible open space within the First Central Site Allocation which could provide the necessary catalyst for delivering this objective. Integrating the new publicly accessible open space with Diageo Lake and Gardens ~~and delivering interventions~~ should support better connections between the open spaces~~, such continuous and connected walking and cycling routes between and/or through them and a complementary range of facilities, could improve the use and function of the open space network in this location~~.

~~1.87~~ 1.70 The development site to the south of Coronation Road benefits from an extant permission for a hotel. This is on land designated as MOL in the London Borough of Ealing's Local Plan. The Section 106 agreement for this application (ref ETL/610/1359) sets out arrangements to designate alternative MOL on land to the south of the southern arm of Lakeside Drive. This Local Plan formalises this arrangement and alternative MOL provision has been designated within the Local Plan Policies Map ~~for this site~~within the Site of Importance for Nature Conservation (SINC) to the west of this cluster.

~~1.88~~ 1.71 Although it is no longer, the Guinness b~~B~~rewery c~~C~~omplex was a key part of Park Royal's industrial heritage. New development can take cues from this, particularly in terms of the use of materials and architectural detailing, street/building naming and the design of the public realm. This approach would not only ensure the new buildings are locally distinctive, but they could also re-tell the history of the area.

Commented [PF138]: Specific amendment.
Reason: To provide clear reference to the All London Green Grid.

Commented [LL139]: Specific amendment.
Reason: To avoid repetition of EU1, T2 and T3.

Commented [PF140]: Specific amendment.
Reason: To provide further clarity.

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POLICY P5: OLD PARK ROYAL

VISION

V1. Old Park Royal's established industrial land use and historic character will be protected. Today, this place is a prominent hub for smaller businesses.; oOpportunities to intensify industrial uses will support the continued growth of start-up businesses and innovative activities across a range of employment sectors. The enhancement of buildings along with improvements to the public realm and movement network will support a functional and exciting place that helps to mediate the transition between Old Oak and Park Royal West.

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

Land uses

- **a) Protecting SIL and delivering a mix of SIL compliant broad industrial type uses which can effectively mitigate and minimise impacts on the road network;**
- **Contributing towardsDelivering additional industrial floorspace and 1,600 1,400 new jobs by taking opportunities to intensify the use of all sites, but in particular on the identified industrial site allocations, and having regard to the locations and typologies identified in OPDC's Park Royal Intensification Study; to increase employment densities;**
- **b)a)**
- **c)b) Protecting, re-providing and/or increasing the provision of small business units in accordance with Policies E1, E2 and E4Policy E3;**

Public Realm and movement

- **d)c) Contributing towards and / or delivering improvements to the function and quality of the movement network for all users by:**
  - **i. enhanced street greening, public realm and active or positive frontages, particularly along Bashley Road, Chandos Road and other key routes;**
  - **ii.i. rationalising, minimising and/or removing on-street car parking where possible and practicable to enable walking, cycling and public realm improvements;**
  - **iii. deliveringthe provision of more generous pavement widths where this does not have a significant adverse impact on the functioning of the highway;**
  - **ii. creating new or upgrading existinged continuous walking and cycling routes, particularly along key routes and towards Park Royal Centre; and**
  - **iv. new or improved walking and cycling routes;**
  - **v. incorporating well designed and adequate access and servicing arrangements, having regard to the constraints on the road network;**
  - **vi.iii. delivering improvements to Chase Road and Bashley Road junctions and Chandos Road and Victoria Road junction to facilitate improved traffic flow and/or pedestrian and cycle enhancements; and**

Commented [PF141]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [LL142]: Specific amendment.
Reason: To avoid duplication with policies E1 and D6.

Commented [TC143]: Specific amendment.
Reason: To standardise terminology.

Commented [LL144]: Specific amendment.
Reason: To reflect recommendations in Park Royal Development Framework Principles

Commented [LL145]: Specific amendment.
Reason: To avoid duplication with policies T2 and T3

Commented [LL146]: Specific amendment.
Reason: To avoid duplication with policies T7.

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~~vii.~~iv. delivering traffic calming measures, including along Bashley Road, Chandos Road and Chase Road.~~; and~~

d) ~~delivering attractive wayfinding, signage and lighting strategies, prioritising Bashley Road and Chandos Road and routes to/from rail stations.~~Contributing towards and / or delivering improvements to the function and quality of the public realm for all users through:

i. enhanced street greening, public realm and active and/or positive frontages, particularly along Bashley Road, Chandos Road ~~and~~, ~~other~~ key routes and on town centre approaches;

ii. delivering more generous pavement widths where this does not have a significant adverse impact on the functioning of the highway; and

iii. improved and attractive wayfinding, signage and lighting strategies, prioritising Bashley Road and Chandos Road and routes to/from rail stations.

Green Infrastructure and environment

~~e)~~ Optimising the use of roof space for food growing~~.~~ and~~E~~ embedding green infrastructure across the area while ensuring the continued successful operation of businesses and the movement network;

~~f)~~e) ~~Optimising the use of roof space for food growing;~~

~~g)~~f) Contributing to and/or delivering measures to improve air quality monitoring, and overcome issues identified in the Local Air Quality Focus Area around Victoria Road/Old Oak Lane;

Heritage and character

~~h)~~ Strengthening local identity and character by conserving and enhancing the ~~proposed St Leonard's Road Conservation Area, other~~ identified industrial heritage assets and their settings, ~~s;~~

~~i)~~g) ~~Ensuring proposals are informed by the area's industrial heritage and positively contribute to the Standard Road Area of Local Character,~~ particularly by:

i. retaining the urban grain and street pattern; and

ii. ensuring a positive relationship between streets and the building frontages.~~;~~

iii. ~~selecting appropriate materials for the public realm and buildings in line with policies D2 and D4; and~~

iv. ~~adopting measures to conserve and/or enhance the setting of heritage assets in line with parts (d) and (e).~~

~~Infrastructure~~

~~j) Contributing to the delivery of infrastructure requirements as set out in OPDC's Infrastructure Delivery Plan; and~~

~~Development and phasing~~

~~k) Supporting the phased delivery of new employment space to support additional jobs across Old Park Royal in line with part b).~~

Commented [LL147]: Specific amendment.
Reason: To reflect recommendations in Park Royal Development Framework Principles

Commented [LL148]: Specific amendment.
Reason: To avoid duplication with policies D2 and D4

Commented [LL149]: Specific amendment.
Reason: To avoid duplication with policy D8.

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SUPPORTING TEXT

~~1.89~~ 1.72 Similar to the majority of Park Royal West, Old Park Royal is designated as a Strategic Industrial Location (SIL). The same priorities in terms of protecting, strengthening and intensifying industrial land apply across both places. ~~However, Old Park Royal policy refines the priorities within this overarching land use designation to respond to the place specific context.~~

~~1.90~~ 1.73 Old Park Royal was largely developed during the early 20th Century and its character is highly distinctive from the rest of the industrial area of Park Royal West. It is home to a number of historically significant buildings linked to its industrial heritage and based on this, there is potential for a new locally listed buildings and a new conservation area referred to as St. Leonards Road1 ~~(which will be subject to a separate public consultation and designation)~~.

~~1.91~~ 1.74 The historic street network which comprises the four parallel roads of Minerva, Sunbeam, Gorst and Standard (some of which are named after local car ~~manufacturers~~manufacturers from that time), remains intact. Other key features of its past - the smaller plots and the densely packed or finer grain arrangement of buildings – are also still present and are fundamental to Old Park Royal's character today. The buildings within the Standard Road Area of Local Character provide a particularly strong historic reference point in terms of their layout and architectural forms. Buildings in this location are typically laid out perpendicular to the street with gable ends at the front and are often hard up against the pavement edge or with minimal setbacks. All of these features set Old Park Royal apart~~,~~ and give rise to a unique industrial heritage that should be promoted and/or retained through any redevelopment. However, it also means that the area is more sensitive to change and the road network is highly constrained as it was not designed to accommodate the type and amount of vehicles that both service and move through this place today. These issues need careful management if Old Park Royal is to continue to be a successful and attractive business and industrial location.

~~1.92~~ 1.75 Evidence demonstrates that Old Park Royal accommodates a high proportion and density of smaller business units relative to that of Park Royal West2. This includes a variety of sectors and many highly valued independent businesses. It is the combination of the built environment, business type, size and employment densities which give rise to the lively urban industrial environment in Old Park Royal. OPDC will seek to protect this concentration of smaller business units within the Old Park Royal by prioritising the provision or re-provision of small business units when applying the policy requirements of Policies~~y~~ E1 and E3.

~~1.93~~ ~~The industrial market across the whole of the Park Royal area has been delivering larger industrial floorplates, which are targeted at medium and large businesses, in particular within the logistics sector. If this trend continues this could begin to impact on the overall availability of space for small units across the whole of Park Royal, including within Old Park Royal. A ready supply of smaller sized units is important to support the growth of small and start-up businesses. This type of small, flexible space will also be required to attract a range of growing sectors, including the creative services and food manufacturing, which are already performing well in the area . Therefore, the policy approach seeks to protect, re-provide and increase the supply of small business units in line with policies E1, E2 and E3.~~

Commented [LL150]: Specific amendment.
Reason: To provide better cross referencing to the Employment chapter

Commented [LL151]: Specific amendment.
Reason: To avoid duplication with policy E1 and E3.

~~1.94~~ Although this is the most intensively used part of Park Royal, there is ~~still the~~a significant opportunity to deliver more jobs within Old Park Royal Place, particularly within site allocations. Site allocations have been identified for two sites in Old Park Royal – land at Bashley Road and 40-54a Minerva Road. The land at Bashley Road is a particularly key site. It covers over 3.8 ha and has been identified as having the capacity to deliver a minimum 30,100 sqm of broad industrial type activities. A comprehensive and coordinated approach should be taken to the delivery of this site to unlock its potential, in accordance with Policy SP10. Smaller scale intensification will also be achievable in Old Park Royal on other sites[footnote], to capitalise on the area's

1.76 ~~Intensifying the use the land to create more jobs would be linked to~~ higher levels of PTAL and to take advantage of Old Park Royal's proximity to Old Oak. ~~Proposals should aim increase employment densities relative to the last occupied use of the site, and have regard to the identified intensification principles4. Applying~~ Delivering this intensification ~~this approach~~ within site allocations and other sites could equate to ~~1,400xxxx additional~~ 1,600 new jobs and growth opportunities across with a range of sectors in Old Park Royal although this figure is highly indicative and is dependent on site specific constraints.

~~1.95 All sites should seek to deliver an intensified form of development, where feasible. However, Cconsidering the context, intensification must be delivered sensitively so that existing issues of transport and servicing are not exacerbated. To minimise traffic impacts, the policy supports uses which increase industrial employment densities and that can effectively mitigate demands on the road network and/or have lower access and servicing requirements than existing uses.~~

Commented [LL152]: Specific amendment.
Reason: To clarify that all sites should contribute towards intensification, updates to the evidence base and to reflect introduction of new industrial site allocations.

Commented [LL153]: Specific amendment.
Reason: To avoid repetition of policy T7 and T8.

~~1.96~~ 1.77 The numbers of people driving to work in Old Park Royal contributes to high levels of road congestion and associated air quality issues across the industrial area. High demand for private car parking for employees also has an impact on the quality of the public realm and the amount of space available for walking and cycling. Furthermore, on-street car parking and the 'overspill' of industrial activities into the public realm, including on-street loading and waste storage, contribute to an unattractive and cramped street environment. There are frequent examples of this across Old Park Royal. This situation negatively impacts on the quality of the built environment, how it is experienced and how attractive it is to users. Whilst land will continue to be protected and supported for broad industrial type ~~uses~~activities, new development and intensification will be expected to minimise and/or mitigate parking demand by supporting employees to use more sustainable travel options in line with Policy SP7~~T~~9. Incorporating well designed and adequate access and servicing will also ensure that the highway can be used appropriately and function more effectively for all users.

~~1.97~~ 1.78 Old Park Royal is sandwiched between the wider industrial area of Park Royal West where change will be incremental and Old Oak where change will be transformational. As a consequence, Old Park Royal will have a pivotal role to play as a transition area between both these areas and become a key route between Old Oak and Park Royal in the future. This can be facilitated through improvements to the existing east-west links along Chandos Road and Bashley Road. These streets are flanked by a clustering of attractive 'landmark' heritage assets, including the Torpedo Factory (see figure 4.18) and Rotax Building so they have the potential to become a highly distinctive and attractive route into Park Royal. The place policy helps to support this objective by:

a) protecting the heritage and character of the area;
b) improving the quality of the public realm by introducing street greening;
c) increasing legibility and safety lighting and signage;
d) supporting increased flows of people by improving the walking and cycling provision; and

e) supporting intensification and creating additional active and positive frontages to animate this route.

1.79 Land adjacent to Old Park Royal will be used as HS2 construction sites. Close to these locations there may be opportunities to deliver meanwhile uses which could provide much needed natural surveillance and support the early activation of the area. OPDC will work closely with HS2 Ltimited and other relevant stakeholders to deliver this aspiration.

Commented [LL154]: Specific amendment.
Reason: To reflect that there may be opportunities for meanwhile uses linked to activities and people using or around the HS2 sites.

~~1.98~~ 1.80 There are no open spaces within Old Park Royal and relatively limited publicly accessible open space provision across the whole industrial area. Policies P7 and EU1 will ensure the two publicly accessible open spaces in close proximity to the place boundary are protected and enhanced to serve local needs. Applicants will also be expected to deliver/contribute towards green infrastructure, such as trees and green walls/roofs, as part of development proposals and the public realm (see Policies EU1 and EU2 for more guidance). As described in the Park Royal West place, additional initiatives such as urban farming and local food production projects could help achieve wider objectives and support a transition to a more circular economy5. Using currently underused spaces for urban farming has a number of benefits, including helping to reduce overheating of buildings, potential to improve the productivity of Park Royal's food manufacturing industriesy, and providing a local food source. Where possible, developments should also incorporate this as part of their proposals.

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P6: Park Royal Centre

Commented [LL155]: Policy wide amendment

Amendment: Full policy has been replaced.
Reason: To reflect recommendations of the Park Royal Development Framework Principles.

VISION

A strengthened and diversified range of new uses, services and amenities, including new town centre uses, workspaces and homes, alongside the anchor uses of Central Middlesex Hospital and ASDA will support a more vibrant and coherent neighbourhood centre. Improvements to the transport network will support walking and cycling, deliver enhanced bus services and ensure the road network keeps Park Royal moving, better connecting businesses, employees, residents and visitors with their destinations.

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

Land Uses

a) Supporting the delivery of a thriving mixed use neighbourhood centre by contributing to the delivery of 1,400 new jobs and a minimum of 650 new homes to support OPDC's 0-10 year housing supply;
b) Delivering and maintaining a quantum and mix of A class floorspace, including smaller units, to meet anticipated future demand in the most up to date Retail and Leisure Needs Study;
c) Supporting a co-ordinated approach to optimising the Central Middlesex Hospital- (CMH) site as a health and care hub by delivering new healthcare and uses related to the hospital function;
d) Ensuring a comprehensive and co-ordinated approach is taken to the development of the ASDA site to support the delivery of retail led mixed use development that:
    i. delivers a mix of town centre use floorspace, including small A class units, as ground floor active frontages facing onto Park Royal Road and Coronation Road;
    ii. delivers residential uses above ground floor frontages;
    iii. delivers new intensified industrial uses as active and/or positive frontages fronting onto Western Road and Coronation Road;
e) Diversifying the services, amenities and D-class and other appropriate town centre uses within the Neighbourhood Centre to support new and existing industrial, health and residential uses;

Public Realm and movement

f) Contributing to and/or enabling the delivery of high quality public realm, healthy streets and new or improved connections to surrounding areas shown in figure 4.19, particularly through the CMH, ASDA;
g) Delivering more continuous, active and/or positive and legible frontages along the key routes with well defined building lines, particularly within the ASDA site fronting onto Park Royal Road;
h) Contributing to and/or enabling delivery of new and improved cycling routes, to create:
    i. continuous two way cycle lanes in both directions, particularly on Coronation Road, Park Royal Road, Abbey Road, Acton Lane;
    ii. an alternative east-west cycle route linking Park Royal station via Park Royal Centre to the Grand Union Canal and Old Oak;
i) Contributing to, enabling and/or delivering the rationalisation of bus movements around Park Royal Centre, in particular within the CMH site, and enhanced bus infrastructure to support existing and planned bus services between Park Royal, Old Oak and other key destinations;
j) Minimising and, where feasible removing on street car parking, particularly along Coronation Road, Park Royal Road, Abbey Road and Acton Lane;
k) Contributing to, enabling and/or delivering a major realignment of the Coronation Road/Park Royal Road/Abbey Road/Acton Lane junction;

Green Infrastructure and the Environment

l) Delivering high quality multifunctional publicly accessible open spaces:
    i. within the Central Middlesex Hospital site;
    ii. within the Asda site and in association with the realignment of the Coronation Road/Park Royal Road/ Abbey Road/Acton Lane junction;

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Heritage and character

m) Strengthening local identity and character by ensuring local character is informed by the area's existing heritage, including the significance of the hospital and industrial related heritage.;

Building heights

n) Contributing to a variety of building heights including a single tall building at the north-eastern corner of the ASDA site to support local legibility and where this facilitates the delivery of the realigned road junction

SUPPORTING TEXT

Park Royal Centre is a designated neighbourhood town centre sitting at the heart of London's largest industrial estate. A large retail supermarket (ASDA) and Central Middlesex Hospital (CMH) act as anchor uses generating footfall within the centre. Other uses include supported housing and smaller services such as banks and cafes which help provide facilities for local employees, residents and visitors but there are still gaps in local provision for business focussed services, such as meeting spaces and an identified need for an additional 3,000sqm of additional A use class floorspace within Park Royal Centre in OPDC's most recent Retail and Leisure Needs Study. A more diversified town centre, including D class uses, is needed to meet the needs of the employees of local businesses, help support wider industrial uses and the residential population.

Both the ASDA and CMH sites are currently underutilised. Parts of CMH are currently vacant, although a new Primary Care Centre opened in Spring 2018 providing vital front line services for residents and workers in Park Royal. This facility has also been designed to potentially expand in future to meet the needs of OPDC's growing population.

CMH has a significant role in terms of its number of employees/visitors, its function, and land take within the centre. Changes here can transform the relationship between hospital and rest of town centre to create a health and care hub which is fully integrated within its context, contributes to an easily accessible and inclusive network of 'healthy streets' and supports wider health and wellbeing outcomes. Supportinged housing units have already been consented and built around the hospital and are appropriate given their proximity to the health facilities. Optimising the use of the CMH site could deliver potential opportunities for other health related services such as training or research and development facilities or other complementary residential accommodation or staff amenity uses.

The ASDA site includes land that is currently vacant or used for surface car parking and offers the greatest potential for large scale redevelopment within the centre, including potential for early delivery. A mix of town centre uses, primarily focussed on the delivery of new A use class floorspace can be delivered here, alongside complementary residential, social infrastructure and industrial uses. Given the potential scale of the opportunity, future development of the ASDA site requires a considered and comprehensive approach. Comprehensive redevelopment would help deliver an optimal layout and amount of development to help support the viability of delivering improvements to the road junction. Also comprehensive redevelopment would ensure there is more flexibility in the proposed layout of uses; this degree of flexibility is required to facilitate the reprovision of the store with new town centre frontages as well as minimising impacts to SIL.

The target of 650 homes across the centre is a minimum. Early work as part of the Park Royal Development Framework Principles document highlights the potential to deliver over 1,100 homes across a number of sites in the centre. However, further work is required to understand the deliverability for some of these sites. The housing target will be reviewed as part of future iterations of the Local Plan and further guidance for the potential delivery of these sites will be included in a Park Royal Supplementary Planning Document (SPD).

The junction of Abbey Road, Acton Lane, Park Royal Road and Coronation Road – which are the roads referred to as the 'Big X'- sits at the heart of the town centre. The existing staggered junction is inefficient

Commented [LL156]: Regulation 19(1) consultation amendment.
Reference: P6C1/1
Reason: To recognise the importance of Central Middlesex hospital

Commented [LL157]: Regulation 19(1) consultation amendment.
Reference: P6/1
Reason: To reflect that planning permission has been granted for supported housing along Acton Lane

and one of the biggest contributors to road congestion in Park Royal, adversely affecting the operation of the SIL. The junction dissects the town centre and acts as a significant barrier to movement and the creation of a coherent centre. A poor pedestrian experience and cycling links into the centre make it difficult to travel to and navigate around.

To address these issues, proposals should support and contribute appropriately to a realigned junction. This realignment would improve the capacity and functionality of junction, ensuring a smoother flow of traffic through the centre and allow for the introduction of better crossing facilities. To deliver the junction realignment, some land from the current ASDA car park would be required, and future development on the ASDA site must safeguard and facilitate delivery of this infrastructure scheme. Delivering the junction realignment will be costly but will benefit uses in the town centre therefore, all development proposals are expected to appropriately contribute to and enable its implementation.

Improvements to the public realm and the introduction of more balanced and active/positive frontages will aid connectivity and coherence. The current layout of the ASDA store is stepped back from the street and the front of the site is used for surface car parking which negatively impacts on the area's sense of place and creates an immediate barrier for those walking and cycling to visit the store. Redevelopment on this site must bring the building line forward to Park Royal Road and create a continuous ground floor active and/or positive frontages to help balance the centre. New pedestrian/cycle connections from adjoining sites will create better links between similar/complementary uses or physical routes into/through the centre.

At present, the bus routing at Park Royal is overly complex, with loops at CMH and ASDA~~sda~~. The highways arrangements around CMH in particular are space hungry and detract from what is otherwise a large publicly accessible open space in the centre of Park Royal. Rationalising the bus routes will mean that the public realm in front of the hospital can be better utilised as a civic open space and integrated with other public open spaces within the centre. Any reconfiguration should enable current and future network requirements to be appropriately provided for.

New publicly accessible open space should be provided in Park Royal Centre to contribute to the target to deliver 30% public open space (see policies SP9 and EU1). This should include new publicly accessible open spaces around the realigned junction and enhanced publicly accessible open space at the front of CMH. Subject to the rationalisation of the bus network on the CMH and removal of surface car parking, there is also potential for new publicly open space on this site.

Park Royal Centre has a diverse range of buildings and uses within and surrounding it. The design and height of new buildings in Park Royal Centre will need to appropriately respond to the surrounding context and will be subject to an assessment of their potential impacts on amenity (see policy D~~5~~6). A single tall building is supported in principle on the north east corner of the ASDA site in this location where it would support the viability of delivering improvements to the road junction, including its realignment and new publicly accessible open space.

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POLICY P7: NORTH ACTON AND ACTON WELLS

VISION

~~V1.~~ **North Acton and Acton Wells will be a high density** mixed use **area** accommodating ~~tall buildings~~ in appropriate locations. An improved **street** network will provide ~~connect~~a choice of greened routes to ~~this place into~~ **Old Oak** ~~South~~**, Park Royal and West Acton.** A new neighbourhood town centre will sit within a high quality and coordinated public realm along Victoria Road and Portal Way. Old Oak major town centre will connect to an enhanced North Acton station delivering a range of active uses.

~~V2. To the north of North Acton Station, the new major town centre of Old Oak High Street will run through Acton Wells, connecting with Victoria Road and in time the northern side of North Acton Station. To the south of the station, the new neighbourhood town centre of North Acton will be focussed along Victoria Road and Portal Way. A range of new town centre uses will be focused on the ground and lower floors along these streets.~~

~~V3. The area will see high quality tall buildings being delivered in appropriate locations, with high density housing being the main land use along with new hotel and student accommodation. New employment space will be encouraged to be integrated within mixed use development and in particular on the ground and lower floors.~~

~~V4. A high quality and coordinated public realm and new publicly accessible open spaces will knit the area together, helping to mitigate the busy road and rail infrastructure and the impacts of High Speed 2 construction and operation.~~

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

Development and phasing

a) Working positively with stakeholders to mitigate the impacts of HS2 construction facilities and associated traffic;

~~Supporting the integration of North Acton Station and Old Oak Common Lane Overground Station with surrounding uses;~~

~~Land uses~~

~~a)~~b) **Supporting the use of Acton Wells to facilitate High Speed 2 construction activities as secured by the HS2 London – West Midlands Act (2017);**

Land uses

~~b)~~c) **Supporting the delivery of mixed use high density residential and student accommodation by:**

i. **contributing to the delivery of** ~~4,300~~4,600 **new jobs and a minimum of 6,000 new homes, including early delivery of** ~~approximately~~ a minimum of ~~4,700~~ 3,200 **new homes to support OPDC's 0-10 year housing supply;**

ii. **delivering appropriate levels of student accommodation in accordance with policy H10;** and

iii. **locating non-residential uses on the ground floor fronting onto the busy streets of Victoria Road, Wales Farm Road, the A4000, School Road and the A40; and**

Commented [PF158]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

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~~iv. supporting the location of residential uses at the ground floor in other locations where high levels of amenity are achieved.~~

~~c)~~d) ~~Supporting and contributing to the establishment of a resilient economy by delivering a mix of~~Focusing **town centre** ~~uses, B1, B2 and B8 uses, employment, and~~ **community**, cultural and catalyst **uses** within North Acton Neighbourhood Town Centre and along Old Oak Street;

~~d) Supporting the retail, leisure and social infrastructure needs of existing and future communities by focusing the delivery of town centre uses within designated town centres, in accordance with Policy SP6 and the Town Centre and Community Uses Chapter.~~

e) Encouraging the activation of the area by working with stakeholders to deliver a range of meanwhile uses across:

i. North Acton including around the southern station square and along Portal Way; and

ii. Acton Wells including along School Road.

~~f) Supporting the delivery of cultural and catalyst uses across this place (see Policy SP6)~~

Public realm and movement

f) Contributing to and/or enabling delivery of a permeable, inclusive and accessible street network with new connections to surrounding areas as shown in figure x;

~~g) Contributing to and/or supporting delivery of a coordinated high quality public realm supported by positive and active frontages along all streets;~~

~~h)~~g) **Contributing to and/or enabling improvements to Victoria Road and Wales Farm Road as key movement routes for walking, cycling, buses and vehicular traffic during construction and operation phases** ~~by:~~**;**

~~delivering high quality footpaths;~~

~~i.~~

~~ii. delivering segregated cycle lanes; and~~

~~iii. supporting vehicular traffic movement on highways.~~

~~i)~~h) **Contributing to and/or** ~~supporting~~ enabling **the delivery of a network of new and enhanced streets with a walking and cycling focus:**

i. along Portal Way;

ii. along Old Oak ~~High~~ **Street to Old Oak South;**

iii. along Jenner Avenue; and

iv. through North Acton Station to School Road and Victoria Road.

~~j) Contributing to and/or supporting delivery of new connections, where appropriate:~~

~~k) along Old Oak High Street, through Acton Wells to North Acton;~~

~~l) through North Acton Station to Acton Wells across the Central Line;~~

~~m) from Portal Way to West Acton across the A40;~~

~~n) from the Victoria Estate to Jenner Avenue;~~

~~o) between North Acton, through the Perfume Factory and the Victoria Estate to the Westway Estate; and~~

~~p) improved walking routes to and through Acton Cemetery.~~

~~i)~~

Green infrastructure and the environment

Commented [PF159]: Specific amendment.
Reason: To avoid repetition with policy D6.

Commented [PF160]: Specific amendment.
Reason: To provide consistent terminology.

Commented [PF161]: Specific amendment.
Reason: To shorten policy.

Commented [PF162]: Specific amendment.
Reason: Moved from below and shorten to provide reference to diagram supporting policy.

Commented [PF163]: Specific amendment.
Reason: To avoid repetition with policy SP7 and T1. This information is provided in supporting text to this policy.

Commented [PF164]: Specific amendment.
Reason: To avoid repetition with policy D2.

Commented [PF165]: Specific amendment.
Reason: To avoid repetition with policies SP7 and T1.

Commented [PF166]: Specific amendment.
Reason: To avoid repetition with policy SP7 and T1. This information is provided in supporting text to this policy.

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q)i) **Contributing to and / or delivering high quality well-connected publicly accessible open spaces across North Acton and Acton Wells. This should include:**

i. **North Acton Station Squares;**

ii. **School Road Square;**

iii. **Victoria Gardens;**

iv. **connected open spaces along Portal Way;**

v. **Old Oak Common Lane Overground Station Square;**

vi. **Acton Wells Square;**

vii. **green infrastructure linear open spaces along Victoria Road, Wales Farm Road, Chase Road, Old Oak High Street and new streets; and**

viii. **sensitive enhancements to Acton Cemetery.**

r)k) **Contributing to and/or delivering mitigation measures that help support OPDC, the London Borough of Ealing and where relevant TfL, to address air quality issues in the Local Air Quality Focus Areas along the A40, Wales Farm Road and Victoria Road;**

Heritage and context

s)l) **Strengthening local identity and character by:**

i. **responding to the locally listed Elizabeth Arden Factoryconserving and enhancing the Castle Public House, the proposed locally listed Europa Studios and the Castle Public House, the proposed St. Leonard's Conservation Area and their settings, other heritage assets and their settings; and**

ii. **ensuring the future local character of buildings and the public realm is informed by the positive elements of the area's industrial and railway heritage.**

Building heights

t)m) **Contributing to a variety of building heights that includes:**

i. **tall buildings around North Acton Station, Old Oak Common Lane Station and key destinations along Old Oak High Street major town centre, North Acton neighbourhood town centre and other key routes that do not result in an overbearingacross North Acton in appropriate locations in accordance with policies SP9, D5 and figure x that do not result in an overbearing wall of development;**

ii. **within Acton Wells East, generally 10 to 12 storeys along Victoria Road;**

iii. **increased heights and massing adjacent to the A40 and railway lines to mitigate impacts on the public realm and residential amenity; and**

iv. **generally lower heights adjacent to sensitive locations including Acton Cemetery, existing residential neighbourhoods at Wells House Road, Midland Terrace and, along Jenner Avenue and along Long Drive.**

Infrastructure

u) **Contributing to the delivery of social infrastructure requirements as set out in the OPDC Infrastructure Delivery Plan (IDP), including a new secondary school within Acton Wells;**

v) **Safeguarding the Quattro site for waste management purposes and other appropriate uses following release of use for HS2 purposes;**

w)n) **Safeguarding land for the delivery of the West London Orbital Line station and services within Acton Wells; andWest Coast Main Line Crossrail Spur.**

x) **Enhancing public transport access by contributing to and / or enabling:**

Commented [PF167]: Specific amendment.
Reason: To standardise terminology with policy EU2.

Commented [PF168]: Specific amendment.
Reason: To reflect demolish of the Elizabeth Arden Factory.

Commented [PF169]: Specific amendment.
Reason: To be consistent with amended policies SP9 and D5.

Commented [PF170]: Specific amendment.
Reason: To avoid repetition with supporting text.

Commented [PF171]: Specific amendment.
Reason: To acknowledge Acton Cemetery as a sensitive location.

Commented [PF172]: Specific amendment.
Reason: Error correction. Long Drive is referred to in Policy P8.

Commented [PF173]: Specific amendment.
Reason: To avoid repetition with OPDC's IDP.

Commented [PF174]: Specific amendment.
Reason: To avoid repetition with policy EU6 and the West London Waste Plan.

Commented [PF175]: Specific amendment.
Reason: To reflect updated transport proposals.

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~~i. the delivery of Old Oak Common Lane London Overground Station and associated transport interchange functions; and~~

~~ii. enhancements to North Acton London Underground Station and associated transport interchange functions.~~

~~y) Supporting improvements to the existing road network including the Victoria Road Gyratory and the A40;~~

o) Providing on-site heating systems.

~~Development and phasing~~

~~z)~~a) ~~Working positively with stakeholders to mitigate the impacts of HS2 construction facilities and associated traffic;~~

~~aa)~~a) ~~Supporting the integration of North Acton Station and Old Oak Common Lane Overground Station with surrounding uses;~~

~~bb) Ensuring different phases of development contribute to the delivery of a network of distinct, but related, neighbourhoods; and~~

~~cc) Working positively with stakeholders to integrate and mitigate the impacts of new railway infrastructure within development.~~

SUPPORTING TEXT

~~1.100~~ North Acton and Acton Wells are located between Old Oak South in the east and Old Park Royal in the west. North Acton, south of the Central Line, ~~and~~ is home to recently built and permitted high density housing and student accommodation ~~(with Imperial College having a significant land ownership in the area)~~ along with existing employment uses ~~including~~ at the Victoria Road Industrial Estate and Carphone Warehouse offices. Acton Wells, to the north, includes the High Speed 2 (HS2) construction sites on either side of Victoria Road. Both North Acton and Acton Wells are adjacent to heavily trafficked roads. These roads ~~that~~ provide important access into Park Royal and Old Oak~~.~~

1.82 ~~The existing road network significantly defines the character of North Acton. Victoria Road, Wales Farm Road, A4000 and the A40~~ but dominate the public realm and impact on the quality of the walking and cycling environment. ~~Within Acton Wells, Victoria Road provides the key north-south route through the area.~~

~~1.101~~ 1.83 ~~The construction of Old Oak Common Station will have a major impact on the area. The early delivery of d~~Development within North Acton and Acton Wells presents a number of challenges to the delivery of successful long-term place making and sustainable communities for the area due to the potential amenity issues generated by ~~construction~~ traffic and the HS2 work sites. To mitigate these impacts, proposals should consider impacts relevant to their site both in terms of short-term implementation and long-term permanent development.

~~1.102~~ 1.84 ~~Although the existing road network and~~ HS2 construction activities will in the shorter term negatively impact on the character and functioning of the area. However, in the medium to long-term there is~~,~~ significant redevelopment potential ~~within North Acton and Acton Wells offers an opportunity to~~ that could enhance the local environment ~~and character in the longer term~~. To deliver these opportunities, this place needs to be redeveloped in a coordinated manner accompanied by a coherent and high quality public realm and network of open spaces.

Commented [PF176]: Specific amendment.
Reason: To avoid repetition with policies P7C1 and P7C2.

Commented [PF177]: Specific amendment.
Reason: To avoid repetition with policies SP7 and T1.

Commented [PF178]: Specific amendment.
Reason: To reflect updated evidence base that demonstrates deliver of a district heating system within North Acton is not viable.

Commented [PF179]: Specific amendment.
Reason: To avoid repetition with policies P7C1 and P7C2

Commented [PF180]: Specific amendment.
Reason: To shorten the policy.

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~~1.103~~ 1.85 The ongoing redevelopment of North Acton ~~is expected to~~will continue and ~~will~~ represents some of the earliest development ~~across~~ in the OPDC area, whereas ~~. Th~~the development of Acton Wells ~~is expected to~~is unlikely to commence until after the opening of Old Oak Common Station in 2026, when the sites are no longer required for construction purposes.

Commented [PF181]: Specific amendment.
Reason: To provide clarity for phasing of development

~~1.104~~ 1.86 North Acton and Acton Wells have the capacity to deliver a minimum of 6,000 new homes during the plan period~~1~~. North Acton has emerged in recent years as a location for new ~~purpose built~~purpose-built student accommodation. To support the delivery a sustainable community within the area, and~~.~~ t~~T~~his will continue to be supported where~~,~~ proposals ~~will need to~~ accord with Policy H10 (Student Housing).

~~1.105~~ 1.87 North Acton can ~~provide~~ accommodate a range of new employment spaces to support the activation of the area and continue its mixed use character. ~~Employment~~ The area has the capacity ~~is identified to be~~to deliver ~~4,300~~4,600 new jobs during the plan period~~2~~ delivered across a range of town centre, B1, B2 and B8 uses and community and cultural uses ~~space~~. This could include catalyst uses, which would be considered in accordance with Policy TCC9. ~~A mix of new office space including small, flexible space, will be supported3.~~ These uses will ~~also~~ play an important role in providing positive and active frontages across the area and in particular in those locations where residential uses may not be appropriate at ground level.

Commented [PF182]: Specific amendment.
Reason: To expand on uses considered to be appropriate.

1.88 North Acton neighbourhood town centre will build on the existing town centre uses to ~~create a new community centre~~ provide~~ing~~ services to support both the existing and new residential and employee communities. In the longer term, Old Oak ~~High Street~~ major town centre will continue through Acton Wells connecting to North Acton neighbourhood town centre. This will support the activation of the area and walking and cycling desire lines between stations. Meanwhile uses around the HS2 works sites will be important in helping to reduce the impact on the amenity of surrounding areas and support activation of this place.

Commented [PF183]: Specific amendment.
Reason: Relocated from below.

~~1.106~~ 1.89 At the time of the publication of this Local Plan, the Quattro site in Acton Wells is safeguarded within the West London Waste Plan (2015). Proposals should accord with this designation or any future policy guidance provided within an updated West London Waste Plan or other Development Plan Document.

Commented [PF184]: Specific amendment.
Reason: To acknowledge guidance for the Quattro Site within the West London Waste Plan.

~~1.107 The delivery of development across different phases in North Acton and Acton Wells, and the presence of HS2 construction activities, present challenges to delivering a coherent sense of place. Cultural uses and meanwhile uses will play an important role in addressing this by supporting the activation of the area, supporting the creation of a cultural quarter, strengthening local identity and complementing the functions of surrounding sites. Meanwhile uses will be particularly useful in helping to support and integrate HS2 construction activities with Old Park Royal along School Road while supporting local identity4. These uses are envisaged to build on the area's existing food production sector by providing eating and drinking uses and robust high quality public realm to support construction workers.~~

Commented [PF185]: Specific amendment.
Reason: Shortened and consolidated with paragraph above.

~~1.108 The potential development of the Perfume Factory site and the Victoria Industrial Estate provides an opportunity to deliver a range of active uses with residential above. To reflect PTAL levels and surrounding context, ground floor land uses should be coordinated to deliver:~~

~~a) town centre uses in the north;~~
~~b) employment uses in the centre; and~~
~~c) residential uses in the south.~~

Commented [PF186]: Specific amendment.
Reason: To avoid repetition with policy.

~~1.109~~ 1.90 The public realm within North Acton is currently of a poor quality and lacks coordination between different development sites. ~~This contributes to a poor quality built environment and low levels of street activity.~~ For an emerging high density area, ~~these qualities~~creating a high quality public realm is ~~are~~ fundamental to the delivery of a high quality place. ~~A series of recommendations are provided to~~Proposals should deliver an improved and coordinated public realm and movement network across North Acton which includes the need to deliver a range of positive and active frontages on to the public realm, ~~creating~~ creates clear definition between public and private spaces and mitigates level changes to support walking and cycling routes5. ~~Alongside the coordination of public realm, these recommendations include supporting the delivery of the section of Victoria Road directly south of North Acton Station, to have limited through-traffic to provide a new piece of public realm and supporting active uses within North Acton neighbourhood town centre to bring vibrancy to the area's streets and spaces.~~

Commented [PF187]: Specific amendment.
Reason: To avoid repetition with following paragraph.

~~1.110~~ 1.91 ~~To address the challenges to local movement presented by the road and rail networks, existing development and HS2 construction activities, the area will need to be supported by a high quality movement network that is integrated with surrounding areas and connects to key destinations. These destinations include North Acton Station, Old Oak Common Lane Station, Old Oak High Street, Old Oak Common Station, Park Royal, Wormwood Scrubs, West Acton and Acton Main Line Station. To facilitate these connections, t~~The movement network will need to be centred on the existing Victoria Road and Wales Farm Road as key north-south movement routes to support all modes of transport during the construction and operational phases of Old Oak6. This will include the provision of segregated cycle lanes and generous footpaths to support walking and cycling.

Commented [PF188]: Specific amendment.
Reason: To avoid repetition with above paragraph.

~~1.111~~ 1.92 In addition to the walking and cycling infrastructure along Victoria Road and Wales Farm Road, ~~development will also need to deliver new and improved routes to address the poor legibility in North Acton and establish high quality connections in Acton Wells. Within North Acton,~~ the section of Victoria Road directly south of North Acton Station has the opportunity to be enhanced to support walking~~/~~ and cycling and the vibrancy and vitality of the new neighbourhood town centre. Portal Way will also provide an important all-modes route focused on walking and cycling. This route should begin at the southern edge of Old Park Royal and continue south through Acton Wells, North Acton Station along Portal Way and across the A40 to West Acton and across Wales Farm Road to Jenner Avenue. Development proposals should also support the provision of a potential new walking and cycling route from North Acton~~, through the Perfume Factory, the Victoria Industrial Estate, through the Westway Estate and onto~~ to Wormwood Scrubs, should connections across railway infrastructure be feasible.

Commented [PF189]: Specific amendment.
Reason: To provide specific focus on portion of Victoria Road south of North Acton Station.

Commented [PF190]: Specific amendment.
Reason: To remove unnecessary detailed references.

~~1.112~~ 1.93 North Acton and Acton Wells currently have limited access to publicly accessible open space. ~~Recent developments have generated low amounts of provision and the functions of the existing open space of~~ Acton Cemetery provides the only sizeable publicly accessible open space but its functions are limited given its character and use. Access to nearby publicly accessible open spaces at North Acton Playing Fields and Wormwood Scrubs are obstructed by the road and rail network. The continued redevelopment of the area a~~t~~s high density~~ies~~ ~~mixed use development~~ will ~~need to be supported~~require ~~by~~ a range of high quality multifunctional publicly accessible open spaces. These will need to be a range of sizes with a variety of functions that reflect their surrounding land uses and activities~~7~~.

Commented [PF191]: Specific amendment.
Reason: To shorten the policy.

~~1.113~~ 1.94 To support the health and well-being of local people, new development will need to contribute to improving air quality along the A40, Wales Farm Road and Victoria Road through identified measures ~~and in discussions with~~agreed by OPDC and the London Borough of Ealing, where relevant~~8~~. This may include street greening, shaping the form of development and using specific high quality sustainable materials (see Policy EU8).

~~1.114~~ 1.95 North Acton and Acton Wells has historically been an area of industry ~~supported by the rail and road networks. However, the regeneration of North Acton has seen.~~ ~~t~~ This historical character has been eroded~~, resulting in a number of heritage assets being lost.~~ and will continue to be so ~~To support~~ to enable the construction of Old Oak Common Station~~, heritage assets will be lost in Acton Wells~~. However, the redevelopment of ~~both areas~~this place offers the opportunity to conserve and enhance the remaining assets, the OPDC heritage themes~~9~~ and ensure new development reflects the existing and evolving local character in terms of design, construction and operation.

~~Specific elements of the historic character are the locally listed Elizabeth Arden Factory and proposed additions to the local list of Europa Studios and the Castle Public House. Together these elements should be used to inform the design of development in North Acton and Acton Wells to help deliver locally distinctive neighbourhoods.~~

Commented [PF192]: Specific amendment.
Reason: To avoid repetition with the above paragraph.

~~1.115~~ 1.96 North Acton and Acton Wells has already been established as a place for tall buildings. This approach will continue to be supported. As new high density and tall buildings are delivered, it is important these take account of the surrounding sensitive locations, public transport access and the emerging context of surrounding sites (see Policy SP9). To deliver this approach, table X proposes ~~the following~~ a range of heights ~~is proposed~~10:

Tall buildings ~~around North Acton Station, Old Oak Common Lane Station and key destinations along Old Oak High Street major town centre, North Acton neighbourhood town centre and other key routes that do not results an overbearing wall of development~~ across North Acton in appropriate locations in accordance with policies SP9, D5 and figure x that do not result in an overbearing wall of development.	To respond to the existing context of tall buildings and optimise development opportunities to support legibility and secure additional benefits for the community and wider area. ~~These include a range of active uses and publicly accessible open spaces.~~
Generally 10 to 12 storeys facing on to Victoria Road	To provide massing that encloses the street and complements the scale of Old Park Royal
Increased heights and massing adjacent to the A40 and railways ~~to mitigate impacts on the public realm and residential amenity~~	To help address impacts of air and noise pollution from the A40 and railways. This will also need to respond to relevant sensitive locations
Generally lower heights adjacent to sensitive locations including existing residential neighbourhoods at Wells House Road, Midland Terrace, along Jenner Avenue and along Long Drive	To ensure development ensure appropriate levels of residential amenity.

Commented [PF194]: Specific amendment.
Reason: To avoid repetition with policy D5.

Commented [PF193]: Specific amendment.
Reason: To ensure consistency with amended wording for policies SP9 and D5.

~~1.116~~ The development of high density mixed use areas will necessitate the provision of a substantial amount of social and physical infrastructure. Within ~~North Acton~~Acton Wells, OPDC's IDP identifies that there is a need for one supernursery and an on-site secondary school ~~within Acton Wells~~. Based on current phasing and population yield assumptions, the study identifies the need for 9 forms of entry within this facility11. Further details on the specification and the approach to the provision of this facility (including alternative arrangements) are set out in ~~Policy TCC4~~the IDP. In accordance with Policy SP10, an equitable equalisation mechanism will be applied to the delivery of the secondary school, to ensure even sharing of the costs of delivering the facility. OPDC will also employ a retrospective pooling contribution mechanism, to provide additional planning contributions towards delivery of the facility from other appropriate developments (see Policy TCC4).

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~~1.117 The Quattro site located in Acton Wells is identified within the West London Waste Plan (2015) to continue to be required for waste management purposes following its release from use by HS2 Limited to support the construction of Old Oak Common Station. Any waste management use would need be delivered in accordance with policies EU6 and D6 to ensure it is integrated with the wider area and mitigates impacts on residential amenity. Mixed use development may be appropriate.~~ .

Commented [PF195]: Specific amendment.
Reason: Amended to located above to reflect wider land uses.

~~1.97 The delivery of Old Oak Common Lane London Overground Station is critical for increasing public transport accessibility levels in Acton Wells. In addition to this new station, enhancements to North Acton Station are required to support the increase in population and improve accessibility to station platforms and the wider area12. Enhancements should address the barrier created by the existing railway cutting to deliver a comfortable and legible connection at street level to Acton Wells. OPDC will work closely with TfL, Network Rail and other relevant land owners to secure its delivery. This improved permeability could be achieved in a number of ways and detailed work will need to be undertaken with TfL and Network Rail to identify a technically sound solution.~~

Commented [PF196]: Specific amendment.
Reason: To avoid repetition with policy P7C2.

Commented [PF197]: Specific amendment.
Reason: To avoid repetition with supporting text to policy P7C1.

~~1.118~~ 1.98 North Acton station has been identified for a series of phased upgrades4. Proposals should support and contribute to these upgrades, which will improve the station's capacity and accessibility. Further policy requirements are provided within Policy P7C1.

Commented [PF198]: Specific amendment.
Reason: To reflect future station improvements.

1.99 Development proposals within Acton Wells should safeguard land ~~T~~to enable the potential delivery of the~~a~~ West London Orbital Line, which may~~would~~ include an interchange with Old Oak Common Lane Station and passenger services running on the existing Dudding Hill Line ~~integration of services between the West Coast Main Line and the Elizabeth Line, proposals should safeguard land in Acton Wells to facilitate the delivery of the West Coast Main Line Elizabeth Line Spur subject to it being feasible.~~ Development proposals should also safeguard land for the potential delivery of the Chiltern Line to Old Oak Common Station. Applicants should refer to OPDC's IDP for the most up-to-date requirements.

Commented [PF199]: Specific amendment.
Reason: To reflect updated transport proposals.

Commented [PF200]: Specific amendment.
Reason: To reflect updated transport proposals.

1.1 Policy EU10 promotes the delivery of low carbon heat networks across the OPDC area. However, OPDC's North Acton District Energy Network Feasibility Study concludes that a low carbon heat network that serves the whole of North Acton is not viable. It may however be possible to establish small networks serving 2 or 3 developments using low carbon heat sources like an~~the~~ aquifer. As such, proposals will be expected to work with OPDC and Ealing to investigate the possibility of establishing small local energy networks. Where this is not possible developments will be required to ~~meet the London Plan zero carbon energy targets using~~deliver on site solutions.

Commented [PF201]: Specific amendment.
Reason: To reflect updated supporting study recommendations.

1.100 The delivery of the subsurface portion of HS2 rail infrastructure through Old Oak requires the use of natural ventilation to support its functioning. This will require the provision of an open air 'ventilation box' within Acton Wells West. This will have an impact on future development capacity and design. To ensure this impact is addressed and to help create a high quality place, OPDC will work positively with stakeholders such as HS2 Ltd and land owners to agree approaches that help to optimise development and continue to deliver transport functions.

Commented [PF202]: Specific amendment.
Reason: To the potential for development on Acton Wells West.

POLICY P7C1: NORTH ACTON TOWN CENTRE CLUSTER

VISION

V1. A vibrant high density neighbourhood town centre, ~~attracting a variety of uses~~ focused on an enhanced North Acton Station and ~~adjacent~~ new station squares. Active ~~across all times of~~throughout the day, ~~these~~ a range of town centre uses will strengthen the area's identity. High quality and coordinated public realm, ~~will be~~ framed by active frontages will guid~~e~~ing people to their ~~local~~ destinations ~~across North Acton, Acton Wells, Park Royal and Old Oak~~.

POLICY

Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:

Land uses

a) Supporting the delivery of a neighbourhood town centre by clustering a range of permanent and meanwhile town centre uses and employment uses around the existing southern and new northern station squares, along Victoria Road south of North Acton Station and along Portal Way with residential above;

Public realm and movement

b) Contributing to enhancing access to North Acton Station;

~~c)~~ Supporting the delivery of Victoria Road to the south of the station square as high quality shared vehicular and public realm space;~~:~~

c)

i. ~~in accordance with OPDC's Sustainable Transport Hierarchy set out in SP7; and~~

ii. ~~mitigating the impact of constructing traffic in the short term.~~

d) Contributing to and / or delivering new and improved walking and cycling infrastructure and routes as shown in figure 4.23~~x~~;

~~d) :~~

~~e) north to south from Old Park Royal and along Portal Way; and~~

~~f) east to west between Chase Road and the Victoria Industrial Estate.~~

Green infrastructure and the environment

~~g)~~e) Contributing to and / or delivering a new northern station square~~; and coordinating enhancements of the station to the existing southern station square.~~

Infrastructure

~~h)~~f) ~~Contributing to~~Supporting enhancements to North Acton ~~London Underground~~ Station to deliver the station as an integral part of the ~~built environment~~town centre ~~providing~~including:

i. increased capacity;

ii. step-free access;~~.~~

~~ii.~~iii. entrances onto station squares; and

~~iii.~~iv. 24 hour ungated high quality walking and cycling north - south routes.~~; and~~

~~iv.~~i. ~~step-free access.~~

Commented [PF203]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF204]: Specific amendment.
Reason: To avoid repetition with Policy SP7.

Commented [PF205]: Specific amendment.
Reason: To avoid repetition with Policy T8.

Commented [PF206]: Specific amendment.
Reason: To reflect current development of the station square.

Commented [PF207]: Specific amendment.
Reason: To provide further clarity.

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Development and phasing

~~i)~~g) **Enabling the delivery of development over and around ~~the~~ North Acton station and railway.~~;~~**

~~and~~

~~j) Ensuring the station is designed to be adaptable to respond to the surrounding changing context and phasing of development.~~

SUPPORTING TEXT

~~1.120~~ 1.102 North Acton Station will continue to be a key transport interchange that provides high levels of public transport access. ~~This access will continue to support the delivery of high density development and a new neighbourhood town centre. However, t~~To ensure people are able to access the station and that the activation of the town centre ~~uses are~~is supported ~~by a high quality environment~~, significant public realm improvements ~~are~~ will be required. These improvements will need to be delivered through joint working between OPDC, TfL and the London Borough of Ealing alongside other stakeholders such as a landowners and local communities.

~~1.121~~ 1.103 North Acton neighbourhood town centre has been designated ~~T~~to provide local services to existing and new communities~~, additional town centre and social infrastructure uses are required. To support their sustainable and coordinated delivery, North Acton neighbourhood town centre has been designated1. To support access to North Acton Station and the activation of the station squares, a range of a~~Active meanwhile and permanent town centre and employment uses ~~should be~~will be supported within this new centre ~~clustered around the, providing a range of uses .~~ These should provide ~~with~~ active and positive frontages ~~to help establish the town centre as a destination, building on its proximity to Park Royal. Residential will be acceptable~~with residential above. ~~These a~~Active uses should continue at ground and lower levels along Victoria Road and Portal Way to help activate th~~e~~is~~e~~ key route~~s for walking and cycling away from vehicular traffic on Victoria Road and Wales Farm Road.~~

~~1.122~~ 1.104 North Acton Station is the main destination in North Acton and will eventually be the meeting place of Old Oak ~~High~~ Street and Portal Way~~. As such, public realm improvements should support people reaching the station. The length of~~ Victoria Road~~, running east to west~~ directly south of North Acton Station~~. currently offers~~currently has a poor pedestrian environment~~ with the carriageway and vehicle movement restricting accessibility to the wider North Acton area~~. ~~HS2 Limited also propose to use this street for construction traffic movement. However, following its use by HS2, T~~this stretch of Victoria Road has the potential to evolve into a piece of high quality public realm delivering a range of functions ~~that is~~ framed by active ~~meanwhile and permanent~~ town centre and employment uses.

~~1.123~~ 1.105 Proposals ~~will~~should ~~contribute to the delivery of a new square to the north of North Action Station. This square should be designed to~~ ~~The station squares will need to provide space for a range of functions, including as a transport interchange and as a space for play, socialising and meanwhile uses. To support these many roles and maximise the quality of the spaces, proposals will be expected to contribute to the delivery of the northern station square as publicly accessible open space that~~ mitigate the ~~s~~ impacts of the HS2 ventilation box in Acton Wells. ~~Proposals will also be expected to contribute to enhancements to the existing southern station square in coordination with enhancements to North Acton Station to support accessibility to the station and activation of the square.~~

Commented [PF208]: Specific amendment.
Reason: To avoid repetition with policy SP10.

Commented [PF209]: Specific amendment.
Reason: To clarify relationship between uses, frontages and routes.

Commented [PF210]: Specific amendment.
Reason: To clarify delivery of a new station square to the north.

Commented [PF211]: Specific amendment.
Reason: To avoid repetition with policy D2.

Commented [PF212]: Specific amendment.
Reason: To avoid repetition with inserted text above.

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~~1.124~~ 1.106 To support the functioning of the station and support high density development, North Acton Station will require enhancements to increase its capacity and access~~2~~. This could include provision of new gatelines, ~~and~~ capacity enhancements, inclusive access, new building additions and a new 24 hour link from north and south, linking the existing southern and new northern station squares. ~~There are a number of proposals to deliver this.~~ Applicants will need to work with OPDC, TfL, the London Borough of Ealing and other stakeholders to define a preferred approach and contribute to the delivery of these proposals ~~including improving access to the station. A new southern station square begins this process, providing better access to the station entrance for pedestrians and cyclists and will need to be complemented by a northern station square in Acton Wells. To integrate the station and squares with the wider movement network, a new 24-hour continuous north-south walking and cycling route through the station will be required.~~

Commented [TC213]: Specific amendment.
Reason: To align with new North Acton Feasibility Study

~~1.125~~ 1.107 Development opportunities around the station will be delivered across a number of phases with areas to the north of the station in ~~areas in the north of~~ Acton Wells required for HS2 construction works until 2026. To reflect the changing context, station enhancements and associated development will need to be appropriately adaptable to respond to and support development over the long term. Development over and around the station will be supported if feasible and should be optimised reflecting the public transport access and local movement network.

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POLICY P7C2: OLD OAK COMMON LANE STATION CLUSTER

VISION

V1. Old Oak Common Lane Station will be ~~an important arrival point into Old Oak South and Acton Wells. It will be~~ a high quality public transport interchange that is fully integrated with Old Oak ~~High~~ Street providing continuous walking and cycling routes between Old Oak South and Acton Wells. It will be accompanied by a new station square to the west, framed by ~~Providing linkages between existing residential areas, the station will mediate the complex arrangement of railway infrastructure and be integrated with new development at Midland Gate. A~~active town centre and employment uses. ~~will frame a new station square to the west and public transport interchange facilities to the east.~~

POLICY

Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:

Land uses

a) **Supporting the delivery of Old Oak ~~High Street~~ major town centre by clustering permanent and meanwhile town centre and employment uses along Old Oak ~~High~~ Street ~~and around the station square~~ with residential above.~~;~~**

Public realm and movement

b) **Working positively and proactively with TfL to ensure ~~the feasible~~ delivery of a high quality public route between Old Oak South and Acton Wells that:**

i. **supports ~~and seamlessly continues~~a continuous ~~the~~ public realm and walking and cycling route~~s of Old Oak High Street~~ that successfully manages level changes within its design;**

ii. **is integrated with Old Oak Common Lane Station;**

~~iii. integrates the station square including transport interchange facilities on the western side, with improvements to public realm and interchange facilities to the east;~~

~~iv. integrates level changes and railway infrastructure within its design;~~

~~v.~~iii. **provides sensitive walking and cycling access to Midland Terrace;**

~~vi.~~ **delivers ~~supports~~ active frontages ~~which are ;~~**

~~vii.~~iv. **integrate~~d~~s with surrounding development opportunities; and**

~~viii.~~v. **conserves the residential amenity of Midland Terrace and Wells House Road ~~in accordance with Policy D6~~.**

Green infrastructure and the environment

c) **Contributing to and / or delivering a publicly accessible station square on Old Oak ~~High~~ Street to the west of the station;**

~~d) Ensuring the movement functions of Old Oak High Street support the activation of the station square;~~

~~e) Maximising access to nature and delivery of green infrastructure within the station squares;~~

~~Building heights~~

~~f) Delivering a range of building heights by:~~

Commented [PF214]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF215]: Specific amendment.
Reason: To avoid repetition with policy T5.

Commented [PF216]: Specific amendment.
Reason: Relocated above to shorten policy.

Commented [PF217]: Specific amendment.
Reason: To provide clearer links to policy guidance for protecting amenity.

Commented [PF218]: Specific amendment.
Reason: To avoid repetition with policy T5.

Commented [PF219]: Specific amendment.
Reason: To avoid repetition with policy EU2.

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~~i. delivering a tall building to the west of the station square;~~

~~ii. ensuring development sensitively responds to the existing residential areas of Midland Terrace, Wells House Road and Shaftesbury Gardens.~~

Commented [PF220]: Specific amendment.
Reason: To avoid repetition with policy P7.

Development and phasing

~~g)~~d) Supporting the delivery~~Delivering of~~ **Old Oak Common Lane London Overground Station** to enhance public transport access and **as an integral part of the built environment by providing:**

i. **ground floor entrances** ~~as part of the crossing~~ **onto the station squares;**

ii. **24 hour ungated walking and cycling east west access routes; and**

iii. **step-free access.**

~~Infrastructure~~

~~enhancing public transport access by supporting the delivery of the proposed Old Oak Common Lane London Overground station and associated transport interchange functions;~~

Commented [PF221]: Specific amendment.
Reason: Relocated to development phasing policy above.

~~h) Ensuring the development of Midland Gate and the delivery Old Oak Common Lane Station and Old Oak High Street complement one another;~~

Commented [PF222]: Specific amendment.
Reason: To avoid repetition with policy SP10

~~i) Ensuring the station is designed to be adaptable to respond to the surrounding changing context and phasing of development including:~~

~~i. Old Oak Common Station;~~

~~ii. Midland Gate;~~

~~iii. Acton Wells; and~~

~~iv. enabling delivery of the station and route over multiple phases.~~

Commented [PF223]: Specific amendment.
Reason: To avoid repetition with policy SP10

SUPPORTING TEXT

1.108 The potential Old Oak Common Lane station is a TfL transport requirement, to provide an appropriate interchange between services within Old Oak Common station and other local services. The ~~proposed~~ Old Oak ~~Common Lane S~~station will need to be designed to support this role.

Commented [PF224]: Regulation 19(1) consultation amendment.
Reference: P7C2/3
Reason: To reflect current proposed status of Old Oak Common Lane Station.

~~1.126~~ 1.109 The station is being designed to serve the North London Line Richmond branch but there are also proposals for a West London Orbital Route, running from Hounslow to Brent Cross on the existing Dudding Hill Line with trains potentially~~proposed to~~ stopping at Old Oak Common Lane Station. Proposals should safeguard for the delivery of any infrastructure associated with this connection. Applicants should refer to OPDC's IDP for the most up-to-date requirements. ~~the continuation of Old Oak High Street from Old Oak South to Acton Wells and on to North Acton. To do so, it will need to be designed and operated as an integral part of this major route1 that also supports transport interchange for passengers connecting to the London Overground network from Old Oak Common Station.~~

Commented [PF225]: Specific amendment.
Reason: To reflect updated transport proposals.

Commented [PF226]: Specific amendment.
Reason: To avoid repetition with inserted text in following paragraph.

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~~1.127~~ ~~The station should also be designed to support the delivery of Old Oak Street through the station as a continuous 24 hour ungated walking and cycling route. Old Oak High Street is the key movement route for Old Oak and surrounding areas. Emerging feasibility studies by Transport for London identify that the High Street may need to be delivered as a cycling and footbridge through the station. To support the transport roles of the station, e~~Entrances should be clearly located onto Old Oak ~~High~~ Street with interchange functions on the station square to the west of the station. Further work will be required to define the detailed design of Old Oak Street between the two stations and any other routes. However, emerging feasibility studies by Transport for London identify that Old Oak Street may need to be delivered as a cycling and footbridge through the station.

~~1.128~~ 1.110 ~~In addition to being a key movement route, the station, the station square and the public realm provide the opportunity to continue Old Oak High Street major town centre into Acton Wells.~~ By clustering active town centre and employment uses around the station square, the activation of this space will assist in local legibility and access to the station.

~~1.129~~ ~~The massing and building heights of development sites around Old Oak Common Lane Station should be delivered in accordance with Policy P7. and importantly deliver~~Proposals ~~should deliver~~ an appropriate standard of amenity for existing residents while responding to the character and heritage of the railway. ~~A sensitively designed tall building that responds to sensitive locations would be supported on the western side of the station square to support local legibility.~~

~~1.130~~ 1.111 The development sites surrounding Old Oak Common Lane Station will be developed across a number of phases. The delivery of development should support and enable the delivery of the station and vice versa, the delivery of the station should support and enable the delivery of an optimised approach to development. ~~Both the station and surrounding sites will need to be developed to support the design and function of the station and delivery of development.~~ ~~The design and functioning of the station building and associated structures will therefore need to be appropriately adaptable to respond to and supporting the surrounding areas and activities. Development on Midland Gate will also need to be aligned with the delivery of the station to ensure that is does not adversely impact on its delivery and the continuation of Old Oak High Street.~~

Commented [PF227]: Specific amendment.
Reason: To reflect updated movement network.

Commented [PF228]: Regulation 19(1) consultation amendment.
Reference: P7C2/5
Reason: To reflect that works on surface links between Old Oak Common Station and the potential Overground station is subject to ongoing work.

Commented [PF229]: Specific amendment.
Reason: To avoid repetition with policy P7.

Commented [PF230]: Specific amendment.
Reason: To support delivery of both the station and surrounding development.

Commented [PF231]: Specific amendment.
Reason: To provide clarity for the implementation of the policy.

DRAFT

POLICY P8: OLD OAK LANE AND OLD OAK COMMON LANE

VISION

~~V1.~~ **Old Oak Lane and Old Oak Common Lane will ~~.~~ be a place that sensitively integrates transport routes, existing neighbourhoods and new development. It will be a place that~~,~~ mediat~~es~~ing between the comprehensive redevelopment of Old Oak and the industrial ~~uses~~ intensification in Park Royal and Channel Gate.**

~~V2. It will continue to be a busy route connecting Harlesden and Willesden Junction Station in the north with Wormwood Scrubs and East Acton in the South. New development will respond to the area's complex context of the nearby Old Oak Common Station, High Speed 2 construction sites, rail lines, Grand Union Canal and the area's residential heritage.~~

~~V3. Within this place, the Atlas Junction neighbourhood town centre will be a vibrant focal point for the local community.~~

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

~~Development and phasing~~

- ~~Working positively with stakeholders to mitigate the impacts of construction activities and traffic within the design of permanent and meanwhile buildings, structures and public realm;~~

Land uses

a) **Supporting the delivery of a ~~range of~~ vibrant mixed use ~~neighbourhoods~~ place by:**
   i. **contributing to the delivery of ~~1,100~~1,600 new jobs and a minimum of ~~2,600~~2,800 new homes over the plan period ~~with~~ including early delivery of a minimum of ~~1,100~~1,200 homes to contribute to OPDC's 0-10 year housing supply; and**
   ~~ii. retaining existing residential uses; and~~
   ii. **delivering ground floor town centre uses ~~and employment uses along Old Oak High Street major town centre and~~ within Atlas Junction neighbourhood town centre.**
   ~~iii. outside of Strategic Industrial Locations (SIL).~~

~~b)~~ **Supporting the functioning of SIL ~~while~~by delivering active and positive frontages~~:~~**

~~c) SIL compliant broad industrial type uses; and~~

~~d)~~**b) ~~within~~on sites facing onto Victoria Road and Old Oak Lane~~,~~.~~:~~ ~~active and positive frontages that help to activate the public realm.~~**

~~e)~~**c) Supporting the functioning of the Willesden Junction Bus Garage ~~Harlesden Bus Depot~~ site as SIL by:**
   i. **retaining the bus depot use unless ~~the use~~it is no longer demonstrated to be required or a suitable alternative location is agreed with Transport for London; and**
   ii. **providing ~~active frontages~~ broad industrial type activities with active frontages facing on to Station Road and positive frontages on to Harley Road.~~;~~ ~~and~~**

Commented [PF232]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF233]: Specific amendment.
Reason: To avoid repetition with policy D6 regarding the protection of amenity.

Commented [PF234]: Specific amendment.
Reason: To avoid repetition with policy H5.

Commented [PF235]: Specific amendment.
Reason: To avoid repetition with inserted text in following paragraph.

Commented [PF236]: Specific amendment.
Reason: To avoid repetition with policy SP4.

Commented [PF237]: Specific amendment.
Reason: To avoid repetition with policy E1.

Commented [PF238]: Regulation 19(1) consultation amendment.
Reference: P8/6
Reason: To provide correct reference to the depot.

Commented [PF239]: Regulation 19(1) consultation amendment.
Reference: P8/6
Reason: To provide correct reference to the depot.

iii. mitigating impacts of SIL uses on the surrounding housing and Bramshill Road publicly accessible open space.

f)d) **Supporting the delivery of a mixed used neighbourhood within the Westway Estate and adjacent sites facing on to Wormwood Scrubs by:**

i. taking a coordinated approach that ooptimisesing development across the sites by promoting a coordinated approach;

ii. delivering a range of housing types and publicly accessible open space;

iii.i. **delivering a mix of housing and compatible employment floorspace that is compatible with housing, including space for small businesses, to make use of the close proximity to Old Oak Common Station in accordance with policy E2; and**

iv.ii. **delivering employment and/or community uses on the ground floor with residential above directly facing Wormwood Scrubs.**

Public realm and movement

g) Contributing to and / or enabling improvements to existing routes and junctions including at Atlas Junction and along Old Oak Lane, Old Oak Common Lane, Victoria Road and Park Road;

h)e) **Contributing to and /or enabling improvements to existing routes and junctions and delivery of new routes** including Old Oak High Street, Park Road, routes into and across the Westway Estate and Channel Gate;**as shown in figure x.**

i)f) **Ensuring new and improved routes can accommodate walking, cycling, bus and other vehicular traffic during the construction and operational phases by:**

i. **delivering improvements to underpasses;**

ii. delivering high quality footpaths;

iii.ii. **delivering segregated cycle lanes along Victoria Road, Old Oak Common Lane, Park Road and where possible on Old Oak Lane; and**

iv.iii. **widening Old Oak Common Lane to include generous footpaths and segregated cycle lanes.**

Green infrastructure and the environment

j)g) **Delivering a high quality, well-connected, network of multifunctional publicly accessible open spaces. This should include contributing towards and/or the delivery of:**

i. the **enhancements toof Cerebos Gardens and Midland Terrace child play space;**

ii. the **enhancements to and expansion of Old Oak Community Gardens within the Island Triangle;**

iii. **Brunel Gardens within the Westway Estate;**

iv. **new and improved spaces within Atlas Junction neighbourhood town centre; and**

v. canalside space on the Willesden Junction Maintenance Depot; and

vi.v. green infrastructure and linear spaces linear spaces **along Old Oak Lane, Old Oak Common Lane, Victoria Road** and new walking and cycling focused streets across the area.

k)h) **Support amenity and health and well-being by:**

i. **ensuring development mitigates the impacts of noise and air pollution generated by the Old Oak Sidings waste facility, SIL uses within the Willesden Junction Bus Garage** Harlesden Bus Depot **site and construction activities including associated vehicle movement; and**

Commented [PF240]: Specific amendment.
Reason: To avoid repetition with the below health and well-being policy.

Commented [PF241]: Specific amendment.
Reason: To avoid repetition with policy SP10.

Commented [PF242]: Specific amendment.
Reason: To avoid repetition with policy SP4.

Commented [PF243]: Specific amendment.
Reason: To avoid repetition with policy SP8 and EU1.

Commented [PF244]: Specific amendment.
Reason: Merged with below.

Commented [PF245]: Specific amendment.
Reason: To avoid repetition with policy D2 and T1.

Commented [PF246]: Specific amendment.
Reason: To avoid repetition with policy P8C1.

Commented [PF247]: Specific amendment.
Reason: To avoid repetition with policy T1.

Commented [PF248]: Regulation 19(1) consultation amendment.
Reference: P8/6
Reason: To provide correct reference to the depot.

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ii. **contributing to and/or delivering measures that help support OPDC, the ~~boroughs~~ local authorities and, where relevant TfL, to address air quality issues in the Local Air Quality Focus Areas along Victoria Road and Old Oak Lane, including street greening.**

Heritage and character

~~l)~~i) Strengthening local identity and character by:

~~i.~~ conserving and enhancing heritage assets including the ~~:~~

~~ii.~~i. Old Oak Lane Conservation Area, Grand Union Canal Conservation Area and their settings;

- **~~existing locally listed Willesden Junction Maintenance Depot;~~**
- **~~proposed locally listed buildings of the Former Railway Institute, Fisherman's Arms Public House, Stoke Place Terrace and 1-17 Farley Buildings; and~~**
- **~~proposed Area of Local Character at Wells House Road.~~**

~~iii.~~ii. ensuring future local character is informed by the area's existing heritage including the railways, Grand Union Canal, residential and industrial heritage.

Building heights

~~m)~~i) Contributing to a variety of building heights that respond to public transport access and sensitive locations including~~by~~ delivering:

~~i.~~ ~~heights within the Atlas Junction town centre Cluster in accordance with Policy P8C1;~~

~~ii.~~i. ~~delivering~~ a range of heights within the Westway Estate and adjacent sites facing onto Wormwood Scrubs ~~that relate to the surrounding context~~ including greater heights in the north of the site along the rail line and lower heights adjacent to existing housing to the south and next to Wormwood Scrubs;

~~iii.~~ii. a range of heights on the Willesden Junction Bus Garage site~~Harlesden Bus Depot~~, if demonstrated to be available for SIL compliant broad industrial type activities~~development~~, including greater heights in the east of the site on to Station Road and lower heights adjacent to housing in the west of the site; and

~~iv.~~iii. generally lower heights directly adjacent to sensitive locations including~~of~~ the Grand Union Canal, Wormwood Scrubs and existing residential neighbourhoods of the Island Triangle, Shaftesbury Gardens, Midland Terrace, Wells House Road, Harley Road and East Acton.

~~Infrastructure~~

~~n) Contributing to the delivery of infrastructure requirements as set out in the OPDC Infrastructure Delivery Plan (IDP);~~

~~o) Enhancing public transport access by supporting the delivery of Old Oak Common Lane London Overground Station and associated transport interchange functions; and~~

~~Development and phasing~~

~~p) Working positively with stakeholders to mitigate the impacts of construction facilities and traffic within the design of permanent and meanwhile buildings, structures and public realm;~~

~~q) Working positively with stakeholders to integrate and mitigate the impacts of new railway infrastructure within development;~~

~~r) Addressing level changes within the design of buildings and the public realm;~~

~~s) Supporting the integration of Old Oak Common Lane Station with surrounding areas; and~~

Commented [PF249]: Specific amendment.
Reason: To avoid repetition with policy P8C1.

Commented [PF250]: Specific amendment.
Reason: To avoid repetition with policy D4.

Commented [PF251]: Regulation 19(1) consultation amendment.
Reference: P8/6
Reason: To provide correct reference to the depot.

Commented [PF252]: Specific amendment.
Reason: To accord with policy E1.

Commented [PF253]: Specific amendment.
Reason: To avoid repetition with policy P7C2.

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~~t) Working positively with stakeholders to enable the delivery of infill development along Old Oak Lane and Old Oak Common Lane and the comprehensive regeneration of the Westway Estate.~~

SUPPORTING TEXT

~~1.131~~ 1.112 The place of Old Oak Lane and Old Oak Common Lane follows the route of these streets, connecting Harlesden in the north to Wormwood Scrubs in the south. Positioned between Old Oak and Park Royal, it is a place of transition in terms of land use, built form and character and will play an important role in integrating Old Oak with surrounding areas. This transition is reflected by its diverse mix of employment and residential uses ~~but low provision of town centre uses. This mix of employment space and housing~~ includinges Strategic Industrial Locations (SIL), other employment floorspace and the four established residential neighbourhoods of the Island Triangle, Shaftesbury Gardens, Midland Terrace and Wells House Road. The Grand Union Canal also crosses the place which is complemented by The Collective development and associated new canalside space.

~~1.132~~ 1.113 The area is shaped by the road and rail network with both Old Oak Lane and Old Oak Common Lane providing important north-south routes that result in high levels of vehicular traffic. This traffic dominates the public realm resulting in a poor walking and cycling environment and, alongside the railways, provides a barrier to local permeability that isolates existing neighbourhoods. During the construction of development within Old Oak and Old Oak Common Station, this traffic will increase resulting in further impacts on amenity and the functioning of the public realm if not appropriately mitigated ~~appropriately~~. Further impact on amenity from construction activities could be created by the High Speed 2 (HS2) construction activities in the adjacent locations of Channel Gate and~~,~~ Acton Wells ~~and Old Oak South~~.

1.114 The early delivery of development within Old Oak Lane and Old Oak Common Lane is supported but does presents a number of challenges. This includes the impacts generated by construction traffic and activities on HS2 work sites. Applicants should appropriately mitigate against these impacts in the design of development. OPDC will work closely with HS2 L~~imited~~d and the London Borough of Ealing to minimise disturbance caused by construction activities to enable the timely delivery of homes and jobs within this place.

Commented [PF254]: Specific amendment.
Reason: To clarify implementation of the policy.

~~1.133~~ 1.115 Old Oak Lane and Old Oak Common Lane is identified to have the capacity to deliver a minimum of 2,800 new homes and a capacity of 1,600 new jobs during the plan period1. Primary development opportunities are within the Westway Estate, Oaklands North and Atlas Junction. This development potential provides the opportunity for new and improved connections to be embedded across the area, for existing neighbourhoods to be integrated with surrounding areas and for a new neighbourhood town centre to be established at Atlas Junction.

~~1.134 Existing land uses in Old Oak Lane and Old Oak Common Lane will continue and will be complemented by a greater mix of residential, town centre and employment uses. To support this, Old Oak Lane and Old Oak Common Lane is identified to have the capacity to deliver a minimum of 2,600 new homes and a capacity of 1,100 new jobs during the plan period1. This will be complemented by the Atlas Junction neighbourhood town centre and the major town centre along Old Oak High Street.~~

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~~1.135~~ ~~1.116~~ The Willesden Junction Bus Garage ~~Harlesden Bus Depot~~ and areas directly to the ~~north and~~ south of the Island Triangle neighbourhood are within ~~Strategic Industrial Location (~~SIL~~)~~ designations. In accordance with London Plan policy and to support the local industrial economy, industrial and/or transport uses should be delivered in these locations. To ensure these uses positively contribute to activating the public realm, proposals should provide active and positive frontages to the street. ~~These may be in the form of ancillary town centre uses floorspace and/or frontages with high amounts of active and positive frontages.~~ The Willesden Junction Bus Garage ~~Harlesden Bus Depot~~ site is surrounded by existing housing directly to the north and uses on the site should mitigate their impacts on residential amenity ~~and the public realm~~in accordance with Policy D6.~~.~~ Within the site, development will be reliant on agreement with TfL that the bus depot services are no longer required or a suitable alternative site has been~~is~~ secured.

~~1.136~~ 1.117 At the Westway Estate, there are currently a number of employment uses. Although the area is not within SIL, there is an opportunity to reprovide some of this employment floorspace ~~to the east of the site~~ within mixed use development that reflects the site's proximity to Old Oak Common Station and potentially to North Acton Station2. Elsewhere, housing at the ground floor and above would complement the adjacent housing along Long Drive to the south. Sites facing onto Old Oak Common Lane have the potential to deliver uses that provide a positive relationship to the street while mitigating the impact of vehicular traffic. These uses could be employment or community uses ~~that have a relationship with Wormwood Scrubs~~and should be designed to respond appropriately to Wormwood Scrubs.

~~1.137~~ 1.118 Old Oak Lane and Old Oak Common Lane are important north-south movement routes and are defined as key connectors. Currently, the design of the highways and the high amounts of vehicular traffic using them create poor walking and ~~,~~ cycling routes and poor quality public realm. The~~i~~se issue~~s~~ will be amplified during the construction of Old Oak and Old Oak Common Station as significant amounts of HS2 and other construction traffic will be moving between Old Oak South, Acton Wells and Channel Gate ~~along Old Oak Common Lane and Atlas Road across Atlas Junction~~. To support and enhance their transport roles for all modes ~~of transport~~, a series of interventions are proposed including segregated cycle lanes and high quality footpaths3.

~~1.138~~ 1.119 To complement this enhanced north~~-~~south movement route, new and improved east~~-~~west connections are required to support access to the surrounding ~~areas~~ Places of Channel Gate, Park Royal and Old Oak South4. Specifically, improvements are required to the existing roundabout ~~on Atlas Road~~at Atlas Junction to support pedestrian and cycling desire lines and along the Grand Union Canal southern towpath (see policy P3). New connections are required to support the continuation of Old Oak ~~High~~ Street into Acton Wells (see Polici~~es~~~~y~~ P7 and P7C2) and potentially between the Westway ~~Estate to the~~and Victoria Road Industrial Estate~~s to provide access to North Acton Station~~. OPDC will work with London Borough of Ealing, TfL and HS2 to deliver these improvements.

~~1.139~~ 1.120 Access to publicly accessible open spaces within Old Oak Lane and Old Oak Common Lane is currently restricted to a series of roadside spaces, including Cerebos Gardens and Wormwood Scrubs to the south of the place. The potential development sites provide opportunities to enhance and expand existing open spaces and deliver new open spaces5 that contribute to the 30% open space requirements set out in Policy SP8. These include:

a) Cerebos Gardens and Midland Terrace play space – enhanced to mitigate impacts of traffic and improve access.

Commented [PF255]: Regulation 19(1) consultation amendment.
Reference: P8/6
Reason: To provide correct reference to the depot.

Commented [PF256]: Specific amendment.
Reason: To align with policy E1.

Commented [PF257]: Regulation 19(1) consultation amendment.
Reference: P8/6
Reason: To provide correct reference to the depot.

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b) Old Oak Community Gardens – enhanced and expanded to support ~~residential~~ the amenity of the Island Triangle neighbourhood.
c) Brunel Gardens – as a new green publicly accessible open space providing a range of functions to support new and existing communities.
d) Atlas Junction spaces – new and enhanced roadside spaces providing spill out space for retail, leisure and eating and drinking uses.
e) Canalside spaces – new publicly accessible open space(s) on the Willesden Junction Maintenance depot providing space for canalside leisure activities and eating and drinking uses.
f) Roadside green infrastructure and linear spaces – new and enhanced ecology and spaces to support air quality, resilience to climate change and visual amenity.

~~1.140~~ 1.121 To support the health and well-being of local people, ~~new development will need to mitigate the impact of surrounding uses and movement routes in their design, delivery and operation. Particular consideration should be given to this as part of developments close to Old Oak Sidings waste facility, Willesden Junction Bus Garage Harlesden Bus Depot and Channel Gate. Mitigation measures may include additional green open spaces, street planting, use of specific materials and shaping the public realm and form of development. To support health and well-being of local people,~~ new development will need to contribute to improving air quality along Victoria Road and Old Oak Lane through identified measures6 and in discussions with OPDC.

~~1.141~~ 1.122 Old Oak Lane and Old Oak Common Lane has a wealth of residential and industrial heritage reflected in the existing and proposed heritage assets7. Although some of these may be lost, the development of sites offers the opportunity to conserve and enhance the remaining assets~~.~~. T~~t~~he OPDC heritage themes seek to ensure new development reflects the existing and evolving local character in terms of their design, use and operation.

~~1.142 Specific elements of the historic character are Old Oak Lane and Grand Union Canal conservation areas and their settings, the locally listed Fishermans Arms Public House and Willesden Junction Maintenance Depot, the proposed locally listed assets within the Island Triangle and Westway Estate and the proposed Wells House Road Local Character Area.~~

~~1.143 Together these elements should be used to inform the design of development in Old Oak Lane and Old Oak Common Lane to help deliver locally distinctive neighbourhoods~~

~~1.144~~ 1.123 Across Old Oak Lane and Old Oak Common Lane there are a range of building heights ~~that reflect the existing industrial and residential land uses. The current tallest building is The Collective adjacent to the Grand Union Canal. Development sites provide the opportunity to help support local legibility to stations and both Atlas Junction and Old Oak High Street town centres and provide appropriate densities to optimise development.~~ Delivery of building heights, including tall buildings set out in policies P8C1 and SP9 ~~This potential~~ needs to be considered in light of ~~the~~ sensitive locations such as the~~of~~ existing residential neighbourhoods and Wormwood Scrubs. ~~Within the Atlas Junction neighbourhood town centre, the Willesden Junction Maintenance Depot and sites to the south provide an opportunity to deliver heights similar to The Collective in the north and lower heights to the south where they meet the Victoria Cottages (see policy P8C1).~~

~~1.145~~ 1.124 The Westway Estate ~~and~~, Willesden Junction Bus Garage ~~Harlesden Bus Depot~~ and Midland Gate sites offer opportunities to deliver greater height in areas closer to public transport access and help to mitigate impacts of railway infrastructure and lower heights to respond to adjacent residential areas and Wormwood Scrubs.

Commented [PF258]: Specific amendment.
Reason: To avoid repetition with policy D6 regarding the protection of existing residential amenity.

Commented [PF259]: Specific amendment.
Reason: To reflect current status of Local Heritage Listings.

Commented [PF260]: Specific amendment.
Reason: To avoid repetition with policy P8C1.

Commented [PF261]: Specific amendment.
Reason: To avoid repetition with policy P8C1.

Commented [PF262]: Regulation 19(1) consultation amendment.
Reference: P8/6
Reason: To provide correct reference to the depot.

Commented [TC263]: Regulation 19(1) consultation amendment.
Reference: P8/4
Reason: To recognise development potential on the Midland Gate site

~~1.146 The development of mixed use sites will necessitate the provision of social and physical infrastructure. These are set out in OPDC's Infrastructure Delivery Plan (IDP).~~

~~1.147~~ 1.125 ~~The early delivery of development within Old Oak Lane and Old Oak Common Lane presents a number of challenges to the delivery of successful long-term place making and sustainable communities. This includes the potential amenity issues generated by construction traffic and HS2 work sites. To mitigate these impacts, proposals should consider impacts relevant to their site both in terms of short-term implementation and long-term permanent development.~~

Commented [PF264]: Specific amendment.
Reason: To avoid repetition with policy D6 regarding the protection of existing residential amenity.

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POLICY P8C1: ATLAS JUNCTION TOWN CENTRE CLUSTER

VISION

V1. ThisA neighbourhood town centre sitting between mixed use Old Oak and Park Royal Strategic Industrial Location. This new centre will provide local services for residential and business communities centred on an improved Atlas junction Junction and Park Road that provides a key route into Old Oak North. Active uses will sit beside high quality canalside spaces helping to establish this stretch of the canal as a place to visit and enjoy. High levels of walking, cycling, bus and vehicular movement will be supported through public realm improvements.

POLICY

Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:

Land uses

a) Supporting the delivery of the neighbourhood town centre by clustering active town centre and employment uses along existing streets and new routes shown in figure x outside of SIL on ground and lower floors with residential above outside of SIL;:

b) on the northern and eastern corners of Atlas Junction;

along Old Oak Lane;

along Park Road;

on to the Grand Union Canal with a focus on leisure, eating and drinking uses; and

Old Oak Common Lane to Oaklands.

c)a)Retaining the Fishermans Arms Public House in accordance with policy TCC7;

d)b) Supporting the functioning of SIL by delivering high density high quality industrial SIL compliant broad industrial type activities uses with active frontages at the Rowan House site on the western corner and south of Goodhall Streetcornerside of Atlas Junction, including opportunities for small walk to services;

c) Supporting the activation of the canal and canalside spaces by delivering and/or enabling:

a. leisure, eating and drinking uses fronting on to the Grand Union Canal;

b. new residential, leisure and visitor moorings adjacent to Tthe Collective, Willesden Junction Maintenance Depot, triangle site and Oaklands North; and

a.c. meanwhile uses within the neighbourhood town centre and Oaklands North.

Public realm and movement

e)d) Delivering a high quality public realm by contributing to and/or delivering:

i. **contributing to and/or delivering Park Road and associated bridge; and**
ii. **contributing to and/or delivering early public realm improvements and high quality footpaths, segregated cycle lanes and street level crossings along Victoria Road, Old Oak Lane, Old Oak Common Lane and Atlas Road; and**
iii. **contributing to the delivery of high quality footpaths, segregated cycle lanes and street level crossings.**

Commented [PF265]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF266]: Specific amendment.
Reason: To shorten policy

Commented [PF267]: Specific amendment.
Reason: To avoid repetition with policy TCC7.

Commented [PF268]: Specific amendment.
Reason: To align with policy E1.

Commented [PF269]: Specific amendment.
Reason: To align with policy E1.

Commented [PF270]: Specific amendment.
Reason: To support the activation of the canal

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f) Contributing to improvements to the Grand Union Canal southern towpath as a shared walking and cycling route;

g)e) Delivering a high quality walking and cycling route to the canal from Old Oak Lane that mediates level changes;

h) Supporting and/or enabling the movement of freight and construction traffic to minimise impacts on walking and cycling routes;

i) Delivering off-street servicing arrangements;

Green infrastructure and the environment

j)f) Supporting health and well-being and resilience to climate change by delivering and/or contributing to new high quality publicly accessible canalside open spaces:

i. as part of the Willesden Junction Maintenance Depot and Powerhouse sites;

i.ii. delivering and/or contributing to a publicly accessible open space within the triangle site;

ii.iii. as part of the Oaklands North site; and

iii.iv. on the north of the canal.

Heritage and design

k)g) Conserving and enhancing local character by:

i. ensuring the locally listed Willesden Junction Maintenance Depot, Victoria Terrace and their settings alongside wider railway heritage are is used to inform the character of new development; and

ii. supporting views along the railway at Old Oak Common Lane bridge and along the canal at Old Oak Lane bridge.

Building heights

l)h) Contributing to a variety of building heights including:

i. on the eastern side of Old Oak Lane, building heights should be taller close to the canal, comparable to the existing height of The Collective building, and should decrease in height to respond appropriately to the existing Victoria Terrace;

ii. on the triangle site east of Willesden Junction Maintenance Depot, generally 6 to 8 storeys facing the Grand Union Canal with potentially increased heights to the south;

iii. on Oaklands North, generally 6 to 8 storeys facing on to the Grand Union Canal, generally 10 storeys along Park Road with an opportunity for a tall building onto Park Road that defines its role as a major key north-south route and canal crossing point;

iv.ii. appropriate street enclosure across the area; and

v.iii. at Rowan House on the western corner of Atlas Junction, heights of generally 8 to 10 storeys.

Development and phasing

m) Delivering and/or enabling the comprehensive redevelopment of the Willesden Junction Maintenance Depot with the adjacent Power House site;

n) Delivering and/or enabling the development of:

i. 2 Victoria Terrace;

ii. Rowan House; and

iii. the triangle site between the railway lines south of the canal subject to improved access.

Commented [PF271]: Specific amendment.
Reason: To avoid repetition with policy P3.

Commented [PF272]: Specific amendment.
Reason: To avoid repetition with policy T8.

Commented [PF273]: Specific amendment.
Reason: To avoid repetition with policy T7.

Commented [PF274]: Specific amendment.
Reason: To reflect updated development feasibility of the triangle site.

Commented [PF275]: Specific amendment.
Reason: To reflect updated development feasibility of the triangle site.

Commented [PF276]: Specific amendment.
Reason: To avoid repetition with policy D4.

Commented [PF277]: Specific amendment.
Reason: To avoid repetition with site allocations.

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SUPPORTING TEXT

~~1.148~~ 1.126 The Atlas Junction town centre cluster is located at a key crossroads connecting key routes between Old Oak South, Channel Gate, Park Royal and Harlesden. ~~It stretches to the north across the Grand Union Canal to include the Fishermans Arms pPublic hHouse. The area also includes the new Atlas Junction neighbourhood town centre and adjacent areas.~~ The cluster has the potential to be a location for early activation of the wider area, knitting together new development at the Collective and Oaklands. It will also help to stitch together new and existing neighbourhoods and provide a focal point for communities. ~~However, there will be a need to manage the impact of construction traffic generated by the development of Old Oak Common Station and within Old Oak.~~

Commented [PF278]: Specific amendment.
Reason: To avoid repetition with policy P8.

1.127 Reflecting its local accessibility and existing town centre uses, Atlas Junction is well placed to serve nearby existing and new residential and business communities. To support these uses, a neighbourhood town centre has been designated1.~~.~~ ~~focused around Atlas Junction. Additionally, town centre uses will be supported along Park Road reflecting its role as a key east-west route that will connect people to other active uses at and between clusters along its length.~~ The existing Collective development demonstrates the development potential ~~for~~within Atlas Junction town centre. The Willesden Junction Maintenance Depot, the adjacent Power House and the sites on the east and west of Atlas Junction represent an opportunity to coordinate and optimise development to help establish ~~the area as a~~this new neighbourhood town centre.

~~1.149~~

~~1.150~~ 1.128 The town centre also overlaps with the Strategic Industrial Location (SIL) designation to the west of Atlas Junction. By ensuring development within SIL provides active and/or positive frontages to the street, these uses will contribute to the vibrancy of the town centre and adjacent locations. These uses could include ancillary ~~retail and~~ front-of-house spaces for industrial uses alongside local walk-to uses. Outside of SIL, the provision of residential uses above ground and lower floors will be supported~~, to further contribute to the activation of the area and help mitigate impacts on residential amenity generated by street-level traffic.~~.

~~1.151~~ 1.129 Adjacent to the canal, meanwhile uses on, and within the envisaged development of, the Willesden Junction Maintenance Depot and Power House should ~~to~~ provide active street level leisure, eating and drinking uses2. These meanwhile and permanent uses have ~~has~~ the potential to continue the activation of the Grand Union Canal that has been generated by The Collective and ~~coordinate~~ to tie in with the wider food and beverage quarter along the Grand Union Canal. Moorings in these locations will also assist in supporting the use of the canal and adjacent spaces.

~~1.152~~ 1.130 ~~The t~~Town centre and employment uses will contribute to the activation of the streets and public realm through the delivery of active frontages. This will be important during the early phases of development to support the functioning of the town centre for local communities.

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~~1.153~~ 1.131 The Collective and Oaklands developments will establish new residential communities in the~~se~~ early phases of development. To support local people reaching their destinations, development should contribute to the delivery of ~~the~~ Park Road and its associated bridge across the canal.~~,~~ H~~h~~igh quality footpaths and segregated cycle lanes need to be delivered along Old Oak Lane, Old Oak Common Lane, ~~and~~ Park Road and Atlas Road that are supported by new and improved street crossings and hard wearing high quality materials3. ~~The southern corner of Atlas Junction provides the opportunity for public realm improvements to support pedestrian desire lines and visual amenity.~~

~~1.154~~ 1.132 In addition to walking and cycling, a substantial amount of freight and construction traffic will pass through the cluster. This movement will need to be supported to facilitate the construction of Old Oak Common Station, wider Old Oak and to allow for the continuing ~~the~~ function~~ing~~ing of Park Royal as a successful industrial estate.

~~1.155~~ 1.133 The development of the Willesden Junction Maintenance Depot and Power House adjacent to the Grand Union Canal provides the opportunity to deliver a new publicly accessible canalside open space that connects to other open spaces along the canal to the east and adjacent to The Collective. To deliver accessible and inclusive access to the canal, this open space will need to integrate level changes in its design. ~~Across~~ This should be supported by the delivery of publicly accessible open space on the triangle of land between the railway tracks. To the north of the canal, sites facing the Willesden Junction Maintenance Depot and The Collective have the potential to provide canalside publicly accessible open spaces. ~~The vehicular traffic generated by the development Old Oak Common Station and wider Old Oak will need to mitigate its impacts in accordance with guidance in the Environment and Utilities Chapter.~~

~~1.156~~ 1.134 ~~The Willesden Junction Maintenance Depot is an existing Locally Listed Building4. OPDC recognises that to develop the site to deliver benefits for the wider area, this asset will likely be lost. However, the character of the building should be used to inform the design of new development and wider local character of the area in accordance with Policy D8.~~ Local Heritage Listings, ~~The~~ bridges ~~crossing the canal and railway line and wider canal and rail heritage are also recognised to~~ as helping to ~~define the historic character of the area5 and development should support views of these heritage assets5 (see Policy D8)~~.

~~1.157~~ 1.135 Across Old Oak Lane and Old Oak Common Lane there are a range of building heights. The current tallest building is The Collective adjacent to the Grand Union Canal. Development sites provide the opportunity to help support local legibility to stations and both Atlas Junction and Old Oak Street town centres and provide appropriate densities to make the best use of land and optimise development. ~~The massing and b~~Building heights ~~of development sites should be delivered in accordance with policy P8. These~~ have been informed by the Victoria Road and Old Oak Lane Development Framework Principles supporting study. Development of the Willesden Junction Maintenance Depot and sites to the south should reflect the existing height of The Collective in the north of the site and decrease to respond to the existing Victoria Terrace. On the east and west corners of Atlas Junction, building heights provide the opportunity to help define the junction with Rowan House on the western corner providing 8 to 10 storeys to create a suitable enclosure to the junction and along Victoria Road.

~~1.158 1.1 The existing Collective development demonstrates the development potential for Atlas Junction. The Willesden Junction Maintenance Depot, the adjacent Power House and the sites on the east and west of Atlas Junction represent an opportunity to coordinate and optimise development to help establish the area as a neighbourhood town centre.~~

Commented [PF279]: Specific amendment.
Reason: To avoid repetition with previous sentence.

Commented [PF280]: Specific amendment.
Reason: To reflect updated development feasibility of the triangle site.

Commented [PF281]: Specific amendment.
Reason: To avoid repetition with policy D6.

Commented [PF282]: Specific amendment.
Reason: To provide further information for building heights.

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~~1.159~~ 1.136 ~~To the east of the Willesden Junction Maintenance Depot and west of Oaklands, a triangular site is bounded by railways and the Grand Union Canal. This site currently has limited access; however, should access be provided from surrounding sites, development could be supported in principle. Any development should be coordinated with neighbouring locations. Should development of the site not be feasible, the site should support the delivery of canal related uses, supporting infrastructure and/or publicly accessible open space.~~

Commented [PF283]: Specific amendment.
Reason: To reflect updated development feasibility of the triangle site.

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POLICY P9: CHANNEL GATE

VISION

V1. A high density industrial area with the opportunity to showcase industrial innovation positioned on the Grand Union Canal. Channel Gate will deliver high quality development that optimises the use of adjacent transport infrastructure and will sensitively respond to the residential community of The Island Triangle. New connections will link Victoria Road to Park Royal with new ~~and improved~~ publicly accessible open spaces along the canal ~~and adjacent to The Island Triangle~~.

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

Land uses

a) **Supporting the use of the area to facilitate High Speed 2 construction activities as secured by the High Speed London – West Midlands Act (2017);**

b) **Delivering 7,600 new jobs by taking opportunities to intensify the use of sites in line with the identified ~~industrial~~ site allocations, and having regard to the locations and typologies identified in OPDC's Park Royal Intensification Study; ~~Supporting London's economy and local job opportunities by contributing to the delivery of 7,600 new industrial jobs;~~**

c) **Supporting the establishment of an industrial innovation area by delivering a range of high quality, high density industrial workspaces in a range of typologies for SIL compliant broad industrial type ~~uses~~activities;**

d) **Ensuring industrial uses support the activation of the public realm by delivering positive frontages along:**

   i. **~~the length of~~ the Grand Union Canal with active frontages at crossings; and**

   ii. **Victoria Road.**

~~e) Supporting the activation of the area across all phases of development by delivering a range of meanwhile uses along the Grand Union Canal and adjacent to the Island Triangle;~~

~~f) Retaining the Strategic Rail Freight designation on the Euroline Freight Terminal and sidings unless the designation is no longer required by Network Rail;~~

Public realm and movement

~~g)~~e) **Contributing to and/or enabling the delivery of a permeable, inclusive, accessible and adaptable street network to improve access to local destinations and freight transport services by:**

   i. **delivering new and enhanced vehicular, walking and cycling routes from Victoria Road and Old Oak Lane to Park Royal and to the Euroline Freight Terminal; and**

   ii. **delivering improved walking and cycling routes along Channel Gate Road, ~~Stephenson Street to the canal, along~~ the Grand Union Canal southern towpath and enhanced connections to Atlas Junction Neighbourhood Town Centre and Willesden Junction Station,~~;~~ ~~and~~**

Commented [PF284]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF285]: Specific amendment.
Reason: To align with policy E1.

Commented [PF286]: Specific amendment.
Reason: To avoid repetition with policy P3.

Commented [PF287]: Specific amendment.
Reason: To avoid repetition with national guidance.

Commented [PF288]: Specific amendment.
Reason: To reflect the existing street network.

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~~iii. working positively with stakeholders to deliver new connections across railways and the Grand Union Canal.~~

Green infrastructure and the environment

~~h)~~ **Supporting residential amenity by~~:~~**

~~i) contributing to the mitigation of industrial activities and HS2 construction activities on the Island Triangle, Midland Terrace, Shaftsbury Gardens and The Collective; and~~

f) ~~d~~ delivering and /or contributing to the expansion and enhancement of Old Oak Community Gardens.~~; and~~

~~j)~~g) delivering new canal-side publicly accessible open spaces;~~,~~

Heritage and character

~~k)~~h) Strengthening local identity and character by conserving and enhancing the Grand Union Canal Conservation Area, ~~the proposed locally listed Plantagenet House,~~ the adjacent Old Oak Lane Conservation Area and their settings;

Building heights

~~l)~~i) Contributing to a variety of building heights ~~which~~ that support the vision for a high density industrial area while not adversely impacting on residential amenity by delivering:

- **i. heights to accommodate a range of high density industrial uses;**
- **ii. lower heights fronting onto the Grand Union Canal to conserve and enhance its designation as a Site of Importance for Nature Conservation and conservation area; and**
- **iii. lower heights adjacent to the Island Triangle.**

~~**Infrastructure**~~

~~**m) Contributing to the delivery of infrastructure as set out in the OPDC Infrastructure Delivery Plan (IDP);**~~

~~**n) Enabling the sustainable transport of freight by supporting the functioning of the Euroline Freight Terminal and the Grand Union Canal;**~~

~~**Development and phasing**~~

~~**o) Working positively with relevant stakeholders to release sites for development as soon as possible and mitigate impacts of construction;**~~

~~**p) Optimising the use of land by delivering comprehensive development.**~~

SUPPORTING TEXT

~~1.160~~ 1.137 Channel Gate sits to the northern and southern edges of the Grand Union Canal and is designated as a Strategic Industrial Location (SIL). Both sites either side of the canal are required by HS2 Ltlimited to support the construction of Old Oak Common Station until 2026. OPDC will work positively and proactively with HS2 limited to support the use of these sites for the functions set out in the High Speed London – West Midlands Act (2017).

Commented [PF289]: Specific amendment.
Reason: To avoid repetition with policy SP7

Commented [PF290]: Specific amendment.
Reason: To avoid repetition with policies P8 and D6.

Commented [PF291]: Specific amendment.
Reason: To support the delivery of new open spaces.

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~~1.161~~ 1.138 Given its location between Park Royal and Old Oak, Channel Gate offers the~~an~~ opportunity to provide a place of transition between the two areas that reflects both the industrial innovation found in Park Royal and the high levels of public transport access found in Old Oak. As such, a comprehensive approach to development ~~will be expected~~should be taken to support the intensification of the area in accordance with Policy SP10~~As such, the area is considered to have the long-term potential to accommodate a high quality and high density industrial area that showcases innovation1.~~

~~1.162~~ 1.139 ~~As SIL~~Once these sites are no longer required by HS2 L~~imited~~, proposals should deliver industrial uses that meet the definition of SIL compliant broad industrial-type activities~~uses~~ in the London Plan and ~~to~~ contribute to the delivery of 7,600 new jobs2. ~~Once these sites are no longer required by HS2 Limited, Channel Gate's location and context could support the delivery of a range of higher density industrial uses reflecting its public transport access and the opportunity to promote industrial innovation within the OPDC area.~~ This may include provision of a mix of industrial typologies from larger floorplates to small businesses, including start-ups, to help support innovation and enterprise.

~~1.163~~ Development should support the delivery of a new movement network in this place, which supports access to nearby destinations such as Willesden Junction Station, Atlas Junction n~~N~~eighbourhood town c~~C~~entre, the Park Royal i~~I~~ndustrial estate and the Grand Union Canal. ~~The long-term development of Channel Gate will require flexibility and adaptability to be embedded within the layout of development and routes to respond to the release of sites and its evolving context3. Proposals will be expected to contribute to the delivery of this network, recognising that its form and layout will change over time.~~

~~1.164~~ ~~As part of this network, OPDC will work with HS2 and TfL to explore the potential to redirect construction traffic from the existing entrance route into Channel Gate along Channel Gate Road to Goodhall Street in the south to help minimise impacts on to the Island Triangle residential neighbourhood.~~

1.140

~~1.165~~ 1.141 The Grand Union Canal will continue to be an important walking and cycling route. Canalside development should support this role by providing natural surveillance. To achieve this, positive frontages should be provided along the length of the canal with active frontages at crossings.

~~1.166~~ 1.142 Along Victoria Road, to support proposals for enhanced walking and cycling access (see policy P8), proposals should provide positive and active frontages. During the use of ~~the sites~~Channel Gate for HS2 construction ~~facilities~~activities, ~~and in the following development phases,~~there may be opportunities to ~~proposals should~~ deliver meanwhile uses which provide ~~this~~ natural surveillance and support the early activation of the area. OPDC will work closely with HS2 L~~imited~~d and other relevant stakeholders to deliver this aspiration.

Commented [PF292]: Specific amendment.
Reason: To align with policy SP10.

Commented [PF293]: Specific amendment.
Reason: To accord with policy E1.

Commented [PF294]: Specific amendment.
Reason: To avoid repetition with the policy.

Commented [PF295]: Specific amendment.
Reason: To simplify terminology

Commented [PF296]: Specific amendment.
Reason: To avoid repetition with the policy T8.

~~1.167~~ 1.143 Proposals will also need to ~~provide a positive edge to the canal and~~ mitigate their impacts on the adjacent Island Triangle neighbourhood and surrounding areas to deliver a high- quality environment in accordance with Policy D6. The expansion and enhancement of the existing Old Oak Community Gardens4 will help to provide a buffer between the construction and industrial activities ~~and housing~~and ensure that the amenity of existing residents is appropriately protected ~~(see Policy D6)~~. Proposals will be expected to contribute additional space to the gardens and consider the garden's design and function in their operation and layout. Proposals should also ~~support~~deliver and/or contribute to the delivery of canal-side publicly accessible open spaces in this place, to capitalise on its value as an ecological and heritage asset.

~~1.168 The construction activities of HS2 have the potential to negatively impact on the amenity of Island Triangle residents, the Grand Union Canal and the surrounding built environment, if not appropriately managed. The design and operation of construction activities, buildings and the public realm provide an opportunity to assist in mitigating these and to create a high quality environment both during construction and operational phases. This should include the use of robust materials, noise absorbing materials and use of planting to mitigate air and noise pollution (see Policy EU8).~~

~~1.169~~ 1.144 Channel Gate benefits from a number of adjacent heritage assets including the Grand Union Canal ~~and , the proposed locally listed Plantagenet House and~~ the ~~adjacent~~ Old Oak Lane Conservation Area. The wider industrial heritage, canal and railway heritage are identified as heritage themes in the OPDC Heritage Strategy. OPDC's Character Areas Study also identifies positive elements of industrial character. Together these elements should be used to inform the design of development in Channel Gate to help deliver a locally distinctive neighbourhood.

~~1.170~~ 1.145 A range of building heights will need to be delivered to enable the intensification of industrial uses and a range of industrial typologies. Building heights should respond appropriately to The Island Triangle and Grand Union Canal which are identified as sensitive locations (see policy SP9 and figure x). ~~To support residential amenity of the Island Triangle and character of the Grand Union Canal, building heights will need to respond to the areas' recognition as a sensitive location in policy SP9 and their designations as conservation areas.~~ Building heights along Victoria Road should provide an appropriate sense of enclosure to the street. In less sensitive locations ~~away from these areas~~, ~~buildings heights should be considered against all other relevant policies and material considerations to~~ development should deliver higher building heights and densities~~support the delivery of high density and high quality industrial uses which support the delivery of 7,600 new jobs~~.

~~1.171 The development of a high density industrial area will necessitate the provision of new physical infrastructure both within and for access to Channel Gate. This will largely be in the form of utilities infrastructure, new bridges and streets to support accessibility across the Grand Union Canal and railway lines provide access to Atlas Junction neighbourhood town centre and Park Royal. OPDC's IDP identifies the likely requirements for infrastructure which are based on current population and employment projections. These could change over time thereby impacting on the size and type of infrastructure required.~~

Commented [PF297]: Specific amendment.
Reason: To enable a range of measures to be undertaken to mitigate impacts on the Island Triangle.

Commented [PF298]: Specific amendment.
Reason: To provide clear linkages with policy D6.

Commented [PF299]: Specific amendment.
Reason: To avoid repetition with Policy D6 this information has been consolidated and located in the above paragraph.

Commented [PF300]: Regulation 19(1) consultation amendment.
Reference: P9/4
Reason: To recognise the current unlisted heritage status of Plantagenet House

Commented [PF301]: Specific amendment.
Reason: To avoid repetition with reference to SP9 which depicts existing conservation areas.

Commented [PF302]: Specific amendment.
eason: To avoid repetition with Policy SP9.

Commented [PF303]: Specific amendment.
Reason: To avoid repetition with Policy DI1.

~~1.172~~ 1.146 Within the north part of Channel Gate, the Euroline Freight Terminal and its sidings ~~is a Strategic Rail Freight Site and~~ provide~~s~~ a valuable opportunity to increase levels of sustainable rail freight transport with access to regional and national networks. Subject to its continued need, proposals should support its continuing operation and development adjacent to it. ~~As such, proposals~~ should support ~~the~~ its functioning ~~of the~~ as a terminal in terms of its design, ~~location of adjacent l~~land use~~s~~ and access. OPDC would support the use of this terminal as a means of moving goods and construction material to and from the area with a goal of removing additional vehicle traffic from the street network. If the terminal is no longer required, OPDC would support the delivery of broad industrial type activities on this site, in accordance with its SIL designation.

Commented [PF304]: Specific amendment.
Reason: To avoid repetition with national guidance

Commented [PF305]: Specific amendment.
Reason: To align with policies T4 and T7.

Commented [PF306]: Specific amendment.
Reason: To align with policy E1.

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POLICY P10: SCRUBS LANE

VISION

V1. Scrubs Lane will be a characterful and well connected street sitting as a hinge between east and west helping to integrate Old Oak with surrounding areas. Development will continue its employment heritage and will integrate space for living, creating and working.

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

Land Uses

a) **Supporting the delivery of a range of mixed use development along Scrubs Lane by contributing to the delivery of ~~1,100~~1,200 new jobs and a minimum of ~~2,000~~2,600 new homes ~~during the plan period including early development~~including 1,950 new homes within the first 0-10 years;**

~~b) Supporting the establishment of clusters to focus the delivery of active permanent and meanwhile uses at:~~

- ~~i. Harrow Road;~~
- ~~ii. Laundry Lane;~~
- ~~iii. Hythe Road; and~~
- ~~iv. Mitre Canalside.~~

~~c)~~b) **Supporting the local economy and strengthening local identity by delivering ~~attractive~~ high quality ground and lower floor employment floorspace on sites fronting Scrubs Lane and existing or proposed yard spaces, consisting of 'small business units for' B1a, B1c, B2 and B8 uses along its length;**

~~d)~~c) **Supporting residential amenity by locating housing:**

i. **above the ground and lower floors onto Scrubs Lane and railway lines; ~~and~~**

ii. **at the ground floor away from~~off of~~ Scrubs Lane where appropriate; and~~.~~**

iii. **~~Responding to the surrounding context of Little Wormwood Scrubs by delivering in~~ a residential-led area south of the canal to the east of Scrubs Lane;**

Public realm and movement

~~e)~~d) **Contributing to and/or enabling the delivery of improved connectivity by:**

i. **supporting Scrubs Lane's role as a connector route;**

ii. **contributing to the delivery of a new continuous generous 5 metre wide footpath along the west of Scrubs Lane;**

~~ii.~~iii. **contributing to the delivery of high quality~~and 4 metre wide two-way~~ segregated cycle lanes with associated junction requirements ~~along the west of Scrubs Lane~~;**

~~iii.~~iv. **contributing to the delivery of an improved footpath, with widening where possible, along the east of Scrubs Lane;**

Commented [PF307]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF308]: Specific amendment.
Reason: To avoid repetition with Scrubs Lane cluster policies.

Commented [PF309]: Specific amendment.
Reason: To use consistent terminology

Commented [PF310]: Specific amendment.
Reason: To provide clarity in location.

Commented [PF311]: Specific amendment.
Reason: To remove unnecessary text.

Commented [PF312]: Regulation 19(1) consultation amendment.
Reference: P10/3
Reason: To clarify the delivery of a new footpath and cycle lane.

Commented [PF313]: Specific amendment.
Reason: To reflect updated connectivity information in the Old Oak North Development Framework Principles.

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~~iv.~~v. improving existing and creating new east–west routes at each cluster and along Wormwood Scrubs Street that provide access to Old Oak North, Old Oak South, the Grand Union Canal, ~~and~~ St. Mary's Cemetery and Kensal Canalside Opportunity Area;

~~v.~~vi. contributing to delivering new walking and cycling connections to Wormwood Scrubs and Little Wormwood Scrubs; and

~~vi.~~vii. working positively with stakeholders to deliver new connections over and/or under railways and the Grand Union Canal.

Green infrastructure and the environment

~~f)~~e) Delivering a high quality, well-connected, network of multifunctional open spaces. This should include:

i. contributing to and/or delivering new publicly accessible open spaces and public realm improvements at each cluster ~~and as early as possible~~;

ii. high quality green infrastructure, including street greening, along the length of Scrubs Lane;

iii. new publicly accessible open space adjacent to Little Wormwood Scrubs; and

iv. yards as open spaces to the north of the canal to support employment uses and as communal or private open spaces for housing; ~~and~~

~~v. contributing to the delivery of green connections into the wider area.~~

~~g) Minimising the impact on the sewer network and reducing the risk of flooding by implementing sustainable drainage systems (SuDS) connected, if feasible, into the Grand Union Canal, and new water infrastructure;~~

Heritage and character

~~h)~~f) Strengthening local identity and character by:

i. conserving and enhancing the St. Mary's Cemetery, Grand Union Canal and, Cumberland Park Factory conservation areas, and Kensal Green Cemetery Grade ~~1~~ I Listed Historic Park and Garden and their settings; and

ii. ensuring future local character is informed by the area's existing heritage including the cemeteries, railways, Grand Union Canal and industrial heritage.

Building heights

~~i)~~g) Contributing to a variety of building heights which respond to public transport access and sensitive locations by delivering:

i. north of the Grand Union Canal, generally 6-8 storey heights onto Scrubs Lane and the Grand Union Canal and 6-10 storey heights onto Harrow Road;

ii. south of the Grand Union Canal, generally 6-10 storey heights onto Scrubs Lane with lower heights adjacent to Little Wormwood Scrubs;

iii. generally lower heights opposite the Cumberland Park Factory Conservation Area;

iv. increased heights ~~of 8-10 storeys~~ adjacent to the railway; ~~and~~

v. a single tall building in each cluster ~~identified in P10(b)~~; ~~and~~

~~vi. visual permeability between tall buildings.~~

~~Infrastructure~~

~~j) Contributing to the delivery of infrastructure requirements, as set out in the OPDC Infrastructure Delivery Plan (IDP);~~

~~Development and phasing~~

Commented [PF314]: Regulation 19(1) consultation amendment.
Reference: P10/23
Reason: To provide clear support for connections to Kensal Canalside Opportunity Area

Commented [PF315]: Specific amendment.
Reason: To enable development to respond to site specific circumstances

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~~k) Working positively with landowners to ensure the phasing of development supports the delivery of the new footpath and segregated cycle lane on the west of Scrubs Lane; and~~

~~l) Enabling the comprehensive redevelopment of the areas to the south of the Grand Union Canal by working positively with stakeholders to support the relocation, reconfiguration and/or development over and around railway infrastructure on the North Pole Depot where feasible.~~

Commented [PF316]: Specific amendment.
Reason: To avoid repetition with Policy SP7.

SUPPORTING TEXT

~~1.173~~ 1.147 The ability to secure early delivery of homes and jobs along Scrubs Lane provides an opportunity to cement forthcoming change in the wider area and to improve connections to Old Oak North. ~~Scrubs Lane's early delivery role and its location on the edge of the OPDC area provides the area with the opportunity to connect existing and new communities within and around Old Oak and to deliver positive changes in the public realm and quality of the environment. This opportunity needs to be balanced with managing the impacts on surrounding heritage assets, open spaces and residential communities.~~

Commented [PF317]: Specific amendment.
Reason: To avoid repetition with later paragraphs.

1.148 ~~A significant proportion of early development will be seen on Scrubs Lane.~~ Scrubs Lane is current~~l~~y home to an established business community comprising a variety of economic sectors ~~with~~ including a significant amount of creative industries. ~~In addition to these~~is ~~are~~There are also residential terraces north and south of the West Coast Main Line. Established residential neighbourhoods are located surrounding Scrubs Lane to the east in College Park, to the north along Brunel Court and further to the south in North Kensington adjacent to Little Wormwood Scrubs. The City Mission Church and nursery at 2 Scrubs Lane are important centres for the community and the nursery ~~i~~was ~~a~~ designated as an Asset of Community Value in November 2015.

Commented [PF318]: Specific amendment.
Reason: Relocated to following paragraph to relate to homes and jobs capacity.

~~1.30~~1.55 OPDC has produced a Scrubs Lane Development Framework Principles (OONDFP) document to provide further detail on the area's development capacity, land use mix and infrastructure required to support the needs of development and create a high quality place. The principles within this document inform the policy for this place. OPDC will also produce an Old Oak North and Scrubs Lane Supplementary Planning Document, which will include more detailed guidance principles for the Old Oak North (see Policy P2) and Scrubs Lane places.

Commented [PF319]: Specific amendment.
Reason: To provide further information regarding the Old Oak North Development Framework Principles and a future Supplementary Planning Document.

1.149 A significant proportion of early development will be seen on Scrubs Lane. Scrubs Lane has the capacity to deliver a minimum of ~~2,000~~2,600 new homes and has a capacity of ~~1,100~~1,200 new jobs in the plan period~~1~~.

~~1.174~~ 1.150 The early delivery of development along Scrubs Lane presents a number of challenges ~~in the~~to ~~delivering s~~successful place making and sustainable communities. These include providing uses and services to support the emerging community while the wider area of Old Oak will continue to be developed. Within the specific context of Scrubs Lane, clusters have a key role in sustaining the presence of active uses to support ~~existing and new residents~~this new community, add life to the street and ultimately support the delivery of Lifetime Neighbourhoods in accordance with Policy SP~~2~~2.

~~1.175~~ 1.151 These active uses will differ from cluster to cluster depending on each cluster's specific character - please see the ~~proceeding~~ cluster policies for further detail. ~~However,~~ ~~t~~They will be expected to include a mixture of small scale 'walk-to' town centre uses, community and employment uses that have a good relationship to the street. These uses could be permanent or temporary but will crucially provide an 'activation' role in helping to draw people to the area to activate and build a sense of place and community.

~~1.176~~ 1.152 To deliver Scrubs Lane's employment capacity and continue to enhance its industri~~al~~alous character, sites fronting on to Scrubs Lane will be expected to re-provide compatible broad industrial type activities.~~deliver ground floor small business employment floorspace.~~ These spaces will need to accord with Polic~~y~~ies ~~y~~ E2 and E3 with regard to their design and operation, be compatible with housing as part of mixed used residential development and ~~have a good~~provide positive and/or active street frontages ~~presence~~. ~~To support residential amenity, housing is expected to be delivered away from Scrubs Lane above ground floor uses onto Scrubs Lane and with opportunities for residential on side streets/connections. To the south of the canal and east of Scrubs Lane, the regeneration of the Mitre Industrial Estate has the potential to deliver new housing alongside other uses reflecting its proximity to Little Wormwood Scrubs.~~

~~1.177~~ 1.153 Scrubs Lane is currently a key connector route, facilitating freight and passenger movement to Harlesden in the north and White City and Shepherd's Bush in the south. East - west connectivity is poor with only one access into Old Oak North at Hythe Road, one pedestrian route into St. Mary's Cemetery, one stepped access to the southern Grand Union Canal towpath and one access to the Mitre ~~Bridge~~ Industrial Estate. To enhance east-west connectivity ~~N~~new and improved connections are ~~therefore~~ proposed at Ellisland Way, ~~Laundry Lane,~~ Park Road, Hythe Road and along both sides of the Grand Union Canal. Providing improved access to Kensal Canalside Opportunity Area will also be facilitated by improved connections to the east.

1.154 ~~The street~~Scrubs Lane will need to accommodate increased vehicular movement generated by the construction and operation of new development. However, as industrial uses are replaced with mixed use development in Old Oak, HGV freight traffic will decrease. This provides opportunities to introduce:

a) ~~-~~new bus routes ~~and~~ with greater frequencies to serve the increase in population with any parking provided off-street;

~~a) .~~

b) ~~In addition to continuing to be a key vehicular route, Scrubs Lane also has the potential to be an important local walking and cycling route. As the early delivery of development will largely be on the western side of the street and the majority of local destinations will be to the west of Scrubs Lane, To support this, a continuous~~ segregated ~~two-way~~ cycle lane~~s are is required3 which will be required to support the delivery of key routes into Old Oak North. on the west of Scrubs Lane to support local access with improvements envisaged along the eastern side. This will~~ link~~ing~~ with the surrounding cycling network. These will need to appropriately integrate with enhanced or new junctions into Old Oak North; ~~in the early phases of development and is required to be 4 metres wide~~delivered in accordance with TfL Cycle Design Standards.

~~b) The cycle lane should be joined by~~

c) a generous 5 metre wide foot path~~4~~ to the west of Scrubs Lane, which ~~not only~~will provide~~s~~ a pleasant walking environment ~~but~~ and will help~~s~~ to provide space for new street greening ~~and also enables~~that will encourage new active uses to spill out onto the street to add vibrancy and character; and~~.~~

Commented [PF320]: Specific amendment.
Reason: To provide consistent guidance with policies E1 and E2.

Commented [TC321]: Specific amendment.
Reason: To avoid repetition with the policy and other policies

Commented [PF322]: Specific amendment.
Reason: To avoid repetition with the policy.

Commented [PF323]: Specific amendment.
Reason: To reflect updated recommendations within the Old Oak North Development Framework Principles.

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d) ~~I~~improvements to the public realm ~~are also envisaged~~ along the eastern side of Scrubs Lane to provide a more pleasant environment for existing and future residents and workers in this location.

~~.~~ OPDC will work with TfL and the relevant local highway authority to deliver these improvements.

~~1.178~~ 1.155 Access to Wormwood Scrubs and Little Wormwood Scrubs is restricted by railways, buildings, vegetation and the street itself. To help people get to these open spaces, sensitive new connections and improvements to existing connections will be required.

~~1.179~~ 1.156 To support place making and provide facilities for new and existing communities, new publicly accessible open spaces and public realm improvements should be delivered as early as is feasible. ~~With t~~The role of clusters for ~~is to~~ focusing activity ~~at specific points along Scrubs Lane, they serve as a mechanism to guide the location of new public open spaces where they will benefit the most people.~~Further requirements for these publicly accessible open spaces can be found in the proceeding cluster policies and in OPDC's Infrastructure Delivery Plan (IDP).

~~1.180~~ 1.157 ~~Along Scrubs Lane, y~~Yard spaces are a significant element of the historic character of the Cumberland Park Factory Conservation Area. To support and continue this character, new development north of the canal should incorporate yards onto the street and next to the railway for servicing ~~commercial development~~employment uses and as communal and/or private residential open space5. Their design and function should appropriately protect residential amenity and ~~should providing green or hard landscaping while~~ includ~~e~~ing sustainable drainage systems (SuDS) and other elements of green infrastructure. Their design should support the delivery of a defined street frontage along the length of Scrubs Lane.

~~1.181 The railway also provides an opportunity to deliver yard spaces for employment uses to act as a buffer between the railway and residential uses and also provide space for employment activities. The use of these yards for employment activities would need to be appropriately managed to protect residential amenity and impacts on traffic movement.~~

~~1.182~~ 1.158 Scrubs Lane has significant heritage assets~~6~~. This historic context results from its industrial and manufacturing history which is demonstrated by both Cumberland Park Factory Conservation Area and the concentration of diverse and creative small businesses along and behind ~~from~~ the street. Combined with the St. Mary's Cemetery and Grand Union Canal conservation areas and ~~the proposed locally listed Mitre Bridge~~Local Heritage Listings, Scrubs Lane has a rich historical context that can positively shape new development.

~~1.183 Development also provides an opportunity to respond to and enhance the area's railway, industrial and canal heritage.~~

~~1.184~~ 1.159 The historic character and the surrounding context provide opportunities to conserve and enhance historic assets and shape a coherent building heights strategy along Scrubs Lane. ~~The n~~New development ~~delivering these homes and workspaces~~ needs to be delivered in a way that supports the achievement of homes and jobs targets and r~~r~~esponds appropriately to ~~development opportunities and~~ sensitive locations. As such, the following heights and responses should be delivered7:

Commented [PF324]: Specific amendment.
Reason: Relocated and condensed from following paragraph to shorten text.

Commented [PF325]: Specific amendment.
Reason: To use consistent terminology with policies E1 and E2.

Commented [PF326]: Specific amendment.
Reason: To provide clarity in protecting residential amenity.

Commented [PF327]: Specific amendment.
Reason: Relocated and condensed within previous paragraph to shorten text.

Commented [PF328]: Specific amendment.
Reason: To avoid repetition with policy.

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North of the canal, generally 6-8 storey heights onto Scrubs Lane with 6-10 onto Harrow Road	To provide an appropriate sense of enclosure to the street in response to the width of Scrubs Lane, with increased height onto Harrow Road. Within this overarching approach to height, the context of each individual plot will also need to be taken into account when considering the most appropriate arrangement of heights on each site.
South of the Grand Union Canal, generally 6-10 storey heights onto Scrubs Lane with lower heights adjacent to Little Wormwood Scrubs	To provide an appropriate scale of massing that reflects the existing railway infrastructure and sensitive locations of Wormwood Scrubs and Little Wormwood Scrubs.
Lower heights opposite the Cumberland Park Factory	To conserve and enhance the Cumberland Park Factory Conservation Area.
Generally 6 to 8 storey heights fronting onto the Grand Union Canal	To conserve and enhance the canal's designation as a Site of Importance for Nature Conservation and conservation area and provide an appropriate sense of enclosure to Mary Seacole Gardens as a publicly accessible open space.
Increased heights adjacent to the railway	To help manage the impact of railway noise on local amenity, respond to less -sensitive locations and respond to the increased massing in Old Oak North.
A single tall building in each cluster identified in P10(b)	A single tall building within each cluster is considered to be more appropriate than the: • uncoordinated delivery of tall buildings along Scrubs Lane; • delivery of increased heights and massing along the length of Scrubs Lane; ~~, rather than providing no tall buildings and increasing the height of buildings adjacent to more sensitive locations, or providing multiple tall buildings.~~ These four tall buildings will support legibility at key east-west intersections with the street, ~~support the attainment of~~help to meet homes and jobs targets, maintain the character of Scrubs Lane, support the delivery of social infrastructure and open space and manage impacts on the townscape and heritage assets. ~~To support legibility and secure additional benefits, through additional development capacity for the community (this could include a mix of greater affordable housing delivery, community uses and public open space) and new infrastructure.~~ Any proposal for a tall building will need to be of the highest design quality. These will be determined on a case by case basis and will be subject to the detailed assessment of its

Commented [PF329]: Specific amendment.
Reason: To provide clearer reasoning for the location and role of tall buildings along Scrubs Lane.

	impacts in accordance with all relevant policies and guidance. Specific consideration will need to be given to impacts on views from surrounding areas. The definition of tall buildings is stated in policies SP9 and D5. ~~A single tall building is considered to be appropriate rather than multiple tall buildings to maintain the character of Scrubs Lane and manage impacts on the townscape and heritage assets.~~
Visual permeability	To help create a high quality townscape and visual amenity. This will enable views across Old Oak as well as to and from surrounding areas.

Commented [PF330]: Specific amendment.
Reason: Replaced with paragraph above.

~~1.185 The creation of new high density development along Scrubs Lane will necessitate the provision of a substantial amount of social and physical infrastructure. OPDC's IDP identifies the likely requirements for infrastructure in the area.~~

~~1.186~~ 1.160 Development ~~fronting on to~~on Scrubs Lane is envisaged to largely be delivered during the first 10 years of the plan period, but ~~. However, t~~the North Pole East Depot site to the south of the Grand Union Canal is potentially a longer term development site, subject to the depot no longer being required for operational purposes. ~~will likely be available for development after the plan period reflecting its existing railway use and potential use to support construction of utilities infrastructure.~~Although the depot is currently not identified as being deliverable or developable within the Local Plan period, OPDC would support its earlier delivery and the potential for this site to contribute to homes and jobs provision and deliver enhanced east-west connections to the Kensal Canalside Opportunity Area.

Commented [PF331]: Specific amendment.
Reason: To provide updated development information for the North Pole Depot.

P10C1: HARROW ROAD CLUSTER

VISION

V1. A community and employment focused cluster framed by the prominent corner of Harrow Road and Scrubs Lane and ~~a new Old Oak High Street~~a new connecti~~on~~ng ~~to~~ to Willesden Junction.

POLICY

Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:

Land uses

a) **Supporting the delivery of a community and employment focused cluster by:**
   i. **clustering active employment and community uses along Harrow Road and Ellisland Way;**
   ii. **delivering residential uses above the ground floor adjacent to the railway, Scrubs Lane and Harrow Road; and**
   iii. **reproviding the floorspace of a church use and associated community use at 2 Scrubs Lane on site including new fitted out building space at community use rent levels.**

Public realm and movement

b) **Supporting local connectivity by delivering Ellisland Way as a new walking and cycling route providing a new route to the new connection ~~from~~ to Willesden Junction Station ~~and Old Oak High Street to Scrubs Lane~~;**
c) **Supporting activation of the public realm by creating a well-defined active frontage onto Scrubs Lane, Harrow Road and Ellisland Way;**
d) **Contributing to the improvement of public realm on Harrow Road to support access to Harlesden town centre;**

Green infrastructure and the environment

e) **Supporting health and well-being and resilience to climate change by delivering new publicly accessible open space on Ellisland Way:**
   i. **~~to the south of~~adjacent to 2 Scrubs Lane; and**
   ~~i.~~ii. **at the entrance to Old Oak ~~High~~ Street if demonstrated to be feasible.~~;~~**

~~**Heritage and character**~~

~~e) **Enhancing local character by conserving and enhancing the Chandelier Building as a building of local heritage interest and continuing its use as B-use class employment floorspace;**~~

Building heights

f) **Contributing to a variety of building heights by:**
   i. **locating a single tall building at the south western corner of the Scrubs Lane and Harrow Road junction to support local legibility; and~~and~~**
   ii. **delivering 8 to 10 storeys on to Harrow Road.~~;~~**

Commented [PF332]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF333]: Specific amendment.
Reason: To provide clarity regarding the location of publicly accessible open space.

Commented [PF334]: Specific amendment.
Reason: Removed to reflect existing heritage designations and avoid repetition of D8.

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~~iii. ensuring the massing of development does not adversely impact on College Park and housing to the north of Harrow Road.~~

Commented [PF335]: Specific amendment.
Reason: Removed to avoid repetition with Policy D6.

SUPPORTING TEXT

~~1.187~~ 1.161 The Harrow Road cluster sits at the busy junction of Harrow Road, Scrubs Lane and the ~~proposed Old Oak High Street~~proposed new connection to Willesden Junction and Old Oak North.

~~1.188~~ 1.162 To support the activation of Ellisland Way and a high quality street environment along Harrow Road and Scrubs Lane, active employment and community uses with a good street presence are required on both streets. Where this is not possible, development should provide positive frontages. ~~Locating housing at the ground floor adjacent to busy roads and the railway can have a negative impact on residential amenity.~~ To help mitigate ~~these~~ impacts on residential amenity, housing should be located above the ground floor, opposite the railway, along Scrubs Lane and Harrow Road ~~and at~~with opportunities to provide housing at ground level where possible along Ellisland Way1.

~~1.189~~ 1.163 The City Mission Church and associated community uses provide important services to the local community which is reflected in the~~ir~~ designation of the community use as an Asset of Community Value in November 2015. To ensure the continued delivery of social infrastructure, the floorspace of these uses should be reprovided.

Commented [PF336]: Regulation 19(1) consultation amendment.
Reference: P10C1/4
Reason: To correctly identify the Asset of Community Value on the site.

~~1.190~~ 1.164 Harrow Road will continue to be a heavily trafficked road connecting with a new ~~entrance to Old Oak High~~ route to Willesden Junction and Old Oak North. ~~As such, t~~To create a high quality walking and cycling environment, Ellisland Way should provide an additional choice for walking and cycling between ~~Old Oak High Street~~the new route to Willesden Junction and Scrubs Lane~~2~~. If demonstrated to be feasible, there may also be the opportunity for Ellisland Way to be delivered as a vehicular route.

Commented [PF337]: Specific amendment.
Reason: To reflect updated information in the Old Oak North Development Framework Principles.

~~1.191~~ 1.165 Working with the different ground levels, there is an opportunity to provide a publicly accessible open space ~~to the rear of~~adjacent to 2 Scrubs Lane on Ellisland Way (see figure 4.36~~x~~) and support the delivery of 30% publicly accessible open space in accordance with Policy SP8.

~~1.192~~ 1.166 The Chandelier Building is home to a diverse range of small businesses. These occupiers and the form of the building reflect the evolving historic industrial ~~historic~~ development along Scrubs Lane and are considered to positively contribute to local character. As such, it is proposed to be identified as a ~~building of heritage~~ interest~~3~~Local Heritage Listing. Proposals should seek to retain the Chandelier Building in accordance with Policy D8 and demonstrate how they have fully explored its retention.

Commented [PF338]: Specific amendment.
Reason: To clarify role of policy D8.

~~1.193 The local historic railways are identified to be an important heritage theme that can help shape the character of development4.~~

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~~1.194~~ 1.167 Delivering a single tall building at the junction of Harrow Road and Scrubs Lane and heights of 8 to 10 storeys elsewhere is considered to be appropriate in principle~~5~~, subject to detailed assessment of the impacts in accordance with all relevant policy and guidance. This location is considered to support wayfinding to the retained community uses, Old Oak ~~High~~ Street and Harlesden town centres. The massing of any development will need to respond to the lower building heights of the adjacent residential neighbourhoods of College Park and Brunel Court to manage the impact on the townscape of Scrubs Lane and residential amenity. To help to define the junction of Harrow Road and Scrubs Lane, the corner of 2 Scrubs Lane should ~~be developed to~~ provide a well-defined and consistent urban edge.

DRAFT

POLICY P10C2: LAUNDRY ~~LANE~~ CLUSTER

VISION

V1. A ~~community focused green landscaped route fronted by housing and community uses linking Old Oak Garden~~key news route mediating complex ground levels to deliver connections into Old Oak North~~, Scrubs Lane and St. Mary's Cemetery~~.

POLICY

Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:

Land uses

a) **Supporting the delivery of a ~~housing and community focused~~mixed use cluster by:**

i. ~~clustering social infrastructure on locations fronting on to Old Oak Gardens and Laundry Lane~~focusing employment and town centre uses ~~and town centre uses at~~ ground and lower ~~floor levels, with potential employment uses on the upper floors to address amenity issues~~; and

~~i.~~ii. delivering residential uses above employment and town centre uses ~~in locations~~ where appropriate standards of amenity ~~issues can be appropriately addressed~~can be provided.~~:~~

~~ii. clustering residential uses with front doors onto Old Oak Gardens and Laundry Lane.~~

Public realm and movement

b) **Supporting local connectivity by:**

i. delivering Park Road, ~~ensuring the green bridge provides a high quality along~~ connecting ~~Laundry Lane~~Park Road~~Old~~ Old Oak South to Scrubs Lane, as ~~an~~ high quality all modes route ~~a~~as a priority, or a **walking and cycling connection** if this is demonstrated not to be feasible;

~~i.~~ii. subject to Park Road being an all modes route,~~if the connection under b)i. is all modes, supporting the potential for this new route~~ to deliver a vehicular access route from Park Road to the Haul Road, to serve the Old Oak Sidings Waste site and European Metal Recycling site, whilst operational;

~~ii.~~iii. **delivering a high quality crossing across Scrubs Lane and safeguarding land to deliver improved access into St. Mary's Cemetery; and**

~~iii.~~iv. **delivering ~~positive~~ active frontages ~~for residential uses~~ along ~~Laundry Lane~~**Park Road and ~~with active frontages for employment or town centre uses facing on~~ the western side of ~~to~~ **Scrubs Lane.**

Green infrastructure and the environment

c) **Supporting health and well-being and resilience to climate change by contributing towards ~~a wide and accessible green~~**publicly accessible open space at the junction of Scrubs Lane and Park Road, that: ~~landscaped bridge and a new publicly accessible green open space on both sides of the rail line that:~~

~~i. includes play space;~~

Commented [PF339]: Policy wide amendments

General amendments:
References to Laundry Lane replaced with Park Road.
References to delivering an all modes routes as a priority provided in addition to walking and cycling route.
Land uses amended to reflect change in movement route. References to a green route removed.
Reason: To align with amended street network work set out in the Old Oak North Development Framework Principles.

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF340]: Regulation 19(1) consultation amendment.
Reference: P10C2/1
Reason: To provide flexibility to support a range of transport modes along Park Road (formally named Laundry Lane).

Commented [PF341]: Specific amendment.
Reason: To support potential connection with haul access road.

DRAFT

~~ii. provides an east-west walking and cycling route between Old Oak Gardens North and St. Marys Cemetery;~~

~~iii.~~i. addresses level changes in its design; and

~~iv.~~ii. mitigates impacts of noise and air quality generated by Park Road and, Scrubs Lane, ~~the Old Oak Sidings access road and rail line.~~

Commented [PF342]: Specific amendment.
Reason: To align with Policy D6.

Heritage and character

d) Enhancing local character by:

i. delivering views along the railway from the ~~green landscaped~~Laundry ~~b~~Bridge; and

ii. conserving and enhancing the heritage significance of 26-30 Scrubs Lane and existing ghost signage ~~as buildings of heritage interest,~~ in accordance with Policy D8.~~:~~

Building heights

e) Contributing to a variety of building heights including locating a single tall building ~~adjacent to the green landscaped bridge~~ on the northern side of ~~laundry lane~~Park Road to support local legibility;

SUPPORTING TEXT

~~1.195~~ 1.168 ~~Laundry Lane~~The Laundry cluster is located on the former site of the Willesden Laundry which is reflected by ghost signage located at 26-30 Scrubs Lane.

1.169 It is located at the point where the proposed key route of Park Road will join Scrubs Lane, providing an east-west connection across Old Oak North, to Old Oak Common Lane. Proposals should support and/or contribute to the delivery of this key route and ensure level changes are addressed in its design. Current evidence shows that this connection is likely to need to be designed as an all modes route~~, but if this is proven to be unfeasible and that suitable all-modes connections can be delivered elsewhere, this route should be delivered as a /cycle connection.~~.

1.170 A mix of uses should be delivered in this cluster reflecting its role as a key route to Old Oak North. Active ground floor uses, such as town centre and employment uses, will support the activation of Park Road and Scrubs Lane. Residential uses will be appropriate above the ground floor.

~~1.196 Delivering social infrastructure facing onto Old Oak Gardens and Laundry Lane will assist in the activation of these spaces and provide a local destination for existing and new communities. These community uses, open spaces and the area's location away from Old Oak High Street make the area appropriate for a housing focus which will be strengthened by delivering residential front-doors at ground-level which open onto Old Oak Gardens and Laundry Lane1.~~

~~1.197 The route of Laundry Lane is identified as a key route for existing and new communities to move east and west2. Its location between the proposed Old Oak Gardens and the existing St. Mary's Cemetery offers an opportunity to connect these spaces through the delivery of a continuous green landscaped link to increase the provision of green publicly accessible open space3. Given its close proximity to the existing residential community at College Park and the future residential communities, the route should provide space for recreation and play.~~

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1.171 Time-limited access to St. Mary's Cemetery is currently provided via a gate. To support access to and from the cemetery, a new pedestrian and cycling crossing should be delivered from Park Road~~Laundry Lane~~4. Any improved access to the cemetery will be explored in discussion with the management company for St. Mary's Cemetery.

1.172 Publicly accessible open space should be delivered within this cluster to support the strategic target to deliver 30% publicly accessible open space (see Policy SP8), help to mediate the level changes required along Park Road to bridge over rail infrastructure and support the delivery of east-west walking and cycling connections between Old Oak North, Scrubs Lane and St. Mary's Cemetery.

~~a)~~

~~1.198~~ 1.173 The ghost signage on the northern façade of 26-30 Scrubs Lane provides a link to the area's industrial past and positively contributes to ~~are proposed to be identified5 as buildings of heritage interest reflecting their positive contribution to~~ the character of the area. This should be conserved and enhanced in accordance with Policy D8. ~~The green landscaped~~The ~~Park Road~~Laundry Bridge should be designed to enable~~bridge provides the opportunity for enabling~~ people to have views along the length of the railway line to reflect the local railway heritage and enhance local character6.

~~1.199~~ 1.174 Delivering a single tall building ~~on~~ to the east of the railway and north of Park Road is considered to be appropriate in principle~~7~~, subject to detailed assessment of its impacts in accordance with all relevant policy and guidance. This location is considered to support wayfinding to Park Road, a key ~~the nearby community uses and access~~ route ~~access in~~into Old Oak North.

Commented [PF343]: Specific amendment.
Reason: To provide additional detail for the role of this asset.

DRAFT

POLICY P10C3: HYTHE ROAD CLUSTER

VISION

V1. A retail, leisure, employment and community focused cluster framed by railway and industrial heritage that connects Old Oak North, to Scrubs Lane and on to St. Mary's Cemetery. This cluster will provide new and improved walking, cycling and vehicular access into Old Oak North.

POLICY

Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:

Land uses

a) Supporting the delivery of a retail, leisure, employment and community focused cluster by:

i. clustering active uses at the junction of Hythe Road, Scrubs Lane and ~~Park Road~~any other access routes required into Old Oak North; and

ii. delivering a range of active meanwhile uses that complement the activation of the Rolls Royce Building during the early phases of development.

Public realm and movement

b) Supporting local connectivity by:

i. enhancing Hythe Road as an all modes key route, with significant enhancements to the walking and cycling environment, into Old Oak North, ~~walking and cycling green route~~ that is successfully integrated with the Rolls Royce Building, ~~in Old Oak North,~~ adjacent railway structures and associated spaces;

ii. providing a crossing across Scrubs Lane to deliver a new walking and cycling route and supporting a future access point into St. Mary's Cemetery from Hythe Road;

iii. ~~delivering~~ supporting another access into Old Oak North, if required. Applicants should engage early with OPDC to understand if this is necessary and ~~what~~the transport functions ~~this access should~~to be provided ~~for~~a ~~new vehicular connection at Park Road as the primary east - west vehicular link to Old Oak North that integrates a high quality new walking and cycling route. Its design will need to successfully address level changes to support pedestrian desire lines and surrounding development~~; and

iv. in the long term, support the potential relocation~~integration~~ of the vehicular access to ~~the~~ Old Oak Sidings and, if operational, EMR ~~sites~~ sites in accordance with Policy P10C2Bii.~~with this new route~~, to release the existing route for publicly accessible open space and/or yard space.

Green infrastructure and the environment

c) Supporting health and well-being and resilience to climate change by delivering new publicly accessible open space at the new access point into St. Mary's Cemetery;

Heritage and character

d) Enhancing local character by conserving and enhancing the heritage of the railway infrastructure and associated spaces;

Commented [PF344]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF345]: Specific amendment.
Reason: To reflect updated information in the Old Oak North Development Framework Principles.

Commented [PF346]: Specific amendment.
Reason: To reflect recommendations of the Old Oak North Development Framework Principles

Commented [PF347]: Specific amendment.
Reason: To reflect updated information in the Old Oak North Development Framework Principles.

DRAFT

Building heights

e) Contributing to a variety of building heights including locating a single tall building at the south western corner of the Scrubs Lane and Hythe Road junction.

SUPPORTING TEXT

~~1.200~~ ~~1.175~~ The Hythe Road cluster ~~defines~~ is located at the current main access point~~s~~ into Old Oak North along Hythe Road. In future, access into Old Oak North will be enhanced in this location, through an improved Hythe Road providing all modes access with improved walking and cycling infrastructure. In addition, there may be a need for an additional all modes access to the north of Hythe Road were the West London Line within Old Oak North not to be provided on a viaduct. The Old Oak North and Scrubs Lane SPD will provide further information regarding this connection. ~~and potentially through the potential provision of a new route, making this location at key destination on Scrubs Lane. and Park Road.~~

Commented [PF348]: Specific amendment.
Reason: To reflect recommendations of the Old Oak North Development Framework Principles.

~~1.201~~ To support the access and functioning of these routes, a range of active ground floor land uses should be provided around the junction fronting a high quality and robust public realm. This should include small-scale 'walk-to' uses to complement the wider town centre hierarchy. The collection of routes also supports the delivery of active meanwhile uses to help draw people into Old Oak North and the nearby meanwhile uses within and around the Rolls Royce Building.

~~1.202~~ ~~1.176~~ ~~A high quality and robust public realm fronted by active street frontages will play an important role in delivering a high quality sense of place of for the cluster while balancing the area's movement functions and helping people to navigate the area1. This is particularly important for locations adjacent to Park Roadthe proposed new access route, where level changes need to positively frame the street and be coordinated with Hythe Road to deliver a high quality walking and cycling environment.~~

~~1.177~~ ~~Hythe Road is recommended to become a walking and cycling route linking Grand Union Square to Scrubs Lane2.~~ The Hythe Road cluster provides an opportunity to continue the~~is~~ walking and cycling route from Hythe Road into St. Mary's Cemetery ~~through~~ via a new crossing of Scrubs Lane. To support this opportunity, a new high quality access point into the cemetery should be delivered in discussion with the management company for St. Mary's Cemetery3. Development adjacent to the new access point should support this route by contributing to the delivery of new publicly accessible open space fronted by active uses.

Commented [PF349]: Specific amendment.
Reason: To avoid repetition with above paragraphs.

~~1.203~~

~~1.204~~ ~~There is a need to improve east-west connections along Scrubs Lane4. Local walking and cycling movement modelling identifies that there is a strong pedestrian desire line from Park Road to Scrubs Lane that will enable people to access the proposed Hythe Road London Overground Station and other active uses at and between clusters along Park Road. As such, development should respond by delivering a high quality east-west walking route fronted by active frontages and addressing level changes.~~

Commented [PF350]: Specific amendment.
Reason: To reflect updated information in the Old Oak North Development Framework Principles.

DRAFT

~~1.205~~ 1.178 The existing ~~waste management sites at the~~ Old Oak Sidings and European Metal Recycling waste management sites are currently accessed through Mitre Yard along ~~an access road~~the Haul Road. In the longer term, and if demonstrated to be feasible, there is an aspiration to work with landowners to provide a new vehicular access to these sites off of Park Road to the north and remove the existing access route through~~from~~ Mitre Yard. The resultant spaces would then be made available for new publicly accessible open space and/or yards for workspaces. As such, proposals should demonstrate how they will provide positive and / or active frontages in the long term while mitigating environmental impacts of freight traffic in the short term.

~~1.206~~ 1.179 Hythe Road runs beneath a number of railway lines and the ~~Old Oak Sidings and European Metal Recycling access road~~Haul Road. The supporting infrastructure of these connections alongside adjacent spaces provide an opportunity to celebrate the transport heritage of Old Oak. Therefore, development should contribute to enhancing these structures and spaces through measures such as lighting, painting and/or other suitable improvements5.

~~1.207~~ 1.180 Delivering a single tall building on the south of Hythe Road is considered to be appropriate in principle6, subject to detailed assessment of its impacts in accordance with all relevant policy and guidance. This location is considered to support wayfinding to the routes into Old Oak and St. Mary's Cemetery and manages impacts on surrounding heritage assets.

DRAFT

POLICY P10C4: MITRE CANALSIDE CLUSTER

VISION

V1. A leisure, eating, drinking and community focused canalside location that celebrates the striking relationship of infrastructure and canal heritage with residential uses, active canalside spaces and uses.

POLICY

Proposals should plan positively to deliver the cluster vision by contributing and / or delivering where appropriate and relevant as follows:

Land uses

a) **Supporting the delivery of a leisure, eating, drinking and community focused cluster by:**
   i. **clustering publicly accessible active community, leisure and eating/drinking uses facing on to Mary Seacole Gardens, the Grand Union Canal and at the junction between 115-129 Scrubs Lane and Mitre Wharf ~~to improve access to the canalside space~~; and**
   ii. **contributing to and/or enabling new residential, leisure, commercial, casual and visitor moorings and associated infrastructure.**

Public realm and movement

b) **Supporting local connectivity by:**
   i. **contributing to the improvement of walking and cycling access from Mitre Bridge to the southern canal towpath and ~~also~~ along the north of the canal to Old Oak; and**
   ~~ii. delivering high quality public realm that integrates level changes and supports walking and cycling routes; and~~
   ~~iii.~~ii. **delivering ~~new public realm and access~~walking and cycling routes to the canal at Mitre Wharf.**

Green infrastructure and the environment

c) **Supporting health and well-being and resilience to climate change by:**
   i. **increasing the size, quality and accessibility of Mary Seacole Gardens by contributing to its enhancement with landscaping improvements, building setbacks and activation by surrounding uses; and**
   ii. **contributing to the delivery of new publicly accessible canalside open space on Mitre Wharf.**

Heritage and character

~~d)~~ **Enhancing local character by ~~:~~**

~~e)~~d) **conserving and enhancing ~~the proposed locally listed Mitre Bridge and linked railway bridge,~~ the Grand Union Canal Conservation Area, ~~and their~~ its setting and Local Heritage Listings~~s~~; ~~and~~**
   ~~i. delivering views along the canal and to/from St. Mary's Cemetery to/from Mitre Bridge.~~

Building heights

Commented [PF351]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF352]: Regulation 19(1) consultation amendment.
Reference: P10C4/3
Reason: To clarify support for residential uses.

Commented [PF353]: Specific amendment.
Reason: To avoid repetition with policies D2 and D3.

Commented [PF354]: Regulation 19(1) consultation amendment.
Reference: P10/10
Reason: To provide clarity regarding the role of the space between 115-129 Scrubs Lane and Mitre Wharf. The diagram supporting Policy P10C4 will be amended to remove the publicly accessible open space in this location.

Commented [PF355]: Regulation 19(1) consultation amendment.
Reference: P10/14
Reason: To provide consistency with policy D8.

DRAFT

~~f)~~e) **Contributing to a variety of building heights including:**

i. **locating a single tall building at 115-129 Scrubs Lane;**

ii. **ensuring the massing and height of development at Mitre Yard supports the functions of Mary Seacole Gardens; and**

iii. **ensuring the massing and height of development ~~at Mitre Wharf supports views to St. Mary's Cemetery and Mitre Bridge by~~ step~~s~~ping up away from Scrubs Lane while responding well to development at 115-129 Scrubs Lane.**

Commented [PF356]: Regulation 19(1) consultation amendment.
Reference: P10/14
Reason: To provide consistency with policy D8.

Infrastructure

~~g)~~f) **Supporting local connectivity by contributing to the delivery of a new walking and cycling bridge alongside the Mitre Bridge and linked railway bridge if feasible;**

SUPPORTING TEXT

~~1.208~~ 1.181 The Mitre Canalside cluster will be a visually prominent location when arriving from the south.

~~1.209~~ 1.182 Reflecting the assets of the Grand Union Canal and Mary Seacole Gardens, the cluster has the opportunity to be a focus for delivering a range of active community and leisure canalside uses that will capitalise on the high footfall delivered by the new and improved east-west canalside routes.

~~1.210~~ 1.183 Moorings play an important role in supporting the historic canalside character, in meeting housing need and in providing space for employment and leisure activities. To support these roles, existing and new permanent and temporary moorings should be delivered in agreement with the Canal and River Trust and local residential mooring associations.

~~1.211~~ 1.184 New and improved walking and cycling routes along the north of the canal should be delivered to enable people to access Old Oak North, ~~active uses fronting~~ Mary Seacole Gardens and ~~north-south connections on~~ Scrubs Lane. The delivery of a separate walking and cycling bridge alongside the Mitre Bridge and linked railway bridge ~~will~~ would be supported if demonstrated to be required and feasible. This will enable a continuous high quality walking and cycling route along Scrubs Lane.

~~1.212~~ 1.185 Mary Seacole Gardens is a cherished local publi~~c~~cly accessible open space that provides a positive setting to the Grand Union Canal. The adjacent waste ~~management~~ transfer facility has a negative impact on the environmental quality of this open space. Following the relocation of the waste transfer sites, the amenity of Mary Seacole Gardens will improve and there is an opportunity for development within the cluster to contribute to improving this publi~~c~~cly accessible open space ~~through~~ by providing active town centre uses, landscaping and public realm improvements. The delivery of active leisure uses will support the local canalside character, recognising the location of the former nearby Mitre Tavern.

~~1.213~~ 1.186 To the ~~east~~ west of Mitre Bridge, a new ~~public realm~~ connecti~~o~~n~~ng~~ to Mary Seacole Gardens should be delivered to improve the choice of walking and cycling routes and continue to provide access to existing and new moorings.

DRAFT

~~1.214~~ 1.187 This cluster is defined by the railway, canal, social and industrial heritage of the area. As such, development should contribute to conserving and enhancing the Grand Union Canal Conservation Area, the Mitre Bridge and the linked railway bridge as proposed locally listed structures and the adjacent railway bridge given its positive impact on local character. This may include measures such as lighting, painting and/or other suitable improvements.

~~1.215~~ 1.188 Delivering a single tall building at 115-129 Scrubs Lane is considered to be appropriate in principle, subject to detailed assessment of its impacts in accordance with all relevant policy and guidance. This location is considered to support wayfinding to the destination canalside uses, ~~the~~ new and enhanced east-west routes and from the south.

~~1.216~~ 1.189 ~~The Mitre Bridge and the Grand Union Canal provide the cluster with a distinctive and positive transport heritage that frames Mary Seacole Gardens. Local views to and from the bridge are also important for conserving and enhancing the value of local heritage assets. In light of this, development should enable views to and from the adjacent conservation areas of the Grand Union Canal and St. Mary's Cemetery.~~

Commented [PF357]: Regulation 19(1) consultation amendment.
Reference: P10/14
Reason: To provide consistency with policy D8.

DRAFT

POLICY P11: WILLESDEN JUNCTION

VISION

V1. Willesden Junction will be a busy destination within Old Oak. An enhanced station will provide better public transport connections and new and enhanced routes will connect Harlesden to Old Oak. New high density development ~~and tall buildings will be supported~~, where feasible and appropriate, will support~~ing~~ the creation of a mixed use neighbourhood. ~~, becoming an increasingly well used node on Old Oak High Street. It will be a focal point that connects Harlesden with Old Oak. Station upgrades will create a fit for purpose intermodal interchange.~~

~~**V2. New high density development will be encouraged, where feasible, and will provide a mix of land uses to support the emergence of a new mixed use neighbourhood. New and enhanced public realm, streets and open spaces through and around the station will seamlessly integrate this Place into its surroundings. Architecture and urban design will celebrate the area's railway heritage, whilst responding to surrounding residential areas.**~~

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

~~**Development and phasing**~~

- ~~**Ensuring station upgrades are delivered in a phased and co-ordinated manner to best facilitate a comprehensive station redevelopment;**~~
- ~~**a) Optimising development on and/or adjacent to the station and tracks;**~~
- ~~**b) Supporting the long term redevelopment of the Willesden Train Maintenance Depot (located on the eastern side of the station) provided an appropriate solution for the relocation, reconfiguration and/or development can be agreed; and**~~

~~**Supporting early development on the western side of Willesden Junction station that contributes to a coordinated delivery of Willesden Junction Station upgrades, the enhancement of Station Approach and new connections across this Place;**~~ **Land uses**

- ~~**c) Supporting earlier delivery of Contributing to the delivery of a minimum of 600**~~ **new homes** **and ~~as early development to contribute to OPDC's 0-10 year housing supply;~~**
- **a) ~~Contributing to the delivery of 200~~ jobs within the plan period including by:**
  - **i. optimising development on and/or adjacent to the station and tracks;**
  - **ii. supporting the long term redevelopment of the Willesden Train Maintenance Depot provided an appropriate solution for the relocation, reconfiguration and/or development can be agreed; and**
  - **iii. supporting development on the western side of Willesden Junction station that contributes to a coordinated delivery of Willesden Junction Station upgrades, the enhancement of Station Approach and delivery of Old Oak Street.**

~~**and by:**~~

- ~~**d) d**~~**Delivering a range of high quality B1 workspaces and town centre uses ~~across Willesden Junction including:~~**

Commented [PF358]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF359]: Specific amendment.
Reason: Relocated below to provide clearer linkages with earlier development.

Commented [PF360]: Specific amendment.
Reason: To reflect updated development phasing information.

Commented [PF361]: Specific amendment.
Reason: To ensure development and station improvements benefit one another.

~~focusing B1a and B1b uses along Old Oak High Street, and around Willesden Junction station and to support its role as a key destination; and~~

~~B1 uses at other locations~~ across Willesden Junction **where residential uses are less appropriate**; and~~.~~

b)

~~i. delivering~~ **Contributing to the delivery of Old Oak High Street as part of a new major town centre by delivering a range of town centre uses along its length**~~Old Oak High~~ Street~~, where feasible, and within and around Willesden Junction station;~~

~~e) Supporting the delivery of residential uses as part of a new mixed use neighbourhood, where appropriate and feasible;~~

~~f)~~c) **Encouraging activation of the area** by delivering a range of meanwhile uses with active and/or positive frontages on ground floors**, particularly along Station Approach, Old Oak** ~~High~~ **Street,** the connection to Harrow Road and ~~within and~~ **around Willesden Junction** ~~and the new station square~~Station. ~~by:~~:

~~i. delivering a range of active and/or positive frontages on ground floors; and~~

~~ii. supporting a range of permanent and meanwhile active uses.~~

~~g) Supporting the neighbouring Harlesden district town centre by submitting a Harlesden Enhancement Strategy where an application provides over 5,000 sqm of town centre uses;~~

Public realm and movement

a) Ensuring station upgrades are delivered in a phased and co-ordinated manner to best facilitate a comprehensive station redevelopment;

~~a)~~ **Contributing to and/or delivering a permeable, inclusive and accessible** ~~street~~ movement **network** ~~that:~~

b) as shown in figure 4.44~~x~~;

~~provides a legible, comfortable and publicly accessible 24-Hour route(s) east-west pedestrian and cycle route(s) through and/or adjacent to Willesden Junction station;~~

~~supports new and improved connections between Old Oak and Harlesden, including the delivery of Old Oak High Street and enhancements to Station Approach; and~~

~~contributes to and enables early delivery of new and improved connections south over the railway lines towards Old Oak North; and~~

~~provides any other necessary routes across this place to support comprehensive redevelopment.~~

~~Supporting the potential delivery of new platforms on the West Coast Main Line;~~

Green infrastructure and the environment

~~b)~~c) **Delivering a high quality, well-connected, network of multifunctional publicly accessible open spaces, including:**

i. **Willesden Junction Station Square; and**

ii. **embedding green infrastructure along Old Oak** ~~High~~ **Street, Station Approach and within other streets** ~~to enable their use for amenity purposes.;~~

~~h) Supporting health and well-being by ensuring sensitive uses are located away from pollution sources and that new development mitigates the impacts of noise and air pollution generated by rail transport and the surrounding uses including Old Oak Sidings waste facility and access road, and associated rail and road vehicles;~~

Heritage and character

Commented [PF362]: Specific amendment.
Reason: To shorten policy and provide flexibility to deliver a range of B1 uses.

Commented [PF363]: Specific amendment.
Reason: To avoid repetition with policies SP2 and SP4.

Commented [PF364]: Specific amendment.
Reason: Merged to shorten policy.

Commented [PF365]: Regulation 19(1) consultation amendment.
Reference: P1/8
Reason: To provide clarity for meeting requirements of the policy.

Commented [PF366]: Regulation 19(1) consultation amendment.
Reference: P1/8
Reason: To reflect figure supporting the policy.

Commented [PF367]: Specific amendment.
Reason: To avoid repetition with policy SP7.

Commented [PF368]: Specific amendment.
Reason: Relocated under infrastructure

Commented [PF369]: Specific amendment.
Reason: To avoid repetition with policy EU1

Commented [PF370]: Specific amendment.
Reason: To avoid repetition with policy D6.

DRAFT

~~c)~~d) **Strengthening local identity and character by:**

i. **conserving and enhancing~~,~~ the Willesden Junction substation and water tower in accordance with Policy D8~~, other identified non designated assets and their settings~~; and**

ii. **encouraging the retention and reuse of heritage assets for meanwhile and employment use where appropriate and feasible.~~:~~**

~~d)~~e) **~~Ensuring~~ ensuring local character is informed by the area's ~~existing~~ railway heritage;**

Building heights

~~e)~~f) **Contributing to a variety of building heights that respond to public transport access~~ibility~~ and ~~surrounding~~ sensitive locations by ~~delivering~~:**

i. **supporting the delivery of tall buildings in Willesden Junction in accordance with Policies SP9 and D5;**

ii. **delivering increased heights and massing adjacent to railway lines to mitigate impacts on the public realm and residential amenity; and**

~~i.~~ **appropriately responding to existing residential areas to the north.~~tall buildings around Willesden Junction Station and at points of the greatest activity along Old Oak High Street;~~**

~~ii. a range of building heights across the Place including:~~

~~iii. tall buildings in less sensitive locations adjacent to railways;~~

~~iv.~~iii. **~~generally lower heights in more sensitive locations close to lower rise existing residential buildings;~~**

~~i. determining building heights using all other relevant planning policy in the Local Plan and London Plan.~~

Infrastructure

~~f)~~ **Supporting local and regional connectivity by ensuring the timely delivery of upgrades to Willesden Junction station;**

g)

i. **to address issues with current rail capacity;**

ii. **to support anticipated future growth ~~in demand associated with new development~~;**

iii. **to deliver new and improved station entrances:**

- ~~that relate directly to surrounding routes and open spaces; and~~
- ~~designed to be easily accessible from its surroundings; and~~

iv. **~~that~~ to integrate the station seamlessly with the wider movement network; and**

~~v. where it would~~to **support and enable the~~:~~**

~~vi.~~v. **delivery of ~~adjacent~~ development on or around the station, where feasible ~~sites; and~~**

~~i. the ability to reintroduce platforms on the West Coast Main Line railway.~~

~~g)~~h) **Supporting the delivery of an enhanced intermodal interchange that:**

i. **can successfully manage the demands of competing transport modes and interchange requirements for walking, cycling, buses, rail, taxis, private vehicles and the impact of future modes; and**

ii. **is phased to deliver early enhancements to the current interchange facilities along Station Approach.~~:~~**

Commented [PF371]: Specific amendment.
Reason: To reflect Draft New London Plan requirements for the location and definition of tall buildings.

Commented [PF372]: Specific amendment.
Reason: To avoid repetition with Policy T5.

Commented [PF373]: Specific amendment.
Reason: To clarify the potential for over station development.

DRAFT

i) supporting and safeguarding for the potential delivery of new platforms on the West Coast Main Line;

~~Development and phasing~~

~~Ensuring station upgrades are delivered in a phased and co-ordinated manner to best facilitate a comprehensive station redevelopment;~~

~~Optimising development on and/or adjacent to the station and tracks;~~

~~Supporting the long term redevelopment of the Willesden Train Maintenance Depot (located on the eastern side of the station) provided an appropriate solution for the relocation, reconfiguration and/or development can be agreed; and~~

~~Supporting early development on the western side of Willesden Junction station that contributes to a coordinated delivery of Willesden Junction Station upgrades, the enhancement of Station Approach and new connections across this Place; and~~

~~Supporting the integration of the station with surrounding areas by ensuring it is designed to be resilient and adaptable to respond to a changing context.~~

Commented [PF374]: Specific amendment.
Reason: To provide clarity regarding potential new transport infrastructure.

Commented [PF375]: Specific amendment.
Reason: Relocated above

SUPPORTING TEXT

~~1.217~~ 1.190 Willesden Junction today is a busy place where people ~~come to~~ interchange between London Overground and London Underground (Bakerloo). 6.7 million passengers use services at Willesden Junction station annually. By comparison, the average for London Overground managed stations is 2.9 million passengers. Many of those passengers continue their onward journey by bus or on foot to nearby destinations such as Harlesden or Park Royal.

~~1.218~~ 1.191 The area is currently dominated by railway infrastructure with freight lines to the north of the station, West Coast Mainline (WCML) tracks to the south and the Bakerloo and London Overground tracks that directly serve the station. This rail infrastructure severs this place from its surroundings and contributes to the area's poor pedestrian and cycle access.

~~1.219~~ 1.192 Willesden Junction is on the northern boundary of Old Oak. To the north is Harlesden district town centre, a well-established existing local area, and immediately to the south is ~~the newly planned high density mixed use area of~~ Old Oak North. It is critical that high quality ~~pedestrian~~walking and~~,~~ cyclinge ~~and bus~~ routes are provided that connect Old Oak with Willesden Junction and Harlesden so that surrounding residents and businesses can access and benefit from the regeneration opportunit~~ies~~y at Old Oak.

~~1.220~~ 1.193 In the future, there will be an increasing number of people wanting to directly access Old Oak from this station. Therefore, its role as an important transport interchange will continue and opportunities should be taken to optimise development across this place where it proves feasible.

~~1.221~~ 1.194 The public transport access already available at Willesden Junction provides the opportunity ~~to provide~~for new high density development and ~~commercial~~ employment uses on land in and around the station. Currently development is expected to take place outside the plan period. OPDC will work with landowners and stakeholders to facilitate earlier delivery of homes and employment space, where viable. ~~Over the plan period, with further improvements to this area, Willesden Junction place has the capacity to deliver 200 new jobs and a minimum of 600 new homes1.~~

Commented [PF376]: Specific amendment.
Reason: To reflect updated development phasing.

~~1.222~~ ~~1.195~~ In addition to supporting new residential uses, the delivery of new town centre uses focused ~~along Old Oak High Street and~~ around Willesden Junction station will ensure ~~the High Street~~it can positively ~~connect~~ integrate into its surroundings and help create a new place ~~here~~. Town centre uses should be delivered to complement other established and planned centres, particularly Harlesden district town centre (see Policy ~~SP6~~TCC1). Meanwhile uses can also play an ~~upfront~~ important role in helping to activate the area in the early years.

~~1.223 Willesden Junction sites adjacent to Harlesden district town centre. To support the functioning of this established town centre, a Harlesden Enhancement Strategy is required for applications for over 5,000 sqm of town centre uses in addition to implementing policy E5 (Local access to training, employment and economic opportunities). See Policy P1 for further information.~~

Commented [PF377]: Specific amendment.
Reason: Relocated to Policy TCC1 for clarity

~~1.224~~ ~~1.196~~ Willesden Junction needs to be supported by a high quality movement network that facilitates access across it and to the surrounding areas north and south. Step free access from all station entrances to platforms should ensure any route~~s~~ to, from or through the station are~~is~~ accessible to all. ~~In addition new and improved intermodal facilities will likely be required, including bus, cycle parking and taxi/ kiss-and-ride provision. These~~Intermodal transport facilities should be located in a high quality interchange area close to station entrances to enhance the sense of arrival.

Commented [PF378]: Specific amendment.
Reason: To shorten text.

1.56 A proposed street network centred on Old Oak ~~High~~ Street aims to address issues of severance~~2~~. ~~The High Street~~Old Oak Street ~~aims~~ seeks to connect Willesden Junction station to ~~to Harrow Road~~Harlesden town centre, providing an ~~much~~ improved, convenient and direct ~~walking, cycling and bus~~ connection~~, north towards Harlesden and Scrubs Lane~~. It will also connect Willesden Junction station south to Harlesden Place in Old Oak North~~, the proposed Hythe Road station and beyond to Old Oak South and the new Old Oak Common Station~~. Infrastructure studies have shown that the delivery of the northern most section of Old Oak Street across Harlesden Place to Willesden Junction is likely to be very challenging to deliver as an all modes route and at the time of the publication of this Local Plan, OPDC would support its delivery as a wide pedestrian and cycle only connection, but stakeholders should refer to OPDC's Infrastructure Delivery Plan (IDP) to find the most up-to-date position on infrastructure requirements.

Commented [PF379]: Specific amendment.
Reason: To Old Oak North Development Framework Principles recommendations.

1.197 Evidence also shows that it will be very challenging to technically and viably deliver Old Oak Street from Old Oak North to Harrow Road as a vehicular connection. The priority will therefore be to deliver a high quality walking and cycling route. However, if future work shows the delivery of the this route as a vehicular connection is feasible, viable and acceptable in terms of its transport impacts, this would be supported.

~~1.225~~ ~~1.198~~ ~~The High Street~~Old Oak Street could ~~also~~ potentially provide points of access onto the Willesden Train Maintenance Depot. The Depot is not identified as coming forward in the plan period but would be supported for earlier delivery if the site is proven to no longer be required for operational purposes or if development could occur over the depot without it impacting on operational requirements. ~~where there an opportunity to support its longer term development, if a solution to the current operational rail uses can be found.~~

Commented [PF380]: Specific amendment.
Reason: To reflect updated evidence base.

~~1.226~~ ~~1.199~~ Delivery of a high quality east-west unpaid pedestrian and cycle route through or adjacent to the station would provide permeability ~~through the~~ site and connect Harlesden Town Centre with Old Oak Street. The link should be direct, step free, safe, open 24 hours and well integrated into the wider public realm.

Commented [PF381]: Regulation 19(1) consultation amendment.
Reference: P11/21, P11/22, P11/23, P11/24, P11/25, P11/26.
Reason: To support improved connections to Harlesden Town Centre.

~~1.227~~ 1.200 A new station entrance ~~onto Old Oak High Street~~to the east of the station would be supported. Aligned to the location of this entrance, a ~~generous~~ new station square on Old Oak ~~High~~ Street would ensure the station has a strong sense of arrival and, as part of this, ample space should be provided for interchange facilities. The new station entrance would be in addition to the existing entrance on Station Approach. Alongside this, there will be a need to enhance Station Approach to provide a high quality integrated connection to Harlesden ~~Town~~ town ~~Centre~~centre from Old Oak Street. Station Approach will continue to perform on important arrival and interchange in the early years in advance of ~~any~~ Old Oak ~~High~~ Street being delivered.

Commented [PF382]: Regulation 19(1) consultation amendment.
Reference: P11/21, P11/22, P11/23, P11/24, P11/25, P11/26.
Reason: To support improved connections to Harlesden Town Centre.

~~1.228~~ 1.201 Historically Willesden Junction has been characterised by railway infrastructure and areas used to support the functioning of the railway3. A number of railway related heritage assets and positive historic elements provide the opportunity to inform the design of development and can play a role in strengthening local identity. This includes the ~~locally listed~~ Willesden Junction electricity substation and water tower which could be retained, enhanced and lit in the short/medium term. Should development be viable on these sites in the future, it may not be possible to retain these heritage assets and this will be managed in accordance with Policy D8 (Heritage). ~~their locations be considered appropriate for development in the longer term, any proposals will need to accord with policy D8 regarding non-designated heritage assets.~~

~~1.229~~ 1.202 A range of building heights are expected across Willesden Junction reflecting the high levels of public transport access. It will be important for development to deliver heights in a coordinated manner to optimise development while mitigating impacts on existing ~~low rise~~ residential amenity, in particular with regards to overshadowing and privacy.

~~1.230~~ 1.203 Early evidence indicates that the station is in need of upgrading to improve current congestion in the peak periods and improve the passenger experience4. Capacity enhancements will also be needed at the station to accommodate future growth, with passenger numbers forecast to potentially more than double in the morning peak and nearly triple in the evening peak by 2041. Station upgrades should be delivered in a phased manner to best facilitate the comprehensive redevelopment of the station and surrounds whilst ensuring that the station can continue to function and serve the local community. The station design should seek to improve the passenger experience, facilities, wayfinding and support the delivery of public realm within and surrounding the station. There is an opportunity to ensure that any future upgrades ~~to the station~~ safeguard the ability to ~~integrate a vehicular link over the West Coast Mainline and any potential~~deliver West Coast Main line platforms at Willesden Junction ~~being reprovided~~ to enhance accessibility and connectivity.

~~1.231~~ 1.204 Opportunities to unlock development potential across this area to deliver new residential, commercial and town centre uses will be supported in principle. However it is recognised that this would need to resolve operational railway requirements in agreement with TfL, Network~~ational~~ Rail and the Department for Transport. Where development is feasible, proposals should seek to optimise development capacity on and/or adjacent to the station and tracks and ensure the station is seamlessly integrated with the development of the wider area to ensure it acts as part of the wider townscape through investment in the public realm.

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POLICY P12: WORMWOOD SCRUBS

VISION

V1. Wormwood Scrubs will continue to be a cherished publicly accessible open space, important ecological asset and a protected area of Metropolitan Open Land. New sensitive connections to the north and east alongside carefully considered improvements will bring Old Oak and White City closer together making the Scrubs more accessible to ~~all~~ locals and Londoners.

~~**V2. OPDC will work with stakeholders and agree any proposals with the Wormwood Scrubs Charitable Trust, the London Borough of Hammersmith and Fulham and in discussion with the local community to conserve and enhance Wormwood Scrubs.**~~

POLICY

Proposals should plan positively to deliver the place vision by contributing and / or delivering where appropriate and relevant as follows:

Delivery

a) **Agreeing any proposals with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham; and**

b) **Supporting the long-term management and maintenance of Wormwood Scrubs and the Old Oak Community Centre by securing appropriate resources.~~;~~**

Green infrastructure and open space

c) **Conserving and enhancing Wormwood Scrubs in its role as a ~~District and~~ Metropolitan Park for use by all Londoners through sensitive enhancements ~~by delivering and / or contributing to high quality;~~:**

   i. ~~**access to nature and nature trails;**~~

   ii. ~~**outdoor leisure and sports pitches;**~~

   iii. ~~**essential ancillary facilities for appropriate uses where they maintain the openness of Wormwood Scrubs;**~~

   iv. ~~**play space including natural play; and**~~

   v. ~~**appropriate lighting.**~~

d) **Protecting Wormwood Scrubs as Metropolitan Open Land (MOL) by ensuring proposals accord with policy EU1 ~~and with the London Plan~~;**

e) **Conserving and enhancing the Local Nature Reserve and Site of Importance for Nature Conservation designations by ensuring proposals accord with policy EU2; and**

f) **Supporting climate change resilience by delivering SuDS which address current surface water flooding issues on Wormwood Scrubs and which can potentially contribute, if required, to a strategic SuDS network;**

Connections

g) **Improving access to Wormwood Scrubs for all Londoners by ensuring development contributes to new and improved sensitive walking and cycling:**

   a. **~~-~~access points shown in figure 4.45~~x~~; and**

Commented [PF383]: Policy wide amendments

General amendments.
Reason: Removal of repetition within policy with other policy areas.

General amendments: Re-ordering of policy to aid with its flow.

Commented [PF384]: Specific amendment.
Reason: To clarify accessibility for local people.

Commented [PF385]: Specific amendment.
Reason: To avoid repetition with OPDC's SCI

Commented [PF386]: Specific amendment.
Reason: To clarify its role as a park within the London Plan.

Commented [PF387]: Specific amendment.
Reason: To avoid repetition with supporting text.

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~~a.~~b. **routes, that are designed to accommodate current and future levels of usage, across, to and from Wormwood Scrubs** to ~~from~~ **the surrounding areas;**

~~g)~~h) **Providing safe and legible pedestrian and cycle connections between Wormwood Scrubs and Little Wormwood Scrubs; and**

~~h)~~i) **Supporting the character of Wormwood Scrubs by ensuring the future proposed Wormwood Scrubs Street to the north of Wormwood Scrubs relates sensitively to the open space.**

SUPPORTING TEXT

~~1.232~~ 1.205 Wormwood Scrubs is a locally cherished open space covering almost 68 hectares. It is the largest ~~green~~ publicly accessible open space in the London Borough of Hammersmith and Fulham and provides local people and Londoners with the opportunities to have access to nature, sports pitches and space for recreation and relaxation. The Scrubs is held in trust by the London Borough of Hammersmith and Fulham and managed by the Wormwood Scrubs Charitable Trust who will need to agree to any enhancements. ~~The Scrubs is managed by the Wormwood Scrubs Charitable Trust who will need to agree to any enhancements.~~ OPDC will also work with other stakeholders, including the London Borough of Hammersmith and Fulham and community, including the Friends of Wormwood Scrubs. The Ministry of Defence also continue to have rights of use for military training purposes.

Commented [PF388]: Regulation 19(1) consultation amendment.
Reference: P12/24
Reason: To provide clarity regarding the roles of the London Borough of Hammersmith and Fulham and the Wormwood Scrubs Charitable Trust

~~1.233~~ 1.206 ~~In 2016, the Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and security and new play equipment. OPDC will work with the Wormwood Scrubs Charitable Trust and LB Hammersmith and Fulham to consider the feasibility of implementing any measures in light of this information.~~ To support sensitive enhancements and the successful management and maintenance of Wormwood Scrubs and the Old Oak Community Centre, OPDC will work closely with stakeholders to secure long-term revenue funding.

~~1.234~~ 1.207 Wormwood Scrubs' roles are reflected in its designations and statutory protections. The Scrubs is designated as Metropolitan Open Land (MOL) within the London Plan and as a Metropolitan Park within the Mayor of London's All London Green Grid. ~~OPDC's Environmental Standards Study also identifies the Scrubs as fulfilling the function of a District Park.~~ In accordance with London Plan policies managing MOL and policy EU1, Wormwood Scrubs will continue to be protected as MOL and publicly accessible open space fulfilling a wide variety of functions.

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~~1.235~~ ~~1.208~~ In addition to these planning designations, the Scrubs benefits from protection by the Wormwood Scrubs Act (1879),~~,~~ ~~and~~ the Commons Act (2006) and relevant parts of the Ministry of Housing and Local Government Provisional Order Confirmation (Greater London Parks and Open Spaces) Act (1967). The Wormwood Scrubs Act sets out provisions ensuring that the space is made available for all Londoners for exercise and recreation. The Scrubs also has a number of biodiversity designations reflecting its diverse range of habitats that give the Scrubs a sense of wildness. These designations include Local Nature Reserves and Sites of Importance for Nature Conservation~~.~~ and will be conserved and enhanced in accordance~~. In accordance~~ with policy EU2~~, these designations will continue to the conserved and enhanced so there is no net loss~~. Wormwood ~~Scrubs~~Scrubs' character as a publicly accessible open space that is more wild than tamed, will inform how the regeneration of Old Oak relates to Wormwood Scrubs. This range of designations, management arrangements and local interest of community groups will enable Wormwood Scrubs to be conserved and sensitively enhanced so it may successfully respond to the impacts resulting from the opening of Old Oak Common Station and the wider regeneration of Old Oak.

~~In 2016, the Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and security and new play equipment. OPDC will work with the Wormwood Scrubs Charitable Trust and LB Hammersmith and Fulham to consider the feasibility of implementing any measures in light of this information.~~

~~1.236~~ 1.209 Other ~~R~~recommended enhancements to Wormwood Scrubs include providing high quality access to nature, natural play and trails, ~~outdoor~~ and improved leisure and sports facilities. Any essential ancillary facilities will only be acceptable if they maintain the openness of the Scrubs reflecting its designation as Metropolitan Open Land. These facilities could include uses such as changing rooms, public toilets and nature education facilities. ~~The existing sports pitches and areas in the east and west of the Scrubs are also identified to be susceptible to surface water flooding which restricts their access and their use.~~ In delivering and / or contributing to high quality sports pitches, existing sports pitches should be retained and / or replaced at an equal or higher quality and function in accordance with Policy TCC6. The existing sports pitches and areas in the east and west of the Scrubs are ~~also~~ identified to be susceptible to surface water flooding which restricts their access and their use. Sensitive interventions within and around Wormwood Scrubs will be required to address this flooding which, if required, could also fulfil a more strategic management role (see policy EU3). ~~Further work will be required to define the amount, form, location and delivery of these elements.~~

~~1.237 The Wormwood Scrubs Survey, carried out in 2016, identified that there is a need for improved ancillary facilities, including toilets and a café. OPDC will work with the Wormwood Scrubs Charitable Trust, London Borough of Hammersmith and Fulham and local communities to appropriately secure these and other potential enhancements, subject to these maintaining its openness and according with its various designations.~~

~~1.238~~ Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. As such, existing communities ~~in~~ and proposed new communities in Old Oak to the north are not able, and will not be able to easily make use of the open space. ~~With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being.~~ The Wormwood Scrubs Act states that the Scrubs should be ~~enhanced~~ used as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area.

Commented [PF389]: Regulation 19(1) consultation amendment.
Reference: P12/24
Reason: To provide clarity regarding the roles of the London Borough of Hammersmith and Fulham and the Wormwood Scrubs Charitable Trust

Commented [PF390]: Regulation 19(1) consultation amendment.
Reference: P12/1
Reason: To continue to reflect Wormwood Scrub's more wild than tame nature.

Commented [PF391]: Specific amendment.
Reason: Relocated from above.

Commented [PF392]: Specific amendment.
Reason: To avoid repetition with policy.

Commented [PF393]: Regulation 19(1) consultation amendment.
Reference: P12/13
Reason: To provide suggestions of what appropriate ancillary facilities could include.

Commented [PF394]: Specific amendment.
Reason: To provide clarification for delivering high quality sports pitches

Commented [PF395]: Specific amendment.
Reason: To avoid repetition with paragraph above.

Commented [PF396]: Regulation 19(1) consultation amendment.
Reference: P12/24
Reason: To provide clarity regarding the roles of the London Borough of Hammersmith and Fulham and the Wormwood Scrubs Charitable Trust

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~~1.239~~ 1.210 As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. The following key walking and cycling routes and enhancements are ~~identified~~proposed:

a) from Old Oak Common Station and surrounds;
b) from Old Oak ~~North~~ Street via a ~~green~~ high quality bridge;
c) from Scrubs Lane via new and improved sensitively designed points of access;
~~d) from Scrubs Lane along a cycling Quietway located on the southern edge of the Scrubs connecting with North Kensington;~~
~~e)~~d) from Old Oak Common Lane via a widened footpath and segregated cycling lane; and
~~f)~~e) from Wormwood Scrubs Street running parallel to the northern boundary of the Scrubs.

Commented [PF397]: Specific amendment.
Reason: Quietway has now been delivered.

~~1.240~~ However, as development proceeds, there may be a need for additional or alternative locations/alignments for these accesses. The most up to date requirements are set out in OPDC's Infrastructure Delivery Plan (IDP).

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5. Design

INTRODUCTION

1.1 Design relates to all components of the built environment. Delivering a high quality and well-designed built environment for both Park Royal and Old Oak is fundamental to successful place making. It is also critical to long-term sustainability, resilience and ensuring integration with surrounding neighbourhoods.

1.2 High quality design has a number of positive interdependencies with sustainability. It can help improve people's physical, mental and emotional health and well-being. Good design is also a fundamental component in supporting and establishing an area's identity and informing people's perception of a place. It can contribute to people's sense of pride for where they live, work and play which in turn contributes to supporting thriving communities and a resilient local economy.

1.3 This chapter does not deal with the spatial locations for the elements of design and should be read in conjunction with the place policies and strategic policies contained within chapters 3 and 4 and specifically with Policy SP6 (Places and destinations) and Policy SP9 (Built Environment). It also has strong linkages with the Environment and Utilities Chapter (chapter 6) and the Transport Chapter (chapter 7).

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POLICY D1: SECURING HIGH QUALITY DESIGN

OPDC will support development proposals where they ~~demonstrate~~ have been subject to a high quality and comprehensive design process resulting in high quality design outcomes. To deliver this:

a) all development proposals should, where relevant and appropriate:

i. commit to using mechanisms to secure delivery of design quality, as defined in submission documents, where these elements are not approved on the grant of planning permission;

ii. make use of the OPDC Place Review Group and OPDC Community Review Group; and

iii. engage positively and proactively with OPDC and relevant statutory consultees ~~in pre-application discussions~~ as early as possible in the design process.

b) major ~~and strategic~~ development proposals should, where relevant and appropriate:

i. demonstrate use of best practice in developing project briefs;

ii. clearly demonstrate how different options for site development have been considered as part of the pre-application process;

~~iii. select a design team that has a range of skills and experience for delivering similar proposals in terms of scale, complexity, use of innovation and high quality design;~~

~~iv.~~iii. undertake proactive engagement with the community and potential end users to inform design in line with OPDC's Statement of Community Involvement (SCI);

~~v.~~iv. commit to providing a Section 106 monitoring contribution if the original design team is not retained for the detailed design stage; and

~~vi.~~v. for outline or hybrid applications, include binding design codes with the application material to inform design within development parameters at the reserved matters stage.

c) proposals referable to the Mayor should, where relevant and appropriate ~~pr~~ovide digital modelling and supporting data in an agreed format with OPDC officers during the development of design and at submission.

SUPPORTING TEXT

1.4 ~~The challenges in d~~Delivering on the principles of Good Growth ~~high density mixed use and industrial development~~ will require a high quality ~~design~~ development design process. The requirements for achieving high quality design are set out in the NPPF, the London Plan, Policy SP9 (Built Environment), the Places Chapter and the Design Chapter. These policies' requirements should be embedded from the beginning of the development design process and should be proportionate to the size and/or potential impact of the proposal.

Commented [PF1]: Specific amendment.
Reason: To provide clarity for the intentions of the policy.

Commented [PF2]: Regulation 19(1) consultation amendment.
Reference: D1/7
Reason: To reflect the establishment of the Community Place Review Panel to help shape planning proposals.

Commented [PF3]: Regulation 19(1) consultation amendment.
Reference: D1/1
Reason: To ensure appropriate consultees are engaged at appropriate times during the pre-consultation process.

Commented [PF4]: Specific amendment.
Reason: To support engagement to be carried out outside of the pre-application process

Commented [PF5]: Specific amendment.
Reason: To recognise that by setting out requirements for major development proposals, this also defines requirements for strategic development proposals.

Commented [TC6]: Regulation 19(1) consultation amendment.
Reference: D1/2
Reason: To avoid restricting procurement of design teams.

Commented [TC7]: Regulation 19(1) consultation amendment.
Reference: DI/15
Reason: To provide a direct linkage to Policy SP2 and aspirations to deliver Lifetime Neighbourhoods.

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1.5 ~~The culmination of this work will be expected to~~The development design process should deliver a high quality ~~designed~~ proposal supported by appropriate evidence that has been informed by an iterative process with clear development options considered with OPDC officers and submitted as part of planning applications for determination. OPDC will expect applicants to demonstrate a commitment to high quality design and not to include inappropriate substitutions ~~on the~~which compromise the quality of design. To support this approach, mechanisms, such as Section 106 agreements and conditions~~,~~ will be used to ensure that design quality is carried through into the detailed design and construction of the development.

1.6 The OPDC Place Review Group is an independent body used by OPDC to advise on the production of planning policy and development proposals. This group draws on its membership of experts from planning, landscape architecture, architecture, conservation, engineering and other built environment sectors. The OPDC Community Review Group is formed of local community representatives. The advice provided to OPDC by both these groups is ~~a~~ valuable ~~contribution~~ to the development design process. Proposals will be expected to be reviewed by these groups where relevant and appropriate. Further details regarding these groups is available on OPDC's website.

~~1.7 For major applications, design brief development should be informed by best practice guidance (such as that provided by the Royal Institute of British Architects (RIBA)) to ensure a design team is appointed with a range of appropriate skills and experience that also supports innovation and emerging practices. This should include skills and experience in public realm and landscape design and delivery.~~

~~1.8~~ 1.7 A critical component of successful proposals is ensuring that the design considers the people using and impacted by the development. As such, major applications will be supported where they demonstrate effective engagement with local communities and potential end users of the development. Further information is set out in OPDC's SCI. Continued learning following the implementation of development is also important. Developers will be required to undertaken post-occupancy surveys to support the delivery of high quality places (see Policy DI3).

~~1.9~~ 1.8 Amendments to the design of major applications can have a significant impact on the quality of the design by virtue of their scale and impact on surroundings. To manage any potential change to the design team, OPDC will expect a Section 106 monitoring contribution to be payable if the original architects or landscape architects are not retained for the detailed design stage. The contribution will be used to secure design advice on revisions to the scheme to ensure that the original design quality is maintained through detailed design. Contributions will need to be agreed on a case-by-case basis depending on the site specific circumstances.

~~1.10~~ 1.9 Major outline or hybrid applications should be supported by design guidelines secured as part of Section 106 agreements and / or planning conditions to ensure the delivery of high quality detailed design at reserved matter stage(s). Design codes should relate specifically to the proposal. Applicants will be expected to discuss the scope of their content with the case officer early in the ~~design~~ development design process to ensure a sufficient level of detail is provided. OPDC will expect design codes to include a sufficient level of detail for ground floors and where development addresses the street and wider public realm.

Commented [TC8]: Regulation 19(1) consultation amendment.
Reference: DI/7, DI4/3
Reason: To reflect the establishment of the Community Place Review Panel to help shape planning proposals.

Commented [TC9]: Regulation 19(1) consultation amendment.
Reference: D1/2
Reason: To avoid reD1/2stricting procurement of design teams.

Commented [PF10]: Specific amendment.
Reason: To avoid duplicating information set out in the previous sentence.

Commented [PF11]: Regulation 19(1) consultation amendment.
Reference: D1/3
Reason: To reflect the role of planning conditions to secure design guidelines.

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Proposals referable to the Mayor are defined in the glossary. Given the potential significant impact of these proposals, these schemes will require substantial analysis during their determination. To support this process, proposals will be expected to provide digital models and any other relevant data to OPDC, in formats agreed by OPDC officers, during pre-application discussions and at submission.

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POLICY D2: PUBLIC REALM

a) **Proposals will be required to contribute positively to the delivery of Healthy Streets and a high-quality, inclusive, accessible and coordinated multi-functional public realm by:**

   i. **ensuring the design of the public realm is an integral part of the scheme's design;**

   ii. **ensuring a coordinated approach between sites to improve existing public realm and provide new public realm;**

   iii. **delivering public realm and its component elements that respond to and enhance positive aspects of existing character;**

   iv. **using coordinated high-quality durable, adaptable and sustainable materials, finishes and details;**

   v. **supporting the activation of the public realm through maximising the use of positive and / or active frontages;**

   vi. **facilitating supporting the coordinated design, delivery, operation and management of infrastructure;**

   vii. **providing a balanced approach between security and design of the public realm that delivers appropriate security measures; and**

   viii. **providing and adhering to a clear, coordinated and robust public realm and open space management and maintenance strategy.**

b) **Proposals should, where feasible, include publicly accessible private realm that will be managed in accordance with the Mayor's Public London Charter and required to :**

c)b) **be available for unrestricted continuous public use and access from the date of occupation on a 24 hour 7 day a week free of charge basis, subject to permitted temporary closures, which is continuous, unrestricted and free of charge;**

   i. **ensure appropriate written notice of any closure is given to the OPDC; and**

   ii. **ensure any closure is for the minimum period reasonably necessary and temporary alternative legible routes are made available.**

d)c) **Proposals for advertisements will be required to:**

   i. **have a positive impact on associated buildings and surroundings in terms of their scale, form, location and illumination; and**

   ii. **have a neutral or positive contribution to amenity and public safety.**

Commented [PF12]: Specific amendment.
Reason: To ensure proposals deliver positive outcomes.

Commented [PF13]: Regulation 19(1) consultation amendment.
Reference: D2/2
Reason: To define linkages with the Mayor's aspirations to deliver Healthy Streets.

Commented [PF14]: Specific amendment.
Reason: To provide clarity for implementation of the policy.

Commented [PF15]: Specific amendment.
Reason: To provide clarity for implementation of the policy.

Commented [PF16]: Specific amendment.
Reason: To provide clarity for implementation of the policy.

Commented [PF17]: Specific amendment.
Reason: To align with Draft New London Plan guidance for securing public access and use to privately owned public realm.

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SUPPORTING TEXT

~~1.11~~ 1.10 The public realm acts as a way of siting buildings in their context. It provides access to, and a means to enjoy buildings. The public realm has the ability to 'make a place' and contribute to achieving the Mayor's aspirations to deliver Healthy Streets. It has many functions including providing space for recreation and social interaction, space for nature, supporting movement, climate change mitigation and adaptation and utilities provision. The OPDC Public Realm, Walking and Cycling Strategy identifies that within a high density context, delivering and coordinating these elements to create a high quality public realm is critical to enable OPDC to achieve its aspirations (as set out in policy SP9) for delivering a high quality built environment.

~~1.12~~ 1.11 The long term development of Old Oak and ongoing protection and intensification of Park Royal requires careful consideration of how the design, delivery and management of new and improved public realm is coordinated. Policy SP10 sets out this approach for all development. Proposals should ensure the design of the public realm is considered early in the ~~scheme~~ development design process and that consideration is given to the integration of the public realm with the surrounding built form and that it responds to local context and character. Proposals should make reference to the OPDC Character Areas Study (2017) to help deliver a network of distinctive places and neighbourhoods. In light of this, proposals will be required to submit material that clearly sets out how they have considered adjacent and connected sites, including highways, footpaths, servicing and entrances, to demonstrate how the consideration and coordination of the design, delivery and management of the public realm has been carried out.

~~1.13~~ 1.12 Component parts of the public realm should be integrated with the wider townscape and should be delivered to provide an uncluttered environment. Street planting should also consider the requirements set out in policy EU2 to contribute to the delivery of high standards of environmental sustainability.

~~1.14~~ 1.13 Developers will need to work collaboratively to deliver a coordinated range of materials, finishes and details that respond to and enhance local character. ~~The~~ Durability will be key within the high density environment created in the OPDC area. ~~use of coordinated appropriate durable, adaptable and sustainable materials, finishes and details for the public realm will play a key role in strengthening and establishing the local identity of areas. This is specifically relevant to respond to high density environments.~~ Within Old Oak temporary materials may need to be utilised during the construction phase and be coordinated with adjacent permanent areas of public realm. Policy EU8 provides guidance for using sustainable materials. ~~Developers will need to work collaboratively to deliver a coordinated range of materials, finishes and details that respond to and enhance local character.~~

Commented [PF18]: Regulation 19(1) consultation amendment.
Reference: D2/2
Reason: To define linkages with the Mayor's aspirations to deliver Healthy Streets.

Commented [TC19]: Specific amendment.
Reason: To remove repetition

Commented [TC20]: Specific amendment.
Reason: Relocated above

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~~1.15~~ 1.14 Proposals should define how they will support the activation of the public realm including the location of positive and active frontages to support natural surveillance and the positioning of seating or other elements of street furniture to encourage social interaction. These elements should be focused in appropriate locations of publicly accessible open spaces, town centres, clusters, canalside spaces and other accessible locations with good levels of direct sunlight (see Policy D6). The provision of positive and active frontages is also applicable to temporary frontages including hoardings. The provision of well-design hoardings will be particularly important for longer-term development sites such as those provided for transport infrastructure sites.

~~1.16~~ 1.15 To enable the effective management of the public realm and minimise disruption to its users, proposals should be designed to coordinate and support the functioning and access of subsurface transport, utility, green and data infrastructure. Proposals should draw from best practice in delivering coordinated infrastructure such as the integrated approach carried out at Kings Cross. OPDC will expect proposals to demonstrate how they are implementing appropriate technologies, such as sensors, to help coordinate the design, delivery, functioning and management of infrastructure in the public realm. See policy EU11 for further guidance on smart technology.

~~1.17~~ 1.16 Integrating security and resilience for emergency requirements within the public realm is important, specifically in busy areas such town centres, around catalyst uses and at rail stations. However, these components should also respond to the local character and context and not detract from the functioning of the public realm. Proposals should have regard to the appropriate guidance published by the National Counter Terrorism Security Office and the Centre for the Protection of National Infrastructure and should carry out early engagement with the Mayor's Office for Policing and Crime, the local Metropolitan Police Crime Prevention Design Advisor, other relevant emergency services and Counter Terrorism Security advisors.

~~1.18~~ 1.17 Proposals should be supported by clear public realm management and maintenance strategies as part of their Green Infrastructure and Open Space Management Plans (GIOSSMPs) that are proportionate to the type of planning application and informed by the latest OPDC, GLA and/or TfL public realm design guidance. The relevant local authority~~borough~~ should be consulted on their content at the earliest opportunity. These should set out responsibilities and indicative costs and funding arrangements for activities such as cleaning, landscaping maintenance, repair and replacement.

~~1.19~~ 1.18 The development of a new street and public realm network within Old Oak and improved walking and cycling connections in Park Royal will require privately owned land to be provided for public access and use. To create a well connected and permeable movement network, OPDC requires that suitable access arrangements are provided across this land and rights of use are secured for the public with required closures carefully managed. This will need to be implemented in accordance with the Mayor's Public London Charter. Potential reasons for closure could include responding to a case of emergency or danger to the public, maintenance requirements and servicing.

Commented [PF21]: Specific amendment.
Reason: To provide clarity that positive and active frontages is a requirement for temporary frontages including hoardings.

Commented [PF22]: Specific amendment.
Reason: To clarify location of information to be provided.

Commented [PF23]: Regulation 19(1) consultation amendment.
Reference: D2/4
Reason: To reflect the difference in detail provided for Full Planning Applications and Outline Planning Applications.

Commented [PF24]: Regulation 19(1) consultation amendment.
Reference: P1C1/7
Reason: To ensure local boroughs are engaged with the management and maintenance of proposed open spaces and public realm.

Commented [PF25]: Regulation 19(1) consultation amendment.
Reference: D2/2
Reason: To define linkages with the Mayor's aspirations to deliver Healthy Streets.

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~~1.20~~ 1.19 Advertisements can come in a range of formats and can include digital, illuminated and large-scale shrouds. Both large scale advertisements and a proliferation of smaller advertisements could potentially have a negative impact on amenity and public safety if not managed and designed appropriately to address their impacts. As such, OPDC will expect advertisements to be well-designed and have a neutral and/or positive impact on the public realm.

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POLICY D3: ACCESSIBLE AND INCLUSIVE DESIGN

Proposals will be supported where they:

a) **deliver development that is compliant with the latest guidance on accessible and inclusive design as an integral part of their design;**

b) **deliver accessible design solutions that meet the requirements of all users at all stages of their lives and contribute positively to ~~addressing~~ removing barriers that currently exist; and**

c) **engage with relevant stakeholders to inform proposals at the earliest opportunity.**

SUPPORTING TEXT

~~1.21~~ 1.20 Securing inclusive and accessible design is a fundamental component of delivering successful place making and sustainable communities.

~~1.22~~ 1.21 The comprehensive redevelopment of Old Oak represents an unparalleled opportunity to deliver a new part of London that is accessible and inclusive for all sections of the community. Policy SP2 recognises the importance of this and seeks to deliver inclusive Lifetime Neighbourhoods whilst Policy SP9 recognises the importance of access and inclusivity in the design of the build environment.

~~1.23~~ 1.22 To support this, OPDC will require proposals for buildings, open spaces, the public realm and infrastructure to adhere to the latest guidance on accessible and inclusive design. Proposals should demonstrate how this will be delivered as an integral part of the overall design to deliver useable and comfortable environments for all at all times of the day.~~.~~

~~1.24~~ 1.23 The existing transport infrastructure and level changes within Old Oak, along with the poor quality congested environment within Park Royal restrict accessibility across the area. ~~As such, i~~In accordance with this policy and P~~p~~olicy SP9, development will need to demonstrate a clear strategy for ~~addressing~~ removing these barriers and addressing level changes, utilising creative solutions where appropriate and relevant.

~~1.25~~ 1.24 Applicants will be required to work with a range of stakeholders to achieve this aspiration including the OPDC Place Review Group, OPDC Community ~~Place~~ Review Group~~Panel~~, local access groups and the GLA Strategic Access Panel. This engagement will be expected throughout the design development process in accordance with ~~p~~Policy D1.

~~1.26~~ 1.25 OPDC's sister organisation, the London Legacy Development Corporation (LLDC) has published Inclusive Design Standards which ~~will prove useful for information to~~could be used to inform proposals.

Commented [PF26]: Regulation 19(1) consultation amendment.
Reference: D3/4
Reason: To recognise changing needs of local people.

Commented [PF27]: Specific amendment.
Reason: To provide clarity for implementation of the policy.

Commented [PF28]: Specific amendment.
Reason: To ensure access is available throughout day and night.

Commented [PF29]: Specific amendment.
Reason: To provide clarity for implementation of the policy.

Commented [PF30]: Regulation 19(1) consultation amendment.
Reference: D1/7
Reason: To reflect the establishment of the Community Place Review Panel to help shape planning proposals.

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POLICY D4: WELL-DESIGNED BUILDINGS

a) Proposals for new buildings, alterations and extensions will be supported where they:

i. respond positively to the character of the existing context and / or positively contribute to the delivery of new positive character;

ii. make a positive contribution to the existing and future townscape including delivering high quality active façade design and maximising the delivery of positive frontages with particular attention paid to corners, entrances and openings;

iii. use high-quality durable, adaptable and sustainable materials, finishes and details that enhance local character;

iv. deliver well designed internal spaces that are suitable for their intended use, are adaptable and contribute to a high quality of life for building users;

v. deliver floorspace and elements of their design that support the sharing economy; ~~and~~

vi. provide a balanced approach between security and design of development that maximises buildings' resilience and fire safety in accordance with the latest Building Regulations and London Plan policies and delivers appropriate ~~safety and~~ security measures.

~~vi. policies.~~

b) Proposals will be supported where roofs are~~; :~~ :

i. designed to minimise the provision of, and ~~visible~~visibility of, plant and building services equipment;~~,~~

~~i.~~ii. optimised in terms of their use for biodiversity, renewable energy generation and green open space, including play space; and

~~ii.~~iii. designed to a high quality when viewed from the public realm and upper floors of surrounding buildings.~~;~~ ~~and~~

~~iii.i. designed to minimise visible plant and building services equipment.~~

c) Proposals for publicly accessible commercial uses, including shopfronts, will be supported where they:

i. provide open, positive and active frontages on to the public realm that contribute to creating a rhythm to the street frontage;

ii. respond to the internal design of the commercial floorspace;

iii. relate sympathetically to the design and materials of the upper parts of the building, adjoining buildings and shopfronts and parts of existing shopfronts that are being retained;

iv. do not result in the loss or partial loss of existing shopfronts which are of architectural interest; and

v. deliver appropriate position, materials and robustness of alarm boxes, waste storage, air conditioning units, security rollers, shutters and cameras and forecourt trading facilities.

d) achieve BREEAM Excellent rating for non-residential development.

Commented [PF31]: Specific amendment.
Reason: To provide clarity for implementation of the policy.

Commented [TC32]: Regulation 19(1) consultation amendment.
Reference: D5/7
Reason: To provide clear references to guidance regarding the roles of Building Regulations and planning policy in delivering the highest standards of fire safety.

Commented [DE33]: Regulation 19(1) consultation amendment.
Reference: EU9/8
Reason: Relocated from EU9 for ease of use.

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SUPPORTING TEXT

~~1.27~~ 1.26 The delivery of high quality design that responds to and enhances existing and emerging character is fundamental to the successful regeneration of Old Oak and Park Royal. This will be of particular importance where buildings are well used, such as rail stations, civic, cultural and other public buildings and OPDC will work positively with stakeholders to ensure that such buildings are of an outstanding design quality.

~~1.28~~ 1.27 A key component to the delivery of well designed buildings is the consideration of their relationship to their surrounding context. By relating well to existing positive elements of the local character and context, proposals can enhance positive elements of character and help to inform new character areas to nurture a sense of place. This will be critical during the long term development of Old Oak and evolution of Park Royal. Alongside information within OPDC's Character Areas Study, the historic environment will be key in informing this process. See Ppolicy D8 and OPDC's Heritage Strategy for further information.

~~1.29~~ 1.28 The interface between the design of a building and public realm needs careful consideration to ensure they complement one another and enhance the local character and environment (see Policy D2). Components of buildings should enhance and support townscape and the functions of the public realm, including, maximising the delivery of positive and active frontages, at the ground and lower floors. Other elements of the façade will need to be considered, including corners, entrances and access points, that are designed and coordinated to complement the public realm and adjacent buildings. High quality facades should seek to create a sense of depth, animation and texture. Amenity will also be an important factor in considering how a building contributes to the townscape, Ppolicy D6 provides relevant guidance.

~~1.30~~ 1.29 Materials that are durable, adaptable and sustainable will play a key role in delivering a network of distinctive and resilient places. The high density environment of Old Oak and industrial nature of Park Royal will require the use of materials that are hard-wearing, weather well and are adaptable. This is specifically relevant to Old Oak where temporary materials may need to be utilised during the construction phase. For both permanent and temporary materials, the use of sustainable coordinated materials will be critical (see policy EU8).

~~1.31~~ 1.30 For the internal design of buildings, spaces will need to be well designed and submission material should include detailed information setting out how they are suitable for their intended use including reference to the latest guidance and / or standards.

~~1.32~~ 1.31 To further support the efficient use of space, proposals should demonstrate how they are supporting the sharing economy~~-~~. The sharing economy enables the efficient use of space and resources while contributing to facilitating social interaction. Further information can be found in OPDC's Circular and Sharing Economy Study. This may include providing shared facilities such as laundries and providing access to 'occasional use' assets such as tools and communal kitchens.

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1.32 Integrating security and resilience for emergency service requirements within developments ~~are~~is critically important, specifically ~~in for~~within tall buildings and in busy areas such town centres, around catalyst uses and stations. Approval may be required under the Building Regulations to make sure that existing and proposed development is constructed or adapted appropriately. The new draft London Plan also provides guidance to deliver the highest standards of fire safety including requirements for major development proposals. Building Regulations are separate from planning guidance. Approval under Building Regulations does not mean that planning permission has been given, nor does a planning permission imply approval under the Building Regulations.

Commented [PF34]: Regulation 19(1) consultation amendment.
Reference: D5/7
Reason: To provide clear references to guidance regarding the roles of Building Regulations and planning policy in delivering the highest standards of fire safety for all buildings, including tall buildings.

1.33 ~~However, these c~~Components required for ~~emergency~~security ~~requirements~~ should ~~also~~ respond to the local character and context. Proposals should have regard to the appropriate guidance published by the National Counter Terrorism Security Office and Centre for the Protection of National Infrastructure and carry out early engagement with the Mayor's Office for Policing and Crime, the local Metropolitan Police Crime Prevention Design advisor, other relevant emergency services and Counter Terrorism Security advisors.

1.34 The amount of high density development in Old Oak will provide an extensive area of roof space alongside the existing roof space in Park Royal. Roof space provides opportunities to deliver a range of functions if appropriately designed and maintained. It offers the potential to help OPDC meet its environmental standards by providing open space, access to biodiversity, play space, space for renewable energy generation and visual amenity from both the street and adjacent buildings. To support these diverse roles, building services and plants should be minimised where feasible and appropriately screened and integrated within the design of the roof space.

1.35 Publicly accessible commercial uses, including shopfronts have an important role in place making as they are the most significant interface between buildings and the public realm. New commercial ground floor A-class floorspace that is accessible to the public should demonstrate how the design of the shopfront has an active frontage and is accessible, relates to the internal design of floorspace, public realm and architecture of the building and adjacent buildings. Solid and perforated roller shutters can have a negative impact on the public realm. Where roller shutters are considered necessary, internal perforated shutters with high amounts of visibility should be located within the shop unit.

Commented [PF35]: Specific amendment.
Reason: To support activation of the public realm.

1.36 To conserve and enhance local character, OPDC will seek to retain existing shop fronts it considers to be of architectural interest. Design should also carefully consider the location, materials and robustness of alarm boxes, canopy boxes and security cameras to avoid undermining the appearance of new developments.

Ensuring development is environmentally sustainable is critical to delivering the Local Plan spatial vision. To deliver and demonstrate this, non-residential development, both stand-alone and as part of mixed use development, will be expected to deliver the Building Research Establishment Environmental Assessment Method (BREEAM) Excellent rating. BREEAM is the most widely recognised UK industry standard for assessing environmental standards in non-residential buildings. As an independent assessment process it provides an objective way to assess the quality of development. The assessment rates buildings from unclassified to outstanding. 10% of new non-domestic buildings are achieving Excellent. Where environmental considerations are designed into a development from the start they are achieving this at very little additional cost. OPDC therefore will require all new non-domestic buildings to achieve a minimum of Excellent. Residential development will be expected to accord with the relevant latest London and national guidance.

Commented [DE36]: Regulation 19(1) consultation amendment.
Reference: EU9/8
Reason: Relocated from EU9 for ease of use.

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POLICY D5: TALL BUILDINGS

Proposals for tall buildings will be supported as an appropriate form of development in principle where they:

a) **accord with latest relevant national guidance, London Plan policies, policy SP9 and relevant policies within the Places Chapter;**

~~a)~~

~~b) deliver outstanding standards of design including:~~

~~i.) making a positive contribution to the skyline;~~

~~ii.) taking into consideration the cumulative effect of other proposals;~~

~~making a positive contribution to the design and use of the public realm; and~~

~~iii.) .;~~

~~i. careful consideration of silhouettes and tops of buildings; and~~

~~c)~~ **deliver significant benefits for the surrounding area and communities including ~~including:~~**

~~d) delivering high quality publicly accessible open space as focal points within the public realm for a range of publicly accessible functions within their curtilage;~~

~~e)~~ **promoting legibility to destinations;** ~~and~~

~~f)~~b) ~~enhancing the skyline and identity of an area;~~

~~i. according with housing policies set out in the Housing Chapter; and~~

~~ii. delivering and/or contributing to social infrastructure and / or other publicly accessible community orientated uses and/or physical infrastructure.~~

~~g)~~c) **undertake proactive engagement with the community and other relevant stakeholders, including the Greater London Authority and Historic England~~, in relation to the location, height, scale, massing and design of tall buildings~~; and**

~~h) do not adversely impact the amenity of their surroundings in terms of:~~

~~i. microclimate;~~

~~ii. overshadowing and daylight and sunlight;~~

~~iii. wind turbulence;~~

~~iv. air quality;~~

~~v. noise;~~

~~vi. lighting;~~

~~vii. reflected glare;~~

~~viii. aviation;~~

~~ix. navigation; and~~

~~x. telecommunications.~~

~~i)~~d) **accord with relevant guidance for RAF Northolt safeguarding zones including consulting with the Defence Infrastructure Organisation on any proposals of 91.4m ~~and~~ above ground level.**

Commented [PF37]: Specific amendment.
Reason: To align with terminology set out in Draft New London Plan Policy D8

Commented [PF38]: Specific amendment.
Reason: To avoid duplication with Draft New London Plan policy D8(C)(1)(a)(i).

Commented [PF39]: Specific amendment.
Reason: To avoid duplication with policy SP8 and reflect site specific circumstances this information has been relocated to the supporting text of this policy.

Commented [PF40]: Specific amendment.
Reason: To avoid duplication with Draft New London Plan Policy D8.

Commented [PF41]: Specific amendment.
Reason: To avoid duplication with the Housing Chapter.

Commented [PF42]: Specific amendment.
Reason: To avoid duplication with the policies TCC4 and DI1.

Commented [PF43]: Specific amendment.
Reason: Moved to supporting text to shorten policy.

Commented [PF44]: Specific amendment.
Reason: To avoid duplication with Draft New London Plan Policy D8 and Local Plan Policy D6.

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SUPPORTING TEXT

6.39 Tall buildings within the OPDC area are defined as those above 15 storeys or 48 metres above ground level. High quality tall buildings at appropriate locations shown in figure 3.15~~x~~ will be a component element of the built character and environment of the OPDC area and will be supported where they accord with the relevant development plan policies. The London Plan provides guidance for the delivery of tall ~~and larger~~ buildings that will also be used in determining applications. Policy SP9 and the Places chapter set~~s~~ out the spatial approach for tall building locations across the OPDC area. ~~This policy is further supplemented by further spatial guidance within the Places Chapter.~~

6.40 Tall buildings have the potential to positively shape the skyline of the local area and west London. However, if tall buildings are not adequately designed they can negatively impact on the functions of adjacent buildings, public realm, spaces and heritage assets. Considering the design, elegance, architectural treatment and materials of a tall building, how the lower floors relate to the public realm and relationship to other existing and planned buildings, will all be of particular importance when considering the effect of a tall building on the skyline and surrounding areas.

6.41 To ensure proposals for tall buildings have a positive impact, OPDC will expect the architectural design to be of the highest quality. Proposals should clearly demonstrate through appropriate townscape analysis, including verified views, how they positively contribute to an elegant skyline.

~~a.~~ ~~The increased development capacity of tall~~Tall buildings ~~can~~ should deliver significant benefits for both the surrounding built environment and existing and future local communities. Benefits ~~can~~could include provision of publicly accessible open space, social infrastructure and affordable workspace. ~~–~~Any proposed benefits should be clearly set out as part of an applicant's Planning Statement.~~Proposals should be supported by a statement demonstrating how they will deliver these benefits.~~ ~~This statement should include how the consideration of appropriate financial viability elements has informed the delivery of any benefits.~~

6.42 Due to the prominence of tall buildings and interest of existing communities, OPDC will expect applicants to demonstrate proactive engagement with the community and other stakeholders to enable the design of proposals to respond to comments.

6.43 Managing potential harmful impacts of proposals is a critical component in determining the appropriateness of a tall building. Proposals should accord with policy D6 and relevant London Plan policies in protecting amenity and be supported by information clearly demonstrating how they do not adversely impact on their surroundings. Specific consideration should be given to the impacts on the amenity of existing residential neighbourhoods and publicly accessible and private open spaces. ~~To support their approach to lighting, proposals should be supported by a lighting strategy.~~

6.44 Old Oak and Park Royal is located within the safeguarding zone surrounding RAF Northolt and ~~any proposal should accord with the latest guidance~~consultation should be

Commented [PF45]: Specific amendment.
Reason: To meet requirements of Draft New London Plan Policy D8.

Commented [PF46]: Specific amendment.
Reason: To meet requirements of Draft New London Plan Policy D8.

Commented [PF47]: Specific amendment.
Reason: To standardise terminology with Draft New London Plan Policy D8.

Commented [PF48]: Specific amendment.
Reason: Moved to supporting text from policy to shorten policy wording.

Commented [TC49]: Specific amendment.
Reason: To align with changes made to OPDC's Validation Checklist and simplify the number of documents required.

Commented [PF50]: Specific amendment.
Reason: To avoid duplication with Local Plan and Draft New London Plan viability requirements.

Commented [KT51]: Specific amendment.
Reason: To avoid duplication with the Design and Access Statement

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carried out with the Defence Infrastructure Organisation on any buildings which exceed the height threshold.~~.~~

POLICY D6: AMENITY

Proposals will be required to deliver an appropriate standard of amenity by:

a) submitting a Daylight, Sunlight and Microclimate Assessment where the scale of proposed buildings ~~proposed~~ has the potential to affect the amenity of ~~light to~~ sensitive neighbouring uses ~~or the design of development has the potential to restrict internal levels of natural light for proposed residential units~~.;

b) achieving the benchmarks for amenity set out in table 5.1 or alternatives agreed with OPDC;

c) implementing the Agent of Change principle so that:

   a. new development does not materially affect the ongoing functioning of existing employment uses and/or town centre uses; and

   b. new development does not cause unacceptable harm to the amenity of existing uses;

~~a) :~~

~~b)~~d) maximising the quality and availability of daylight and direct sunlight within buildings and to the public realm;

e) delivering appropriate levels of privacy;

~~c)~~f) ensuring bedrooms are located away from and / or designed to mitigate light pollution;

~~d)~~g) ensuring proposals that include residential private and / or communal open space:

   i. receives direct sunlight for ~~part~~ a reasonable period of the day;

   ii. supports integrated solutions for food growing; and

   iii. are located away from and/or designed to mitigate air, light and noise pollution~~ng activities where possible~~.

~~e)~~h) minimising the effects of the urban heat island effect by:

   i. requiring proposals referable to the Mayor of London to undertake modelling to identify potential impacts on the urban heat island effect; and

   ii. mitigating overheating of public realm where impacts are identified by utilising appropriate mitigation measures.

~~f)~~i) minimising excessive wind speeds generated by development by:

   i. requiring proposals referable to the Mayor of London to undertake wind tunnel modelling early in the design process; and

   ii. mitigating negative impacts on buildings and the public realm where identified including through the use of green infrastructure.

Commented [PF52]: Specific amendment.
Reason: To standardise terminology.

Commented [PF53]: Specific amendment.
Reason: To provide clear requirements for submission of a Daylight, Sunlight and Microclimate Assessment

Commented [PF54]: Specific amendment.
Reason: To avoid repetition elsewhere in the Local Plan and ensure that the amenity of existing residential and employment/town centre uses are protected.

Commented [PF55]: Specific amendment.
Reason: To accord with Draft New London Plan policy D12 and the NPPF.

Commented [PF56]: Regulation 19(1) consultation amendment.
Reference: EU4/1
Reason: To ensure residential amenity is protected from inappropriate levels of light pollution.

Commented [PF57]: Specific amendment.
Reason: To provide stronger protection of amenity of communal open spaces.

Commented [PF58]: Specific amendment.
Reason: To provide stronger protection of amenity of communal open spaces.

Commented [PF59]: Specific amendment.
Reason: To provide stronger protection of amenity of residential open spaces.

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SUPPORTING TEXT

New development will need to deliver a high standard of amenity during the construction and operation of development in terms of privacy, overshadowing, air quality, noise and light pollution, daylight/sunlight, wind and microclimate for future building users and neighbours. This should be demonstrated within a Daylight, Sunlight and Microclimate Assessment, supporting applications. where the proposed development has the potential to affect light tothe amenity of sensitive neighbouring uses, which could include . Sensitive neighbouring uses includessuch as housing, publicly accessible open spaces and social infrastructure such as schools. During the design, construction and operation of development, OPDC will work with stakeholders to minimise negative impacts.

Development within Old Oak and Park Royal will be high density. If not designed to a high standard, high density development can have a negative impact on amenity. The OPDC's Environmental Modelling Framework Study and OPDC's Environmental Standards Study show that to deliver a high standard of amenity within a high density environment, specific approaches are required that complement recognised methodologies. As such, OPDC has developed the OPDC Environmental Modelling Framework shown in table 5D6.1, to identify which methodologies for measuring appropriate levels of amenity are most effective for a high density area. These methodologies may evolve over time and it will be important to discuss and agree with OPDC officers which methodology is most appropriate to use.

Proposals should seek to achieve the benchmarks in table D6.1, however OPDC recognises that there may be instances where a degree of flexibility will be required where development will deliver other substantial benefits for the wider area. Further to these environmental modelling conditions, applicants should also give full consideration to how the design of development can ensure adequate standards of amenity.

There are a number of existing employment, town centre and residential uses within and around the OPDC area and it is important that the amenity and continuing effective function of these uses is appropriately safeguarded. To ensure this, OPDC will employ the Agent of Change principle. The onus will be on the applicant (as the Agent of Change) to demonstrate that existing uses can continue to function and/or that their amenity is not unacceptably harmed.

Privacy levels can impact on the usability of a space. For residential uses, careful consideration will need to be given to the design and location of habitable rooms, including the location and design of bedrooms to mitigate light pollution. .

Apartments will comprise the majority of housing in Old Oak. Private open space will mainly be provided as balconies alongside terraces and roof gardens. These private open spaces need to be positioned where they are comfortable to use and of sufficient size to enable them to be used as outside living space. In addition to the latest GLA housing design guidance, pPrivate and communal open spaces should preferably have a southerly aspect to benefit from direct sunlight during the day. To support their usage, where possible, they should be positioned away from, or designed to mitigate, sources of noise and poor air quality that would make them unpleasant to use. Facilities to support food growing, should be incorporated into balcony, terrace and roof design and loading capacity.

Commented [PF60]: Specific amendment.
Reason: To provide clear requirements for content of Daylight, Sunlight and Microclimate Assessments

Commented [PF61]: Specific amendment.
Reason: Relocated above to shorten supporting text.

Commented [TC62]: Specific amendment.
Reason: To accord with Draft New London Plan policy D12 and the NPPF and avoid repetition elsewhere in the Local Plan

Commented [PF63]: Regulation 19(1) consultation amendment.
Reference: EU4/1
Reason: To ensure residential amenity is protected from inappropriate levels of light pollution.

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Enclosing balconies as glazed, ventilated winder gardens should be explored at higher storeys, in locations exposed to Noise Exposure Category C or D or areas of high wind. Winter gardens should be thermally separated from the interior with drainage integrated with the floor.

High density development can give rise to the urban heat island effect. As building regulations become more stringent, buildings are increasingly suffering from overheating. The reasons for this are complex and are set out in the OPDC Environmental Standards Study but multi-storey high density development is particularly susceptible to overheating. In light of this, proposals referable to the Mayor of London (defined in the Mayor of London Order 2008) ~~are required to~~should undertake modelling to assess the cumulative impact of existing and committed development and to mitigate impacts where necessary.

The use of green infrastructure including but not limited to trees, open space, embankments, water features, the Grand Union C~~e~~anal, fountains and streams and open water bodies can significantly reduce the urban heat island effect. However, these elements need to be carefully designed in order to balance the need for winter solar gain and sufficient daylight, with protection against overheating. Dynamic models should be used and the effectiveness of these interventions assessed as part of a post occupancy survey (see Policy DI3) to evaluate building performance. Green infrastructure can also be an effective way to screen and protect sites against turbulence, wind tunnelling and noise caused by high density development.

Objective	Masterplanning Scale	Building Scale	Justification
Internal Daylight	Metric: Vertical Sky Component (VSC) Benchmark: Building Research Establishment (BRE) 209 (2011) Min. 15% VSC at the centre of the lowest window where daylight is required. Method: BRE 209 (2011) methodology.	Metric: Vertical Sky Component (VSC) and Average Daylight Factor (ADF) Benchmark: BRE 209 (2011) VSC: Min. 15% at the centre of the lowest window where daylight is required. ADF: 1% for bedrooms, 1.5% for living rooms, 2% for kitchens. Method: BRE 209 (2011) methodology supported by detailed calculations with radiance-based engine.	OPDC's Environmental Modelling Framework Study recommends the use of the Useful Daylight Illuminance (UDI) metric and WELL Building Standards as a benchmark to measure internal daylight for proposals at both the masterplanning and building scales. At the masterplanning scale, this approach relies on assumptions to be made for each proposal on a case-by-case basis. However, in light of the level of detail provided for outline planning applications at the masterplanning scale, these assumptions may not be reflected in the related detailed planning applications limiting their use. Therefore, OPDC considers that the use of the recognised BRE 209 methodology, measuring the VSC of proposals, is more appropriate for the level of detail provided for masterplan scale applications. At the building scale, UDI relies on the use of detailed localised climatic modelling. This considers the annual variation in exterior illumination generated by the sun's position and cloud cover. However, in considering this approach, relevant modelling information is currently not available for the OPDC area. As such, OPDC considers that the use of the recognised BRE 209 methodology, measuring the VSC and ADF of proposals, is more appropriate given current availability of information. Should detailed data be made available, OPDC will work with applicants to determine the approach to use. For both scales, OPDC welcomes the use of emerging best practice methodologies to measure internal daylight. This should be discussed and agreed with OPDC.
Internal Sunlight	Metric: Annual Probable Sunlight Hours (APSH) Benchmark:		In addition to daylight, direct sunlight can contribute to making an indoor space pleasant and enjoyable. Sunlight also provides direct solar gains which can passively heat a space during the winter, but could also contribute to

	Building Research Establishment (BRE) 209 (2011) min. 5% APSH between equinoxes and 25% annually Method: APSH on solar collecting façades with radiance-based model.		overheating in summer. The requirements of the BRE Guidelines are based on Annual Probable Sunlight Hours (APSH) and set a minimum of 25% APSH over the entire year and 5% APSH during winter months. The OPDC Environmental Modelling Framework Study identifies that using radiance based modelling is appropriate.
Outdoor Sunlight on Public Realm	Metric: Sunlight hours in external space Benchmark: BRE 209 (2011) 2 hour sunlight on 21 March over half the area and 4 hour in dedicated play space. Also consider seasonal sunlight throughout the year in combination with air temperatures. Method: Radiance-based model. Use UMI's Outdoor Comfort Module to perform seasonal analysis of sunlight hours and temperatures when available.		Whilst much of peoples' time is spent indoors, it is vital to provide a welcoming outdoor environment which encourages physical activity, social interaction and community cohesion. Sunlight in the public realm plays a major role in encouraging the above activities because it can draw people outdoors to interact with others, nature and the built environment. This is an important element to consider when planning a high density development and to best ensure the effective use of the planned public realm. To deliver this, proposals should consider the cumulative design of a group of buildings to best deliver good levels of daylight and sunlight throughout the year, including during the winter months. OPDC's Environmental Modelling Framework Study identifies that the standard metric used to assess outdoor sunlight provision is direct sunlight hours falling on a space. The BRE Guide recommends that outdoor spaces should receive at least 2 hours of sunlight over half the space on March 21. Based on a review of best practice, the OPDC Environmental Modelling Framework Study identifies that for areas of dedicated play space, at least 4 hours of sunlight on March 21 should be achieved.
Urban Wind	Metric: Wind speeds and associated frequencies Benchmark: Follow BRE 380 best practice guidance. Method: Wind rose-based assessment	Metric: Wind speeds and associated frequencies Benchmark: Lawson Wind Comfort Criteria and consideration of dispersion of pollution and urban heat island effect Method: Wind tunnel testing as a priority. If it is agreed that this is not required, developers should use of Computational Fluid Dynamics.	High density development and tall buildings can significantly impact wind speeds and characteristics, natural ventilation, temperature, pollution levels, local comfort and health and wellbeing. This can in turn influence the use of publicly accessible open spaces. Creating a comfortable environment is an important component of successful place making. Proposals referable to the Mayor of London (defined in the Mayor of London Order 2008) are therefore required to undertake this modelling. The OPDC Environmental Modelling Framework Study identifies that the common approach to modelling of urban wind at the masterplanning scale currently utilises wind roses alongside qualitative considerations based on best practice principles, such as BRE 380 Guide. This approach is recognised to currently be appropriate subject to future parametric modelling being made available. The study also identifies that the standard modelling of urban wind at a building scale is carried out using Computational Fluid Dynamics (CFD) or wind tunnel testing which tend to focus on pedestrian comfort using the Lawson Comfort Criteria. This is considered to be appropriate for Old Oak and Park Royal; however, consideration will also need to be given to modelling impacts of the urban heat island effect.
Energy Efficiency - Control of Solar Gains	Metric: Summer façade irradiation Benchmark: None. Compare with Part L reference case to identify potential issues Method:	Metric: Internal temperatures (naturally ventilated) or cooling energy use (mechanically cooled) Benchmark: Pass two of Chartered Institution of Building Services Engineers (CIBSE) TM52	While ensuring adequate daylight and solar access is essential in providing a healthy built environment, this must be considered alongside energy efficiency and thermal comfort. Increased summer solar gains can result in overheating in naturally ventilated buildings and increased energy use in mechanically cooled buildings. At a masterplanning scale, summer irradiance levels is identified by the OPDC Environmental Modelling Framework

	Radiance-based model	overheating criteria or minimise cooling energy use. Method: Dynamic thermal simulation at building scale.	Study as an appropriate metric that should be compared to Building Regulations Part L to identify issues. At a building scale, the Study identifies that internal temperatures or cooling energy use are appropriate metrics. Detailed dynamic thermal analysis is recommended to assess the risk of summer overheating from solar gains. In accordance with the study, the industry best practice of using CIBSE TM52 should be utilised.
Energy Use - Space Heating	Metric: Space heating energy use Benchmark: Minimise energy use beyond compliance with Part L Method: UMI 'shoeboxer' or degree-day approach for comparative assessment	Metric: Space heating energy use Benchmark: Minimise energy use beyond compliance with Part L Method: Thermal simulations at building scale.	On the one hand, a consequence of designing for improved daylighting is the potential increase in building heat losses through the fabric due to higher glazing ratios and greater envelope-to-space ratio. This can result in increased space heating energy use. On the other hand, maximising access to sunlight will likely increase winter solar gains and reduce space heating energy use. The OPDC Environmental Modelling Framework Study identifies that Massachusetts Institute of Technology (MIT) have developed Urban Modelling Interface software using the industry standard Energy Plus simulation which enables the efficient and effective modelling of space heating at a masterplan scale. The study recommends the use of the approach for assessment of schemes. At a building scale, detailed space heating use compared to Building Regulations Part L is recommended by the study to be undertaken with detailed thermal simulations carried out.

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POLICY D7: KEY VIEWS

Proposals that impact on a key view will be supported where they:

a) contribute positively to the character and composition of identified key views relevant to the proposal; and

b) define, assess and justify their impact on any other views relevant to the proposal and clearly demonstrate how it delivers a positive contribution to the relevant key views.

SUPPORTING TEXT

Development within the Old Oak and Park Royal area will be visible from the surrounding areas. This new development can help to positively shape key views from within and outside of the area. Development can also provide visual interest and contribute to informing the local character and identity of the area.

The level of development proposed at Old Oak and parts of Park Royal will be visible from certain locations across London and can help to mark its location as a major new centre. OPDC will seek to ensure that the new skyline of Old Oak and Park Royal makes a positive contribution to the character and identity of the wider area through its composition and quality in key views. To deliver this, proposals within the OPDC area will need to carefully coordinate their layout and massing to ensure that key views experienced will contribute to creating a successful and, distinctive place.

Commented [PF64]: Regulation 19(1) consultation amendment.
Reference: D7/3
Reason: To clarify policy relates to views to development within the OPDC area.

The OPDC Views Study identifies the following types of key view:

Panoramas – views taken from across London at elevated publicly accessible locations;
Kinetic views – views taken from around that show view Old Oak and Park Royal along elevated movement routes;
Open space views - views taken from nearby publicly accessible open spaces;
Linear views – views taken along streets, paths and the Grand Union Canal within and round Old Oak and Park Royal; and
Heritage views – views relating to the setting of heritage assets.

Proposals that impact on the key views shown in figure 5.7 should define, assess and justify the impact on the relevant view and clearly demonstrate how it delivers a positive contribution to the relevant key views. Some views may require a greater level of assessment, while some views may require less, such as kinetic views, where it would be difficult to identify a specific point to assess the view from. This iInformation for assessing impacts on views should be contained within a Townscape/Visual Impact Assessment. Other views relevant to each proposal will also need to be identified by the applicant in discussion with OPDC, and assessed and justified as required. Given heritage assets within and around the area, this process will also likely require input from Historic England.

Commented [PF65]: Regulation 19(1) consultation amendment.
Reference: D7/5
Reason: To clarify selection of views will be carried out on a case by case basis and level of detail for each type of view may vary.

Assessments should include verified daytime, evening and night-time views that consider tree coverage and cumulative impacts from other permitted development, proposals and relevant OPDC planning guidance. This information should be provided in static images and as digital modelling data in a format to be agreed with OPDC. Specific consideration will be given to how the silhouette, bulk, massing and elevational treatment of development impacts on key views.

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POLICY D8: HERITAGE

a) **Proposals should conserve and enhance the historic environment;**

~~a)~~b) OPDC will give great weight to the conservation and enhancement of the significance of designated heritage assets, including their settings. Proposals harming the significance of a designated heritage asset should be justified having regard to their heritage interest, reasonable alternatives to avoid of mitigate harm and delivery ofthe~~-~~ public benefits ~~of the proposal or the viable reuse of an asset;~~

c) Proposals which have the potential to affect the significance of non-designated heritage assets, set out in table 5.X, ~~will be supported where they~~should undertake the following sequential approach:

i. positively responding to non-designated assets in their design; or

ii. avoiding unjustifiable harm to non-designated heritage assets; or

iii. demonstrating the rationale for any justifiable harm to non-designated heritage assets; or

iv. for proposed demolition of all or part of a non-designated heritage asset, provide a justification that all reasonable attempts have been made to retain all or part of the asset and demonstrate how the asset has been used to inform the character of new development;

~~b)~~d) **Proposals** which have the potential to impact upon any affected heritage assets and their settings **will be supported where they submit a Heritage Impact Assessment that sets out:**

i. **a description of the significance of any affected heritage assets and their settings;**

ii. how they accord with the latest relevant national guidance and London Plan policies;

iii. how they justify any harm to the significance of designated heritage assets and accord with the sequential approach for managing harm to the significance of non-designated heritage assets at c);

~~ii.~~iv. **how they promote the significance of any affected ~~designated and non-designated~~ heritage assets and their settings;**

~~iii.~~i. ~~how they accord with the latest relevant national guidance and London Plan policies;~~

~~iv.~~v. **how they positively respond to the relevant OPDC heritage themes in their design; and**

~~c)~~ **if relevant, a commitment to demolishing a building in a conservation area only after approval of a replacement building.**

~~d) Proposals affecting the significance of non-designated heritage assets, set out in table 5.2, will be supported where they undertake, and demonstrate within a Heritage Impact Assessment, the following sequential approach:~~

~~i. positively responding to non-designated assets in their design; or~~

~~ii. avoiding unjustifiable harm to non-designated heritage assets; or~~

~~iii. demonstrating the rationale for any justifiable harm to non-designated heritage assets; or~~

Commented [PF66]: Regulation 19(1) consultation amendment.
Reference: D8/4 and D8/23 (part of)
Reason: To ensure the Local Plan provides guidance for designated assets at the request of Historic England.

Commented [PF67]: Specific amendment.
Reason: Relocated from below to flow on from new designated assets policy above.

Commented [PF68]: Specific amendment.
Reason: To enable new development to reflect existing character.

Commented [PF69]: Specific amendment.
Reason: To clarify implementation of the policy

Commented [PF70]: Specific amendment.
Reason: Relocated from below to support flow of policy.

Commented [PF71]: Regulation 19(1) consultation amendment.
Reference: D8/4
Reason: To ensure the Local Plan provides guidance for designated assets at the request of Historic England.

Commented [PF72]: Specific amendment.
Reason: To avoid repetition within the policy.

Commented [PF73]: Specific amendment.
Reason: Relocated to above to support flow of policy.

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~~iv.~~v. ~~for proposed demolition of all or part of a non-designated heritage asset, providing a justification that all reasonable attempts have been made to retain all or part of the asset.~~

e) Proposals that affect or have the potential to affect archaeological heritage assets will be supported, where they demonstrate the appropriate level of investigation and recording within an Archaeology Impact Statement.

SUPPORTING TEXT

Old Oak and Park Royal has a rich social, cultural and built heritage that reflects its change from a rural landscape to an industrial powerhouse and transport hub. Heritage assets refer to designated and non-designated assets. The area's historic context also plays an important role in helping to inform place making and generating social, economic and environmental benefits. The scale of development planned across the OPDC area will mean that new development will be visible from surrounding areas. New development should recognise the significance and value of heritage assets and promote, conserve and enhance these. In addition to policy D8, guidance set out within the National Planning Policy Framework (NPPF), the London Plan and policy SP9 will be utilised to consider proposals' impacts on heritage assets. OPDC will also make use of the Greater London Historic Environment Record and OPDC heritage designations and guidance for Conservation Areas, Local Character Areas, the Local List and~~,~~ Buildings of Local Heritage Interest.

OPDC's Heritage Strategy (2017) provides a detailed analysis of Old Oak and Park Royal's heritage. The recommendations set out in the strategy are outlined in Table 5.2.

Designated heritage assets within the OPDC area consist of Statutory Listed Buildings and conservation areas. These benefit from protection in the NPPF, which should be implemented alongside policy D8(b). Policy D8(b) also applies to non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments.

Ensuring development contributes to promoting and enhancing the significance of heritage assets and their settings can include the viable reuse of assets. It can also include the principle of improving access to heritage assets while ensuring that any harm to significance is minimised and outweighed by the public benefit of securing access.

Heritage Impact ~~Statements~~ Assessments supporting all proposals affecting heritage assets should include a description of the significance of any heritage assets and their settings affected to ensure consistency with the NPPF, the London Plan and relevant Historic England guidance. An analysis of the resultant impact of the development on the heritage asset and its setting should also be provided. The level of detail of this material should be proportionate to the significance of the asset affected. Heritage assets will play a key role in shaping local character across the OPDC area. Proposals will be required to demonstrate how they are promoting the significance of assets including improving public access and celebrating assets within the design of a development or use of an asset where appropriate. The OPDC heritage themes also play an important role in helping to enhance local identity. As such, Heritage Impact ~~Statements~~ Assessments should also set out how proposals exhibit an understanding of the relevant OPDC heritage themes and any relationships between them.

Commented [PF74]: Specific amendment.
Reason: Relocated to above to flow on from new designated assets policy above.

Commented [PF75]: Regulation 19(1) consultation amendment.
Reference: D8/7
Reason: To provide clear references to heritage designations at the request of Historic England.

Commented [76]:

Commented [PF77]: Regulation 19(1) consultation amendment.
Reference: D8/5
Reason: To align with NPPF guidance for scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments.

Commented [PF78]: Specific amendment.
Reason: To help clarify how significance of assets can be promoted.

Commented [PF79]: Regulation 19(1) consultation amendment.
Reference: D8/20
Reason: To reflect the relationships between the heritage themes.

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To ensure the significance of conservation areas are not negatively impacted by the approved demolition of buildings within their area, applications for replacement buildings should be secured prior to commencement of demolition. Exceptions to this may be made where the building to be demolished clearly detracts from the conservation area and removal will result in an enhancement ~~of~~to the areas character or appearance. Where possible, proposals should demonstrate intent of implementation.

Although non-designated heritage assets, as set out in table 5.2, do not benefit from statutory protection, proposals that seek to conserve and enhance these assets will be supported. The sequential approach set out in the policy, and detailed further in table 5.3, should~~will~~ be undertaken to manage the impact of proposals on an asset's significance.

Although Old Oak and Park Royal does not have any known archaeological designations, to ensure the historic environment is conserved and enhanced, proposals which are identified to have or have the potential to include heritage assets with archaeological interest should be supported by an appropriate desk-based assessment proportionate to the significance of the archaeological asset. Where the significance is considered to be of a sufficient status, a field evaluation should be carried out. Should Archaeological Priority Areas or Sites of Archaeological Importance be identified, an Archaeology Impact Statement will be required to be submitted.

Designated ~~and Heritage Assets~~ ~~Non-Designated Heritage Assets~~	Non-Designated Heritage Assets	**OPDC Heritage Themes**
Th~~e~~ise include~~s proposals for designated~~ statutory listed buildings and structures~~, locally listed buildings and structures,~~ and ~~,~~conservation areas~~, areas of local character and other buildings of local heritage interest.~~ OPDC will maintain a list of designated heritage assets ~~and locally listed heritage assets~~ and identify these on the P~~p~~olicies M~~m~~ap.	These include Local Character Areas, Locally Listed Buildings and Buildings of Local Heritage Interest. OPDC will maintain a list of non-designated heritage assets and identify these on the Policies Map.	These comprise five key heritage themes which relate to the majority of the heritage assets within both Old Oak and Park Royal: Grand Union Canal heritage Rail heritage Industrial heritage Historic residential enclaves Historic scrubland and open spaces (including cemeteries) These themes provide opportunities for proposals to conserve and enhance the historic environment where heritage assets are not present.

Commented [PF80]: Specific amendment.
Reason: To help clarify how the policy may be implemented.

Commented [PF81]: Regulation 19(1) consultation amendment.
Reference: D8/5
Reason: To align with NPPF guidance for scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments.

Commented [PF82]: Specific amendment.
Reason: To provide clarity between designated and non-designated assets.

OPDC is not responsible for the adjacent St. Mary's Conservation Area and Kensal Green Cemetery Grade 1 Listed Registered Park and Garden. However, they contain a number of heritage assets which are identified by Historic England to be at risk. OPDC will work with Historic England, London Borough of Hammersmith and Fulham and Royal Borough of Kensington and Chelsea and other stakeholders to remove these from the Heritage at Risk Register. Where appropriate, contributions to support the conservation and enhancement of heritage assets will be secured in accordance with OPDC's Planning Obligations Supplementary Planning Document.

Commented [PF83]: Regulation 19(1) consultation amendment.
Reference: D8/25
Reason: To provide mechanisms to secure funding to conserve and enhance heritage assets.

In addition to built heritage, social and cultural heritage should be recognised in new development. OPDC's Heritage Strategy provides an in depth analysis to help inform elements such as place and street naming.

1. Positively respond to non-designated assets in their design; or	As a priority, development should seek to respond positively to the significance of the asset in its design. This may include elements such as massing, building lines, land use, detailing and materials. If this is not proposed, development should demonstrate how the significance of the asset will not be harmed.
2. Avoid unjustifiable harm to non-designated heritage assets; or	Unjustifiable harm should be avoided to ensure consistency with the NPPF.
3. Demonstrate the rationale for any justifiable harm to non-designated heritage assets; or	Should justifiable harm to the non-designated heritage asset be identified, a clear justification should be provided that sets out how the proposal delivers public benefits, including securing its optimum viable use.
4. For proposed demolition of all or part of a non-designated heritage asset, provide a justification that all reasonable attempts have been made to retain all or part of the non-designated heritage assets and demonstrating how the asset has been used to inform the character of new development ,	Proposals seeking to demolish part or all of a non-designated heritage asset should provide a clear justification for how it has sought to retain all or part of the asset and why demolition is required. Where a proposal has successfully justified demolition of all or part of a non-designated heritage asset, it should demonstrate in its design how it exhibits the significance of the asset. This could include the re-use of the demolished asset's materials and/or responding to the asset's form or details in the design of replacement development.

Commented [PF84]: Specific amendment.
Reason: To enable new development to reflect existing character.

POLICY D9: PLAY SPACE

Where relevant and appropriate, proposals should:

a) contribute positively to maximising opportunities for high quality multifunctional play and informal recreation for all ages; and

b) deliver and / or contribute to a range of dedicated child play space in accordance with the latest OPDC and GLA guidance and ensure:

i. dedicated child play space for 0-5 years is publicly accessible and provided within Small Open Spaces or Pocket Parks as a priority;

ii. dedicated child play space for 5 years and above is provided within larger publicly accessible open space as a priority;

iii. all dedicated child play space receives a minimum amount of 4 hours of solar exposure on 50% of its area supported by appropriate levels of shading in the summer months;

iv. all dedicated child play space is located away from areas of wind turbulence and pollution hot spots; and

v. all dedicated child play space benefits from natural surveillance.

Commented [PF85]: Specific amendment.
Reason: To clarify implementation of the policy.

SUPPORTING TEXT

Providing opportunities for play for all ages and encouraging activity in everyday lives provides life-long benefits for people's physical, mental and emotional health and well-being as well as facilitating social interaction. Specifically for children, play helps in their development to learn about social interaction. Proposals should demonstrate the delivery of high quality design for stimulating multifunctional play spaces and informal recreation. Play space should provide access to nature and opportunities for exercise for both children and adults. Where appropriate, play spaces should be integrated with social infrastructure and delivered with associated spaces for parents and guardians.

Commented [PF86]: Regulation 19(1) consultation amendment.
Reference: D9/9
Reason: To reflect aspirations of Sport England's Active Design guidance.

Proposals should contribute to the delivery of the network of dedicated play space and informal play space in accordance with the OPDC's and GLA's latest guidance.

As well as dedicated child play space there is an opportunity to deliver informal play space and elements of play for all ages across the public realm of Old Oak and Park Royal with opportunities to embed this into a range of Local Parks, Small Open Spaces, Pocket Parks and the street network.

Maximising access to a range of dedicated child play space will be critical in the high density environment of Old Oak. To help achieve this, as a priority, play spaces should be provided in publicly accessible open spaces. For 0-5 years play this should be within Local Parks, Small Open Spaces and Pocket Parks that provides doorstep play and for 5 years and above this should be within spaces equivalent to Local Parks or larger as set out in the London Plan open space hierarchy.

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By locating play spaces in these locations, it is more likely that they will meet the requirements set out in OPDC's Environmental Modelling Framework Study to deliver a high standard of amenity. This study identifies that to ensure a high quality environment, dedicated play space should receive good levels of solar exposure through direct sunlight with a minimum of 4 hours of sunlight on the 21st March on 50% of the area. OPDC recognises this approach is challenging within a high density context, but every effort should be made to deliver this requirement. This is based on a review of standards across Europe. It also recommends that play space is located in sheltered locations away from wind and areas of air pollution to support health and well-being. Dedicated playspace should also be protected from areas that are exposed to wind and to air pollution hotspots in accordance with policy EU4.

In contributing to the delivery of the range of dedicated play spaces, proposals for off-site delivery should clearly set out details of the intended provision and its delivery. This should include information for the location, design and management and maintenance arrangements. Where on-site or off-site provision is not proposed, contributions will be soughtsort in accordance with the latest OPDC guidance.

To support use of dedicated play space and prevent anti-social behaviour, play space should have natural surveillance, including from homes or social infrastructure and be located outside on at ground level, podiums, terraces or roofs. It should also be protected from areas that are exposed to wind and to pollution hotspots.

Commented [PF87]: Specific amendment.
Reason: To recognise challenges of delivering policy requirements within a high density context

Commented [PF88]: Regulation 19(1) consultation amendment.
Reference: D9/6
Reason: To provide a clear link to policy EU4.

Commented [KT89]: Specific amendment.
Reason: To avoid repeating policy text.

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1 Environment and Utilities

INTRODUCTION

1.1 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.

1.2 The OPDC area is set to undergo rapid transformation over the coming decades. The new transport super-hub at Old Oak Common and other associated infrastructure improvements will fundamentally change the area into one of London's most well connected places. In line with the Mayor's aspirations to ~~transform~~ make London ~~into~~ a zero carbon city, it will be important that that new development sets new standards in low carbon, resource efficient development. In addition, development should seek to create a thriving natural and physical environment that supports high quality living and wellbeing and a healthy and biodiverse natural environment.

1.3 In accordance with Policy SP10, development on the scale envisaged provides opportunities for coordinated and integrated approaches to provision of water, energy, waste management and smart utilities and physical infrastructure. Delivering secure, affordable and low carbon utilities will be the focus for an integrated approach.

1.4 The success of the development will also require investment in natural capital. To accompany the density of development envisaged, there is a need to secure a high quality and robust network of parks, green, civic and other open spaces delivered as an integrated network. From an environmental perspective the open space network can help address flood risk, the urban heat island effect and other impacts related to high density development~~, living~~ and climate change. The network of open spaces can also provide a focus for the community to meet and play, exercise, relax and provide space for biodiversity. These spaces will be a vital part of the health, educational and civic infrastructure that underpins all successful places.

1.5 This Environment and Utilities chapter has been developed alongside the Design (chapter 5) and Transport (chapter 7) chapters. Design, transport and environment share a common objective of creating high quality places that will stand the test of time and create a place in which human and natural communities can thrive.

1.6 This chapter expands on the spatial vision and strategic policies, especially policies SP2, SP3, SP8, SP9 and SP10. This chapter does not deal with the spatial locations for environmental infrastructure, so should be read in conjunction with the place policies in Chapter 4.

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POLICY EU1: OPEN SPACE

OPDC will secure the delivery of a high quality green infrastructure and open space network that enhances the overall quality of the environment, as set out in Policy SP8 by supporting developments which:

a) **give Metropolitan Open Land (MOL), including Wormwood Scrubs the strongest protection. Proposals that result in loss or harm (including the erosion in the quality) of MOL will only be permitted in very special circumstances set out in the NPPF, ~~very special circumstances~~ and where at least an equivalent quantum, ~~and~~ quality, access and function of ~~open space~~MOL is provided;**

b) **protect other existing open spaces. Proposals that result in loss or erosion in the quality of existing open space will only be permitted where at least an equivalent quantum, ~~and~~ quality, access ~~and~~ function of open space is provided;**

c) **support the delivery of a minimum of 30% of the developable area outside of Strategic Industrial Location (SIL), as publicly accessible open space, including spaces identified in the Places chapter by:**

   i. **contributing towards and/or delivering 3 new local parks that are each at least 2ha in size, in the locations identified in the places chapter;**

   ii. **contributing towards and/or delivering a range of smaller publicly accessible open spaces and pocket parks;**

   iii. **contributing towards and/or delivering local Green Streets that are fully accessible, designed predominantly for high pedestrian and cycle flows, have embedded green infrastructure, have very restricted access for motorised vehicles and form part of a wider grid of connected green routes; and**

   iv. **where it is not ~~possible~~ feasible or desirable for individual developments to make on-site contributions to achieving 30% publicly accessible open space, a financial contribution will be sought towards delivering the overall publicly accessible open space provision, equivalent to 4.1sqm of open space per resident and 1sqm of open space per worker generated by the development;**

d) **ensures all open space (including public, private and communal areas) is high quality and provides for a range of functions, by including a number of the following:**

   i. **incorporating play space provision in accordance with Policy D9;**

   ii. **incorporating biodiversity and urban greening provision, in accordance with Policy EU2;**

   iii. **providing opportunities for local food growing;**

   iv. **providing recreation and sports space, including playing fields in accordance with Policy TCC6;**

   v. **ensuring appropriate standards are met, including in respect of air and noise quality and micro-climate;**

   vi. **incorporating climate change mitigation measures, including SuDS and urban heat island mitigation; and**

   vii. **providing appropriate arrangements for the long-term management and maintenance of open space.**

Commented [PF1]: Specific amendment.
Reason: To clarify exceptional circumstances are set out in the NPPF.

Commented [PF2]: Regulation 19(1) consultation amendment.
Reference: EU1/24
Reason: To clarify that access and function also need to be considered.

Commented [KT3]: Regulation 19(1) consultation amendment.
Reference: EU1/24
Reason: To clarify that access and function also need to be considered.

Commented [KT4]: Regulation 19(1) consultation amendment.
Reference: EU1/25
Reason: To clarify policy requirements.

Commented [KT5]: Regulation 19(1) consultation amendment.
Reference: EU1/26
Reason: To align with amendments to policy TCC6

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SUPPORTING TEXT

1.7 Provision of open space is an integral component of a successful neighbourhood and the wider place making agenda. It contributes to social cohesion, health and wellbeing as well as the economic and environmental strands of sustainable development.

1.8 Adequate provision of open space is particularly important in high density development, where demand for different types of public space is high. OPDC is seeking to ensure that a sufficient quantity of space is provided to meet the needs of the whole community, that is of a high quality and has secure long-term funding to support on-going management and maintenance.

1.9 The priority ~~first and foremost~~ is to protect Metropolitan Open Land (MOL). ~~The Mayor affords MOL the same protection as green belt. Policies in the NPPF as they relate to green belts and the London Plan as they apply to MOL will apply.~~ Its loss or erosion in its quality will be strongly resisted except for in very special circumstances, as set out in the NPPF. Wormwood Scrubs is designated as MOL and as well as being protected, ~~but~~ there will be opportunities for sensitive enhancements to this space, to help it fulfil a role as a ~~district and~~ metropolitan park. See the Wormwood Scrubs Place Policy (P12) for further details ~~on the protection and potential for sensitive enhancements to Wormwood Scrubs as MOL~~. ~~As new open spaces are delivered OPDC will also give consideration to expanding MOL designations, working with relevant stakeholders.~~

Commented [TC6]: Specific amendment.
Reason: To ensure consistency with the NPPF.

1.10 Other open space provision contributes to local character. OPDC will also resist the loss of this open space. Only where necessary will development in other open spaces be allowed and on the condition that an equivalent quantum, ~~and~~ quality ~~of open space~~ and ~~equivalent~~ access is provided and that the range of functions (e.g. play space, sports provision) provided within the lost open space are reprovided to an equal or better quality.

Commented [PF7]: Specific amendment.
Reason: To align with amendments to policy TCC6

1.11 For new publicly accessible open space provision, there are no overall government standards, but Local Authorities are encouraged to develop their own standards based on context and need. OPDC has produced an Environmental Standards Study, which identifies that a minimum of 30% of the developable area outside of Strategic Industrial Location (SIL) should be allocated to provision of high quality publicly accessible open space as part of a strategic approach to green infrastructure.

1.12 An important element of the publicly accessible open space network is Local Parks. OPDC's Environmental Standards Study identifies that three local parks of at least 2ha should be incorporated into the development area at Old Oak. One local park is proposed in Old Oak South near to the Old Oak Common station. Another is proposed in Old Oak North, whilst the third local park is proposed by the Grand Union Canal, with contributions towards its delivery from development in both the Old Oak South and Old Oak North places. Further details on these local parks can be found in the Old Oak South (P1), Old Oak North (P2) and Grand Union Canal (P3) place policies. These parks would provide much needed on-site open space, that would act as a focal point for the new community, ~~as well as~~ provide important ecological assets~~,~~ and will be a major component of a climate resilience strategy. In addition to ~~3~~ three local parks, development proposals will be expected to demonstrate that sites are supported by existing or proposed smaller open spaces and contribute to the delivery of other publicly accessible open spaces as set out in the Places chapter and/or in the IDP.

1.13 Applicants will also be required to contribute to and/or deliver a green grid of streets. These will link the network of new and existing open spaces together, by providing safe and accessible pedestrian and cycle routes between open spaces. These local streets will form an integrated network that should be tree lined, incorporate urban greening in accordance with Policy EU2, to support the delivery of nature corridors and ~~surface based~~vegetated SuDS in accordance with Policy EU3~~, including bio swales and rain gardens where appropriate~~. They will connect the open spaces into the All London Green Grid.

1.14 Where ~~sites~~ developments are not able to contribute to the ~~overall~~ on-site open space ~~strategy~~ requirements or it is not suitable or desirable for them to do so, ~~they~~ applicants will be required to make a financial contribution equivalent to 4.1 sqm per resident and 1 sqm per worker generated by the development. These figures have been calculated using the projected total population yield and developable area and equate to the amount of space allocated to each resident and worker in order to deliver the 30% open space target across the ~~whole~~ developable area~~site~~.

1.15 The contribution will be acceptable where the proposal demonstrates a clear and robust rationale for why on-site delivery cannot be achieved or is not desirable. This rationale should be provided within submission material and for major applications within the Green Infrastructure and Open Space Strategy and Management Plan (GIOSSMP).

1.16 In addition to publicly accessible open spaces, communal open space and private open space for residents and employees within new development, are integral components of the green infrastructure network set out in Policy SP8. OPDC's Environmental Standards Study identifies that communal~~private~~ courtyards and terraces should be of a sufficient size to be useable and inviting and should be integral to the character of the development. Private open space will include a mix of balconies, winter-gardens, roof terraces and gardens. The size of these spaces will need to accord with London Plan policy.

1.17 Open space should perform a range of social and environmental functions including providing quiet spaces, active spaces, play spaces and playing fields in accordance with Policy D9 and TCC6, space for ecology and biodiversity in accordance with Policy EU2, space for water management in accordance with Policy EU3 and space to help cool the city and help reduce air and noise pollution. Space for food growing should~~. Another important function is the provision of space for local food growing~~ also be provided, which can~~. This has the potential to~~ support community cohesion and the sharing economy, health and well-being~~, as well as~~and minimise carbon emissions through the reduction of food miles. ~~Open spaces should also provide space for play, in accordance with Policy D9 and for ecology and biodiversity, in accordance with Policy EU2.~~

1.18 Buildings surrounding open spaces need to be designed to provide appropriate levels of direct sunlight into open spaces. ~~Given the envisaged high levels of use,~~The high densities of development are likely to result in elevated levels of use of these spaces. These spaces therefore need to be of a high quality, ~~robust~~ and need to receive good levels of~~the~~ solar exposure particularly in play spaces, which should exceed national standards to benefit the large numbers of people using the spaces (see Policies D6 and D9).

Commented [TC8]: Specific amendment.
Reason: To avoid repetition with Policy EU3

Commented [PF9]: Specific amendment.
Reason: To identify linkages with Policies TCC6, EU2, EU3, EU4 and EU5.

Commented [KT10]: Regulation 19(1) consultation amendment.
Reference: EU1/26 and EU1/27
Reason: To strengthen policy objectives.

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1.19 Where open space is poorly managed and maintained it can become an eyesore or a crime hot spot. Developers should demonstrate appropriate long-term management arrangements for open spaces. Developers should also encourage community management of open spaces, in accordance with Policy DI3. The relevant local authority should be consulted about all management and maintenance arrangements for publicly accessible open space that they may adopt in future.

Commented [KT11]: Regulation 19(1) consultation amendment.
Reference: P1C1/7
Reason: To ensure local authorities are appropriately consulted.

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POLICY EU2: URBAN GREENING AND BIODIVERSITY

OPDC will ~~seek to~~ ensure that development in the OPDC area secures an overall increase in green cover and a net gain in biodiversity by supporting development proposals where they:

a) would not result in a loss of existing biodiversity unless either an equivalent type and equal or greater amount of biodiversity is provided on-site, or where this is not feasible, OPDC will secure a financial contribution to facilitate off-site enhancements in lieu of on-site provision;

b) **avoid environmental disturbance to biodiversity during and post construction. ~~and only Ww~~where proposals demonstrably cannot avoid disturbance, ensure that appropriate and necessary mitigation measures are utilised;**

c) measurably conserve and enhance Sites of Importance for Nature Conservation (SINC) (see figure 6.3) and other identified priority habitats or species;

~~a)~~d) **deliver new urban greening and ecological improvement by:**

i. **maximising ~~opportunities~~ the provision of~~for~~ green roofs and walls;**
ii. **wherever possible, delivering planting of mature or semi-mature trees along all streets;**
iii. **integrating planting as part of SuDS systems;**
iv. **integrating biodiversity into the built environment by provision of nest sites, roosts and shelters;**
v. **ensuring that planting is ecologically appropriate and provides benefits for wildlife; and**
vi. **delivering a range of habitats that are resilient to climate change;**

~~b) measurably conserve and enhance Sites of Importance for Nature Conservation (SINC) (see figure 6.3) and other identified priority habitats or species. Proposals that would result in a measurable loss of biodiversity will only be permitted where either an equivalent or greater amount of biodiversity is provided on-site, or where this is not feasible, OPDC will secure a financial contribution to facilitate off-site enhancements in lieu of provision; and~~

~~c)~~e) **demonstrate that major development proposals have optimised urban greening in their schemes with reference to the Urban Greening ~~Space~~ Factor and Green points system score. Developments should seek to achieve the most recent target scores within Mayoral policy / guidance or OPDC policy guidance;**

~~d)~~f) **accord with and support the delivery of guidance in the OPDC area's most up-to-date Biodiversity Action Plan(s); and**

~~e)~~g) **put in place appropriate arrangements to monitor and safeguard the long-term management of new and/or enhanced biodiversity and urban greening.**

Commented [TC12]: consultation amendment.
Reference: EU2/4
Reason: To strengthen the policy

Commented [KT13]: Regulation 19(1) consultation amendment.
Reference: EU2/20 and EU2/22
Reason: To strengthen guidance for reproviding lost biodiversity assets.

Commented [KT14]: Specific amendment.
Reason: Relocated from below to support flow of policy.

Commented [TC15]: Regulation 19(1) consultation amendment.
Reference: EU2/20
Reason: to reference potential amenity impacts on biodiversity, including light pollution, and need for these impacts to be minimised and/or mitigated.

Commented [KT16]: Specific amendment.
Reason: Relocated from below to support flow of policy.

Commented [PF17]: Specific amendment.
Reason: Relocated to above to support flow of policy.

Commented [PF18]: Specific amendment.
Reason: To accord with updated Mayoral guidance.

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SUPPORTING TEXT

1.20 Green space and biodiversity in the UK has decreased dramatically during the last century. However OPDC's Environmental Standards Study shows that urban areas have potential to provide new habitat and space for biodiversity, ~~and~~ which if well designed, can be a refuge for species that are in decline. Biodiversity can also increase the functional performance and productivity of green infrastructure.

1.21 Biodiversity in urban areas can enhance a sense of wellbeing. People's health, ~~attitudes and behaviour are~~ is positively affected when they come into contact with nature. ~~Contact with biodiversity also reinforces attitudes towards open space and nature~~.

1.22 The best developments embed green infrastructure in a way that enhances its value and enriches its biodiversity. This can be achieved through careful design of open space, tree planting and through inclusion of biodiverse rich green roofs, walls, bat and bird boxes ~~, open spaces~~ and other features that provide habitat for species.

1.23 Every opportunity should be made to incorporate green infrastructure that contributes to the overall quantity and quality of biodiversity and green space in public, semi-public and private areas from the outset. The approach and benefits that the development will make to biodiversity should be set out by the applicant as part of their GIOSSMP required in Policy SP8.

1.24 Biodiversity is often impacted or lost during demolition, enabling works, construction or during occupation ~~over the long term~~ following redevelopment. Where biodiversity or vegetation is lost, OPDC will expect developers to replace all losses with an equivalent type and quality of vegetation on site, or where this is not possible make a financial contribution so that compensatory planting can be provided as close to the development as possible. Where mature trees or shrubs are lost for example, they should be replaced with planting of an equal value. Development proposals should provide details on how they will protect or mitigate any impacts on biodiversity during site works and once occupied including from changes to air, noise, light and other potential pollution impacts as well as changes to soil, water and other habitats within their GIOSSMP.

1.25 Where possible, preference should be given to use of native species whilst also ensuring that species are chosen which are resilient to climate change and the physical impacts of development. Species should also be selected that can contribute to different functions including reducing the urban heat island effects of development, enhancing air quality, filtering excessive noise pollution, providing shade to buildings, enhancing resilience to flooding, food production, promoting a sense of health and wellbeing and enhancing the biodiversity and health of the overall ecosystem. The design of habitat and choice of species should support cost effective management and maintenance over the long term.

1.26 Figure 6.3 shows the Sites of Importance for Nature Conservation (SINCs) within and surrounding the OPDC area. The area is surrounded by a number of sites of metropolitan and borough importance. If not carefully designed, delivered and operated, the density of new development proposed could impact on the hydrology, micro climate and solar access of these sites. Studies to understand the impact of development on these sites must be carried out during the design stage, to demonstrate how potential impacts have been mitigated and/or minimised.

Commented [PF19]: Regulation 19(1) consultation amendment.
Reference: EU2/20
Reason: To strengthen guidance for reproviding lost biodiversity assets.

Commented [TC20]: Regulation 19(1) consultation amendment.
Reference: EU2/21
Reason: to reference potential amenity impacts on biodiversity, including light pollution, and need for these impacts to be minimised and/or mitigated.

Commented [TC21]: Regulation 19(1) consultation amendment.
Reference: EU2/19
Reason: To strengthen policy guidance.

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1.27 In accordance with the London Plan, strong protection will be given to sites of metropolitan importance for nature conservation, while sites of borough and local importance for nature conservation will be given a level of protection commensurate with their importance.

1.28 Where it is not possible to protect a SINC, applicants will be expected to deliver alternative biodiversity habitats of an equivalent or greater quantum and quality or provide financial contributions to offset for its loss, which would be used to protect and enrich existing sites of biodiversity, provide better access to areas that are biodiverse and support development of educational materials.

Commented [PF22]: Specific amendment.
Reason: Relocated from below to reflect policy amendments.

~~1.23~~

~~1.24~~ 1.29 ~~Biodiversity is often impacted or lost during demolition, enabling works and construction. OPDC will therefore require development proposals, as part of their GIOSSMP, to provide details on how they will protect or mitigate any impacts on biodiversity during site works.~~

Commented [PF23]: Specific amendment.
Reason: Relocated above to reflect policy amendments.

~~1.25~~ 1.30 Green roofs and walls will play an important role in assisting OPDC in delivering its aspirations for environmental sustainability. In accordance with Policy D4, green roofs ~~will~~ should be used to provide a variety of services including rainwater attenuation, renewable energy generation, play space and food growing facilities. Proposals should be supported by submission material clearly setting out how the delivery of green roofs has sought to be maximised, including, where feasible, not locating mechanical plant facilities on roof space.

~~1.26~~ 1.31 Trees should be incorporated into streets and public spaces to enhance the quality of each place. Attention should be given to planting the right tree in the right place, to maximise the social, environmental and economic benefits associated with tree planting. Special attention should be given to choice of species and where and how trees are planted to ensure they support and don't unduly undermine other demands placed on the public realm. Trees should be planted in accordance with the Trees in Hard Landscapes guide, which is supported by the GLA and has been produced by the Tree and Design Action Group.

~~1.27 Where possible, preference should be given to use of native species whilst also ensuring that species are chosen which are resilient to climate change and the physical impacts of development. Species should also be selected that can contribute to different functions including reducing the urban heat island effects of development, enhancing air quality, filtering excessive noise pollution, providing shade to buildings, enhancing resilience to flooding, food production, promoting a sense of health and wellbeing and enhancing the biodiversity and health of the overall ecosystem.~~

~~1.28 Figure 6.3 shows the Sites of Importance for Nature Conservation (SINCs) within and surrounding the OPDC area. The area is surrounded by a number of sites of metropolitan and borough importance. If not carefully designed, delivered and operated, the density and height of new development proposed could impact on the hydrology, micro climate and solar access of these sites. Studies to understand the impact of development on these sites must be carried out during the design stage, to demonstrate how potential impacts have been mitigated and/or minimised.~~

~~1.29 In accordance with the London Plan, strong protection will be given to sites of metropolitan importance for nature conservation, while sites of borough and local importance for nature conservation will be given a level of protection commensurate with their importance.~~

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~~1.30 Where it is not possible to protect a SINC, applicants will be expected to make a contribution towards the loss of biodiversity. This will be used to protect and enrich existing sites of biodiversity, to provide better access to areas that are biodiverse and to support development of educational materials.~~

Commented [PF24]: Specific amendment.
Reason: Relocated above to reflect policy amendments.

~~1.31~~ 1.32 To measure the quantity and quality of green space, applicants should demonstrate how their scheme compares to the Urban Greening ~~Space~~ Factor and the accompanying Green Points system. This approach aims to secure a minimum amount of green cover in every building lot, and to minimise the degree of sealed or paved surfaces in development. This tool has been tested and adopted by a number of UK local authorities including the London Borough of Sutton and the City of Southampton and is being adopted by the Mayor of London. In order to optimise green infrastructure provision, developers should, as part of their GIOSSMPs score their proposed green infrastructure against the Urban Greening ~~Space~~ Factor and Green Points System criteria. Developments should seek to achieve the targets set out in the most up-to-date mayoral policy or guidance, which at the time of this Local Plan's publication are a score of 0.4 for residential-led developments or 0.3 for commercial-led developments. The 0.3 score will not be applied to proposals within Park Royal SIL as it is recognised that it would be challenging to achieve this score where schemes have significant requirements for servicing, but OPDC will start to work with developers to seek to optimise proposals' Urban Greening Factor Score in this location. OPDC is also planning to develop more locally set standards, which would be contained within a future Supplementary Planning Document (SPD).

Commented [PF25]: Specific amendment.
Reason: To accord with updated Mayoral guidance.

~~1.32~~ 1.33 GIOSSMPs should also explain how habitats and biodiversity will be managed, maintained and funded in perpetuity once the site is occupied. Management arrangements will be appropriately secured through conditions by OPDC.

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POLICY EU3: WATER

Development proposals will be supported where they:

a) ~~collaborate~~ work positively **with OPDC and its development partners to deliver an integrated strategy for managing foul and surface water and for supplying potable and non-potable water;**

~~**b) appropriately contribute to and/or deliver the required water infrastructure identified within OPDC's Infrastructure Delivery Plan (IDP);**~~

~~**c)**~~**b) Provide sufficient attenuation storage capacity to ensure the peak rate of surface water runoff generated during rainfall events up to the 1 in 100 years plus a 40% climate change allowance, does not exceed greenfield run-off rates by applying the following hierarchy:**

~~**i. delivering and/or contributing to strategic SuDS;**~~

~~**ii.**~~**i. delivering where appropriate and through agreement with the Canal and River Trust, outfalls to the Grand Union Canal, where the water is of an adequate ~~standard~~ quality, in accordance with the Water Framework Directive or any subsequent standards, and would not have a detrimental effect on the ecological and chemical status of waterbodies;**

ii. providing ~~for~~ on-site source control to attenuat~~e~~ion ~~where strategic SuDS or outfall to the Grand Union canal is not feasible~~on-site. The priority for on-site attenuation should be the provision of vegetated Sustainable Drainage Systems (SuDS), with other solutions, including below ground attenuation, only deemed acceptable where all vegetated options have been ~~appropriately~~ fully explored; and

iii. Where source control SuDS features cannot achieve sufficient attenuation, delivering and/or contributing to strategic SuDS, which should be incorporated into streets, open spaces and other public realm areas;~~.~~

c) ensure sufficient capacity within the sewerage network by, as part of applicants' Water Efficiency, SuDS and Drainage Statement, demonstrating how the development will enable capacity to be released within the existing combined sewer network to accommodate additional foul water flows, without compromising the ability of other developers to meet future development needs;

d) comply with any relevant requirements of local authority Surface Water Management Plans (SWMPs) and the Thames River Basement Management Plan;

e) ~~r~~undertake Flood Risk Assessments (FRAs) for schemes meeting the thresholds set out in DEFRA and EA guidance~~equire major developments to submit Site Specific Flood Risk Assessments (FRAs)~~;

f) alleviate localised surface water drainage problems, identified within the Integrated Water Management Strategy (IWMS), SWMPs and/or in the Site S~~s~~pecific FRA;

g) demonstrate that development within the area at risk of fluvial flooding from the River Brent (see figure 6.5), reduces flood risk and improves flood storage in the area;

h) address potential flood risk associated with any changes to topography or hydrology; and

i) maximise the efficient use of potable water by:

Commented [PF26]: Specific amendment.
Reason: To strengthen policy.

Commented [TC27]: Specific amendment.
Reason: To avoid duplication with Policy SP10.

Commented [PF28]: Specific amendment.
Reason: Relocated to clarify implementation of policy requirements and align with Utilities Study

Commented [TC29]: Regulation 19(1) consultation amendment.
Reference: P3/25, EU3/5
Reason: To make reference to the Water Framework Directive.

Commented [PF30]: Specific amendment.
Reason: Relocated to clarify implementation of policy requirements and align with Utilities Study

Commented [TC31]: Specific amendment.
Reason: To ensure conformity with the recommendations of the Utilities Study

Commented [TC32]: Regulation 19(1) consultation amendment.
Reference: P3/26, EU3/5
Reason: To make reference to the Thames River Basement Management Plan

Commented [KT33]: Regulation 19(1) consultation amendment.
Reference: EU3/18, EU3/20
Reason: To reinforce and align with the requirement for all developments to undertake FRAs for schemes meeting the thresholds set out in DEFRA and EA guidance.

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i. **delivering on-site water recycling ~~use~~ technologies particularly in non-residential developments, including rainwater harvesting and/or greywater recycling, where these are shown to be viable;**

ii. **for all non-residential developments, seeking to achieve the maximum score for water use in the BREEAM ratings (or an equivalent in any future nationally recognised assessment scheme); and**

iii. **designing residential development to minimise the use of mains water to better the Mayor's per capita water consumption targets ~~of 105 litres a day~~, where viable.**

SUPPORTING TEXT

~~1.33~~ 1.34 In accordance with Policy SP2, OPDC is seeking to ensure that the development achieves the highest standards of sustainable development. The approach adopted to the management of water supply, surface water and foul drainage and sewerage treatment plays an important role in meeting this objective.

~~1.34~~ 1.35 OPDC recognises the environmental and cost benefits realised from an integrated approach to water management, in accordance with Policy SP10. An Integrated Water Management Strategy (IWMS) has been produced that identifies options for sustainably managing water to meet the changing needs of occupiers of the development. The approach set out in the IWMS seeks to reduce the risks of flooding across the development area and wider drainage network whilst minimising the demand on stressed water resources, taking into account the effects of climate change. The recommendations from the IWMS have been embedded into this policy, the relevant Place policies and the infrastructure requirements in the Infrastructure Delivery Plan (IDP).

~~1.35~~ 1.36 OPDC will seek appropriate contributions from development towards required area-wide and cross-site infrastructure. Within larger development proposals, there may be a need for direct delivery of water infrastructure. To support the development of appropriate area-wide and cross-site solutions, OPDC will require applicants to work collaboratively with OPDC, service providers, developers and local authorities as the lead Local Flood Authorities.

~~1.36~~ 1.37 Thames Water has indicated that the existing Counters Creek combined sewer~~s~~ has~~ve~~ no capacity to accept increased flows. As a result it will be necessary to ~~provide SuDS~~deliver water attenuation technologies to enable the peak surface water discharge rate generated during rainfall events with a return period of up to 1 in 100 years plus 40% climate change to be reduced to greenfield runoff rates.

~~1.37~~ To achieve this, the policy takes a sequential approach., ~~firstly requiring development to contribute to off-site SuDS that where possible will be integrated into open space, in particular public space, and along streets.~~

Commented [PF34]: Regulation 19(1) consultation amendment.
Reference: EU3/19
Reason: To reinforce the Local Authorities role as Lead Flood Authority

Commented [KT35]: Regulation 19(1) consultation amendment.
Reference: EU3/3
Reason: To make specific reference to Counters Creek

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1.38 For developments north of the Grand Union Canal, opportunities should be sought to redirect surface water from the combined sewer into the Grand Union Canal via gravity fed systems, providing that consent is granted from the Canal and River Trust~~, in order to comply with the drainage hierarchy contained within the London Plan~~. All water flowing into the canal will have to meet an adequate water standard meeting the requirements of the Water Framework Directive or subsequent standards (see para 5.10.1.3 of the IWMS for further details on potential measures) and not impact on the ecological and chemical status of waterbodies.

1.39 Where development cannot divert surface water into ~~a strategic off-site SuDS system or into~~ the Grand Union Canal, or can only meet part of it's the requirement via ~~these routes~~this route, ~~it~~ applicants will be required to provide on-site attenuation to achieve the greenfield runoff rate. Where on-site attenuation is provided ~~it~~ priority should be given to the~~rough~~ provision of above ground vegetated space including green space, raingardens and~~,~~ green roofs~~, with b~~In accordance with the Mayor's drainage hierarchy, below ground attenuation will only deemed acceptable where all above ground options have been appropriately explored. Where on-site attenuation cannot achieve run-off rates, applicants should consider off-site strategic attenuation measures, integrated within public open spaces and highway networks.

1.40 As Lead Local Flood Authorities (LLFA), the London Boroughs of Brent, Ealing and Hammersmith and Fulham have Surface Water Management Plans (SWMPs) in place that will inform the measures necessary to mitigate the incidence of localised surface water flooding in the OPDC area. Development proposals will be expected to alleviate localised surface water drainage problems where these have been identified within the IWMS. Major developments should, as part of their Sustainability Statements submit a Water Efficiency, SuDS and Ddrainage ~~strategies~~Statement, demonstrating compliance with the requirements set out in this Local Plan and any relevant local authority requirements/standards for drainage, in their role as LLFA. Proposals should also support and enable the implementation of measures identified in the Thames River Basement Management Plan.

1.41 All ~~major~~ developments that are located in flood risk areas which meet the thresholds set out in DEFRA and EA guidance should undertake a Site Specific Flood Risk Assessment (FRA) to ensure that the development will remain safe and will not increase flood risk to others. Locally, smaller-scale projects that help to separate foul and surface water drainage will also be important to help mitigate the 'poor water quality' status of the River Brent, and the Grand Union Canal, helping to meet the requirements of the EU Water Framework Directive (2000/60/EC) (or any future UK legislative requirements) and the objectives and actions of the Thames River Basin Management Plan~~ 2015~~. ~~In some cases new development and infrastructure will impact on the topography and/or hydrology of the area. Where there are changes, an FRA should be undertaken to understand the impact on the immediate development and surrounding areas.~~

1.42 The area's demand for water will increase as the population grows. Expectations of higher seasonal rainfall and hotter summers will mean that water availability will decrease when it is needed most. Development should therefore maximise reduction in potable water demand. To support this, measures such as smart metering, water saving and particularly in non-residential developments, rainwater harvesting and greywater recycling ~~will be expected~~should be provided ~~in non-residential developments~~.

Commented [TC36]: Specific amendment.
Reason: To aid flow of text.

Commented [TC37]: Regulation 19(1) consultation amendment.
Reference: P3/25
Reason: To make reference to the Water Framework Directive.

Commented [PF38]: Specific amendment.
Reason: To support delivery of strategic SuDS networks.

Commented [TC39]: Regulation 19(1) consultation amendment.
Reference: EU3/5
Reason: To clarify need to support and enable measures in the Thames River Basement Management Plan

Commented [KT40]: Regulation 19(1) consultation amendment.
Reference: EU3/18
Reason: To reinforce the requirement for all developments to undertake FRAs for schemes meeting the thresholds set out in DEFRA and EA guidance.

Commented [KT41]: Regulation 19(1) consultation amendment.
Reference: EU3/21
Reason: To require developers to adopt the water hierarchy in conformity with the London Plan where appropriate.

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1.43 OPDC will expect applicants and water suppliers to help future residents identify how they can reduce consumption and discharge and provide training where appropriate. The performance of technologies, on-going management and maintenance and user behaviour will be assessed by OPDC through collecting data from post occupancy surveys (see policy DI3) to understand how systems can be improved.

1.44 Non-residential developments should aim to improve water efficiency above the London Plan standards as the opportunities to incorporate features like waterless urinals and grey–water or rainwater flushing of toilets is well established. Evidence from the Building Research Establishment (BRE) suggests that a 25% reduction is generally being achieved by good quality non-residential development using water efficient appliances and water metering. A more challenging target of 40% reduction is being achieved in the most sustainable buildings where rainwater harvesting and greywater recycling systems are provided. For residential developments, developers will be encouraged to design water systems to enable residents to meet or exceed the Mayor's targets for domestic water use.

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POLICY EU4: AIR QUALITY

Development proposals will be supported where they appropriately minimise air pollution and make a positive contribution to overall improvement in air quality by:

a) submitting an Air Quality Assessment:
   i. for all major planning applications; and/or
   ii. where the proposed development includes new uses or buildings that have the potential to generate air pollution; and/or
   iii. where a sensitive use is proposed in close proximity to an existing source of air pollution;

b) ensuring the Air Quality Assessment required under a) considers:
   i. the potential impacts of pollution from the development on the site and on neighbouring sites;
   ii. potential exposure to pollution above the Government's air quality objective concentration targets; and
   iii. the impacts of demolition, construction and operational phases of development;

c) ensuring the Air Quality Assessment required under a) identifies mitigation measures to be implemented to reduce:
   i. emissions, particularly of nitrogen oxide and particulate matter, including PM_{10} and $PM_{2.}$ to meet the Air Quality Positive objective; and
   ii. exposure to acceptable levels;

~~a)~~d) implementing the recommendations of the Old Oak and Park Royal Air Quality Study (AQS) summarised in table 6.1;

~~b)~~e) helping to reduce pollution in air quality focus areas, identified in figure 6.7, to comply with the most up to date national air quality standards;

~~c)~~f) delivering and/or contributing to the provision of new automatic monitors and diffusion tubes, with equipment to monitor NO2 and PM10 at locations identified in figure 6.7;

~~d)~~g) complying with the relevant borough's Air Quality Action Plans (AQAPs) and the mitigation measures identified therein;

~~e)~~h) ~~avoiding the exceedance of~~meeting EU or subsequent nationally established health-based standards and objectives for NO2 and PM10 and other particulates;

~~f)~~i) designing and positioning buildings, civic and open spaces to minimise exposure to elevated levels of pollution by avoiding creating street canyons, or building configurations that inhibit effective pollution dispersion. In particular, bus and taxi facilities should be designed to avoid the build-up of pollution;

~~g)~~j) minimising emissions from any combustion based sources of energy that are deployed by ensuring low emission plant is used and where appropriate suitable after treatment technologies are adopted; and

~~h)~~k) designing and positioning any energy facilities within the development area to minimise harmful emissions and maximise the rapid dispersion of any residual pollutants ~~in order~~ to minimise impact.

Commented [KT42]: Regulation 19(1) consultation amendment.
Reference: EU4/14, EU4/10
Reason: To provide clearer guidance for delivering Air Quality Assessments.

Commented [PF43]: Specific amendment.
Reason: To clarify implementation of the policy.

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SUPPORTING TEXT

1.45 Air quality has a significant role to play in health and wellbeing. Poor air quality can reduce life expectancy and contribute to a number of illnesses like asthma.

1.46 The 'agent of change' principle will be applied to the assessment and treatment of poor air quality (see Policy D6). Air Quality Assessments should be undertaken to identify the potential for air quality to impact on or be caused by new development and to demonstrate how these impacts are being appropriately mitigated. Air Quality Assessments should accord with the requirements of the above policy and any other requirements in Mayoral policy and/or guidance.

Commented [TC44]: Specific amendment.
Reason: Relocated from below and edited to cross-reference policy D6, where agent of change is primarily dealt with.

Commented [TC45]: Regulation 19(1) consultation amendment.
Reference: EU4/14
Reason: To provide clearer guidance for delivering Air Quality Assessments.

~~1.46~~ 1.47 The London Boroughs of Ealing, Brent and Hammersmith and Fulham experience significant air pollution, directly attributable to emissions from road traffic. The Old Oak and Park Royal area is affected for example where it is bounded by the A40 (Western Avenue) and the A406 (North Circular). The nature of industrial uses in the area also gives rise to air pollution, particularly from HGVs and also from some of the facilities themselves, some of which are classified as heavy industry and waste transfer and management sites. A number of areas in Old Oak and Park Royal have been designated as Air Quality Management Areas for Nitrogen Dioxide (NO2) and particulate matter (PM10). OPDC has produced an Air Quality Study (AQS) which provides the evidence and sets out comprehensive strategies to support improvement in, and better, the area's air quality.

~~1.47~~ 1.48 TfL encourages the establishment of Low Emission Neighbourhoods (LENs), an area-based scheme that includes a package of measures focused on reducing emissions (and promoting sustainable living more generally). The OPDC area meets all of these requirements and OPDC will work in collaboration with TfL, to consider the designation of appropriate parts of the area as a LEN. The Air Quality Study (AQS) sets out all the policies that will contribute to achieving the LEN.

~~1.48~~ 1.49 TfL have recently proposed to introduce an ultra-low emission zone (ULEZ) that would cover the OPDC area. This is an area within which all cars, motorcycles, vans, minibuses, buses, coaches and heavy goods vehicles (HGVs) will need to meet exhaust specific emission standards (ULEZ standards) or pay a daily charge to travel. In order to combat the risks associated with air quality, OPDC ~~would~~ strongly supports this initiative. In addition, to promote better air quality associated with transport, OPDC will also work with applicants to ensure all parking provision can be upgraded to accept charging points, and the electricity grid is designed to enable this (see Policy T4).

~~1.49~~ 1.50 Air quality issues are impacted by a number of policy areas in the Local Plan including design, waste, transport, energy, spatial strategy, construction, logistics, green infrastructure and urban greening. The AQS sets out a very comprehensive set of policy recommendations and supporting evidence that touches on all of these policy areas. Developments will be required to familiarise themselves with the recommendations and demonstrate how they have implemented these through their planning applications. Table 6.1 provides a summary of these recommendations.

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~~1.50~~ 1.51 The AQS identifies that there is a good network of NO2 diffusion tubes inside and surrounding the Old Oak and Park Royal area together with a number of focus areas where air quality is particularly poor. These are shown in Figure 6.7. ~~–~~There is a need for additional monitoring in some areas not covered by the network to enable applicants to prepare Air Quality Assessments in support of planning applications. The place policies within this Local Plan support the improvement of air quality by requiring development to contribute to and/or deliver measures. Data from these monitors will be connected to DEFRA's Automatic Urban and Rural Network (AURN) quality control standards and made publicly available. Data from monitoring stations will also be reported as part of OPDC's Authority Monitoring Report (AMR).

~~1.51~~ 1.52 Development should ~~also~~ demonstrate that it is adopting the recommendations set out in the Air Quality Action Plans (AQAPs) of the relevant local authorities, which take a comprehensive approach to addressing air quality. The host local authorities remain the responsible authorities for the production of AQAPs, but OPDC will work closely with the local authorities to ensure that future iterations of AQAPs are aligned for the OPDC area and support the aspiration to achieve ~~high~~ air quality positive development~~standards of air quality~~. The host authorities continue to be the responsible body for air quality within their boundaries under the 1995 Environment Act, and the impacts of any development should therefore be subject to review by the host authority.

Commented [TC46]: Regulation 19(1) consultation amendment.
Reference: EU4/14
Reason: To provide clearer information on the role of the Local Authority for Air Quality

~~1.52~~ 1.53 High density development can have a significant impact on air flow and areas of pollution accumulation. The Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) have produced guidance on managing air quality in cities that states that "wherever possible, new developments should not create a new "street canyon" or a building configuration that inhibits effective pollution dispersion". The design and layout of the new development including the orientation, massing and height of buildings and location of social infrastructure and open~~green~~ space influence exposure to poor air quality. Where possible, development should be designed to minimise exposure to pollution especially for vulnerable communities like young children, older people and people suffering from respiratory and other related illnesses.

Commented [TC47]: Specific amendment.
Reason: Relocated from below to aid flow of supporting text.

~~1.53~~ 1.54 Previous Local Air Quality Management Technical Guidance (LAQM.TG(09) ~~–~~) identifies wind tunnels and Computational Fluid Dynamic (CFD) modelling as useful tools with which to investigate the air quality impacts for certain meteorological scenarios and these should be used in ~~–~~addition to Gaussian plume models. ~~Policy D6 on Amenity reinforces the importance of modelling wind flow particularly around tall buildings and in dense urban locations to understand the impact on pollution.~~

Commented [TC48]: Specific amendment.
Reason: Removed as this is more relevant to wind force rather than transport of air pollutants

~~1.54~~ 1.55 OPDC will adopt EU established health-based standards and objectives for a number of air quality indicators (NOX, PM10 and PM2.5) until these are superseded by UK standards. Developments should not increase the area of exceedance. Some development will inevitably occur in areas where standards are exceeded. In these areas, developments should be designed to reduce exposure to pollution concentrations to protect the health of future residents and receptors.

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~~1.55~~ 1.56 ~~The design and layout of the new development including the orientation, massing and height of buildings and location of social infrastructure and green space influence exposure to poor air quality. Where possible, development should be designed to minimise exposure to pollution especially for vulnerable communities like young children, older people and people suffering from respiratory and other related illnesses. OPDC will apply 'agent of change' principles when considering the impact of air quality, i.e. if there is an existing use that generates air quality issues, such as a an industrial use or road, the onus will be on the new development to adequately mitigate against the impacts of air pollution.~~

Commented [TC49]: Specific amendment.
Reason: Relocated above to aid flow of supporting text.

Commented [TC50]: Specific amendment.
Deleted as repeats policy guidance elsewhere in supporting text, in Policy D6 and in the London Plan.

~~1.56~~ 1.57 Where combustion based sources of energy are used they must comply with the Mayor of London's Supplementary Planning Guidance (SPG) on Sustainable Design and Construction. Monitoring and modelling of pollutant concentrations has shown that NO2 concentrations in the area are between 5% below or above the annual mean Air Quality Objective (AQO) (above 38µg/ m-3) across wide areas of Old Oak and Park Royal. As a result, Band B emission standards for CHP plant and solid biomass boilers in the Mayor of London's Supplementary Planning Guidance (SPG) on Sustainable Design and Construction will apply.

~~1.57~~ 1.58 In addition, energy and waste facilities should be carefully positioned and designed to ensure that emissions do not impact on local residential development or civic amenities including schools, community, sport and health centres.

~~1.58~~ 1.59 Control of harmful emissions from all waste processing and transfer sites should be addressed using the mitigation measures set out in the AQS, including enclosing sites where feasible. This follows the principles of 'good growth' (see Policy SP2), and will help ensure onerous restrictions are not imposed on waste management operations.

Policy Area	Policy Action / Mitigation Measure
Transport	Minimise demand for travel by private motor vehicles and encourage transport by shared, low and zero emission modes. Provide a maximum of 1 car parking space per 5 residential units. Provide dedicated cycle lanes and attractive pedestrian routes. Design local roads to restrict vehicle speeds to 20mph. Enhance integrated rail, London ~~u~~Underground, London ~~o~~Overground and bus provision and prioritise sustainable transport through careful management of traffic.
Energy	Promote the use of low and zero emission energy provision. Ensure energy from Combined Heat and Power (CHP) / biomass meets the highest emissions standards, in line with London Plan guidance. Design provision of energy facilities to maximise rapid dispersion of emissions from discharging stacks and vents.
Waste	All new waste treatment and handling facilities should be fully enclosed. Work with existing businesses to reduce emissions including through enclosure of sites, reduction in emissions from transport and non-road based plant, and suppression of dust.
Overall Emissions	Support introduction of an Ultra-Low Emissions Zone (ULEZ). Work with TFL to designate a Low Emissions Neighbourhood for the OPDC area. Establish a Class C Clean Air Zone to encourage the use of low emissions vehicles. Work with TfL to promote use of zero emission buses and taxis in the OPDC area Minimise air pollution making new developments 'air quality neutral' or 'positive' in accordance with the Mayor SPG on Sustainable Design and Construction. Proposals should not increase the area of exceedance of EU established health-based standards and objectives for NO2 and PM10. Where new developments are introduced into an area where the standards and objectives are exceeded, developments should be designed to minimise and mitigate against increased exposure to poor air quality.

	Developers should produce an Air Quality Assessment with the planning application. The AQS provides further recommendations on matters for inclusion within the air quality assessment.
Monitoring	Support the installation of new automatic monitors for NO2 and PM10 on main A-roads (see figure 6.7) and around stations in the area and in adjacent areas of high concentrations of pollution. Support establishment of new NO2 diffusion tube sites. Integrate pollution monitoring with public information systems and smart city initiatives.
Design / Public Realm	Development and building design should not inhibit the effective dispersion of pollution. In particular, bus and taxi facilities should be designed to avoid the build-up of pollution or increase public exposure to elevated levels of pollution. Developments should provide adequate, appropriate and well located green space and urban greening to help reduce pollutant concentrations across the area.
Construction and Logistics	Minimise emissions from freight, delivery and servicing during the demolition and construction phase by adopting comprehensive air quality control measures. Follow the guidance set out in the Mayor's SPG on 'The Control of Dust and Emissions during Construction and Demolition' to assess the impact on air quality during construction and to inform mitigation. Localised AQ measures to tackle known issues in the OPDC area, particularly those associated with high NO2 within the GLA's Air Quality 'Focus Areas' (see figure 6.7). Renewable, mains or battery powered plant items should be used for Non-Road Mobile Machinery (NRMM) on construction sites. All demolition and construction sites should be monitored for the generation of air pollution. PM10 monitoring should be carried out at medium and high risk sites.

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POLICY EU5: NOISE AND VIBRATION

Development proposals will be supported where they:

a) ~~**apply the 'agent of change' principles to attenuation of noise and vibration;**~~

b) **submit a Noise and Vibration Assessment (NVA) which will be required for all major developments and in respect of all applications where the location is likely to be particularly sensitive to noise. The NVA should cover both the construction and operation phases of development and include predictive noise and vibration modelling to:**

- **i.** **avoid significant adverse impacts of noise and vibration on health and quality of life as a result of new development;**
- ~~**i.**~~**ii.** **demonstrate development complies with the most relevant and current building standards (BS); and**
- ~~**ii.**~~**iii.** **identify unacceptable impacts and secure the appropriate delivery of mitigation measures;**

c) **appropriately reduce exposure to existing noise generators such as waste sites, cultural facilities, strategic roads, rail or industrial uses, whilst ensuring the continued effective operation of those uses;**

d) **ensure plant and/or machinery can be operated without causing harm to amenity;**

e) **ensure noise and vibration is minimised from demolition and construction phases of development and from delivering and servicing of development once occupied; and**

f) **include features of positive soundscape interest and deliver high quality soundscapes.**

SUPPORTING TEXT

~~1.59~~ 1.60 Noise and vibration pollution has a major effect on amenity and health and therefore quality of life. It is a particularly significant issue in high density and mixed use areas and where residential buildings are located in close proximity to industrial and heavily trafficked areas and large construction sites.

~~1.60~~ 1.61 In accordance with Policy D6 ~~and the London Plan,~~ OPDC will apply 'agent of change' principle~~s~~ when considering the impact of noise and vibration i.e. if there is an existing use that generates noise~~, such as a cultural facility or an industrial use~~, the onus will be on the new development to adequately mitigate against the impacts of this noise.

1.62 OPDC will require all major development or developments that ~~that~~ are particularly sensitive to noise and/or vibration to undertake a Noise and Vibration Assessment (NVA). NVAs should be undertaken by suitably competent persons who are Corporate members of the Institute of Acoustics and by companies which are members of the Association of Noise Consultants. Suitably competent persons should be able demonstrate an understanding of the appropriate methods required to both assess and mitigate the various sources of noise and vibration included in the NVA.

Commented [TC51]: Specific amendment.
Reason: To remove repetition with policy covered in D6.

Commented [PF52]: Specific amendment.
Reason: To provide further guidance for contents of NVAs.

Commented [TC53]: Specific amendment.
Reason: To tie into policy D6 where the agent of change is dealt with.

Commented [PF54]: Specific amendment.
Reason: To provide further guidance for contents of NVAs.

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~~1.61~~ 1.63 The NVA should demonstrate that development proposals will comply with the most up-to-date British Standards Institution's (BSI's) Building Standards (BS) and it should also include predictive modelling to identify appropriate mitigation measures both at the construction and occupation phases of the development.

~~1.62~~ 1.64 The operational noise and vibration impacts likely to arise from the development should be assessed in accordance with appropriate recognised methodologies, such as BS 4142, Calculation of Road Traffic Noise (1988) and Calculation of Railway Noise (1995) or any subsequent standards. The effect of noise and vibration during the operational phase can be minimised by separating uses sensitive to noise from development that generates higher levels of noise and vibration. Noise sensitive development includes housing, schools and hospitals as well as offices, workshops and open spaces, while higher levels of noise is generated by rail, road and air traffic, industry, entertainment (e.g. nightclubs, restaurants and bars) and other uses.

Commented [PF55]: Specific amendment.
Reason: To provide further guidance for assessment of operational noise and vibration impacts.

~~1.63~~ 1.65 OPDC will only grant planning permission for development sensitive to noise and vibration in locations that experience noise and vibration pollution if appropriate attenuation measures are taken. This could include provision of measures such as:

a) noise and vibration insulation,
b) buffering between residential and commercial uses in the same building,
c) provision of winter gardens and balconies,
d) use of greenery to buffer streets,
e) varying of building elevations,
f) increased insulation around stations and limiting direct openings between building uses and stations,
g) buffering rail corridors through planting or use of screens, and
h) locating internal uses in buildings ~~that are~~ adjacent to rail and industrial sites that are less affected by noise.

~~1.64~~ 1.66 Attention should be paid to the use of machinery, plant and vehicles both during construction and in operation. Care should be taken in terms of citing and choice of machinery and plant, control over time and length of use, and provision of sound barriers and other facilities to attenuate the impacts.

~~1.65~~ 1.67 Whilst sound in the environment, especially that made by other people, has overwhelmingly been considered in negative terms, as both intrusive and undesirable, noise can if managed properly also have positive aspects. Acousticians are now beginning to acknowledge the relevance of positive soundscapes, moving away from a focus on negative noise to identify a means whereby the concept of positive soundscapes can influence behavioural characteristics of people living within it. The Mayor's Ambient Noise Strategy 'Sounder City' (Para 4F.29) states the importance of considering features of positive soundscape interest, which may constitute 'soundmarks'. City soundscapes can be part of their distinctive historic character and the sounds surrounding water features, such as the canal, can be valued positively. ~~OPDC will therefore support developments that seek to deliver high quality soundscapes.~~

DRAFT

POLICY EU6: WASTE

a) OPDC will ensure that proposals contribute towards meeting apportionment targets by supporting development proposals where they -safeguard:

~~Development proposals will be supported where they:~~

~~comply with the policies in the most up-to-date West London Waste Plan (WLWP);~~

~~safeguard:~~

i. ~~the existing permitted capacity at~~ the Old Oak Sidings site ~~waste management site~~ in Old Oak North and make efficient use of the site in line with Policy P21; and ~~and~~

~~i.~~ allocated sites and other existing waste management ~~sites~~ sites within the~~in Park Royal~~ OPDC area identified in the most up to date West London Waste ~~Plan~~ Plan.~~to meet local authority apportionment requirements, unless:~~

ii.

b) ~~compensatory site provision is provided in accordance with part c), i) to iii) below or it can be demonstrated that a loss of capacity will result in more waste being managed higher up the waste hierarchy; and~~

~~will not compromise the ability of the local authorities to achieve their waste apportionment targets;~~

Aany existing waste management site(s) lost to a non-waste use will be required to provide compensatory site provision which ~~normally~~ meets the maximum throughput that the lost site ~~could~~ achieved. Site provision should be made in the most appropriate location, according to the following sequential manner:

~~i.~~ within the OPDC areaborough ~~where~~ that ~~the site is located~~; or

~~i.~~

ii. within ~~the~~ the relevant waste ~~plan or~~ authority area based on where the lost site is located; or

~~ii. West London Waste Authority and Western Riverside Planning Authority area within which the site is located; or~~

~~iii. within Greater London.~~within Greater London;

~~iv.~~

~~v.~~iii.

c) Applications for new waste facilities or enhancements to existing waste facilities will be supported where they:

i. comply, ~~with other policies in OPDC's Local Plan and,~~ where applicable, with the policies in the most up-to-date West London Waste Plan;

ii. ~~prioritise locating any new waste facilities within existing allocated waste sites safeguarded~~ under part a);

iii. help to move waste up the waste hierarchy (see figure 6.10) with a focus on reuse, repair and remanufacture;

~~vi.~~iv. deliver and/or demonstrate how energy generation opportunities are future proofed to deliver carbon dioxide reductions and enabled to connect into area-wide district heating networks;

Commented [LL56]: Regulation 19(1) consultation amendment.
Reference: EU6/32
Reason: To clarify support for optimising the site.

Commented [LL57]: Regulation 19(1) consultation amendment.
Reference: EU6/12
Reason: To clarify that this refers to all sites in the WLWP

Commented [KT58]: Regulation 19(1) consultation amendment.
Reference: EU6/24; EU6/26; EU6/35
Reason: To clarify that all waste management sites will be protected in accordance with the London Plan.

Commented [LL59]: Regulation 19(1) consultation amendment.
Reference: EU6/39
Reason: To prioritise sites within the OPDC area.

Commented [LL60]: Specific Amendment
Reason: To provide policy criteria help with the assessment of any windfall sites

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~~vii.~~v. if relevant and appropriate, deliver anaerobic digestion and/or other bio-waste treatment and additional recycling facilities particularly to support greater levels of recovery in accordance with the waste hierarchy;

~~viii.~~vi. minimise CO2 emissions and where relevant, increase operational capacity and waste recovery rates;

~~ix.~~vii. fully enclose operational facilities; and

~~x.~~ adequately mitigate their impact on amenity, including ~~, the transport network,~~ air quality, noise, vibration, dust, litter, vermin~~,~~ and odours, ~~on~~ the transport network ~~other emissions~~ and other environmental considerations.~~;~~

viii.

e) Major development proposals will be supported where they demonstrate:

i. through a Site Waste Management Plan ~~submissions~~, waste ~~is being~~will be managed, both during construction and operation, as high up the waste hierarchy as possible;

ii. a collaborative approach with the Waste Authorities and OPDC is being positively adopted to help deliver strategic waste management systems in order to meet national and London waste recycling targets;

~~ii.~~ adequate provision for waste storage and collection within developments, in accordance with the London Waste Recycling Board's (LWARB) guidance on recycling and storage, ensuring:

iii.

~~A.~~ source segregation of bio-waste and other recyclables;

A.

~~B.~~ control of odour, nuisance and air and noise pollution from waste storage and collection; and

B.

C. working with relevant local waste authorities to ensure waste collection approaches align with current and future waste collection arrangements;

~~iii.~~iv. arrangements have been made to support an optimised approach to the reuse of domestic, commercial and construction waste. Where feasible, proposals should reuse and/or recycle a minimum of 95% of construction, demolition and excavation waste; and

~~iv.~~v. provision of appropriate details and training ~~is being~~to be provided to occupants, to support waste management and engage residents in waste recycling, to support the attainment of Mayoral municipal and commercial waste recycling targets.

SUPPORTING TEXT

~~1.66~~ 1.68 Waste is a major issue for London. London is seeking to reduce waste and in particular waste sent to landfill by promoting the waste hierarchy, as set out in the London Plan (see figure 6.10). It gives top priority to preventing waste in the first place. When waste is created, it gives priority to preparing it for re-use, then recycling, then recovery, and last of all disposal (e.g. landfill). Developments should demonstrate how they have considered managing waste in accordance with the waste hierarchy through design, construction and operation.

Commented [TC61]: Specific amendment.
Reason: To align with definition of amenity in glossary and provide specific examples of amenity considerations.

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~~1.67~~ 1.69 The London Plan apportions household and commercial waste arisings to each London Borough and requires them to allocate sufficient land to deal with their apportioned waste per year. A key objective of London Plan policy is to work towards 100% net self-sufficiency of waste management across London by 2026.

~~1.68~~ 1.70 Mayoral Development Corporations (MDCs) do not have their own apportionment targets but the London Plan requires, that where an MDC exists or is established within a borough, the MDC will co-operate with the Borough to ensure that their apportionment requirements are met. Also, the boroughs are still responsible for the collection of household waste and for making arrangements, through their statutory waste disposal authority (WDA), to dispose of this waste. The WDAs covering OPDC area are the West London Waste Authority and Western Riverside Waste Authority. OPDC~~C's~~ is ~~therefore~~therefore ~~seeking to work with the~~ working with the host boroughs to deliver a comprehensive and integrated approach to waste management.

~~1.69~~ For the part of the OPDC area covered by the London Boroughs of Brent and Ealing, OPDC has been working jointly with these boroughs, as well as Harrow, Hillingdon, Hounslow and Richmond upon Thames, to prepare the West London Waste Plan (WLWP). The WLWP was adopted by OPDC in July 2015 as a Development Plan Document and is part of OPDC's Local Plan. ~~The~~ WLWP ~~plan identifies two specific~~provides more information on a number of existing waste management sites and allocated waste sites within ~~Park Royal~~ the OPDC's area ~~that are safeguarded for waste~~ (see figure 6.9)~~:~~

~~1.70 Twyford Waste Transfer Station; and~~

~~Quattro, Victoria Road.~~

~~1.71~~

.

The WLWP and the safeguarding of these sites provide sufficient capacity to meet the current ~~satisfies the requirements of the London Plan (paragraph 5.80) to ensure that the~~ London Plan (2016) apportionment targets ~~are met in respect of the~~for ~~London Boroughs of~~ Brent and Ealing.

~~1.72~~ The London Borough of Hammersmith and Fulham is part of the Western Riverside Waste Authority (WRWA) area. There are ~~also~~ existing waste sites ~~Five waste sites that fall~~ within Hammersmith and Fulham, ~~are~~ also within OPDC's boundary (see figure 6.79)~~.:~~

~~1.73 Old Oak Sidings (Powerday)~~

~~1.74 European Metal Recycling (EMR);~~

~~1.75 Capital Waste Ltd;~~

~~1.76 UK Tyre Exporters; and~~

~~1.77~~ 1.71 ~~O'Donovan's Waste Disposal Ltd.~~

Commented [KT62]: Regulation 19(1) consultation amendment.
Reference: EU6/7
Reason: To provide clarity on the role of the local authorities.

Commented [LL63]: Specific amendment.
Reason: To identify other partners involved in the WLWP.

Commented [LL64]: Regulation 19(1) consultation amendment.
Reference: EU6/12
Reason: To direct readers to the adopted West London Waste Plan for accuracy and more information.

Commented [KT65]: Regulation 19(1) consultation amendment.
Reference: EU6/2, EU6/45
Reason: Figure 6.9 has been updated to reflect the position in the West London Waste Plan.

Commented [LL66]: Specific amendment.
Reason: Readers are now directed to the adopted West London Waste Plan for accuracy and more information.

Commented [LL67]: Specific amendment.
Reason: Removed as detail is provided in a map and in the evidence base.

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~~1.78~~ 1.72 The~~se~~ existing waste sites in ~~Old Oak~~Hammersmith and Fulham may be subject to transformational change and redevelopment in order to realise the planned growth of homes and jobs. OPDC has produced a Waste Apportionment Study and worked in partnership with the other Waste Planning Authorities (WPAs) in the WRWA area to prepare a joint Waste Technical Paper to demonstrate how OPDC is co-operating to ensure that the host boroughs' apportionment requirements are met.~~.~~

~~1.79 The Waste Technical Paper sets out the waste arisings within the WRWA area for a number of waste streams and examines the amount of waste management capacity available to meet the London Plan apportionment targets.~~ This Waste Apportionment Study demonstrates that ~~T~~the Old Oak Sidings (Powerday) site has sufficient capacity and land to meet ~~and exceed~~ LBHF's London Plan apportionment targets, with some potential surplus capacity available. The Powerday site~~,~~ ~~and~~ is therefore safeguarded and protected alongside other sites identified in the WLWP. ~~OPDC's Utility Study also identifies that the Old Oak Sidings site could also be a potential contributor to a strategic heat and energy network. It could also provide for bio-waste recovery.~~

1.73 The Waste Technical Paper also shows the capacity available to manage Construction, Demolition and Excavation waste and that there is no requirement for additional waste capacity related to the other waste streams.

1.74 ~~It is noted that a~~The Mayor has published a new draft London Plan (2017) ~~has been published~~ with higher apportionment targets set out for Brent and Ealing and a reduced overall target for Hammersmith and Fulham by 2041. OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority and, therefore, OPDC will continue to work positively with the host boroughs to help demonstrate how any new~~revised~~ London Plan apportionment targets would be met, and if necessary, this may trigger a~~the~~ review of this policy and relevant policies in the WLWP.

~~1.80~~ 1.75 ~~Other w~~Waste ~~management~~ sites not required to meet the boroughs' apportionment targets ~~–~~can still help drive improvements and flexibility in achieving ~~–~~self-sufficiency across London. Therefore, in line with London Plan Policy ~~5.17~~, any existing waste management sites which are ~~not required for waste apportionment and are~~ proposed for redevelopment will need to be replaced by ~~should promote additional~~ compensatory ~~site provision~~provision which can meet ~~in order to meet~~ the maximum throughput that the lost site could have achieved. Data on throughput should be assessed ~~over a three year timeframe to derive the, in~~ in accordance ~~with the new draft London Plan~~mayoral guidance.~~.~~ In line with Policy EU6, Aa sequential approach will also be applied to account for the proximity principle, which requires waste to be managed as close to source as possible. This policy requirement should be discussed with OPDC and the relevant local authority ~~with any applicants~~ at the earliest opportunity during pre-application discussions.

~~1.81 To support decentralised energy provision and bio-waste treatment, OPDC will support the development of proposals that bring forward innovative solutions for energy generation where they meet the London Plan carbon intensity floor emissions performance standards (400g/kWh electricity produced at the time of the publication of this Local Plan). To meet this standard, the feedstock would need to be 100% organic or residual waste (i.e. has little recyclable content in it, namely plastics) and operate in Combined Heat and Power (CHP) mode. In addition proposals will need to meet the air quality standards set out in Policy EU4.~~

Commented [TC68]: Specific amendment.
Reason: Relocated below to aid the flow of the supporting text

Commented [LL69]: Specific amendment.
Reason: To summarise other key findings in the evidence base

Commented [LL70]: Regulation 19(1) consultation amendment.
Reference: EU6/8
Reason: To provide an update on the draft new London Plan and highlight the potential need for a future review.

Commented [LL71]: Regulation 19(1) consultation amendment.
Reference: EU6/44
Reason: To clarify that all waste management sites will be protected in accordance with the London Plan.

Commented [TC72]: Regulation 19(1) consultation amendment.
Reference: EU6/21
Reason: To reflect additional guidance emerging in the new draft London Plan.

Commented [TC73]: Specific amendment.
Reason: To avoid duplication with the London Plan.

~~1.82~~ 1.76 OPDC's Utilitiesy Study ~~also~~ identifies that the Old Oak Sidings site could ~~also be a potential contributor to a~~potentially form part of a strategic heat and energy network. It could also provide for bio-waste recovery. OPDC will work with the operators of the waste sites and other relevant stakeholders such as~~,~~ the Environment Agency, the waste authorities, local authorities, businesses and residents to find ways to introduce energy generation in a way that delivers benefits and addresses adverse impacts to the area.

~~1.83~~ 1.77 Anaerobic digestion could help treat bio-waste ~~whilst also contributing to the~~and provide low carbon energy ~~strategy~~. These facilities could be planned in association with proposals for urban food growing and processing, and for green infrastructure, realising further social, economic and environmental benefits, and supporting other local plan objectives.

~~1.84~~ 1.78 Where applications propose new or enhanced facilities these will only be supported where the development can demonstrate that it will not adversely impact on the surrounding environment. In addition, proposals will need to demonstrate that they are compatible with the overall strategy for growth and intensification of the area, and improve the existing performance of the facility, in particular by enhancing efficiency and reducing emissions. In line with Environment Agency guidance facilities should be fully enclosed in order to minimise noise and air emissions in line with Policies EU4 (Air Quality) and EU5 (Noise and Vibration).

~~1.85~~ 1.79 Movement of waste out of the area can have a major impact on congestion, carbon emissions and air quality. OPDC will require developers to look at ways to minimise these impacts through for example:

a) the adoption of consolidation areas to collect, compact, process and hold waste within development sites;
b) the use of reverse logistics;
c) close working with local waste sites; and
d) use of rail and water transport options in line with Policy T8.

~~1.86~~ 1.80 The biggest impact in the initial phases of the development will be from Construction, Demolition and Excavation (CD&E) waste. The construction industry produces about 24% of total UK waste each year or more than 100 million tonnes. It is estimated by the UK Green Building Council that 13% of materials delivered to site are never used. As one of the biggest future construction sites in London the development is likely to create a very significant amount of waste if it is not carefully managed.

~~1.87~~ 1.81 Existing CD&E recycling targets in the London Plan are ambitious. OPDC's Environmental Standards Study identifies that to make the OPDC area best practice in terms of recycling, development in Old Oak and Park Royal should seek as a minimum to meet, and preferably to exceed these. These targets build on best practice in construction from projects like the London Olympics, Kings Cross and Crossrail.

~~1.88~~ 1.82 OPDC will therefore support major development proposals that include a detailed Site Waste Management Plan (SWMP) that follows the waste hierarchy. Construction sites will be expected to divert over 95% of the waste generated from landfill, a figure similar to what is being achieved on the Olympic Park, Crossrail, Elephant Park and other major developments.

~~1.89~~ 1.83 To support the elimination of waste, to promote reuse of construction waste and to encourage the development of a secondary materials market, developers should work with their contractors to incorporate these targets into their SWMPs.

Commented [TC74]: Specific amendment.
Reason: Relocated from above to aid the flow of the supporting text

Commented [KT75]: Regulation 19(1) consultation amendment.
Reference: EU6/27; EU6/36
Reason: To clarify that a range of stakeholders would be involved which may include but not be limited to the examples listed in the supporting text

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~~1.90~~ 1.84 Some of the most advanced construction waste processing plants in the UK are based in the OPDC area. National guidance on the waste hierarchy promotes the treatment of waste facilities as close as possible to sources of waste arising. The co-location of Old Oak and Park Royal and the existing waste treatment and processing facilities provides an excellent opportunity to develop exemplar approaches to resource efficient waste management that can support the circular and sharing economy policy (see Policy EU7 ~~below~~).

~~1.91~~ 1.85 Achieving high rates of municipal and commercial resource recovery and recycling in dense urban areas is very challenging. Average recycling rates in inner city areas, particularly in areas with tall buildings, in London are less than 30% [Footnote: Waste in Tall Buildings Study]. To meet national and London Plan targets, effective waste segregation and storage facilities in apartments will be required. Developments will also have to ensure there is sufficient space for on-site waste collection, storage and compaction and transfer facilities. It will be important to agree the design and sizing of facilities to be provided as well as the transfer arrangements with the Waste Authority responsible for collection.

~~1.92~~ 1.86 Provision of waste storage and collection within development should adopt the London Waste and Recycling Board's (LWARB's) guidance on recycling, and in particular ensure bio-waste can be separated out and systems put in place to manage odour, nuisance and noise associated with waste management. The infrastructure and management of waste should enable developments to contribute to the London Plan target to recycle 65% of all municipal waste.

~~1.93~~ 1.87 Innovation in communal waste collection facilities may be required to minimise the space required within plots and to encourage waste recycling. Residents will need to be actively engaged to encourage recycling and developers will need to provide residents with appropriate details on how to make best use of their waste collection and storage infrastructure, to support the attainment of Mayoral recycling targets.

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POLICY EU7: CIRCULAR AND SHARING ECONOMY

Major development proposals will be required to submit a Circular and Sharing Economy Statement, demonstrating:

- **a) how the design and construction of the development enables buildings and their constituent materials, components and products to be disassembled and reused at the end of their useful life;**
- **b) where, so far as is possible, the circular and sharing economy has been promoted through leasing or rental arrangements for building systems, products and materials;**
- **c) how sharing economy principles have been adopted in the design, construction and on-going operation of the development; and**
- **d) how circular economy principles have informed the design and implementation of energy (including heating and cooling), water and waste infrastructure.**

SUPPORTING TEXT

~~1.94~~ 1.88 The circular and sharing economy is an alternative to the traditional linear economy which is characterised by a take, make, use and dispose approach to the use of resources and materials. The linear economy has delivered rapid economic growth, but it has also contributed to climate change, waste, pollution and degradation of the natural environment. These problems are exacerbated by population growth, urbanisation and an increase in global per capita consumption, which is putting pressure on the environment and scarce resources.

~~1.95~~ 1.89 The circular and sharing economy sets out an alternative approach to urban development, industrial production, utility provision, consumption and waste disposal based on a take, make, use and remake model. This approach requires whole life thinking in which products and services are designed in such a way that they are non-polluting, use renewable resources sustainably and enable materials and resources to be reused at the end of their life. To deliver a circular and sharing economy will require new business models in which products, components and materials are designed to:

a) minimise their environmental footprint throughout their life;
b) last as long as appropriate;
c) be dismantled and reused or repurposed at the end of their useful life. This should facilitate more waste products and materials to be reused, repaired, refurbished, or remanufactured before they are recycled;
d) where appropriate, be leased or rented rather than sold so that the manufacturer retains ownership and responsibility for end of life disposal and reuse (and is therefore incentivised to ensure the costs of disposal are minimised and the value of reuse optimised); and
e) be shared, through co-use and exchange systems to make better use of products over their life.

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~~1.96~~ 1.90 Major development proposals will be expected to demonstrate through submission of a circular and sharing economy statement within Sustainability Statements, how the principles of the circular and sharing economy have been incorporated into the design, construction, operational use of and end life disassembly of new development. At Old Oak and Park Royal there are many opportunities to adopt circular and sharing economy principles and practice including:

a) Food: Park Royal is one of the biggest centres for food processing in the UK. Industrial and domestic food waste could be collected and treated to create nutrient, energy, CO2, water and other products that could be reused locally to produce energy, food and resources for the pharmaceutical and other industries thereby turning a product that is expensive to dispose of and is polluting into a high value resource. The process should be applied to the whole supply chain so that waste is reduced at the point of supply (see Policies P4 and P5).

b) Water: Water can be harvested, stored, treated and reused on site thereby relieving pressure on the sewers, reducing demand for potable water, and contributing to the quality of green infrastructure (see Policy EU3).

c) Energy: Renewable and low carbon energy including free sources of heat from the sewers, canal, data centres, Energy from Waste (EfW) and other sources can be harvested and used to provide heat and cooling to homes. Renewable electricity can be generated and supplied to homes and commercial space. Storage can be used to balance supply and demand and community interest companies could be formed to take part in supply and demand management (see Policy EU10).

d) Materials: Low impact, renewable materials can be specified in development. Materials that can easily be recovered at the end of their life should be used and assembly of materials and products (whether in buildings or white good etc.) should be designed for disassembly (see Policy EU8).

e) Fabrication: use of off-site and modular construction can reduce waste and enhance efficiency of construction. Light weighting of buildings and buildings that can be disassembled and reused should be embedded in the design process. Building facades and other elements that will be replaced or repaired over their life should be designed so they enable repair, reuse or refurbishment at low cost. Leasing of short and medium life products should be considered (see Policies SP2 and EU8).

f) Mobility: Walking and cycling should be promoted as the preferred choice where possible and practical; low carbon and zero emission vehicles should be promoted that provide energy storage when not in use to the power network (see Policy T4); and new mobility services should be designed to maximise asset utilisation. These should be supported by sensor networks, predictive analytics and user-facing digital services to help optimise use of system and deliver a high quality user experience.

g) Transport: Measures such as car clubs should be promoted, in accordance with Policy T4.~~,~~ These should be accompanied by suitable electric vehicle charging infrastructure which should be designed to limit excessive peaks in electrical demand and where possible, utilise locally generated renewable energy. ~~together with local power networks that can supply locally generated power to charge electric vehicles, and use those vehicles as part of a storage and back up supply when demands peak and / or vehicles are idle~~.

h) Communal space: Providing space in communal areas for facilities that people need, but do not often use. Examples could be laundry and ~~dry cleaning~~ facilities, communal kitchen space, spare rooms for visitors and hardware and tools (see Policy D4).

Commented [PF76]: Specific amendment.
Reason: To clarify which validation document the information should be provided within.

Commented [TC77]: Specific amendment.
Reason: To align with Utilities Study

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i) Maker and mender centres: Locations in the neighbourhood where communities can take, make and repair products. These centres could be designed to take all sorts of products from bulky furniture to electrical items as long as they can be reused, repaired or repurposed. The centres could be kitted out with machinery and facilities to help repair from 3D printers to routers and laser cutters. They would help reduce waste and provide new jobs. These facilities would be part of the social infrastructure (see Policy TCC4).

j) Skills sharing: providing space or an online platform for the community to share their skills and resources (see Policies D4 and EU11).

k) Logistics: Movement of goods should be consolidated, smart technology used to optimise use of vehicles; last mile deliveries should be by clean vehicles and at times when they cause least disruption; reverse logistics should be adopted to support waste reuse where possible; new technologies like drones can be used to enhance optimisation and reduce impacts on roads. Non-road based transport including rail and water should be fully integrated and used to support movement of goods and waste (see Policies T7, T8 and EU11).

l) Flexible design: In accordance with Policy SP2, buildings and public space should be designed so that they are highly adaptable to economic, demographic/social, technical and commercial and environmental change. They should be designed for flexibility, interoperability, disassembly and reuse. Consideration should be given to sharing and leasing of space over different timescales to optimise use. This could include sharing spaces between different uses at different times of the day and night Maker space, for example, could be rented out for different periods of time and by the desk, room or whole facility.

m) Digital platforms: These should be provided to help communities connect and share space, resources, time, experience and skills. Community ownership of assets (energy, mobility, shared space, social and cultural infrastructure, goods and services) should be enabled and supported (see Policies EU11 and DI3).

n) Waste: Opportunities should be maximised for the separation and collection of recyclables and minimising waste during the life of the building through innovative use of collection methodologies/technologies, and a coordinated campaign of communications and engagement on waste minimisation and recycling (see Policy EU6).

o) Smart monitoring: Exploring the use of smart technology to measure, monitor and track waste collection, processing and resource utilisation to enable better waste management practices and to enhance resource recovery (see Policy EU11).

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POLICY EU8: SUSTAINABLE MATERIALS

Proposals will be supported where they use high-quality durable and adaptable materials, finishes and details that are, where appropriate:

- **a) permeable and porous to support policy EU3;**
- **b) noise absorbing to support policy EU5; and**
- **c) non-reflective and low heat absorbing to reduce the urban heat island impacts of development.**

Proposals will be supported where they use sustainable materials that:

- **d) where feasible are sourced locally;**
- **e) reduce embodied carbon in the development;**
- **f) where feasible use rapidly renewable and healthy materials;**
- **g) are designed to last and wear well over the life of the development;**
- **h) are sourced from reused and recycled content. A minimum of 20% of the total material value of new buildings and, infrastructure and landscape works should derive from reused or recycled content; and**
- **i) use 100% of timber from sustainably certified sources.**

Commented [KT78]: Regulation 19(1) consultation amendment.
Reference: EU8/6
To clarify implementation of the policy.

SUPPORTING TEXT

~~1.97~~ 1.91 The high density environment of Old Oak and industrial nature of Park Royal will require the use of materials that are hard-wearing and adaptable, and that will last and weather well. Access to building elements in tall buildings is difficult and replacing elements like facades can be very costly. Procuring materials that are able to withstand the test of time and will retain their aesthetic qualities and define the character of an area over several generations, in the same way brick has lasted and defined the character of London, will be essential to deliver long term value, quality and sense of place.

~~1.98~~ 1.92 The choice of materials can also impact on the environmental quality of the area. Whilst the contribution that individual developments can make might seem minor, the overall impact of many developments can be very significant. Key issues to consider include the porosity of paving materials and the contribution these can make to achieving green field run-off rates (see Policy EU3); the impact different materials have on the soundscape and their ability to absorb or reflect noise; and the reflectivity and conductivity of materials and their impact on the urban heat island and sunlight intensity in public areas.

~~1.99~~ 1.93 Considerable investment and progress has been made by the construction product industry to develop materials that have a low embodied carbon, are healthy, use sustainably sourced materials, use secondary/recycled products, can be disassembled and reused at the end of their useful life and enhance the overall performance of buildings. OPDC will encourage the use of these materials where possible to reduce the lifetime impact of the development on the environment.

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~~1.100~~ 1.94 One of the most positive contributions a major construction project can make to an area is to source materials locally. This is often difficult but contractors should seek out local sources wherever possible as they put income and jobs into the local economy and reduce emission associated with bringing materials to site from longer distances.

~~1.101~~ 1.95 Examples of innovation that are making significant contributions to the use of sustainable materials and overall environmental performance include:

a) New smart glass with coatings that can help increase the thermal performance of buildings and reduce demand for heat and at the same time reduce incoming solar gain and potential for ~~therefore~~ overheating;
b) Roofing and cladding materials that integrate solar photo voltaic technology, and can therefore act both as protection and a source of energy generation;
c) Innovation in smart and low embodied concrete that can for example absorb carbon dioxide, reduce embodied carbon, uses high levels of recycled material or is self-healing and therefore requires less maintenance. Whilst some of this innovation is cutting edge, low carbon concrete has been used on many projects including the London Olympics. On the London Olympics, Crossrail and other major projects, between 20% and 80% of the material in the concrete was procured from secondary sources including pulverised fuel ash (PFA) and granulated blast surface slag (GGBS) and recycled aggregate and cement substitutes. These projects demonstrated that over 20% of the total monetary value of materials on major construction sites could be sourced from secondary sources without impacting on cost. Major contractors like BAM and Skanska are regularly achieving these standards as evidenced in OPDC's ~~the~~ Environmental Standards Study;
d) Projects are also increasingly using materials like cold asphalt and recycled concrete kerbs that make use of recycled materials and have a lower embodied carbon content than more traditional materials;
e) Innovation in healthy materials has made significant progress in response to concerns about indoor air quality resulting from off-gassing, poor ventilation and other design and construction related issues. ~~,~~ ~~P~~Paints which used to contain lead ~~and volatile organic compounds (VOC)~~ are now free of ~~both these~~this metal and ~~volatile organic compounds (VOC) have been reduced and are often now eliminated from paints and other materials~~products. Other products have also ~~eliminated~~ reduced the use of chemicals which can cause harm to health and impact on indoor air quality including carpets and textiles etc;
f) The Waste Resource Action Plan (WRAP) carried out research into the use of recycled products in construction and identified that waste could be significantly reduced in construction and over 20% by value of the materials used on development could be sourced from recycled or secondary sources without impacting on cost. Their work was successfully adopted on the Olympic Park and has subsequently been used on other projects as evidenced in the Environmental Standards Study;
g) The use of wood in construction is becoming much more common. Cross laminated timber and other timber systems are regularly being used to make multi story buildings including the structural components. Where these materials are sourced from sustainable forests they can make a positive contribution to biodiversity and land management and can help reduce the life time carbon emissions of the building and provide a healthy indoor environment. They are also often constructed using innovations in off-site manufacturing and can be erected quickly and potentially dismantled with parts reused at the end of their life;

Commented [KT79]: Regulation 19(1) consultation amendment.
Reference: EU8/5
Reason: To address indoor air quality

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h) Innovation in the use of rapidly renewable materials should also be promoted. These are materials that are defined as natural, non-petroleum-based building materials that have harvest cycles under 10 years. Such materials include bamboo, straw, cork, natural linoleum products (such as Marmoleum), wool, wheatboard and strawboard. The USA based Leadership in Energy and Environmental Design (LEED) assessment process, which is the biggest green building certification system in the world, is promoting the use of these materials as they can contribute to better land management and biodiversity and generate income for farmers ~~in the developing world~~; and

i) Responsible sourcing of materials is encouraged by the London Plan and required by BREEAM. Developments are increasingly using materials from suppliers who participate in responsible sourcing schemes that are accredited and recognised across industry. Such schemes include but are not limited to the BRE BES 6001 Framework Standard for Responsible Sourcing and FSC and PEFC certified timber. The UK government established Central Point of Expertise on Timber (CPET) has carried out work demonstrating that sustainable timber can be procured at little or no extra cost. Materials should also be procured from suppliers that operate Environmental Management Systems certified against ISO 14001 or EU Eco-Management and Audit Scheme (EMAS) standards, covering all stages of material manufacturing. These schemes are regularly used on major projects by developers like Lend-lease, British Land and Hammersons and can be delivered at no additional cost as evidenced in ~~the~~ OPDC's Environmental Standards Study.

~~1.102~~ 1.96 OPDC will support development that adopts the above measures as part of the overarching approach to sustainable place making.

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POLICY EU9: MINIMISING CARBON EMISSIONS AND OVERHEATING

a) Major development proposals will be supported where they:

i. meet or exceed the on-site carbon emissions targetstandards set out in the London Plan energy hierarchy;

ii. where they cannot deliver the London Plan CO2 reduction targets on-site, they make a sufficient financial contribution towards carbon reduction in line with the OPDC's carbon off-set policy;.

iii. future proofdesign buildings to use low carbon heat sources in future and when connecting into heat networks, design building services to achieve low flow return temperatures to optimise network efficiency;

iv. demonstrate how carbon reduction measures are being implemented and are performing to achieve the calculated CO2 reduction targets by carrying out post-construction audits to demonstrate that the carbon reduction measures have been fully implemented and are achieving the calculated C02 reduction targets;

v. demonstrate that the risks of overheating have been addressed through the design of the development. To address the risks of overheating, applicants for major developments should accord with the Mayor's cooling hierarchy and carry out modelling in line with the most up to date guidance from the GLA and CIBSE. Modelling should take account of the predicted risks of climate change; and

vi. provide appropriate smart technologies and guidance to enable occupiers to monitor and manage their energy use; and

vii. submit an energy statement which shows compliance with this policy;

b) All development proposals for non-residential development will be supported where they achieve BREEAM Excellent rating.

Commented [PF80]: Specific amendment.
Reason: To align with the Utilities Study.

Commented [PF81]: Specific amendment.
Reason: To clarify policy requirements.

Commented [PF82]: Specific amendment.
Reason: To accord with Mayoral policy/guidance.

Commented [PF83]: Regulation 19(1) consultation amendment.
Reference: EU9/8
Reason: Relocated to Policy D4.

SUPPORTING TEXT

1.103 1.97 The London Plan requires all new residential development to be zero carbon, with non-residential development meeting this target from 2019. In line with the London energy hierarchy, buildings should be designed to reduce energy demand. This will allow occupants to both minimise their fuel bills and reduce their carbon emissions. This positively supports the governments affordable warmth agenda, designed to take people out of fuel poverty. The Mayor's vision is that London becomes a zero carbon city by 2050. The new draft London Plan (2017) and the draft London Environmental Strategy encourage Opportunity Areas and in particular, Mayoral Development Corporations to set high standards in environmental sustainability. The new draft London Plan (2017) requires the regulated CO_2 emissions for new homes to be reduced by a minimum of 10% against Part L of Building Regulations Target Emission Rates, through energy efficiency alone. Non-domestic development is encouraged to reduce regulated CO_2 emissions by 15% or more through energy efficiency measures alone. OPDC expects developments to meet and where feasible improve on these targets.

Commented [PF84]: Specific amendment.
Reason: To reflect new Mayoral guidance.

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~~1.104~~ 1.98 As part of the overall strategy to deliver zero carbon development, the London Plan also promotes supply of low carbon energy and provision of on-site renewable technologies. At the scale of development proposed in the OPDC area, adopting decentralised energy systems is likely to be the most cost effective way to deliver and future proof carbon reductions. Policy EU10 (Energy Systems) sets out policy for low carbon energy networks.

~~1.105~~ 1.99 Previous work by Government as part of exploring zero carbon policy identified that for many schemes, achieving zero carbon homes purely through on-site measures would not be cost effective or technically feasible. It was recognised that in many cases carbon savings would be delivered more cost effectively off-site. The Mayor's SPG on Sustainable Design and Construction1 notes that London Boroughs should establish a planning related carbon dioxide reduction fund and set a price at which the carbon dioxide short fall will be calculated.

~~1.106~~ 1.100 OPDC will prepare a supplementary planning document, setting out the rate per tonne of carbon dioxide and the scheme for applying the funds raised. OPDC will work with neighbouring boroughs to establish a ring-fenced offset fund to support delivery of carbon saving projects off-site and put in place appropriate measures to recruit a pipeline of suitable projects. OPDC will develop guidelines on the projects that can be supported (consistent with future London-wide guidance produced by the GLA). Appropriate monitoring procedures will be put in place to ensure that projects supported by the fund are delivered as planned and carbon savings realised. Offsetting payments will be secured through Section 106 agreements.

~~1.107~~ 1.101 As set out in the supporting text to Policy EU10, low temperature district heating systems are expected to offer greater efficiency as decarbonisation of the electricity grid begins to favour the use of heat pumps utilising low carbon heat sources. To enable the use of low temperature heat networks, systems within buildings will need to be designed and commissioned for low temperature operation. Please see OPDC's Infrastructure Delivery Plan for OPDC's requirements relating to this. ~~-~~

~~1.108~~ 1.102 Studies have shown that buildings do not perform as well in operation as anticipated when they were being designed. Undertaking audits and testing will help identify and rectify causes of the performance gap resulting from the construction and commissioning of the building.

~~1.109~~ 1.103 Residents' behaviour can significantly impact on energy demand. It is therefore important to explain and provide details on how to operate their home in an energy efficient manner. Where they have agreed for their energy use data to be made available, residents should be offered easy to read assessments outlining actual energy use and offering advice on how this could be reduced. These should where possible provide appropriate benchmark comparators, for example, against the average for homes of a similar type in the area. OPDC will work with developers, energy suppliers and residents to determine how this can be accomplished, while ensuring appropriate data protection.

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~~1.110~~ 1.104 The risks now and into the future of overheating are significant particularly on dense and tall development, in south and west facing apartments and in single aspect units. In preparing an energy statement, developers should set out the design measures that have been introduced to mitigate the risk of overheating and minimise the demand for cooling. Developers should undertake dynamic overheating modelling in line with CIBSE guidance TM52, TM59 and using TM49 guidance in relation to weather data for London, or where these approaches are superseded ~~they will be required to use~~ the most up to date modelling standards and guidance should be followed.

Commented [TC85]: Specific amendment.
Reason: updated to reflect relevant new guidance.

~~1.111~~ 1.105 Accurate, real-time information on energy demand will inform demand side response strategies, enabling demand and supply to be better managed, overall costs reduced and to support more effective energy investment planning. Smart meters (and in-home displays) are necessary to achieve this. The Government is requiring energy suppliers to install a smart electricity and/or gas meter (with displays) in every home. There is no similar requirement for heat meters for district energy systems but similar smart heat meters and displays do exist and will be encouraged to be installed and used.

~~1.112~~ 1.106 As regulated loads are progressively reduced, the importance of reducing unregulated loads increases. Evidence from the Energy Systems Catapult suggests growing use of ICT and other 'small power' electronic equipment is increasing unregulated loads. Use of smart ~~technologies~~technologies to monitor and manage unregulated loads will help reduce demand.

~~1.113~~ 1.107 ~~Ensuring development is environmentally sustainable is critical to delivering the Local Plan spatial vision. To deliver and demonstrate this, non-residential development, both stand-alone and as part of mixed use development, will be expected to deliver the Building Research Establishment Environmental Assessment Method (BREEAM) Excellent rating. BREEAM is the most widely recognised UK industry standard for assessing environmental standards in non-residential buildings. As an independent assessment process it provides an objective way to assess the quality of development. The assessment rates buildings from unclassified to outstanding. 10% of new non-domestic buildings are achieving Excellent. Where environmental considerations are designed into a development from the start they are achieving this at very little additional cost. OPDC therefore will require all new non-domestic buildings to achieve a minimum of Excellent. Residential development will be expected to accord with the relevant latest London and national guidance.~~

Commented [PF86]: Regulation 19(1) consultation amendment.
Reference: EU9/8
Reason: Relocated to Policy D4.

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POLICY EU10: ENERGY SYSTEMS

To promote the delivery of low carbon, energy efficient and integrated electricity, ~~and~~ heat and cooling~~th~~ networks, major development proposals should:

a) support the delivery of local smart energy grids including generation and storage of power from multiple sources;

b) support and contribute to/and or deliver low carbon heat networks. Development should prioritise connecting to strategic area wide low temperature district heating networks when and where available and where not available, provide on-site heating solutions and future proof the development so that it can connect into a low carbon low temperature district heat network if and when it becomes available;

~~b)~~c) support and contribute to/and deliver low carbon cooling networks where feasible and appropriate. Development should prioritise connecting to strategic area wide district cooling networks when and where cooling is required and where these networks are available and contribute to reducing energy and CO_2 emissions. Where a network is not available, provide on-site cooling solutions and future proof the development so that it can connect into a low carbon district cooling network if it becomes available;

Commented [PF87]: Regulation 19(1) consultation amendment.
Reference: EU10/14
Reason: To define requirements for delivering low carbon cooling networks

~~c) adopt the following sequential hierarchy when selecting a preferred heat solution:~~

- **~~i. use available secondary heat sources, in conjunction with heat pumps, where required. Proposals for energy generation or generators of significant amounts of waste heat should be designed to enable current or future connection to a local carbon heat network for heat off-take;~~**
- **~~ii. generate clean heat and/or power from renewables or hydrogen fuel cells;~~**
- **~~iii. use gas fuel cells;~~**
- **~~iv. use Combined Heat and Power (CHP); and~~**
- **~~v. use gas boilers, prioritising communal boilers;~~**

Commented [PF88]: Specific amendment.
Reason: To avoid repetition with policy guidance provided in the new draft London Plan.

d) provide evidence that appropriate management mechanisms will be put in place to ensure that the end customers are protected in respect of the price of energy provided and the level of service and ensure heat loss from the network is minimised;

e) demonstrate that there is capacity in the network to facilitate delivery of their development at the time of the application and the expected delivery period; and

f) contribute to and/or deliver new heat, cooling and electricity networks to accord with the specification requirements set out in OPDC's Infrastructure Delivery Plan (IDP).

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SUPPORTING TEXT

~~1.114~~ 1.108 The Mayor is committed to reducing London's carbon emissions significantly over the next few decades. Development on the scale envisaged in the OPDC area has the opportunity to deliver low and, over time, zero carbon development in line with the Mayor's aspirations. As the Old Oak and Park Royal area represents one of the biggest development projects in London, setting new standards across this development can be a catalyst for better development across all of London's Opportunity Areas. However, there is a cost associated with delivering low carbon development and careful decisions therefore need to be made when choosing the best way to achieve this aspiration.

~~1.115~~ 1.109 Measures supporting energy efficiency (see Policy EU9) are an important step towards ensuring a zero carbon future in Old Oak and Park Royal. Avoidance over the long run is the most cost effective way to achieve carbon reduction and it reduces running costs for occupants, which in affordable homes can be particularly beneficial.

~~1.116~~ 1.110 In conjunction with an emphasis on energy efficiency, the achievement of the Mayor's zero carbon targets will require the adoption of innovative approaches to the generation and supply of heat, hot water and power. The Government's Energy Systems Catapult predicts that peak energy demand by~~in~~ resident~~sial~~ and ~~development~~ businesses will increase very significantly as a result of increasing electrification of heating, greater uptake of electric vehicles and increasing use of computers and other devices. Local smart energy grids can play an important role in mitigating the impacts of this and supporting a low carbon and resilient energy network. The roll out of smart mete~~rsring~~ in homes, improvements in communications technology, reducing costs for renewable energy generation and battery storage, provide greater opportunities to use demand management to shift flexible demands, store energy and reduce peaks in electrical demand. Energy pricing structures and system balancing mechanisms are expected to increasingly favour local demand management. Dynamic balancing of demand and supply on local distribution networks will play an increasing role in ensuring a resilient low carbon and cost effective electricity supply system. New smart infrastructure must be designed to enable this through connection of local generation sources and appropriate provision of storage, metering and control and communication technology.

~~1.117~~ 1.111 In respect of heat, OPDC's preferred approach is to develop a strategically planned decentralised heat network. In accordance with the new draft London Plan, secondary heat sources for decentralised networks should be prioritised. OPDC's Utilities Study demonstrates that the OPDC area has access to a number of low carbon heat sources including ~~Energy from Waste (EfW),~~ heat from the Grand Union Canal, ~~heat from~~ sewage networks, ~~and heat from~~ aquifers and potentially heat from Energy from Waste (EfW). The work has also demonstrated that the available low carbon heat sources could meet ~~all~~ much of the baseload heat demand for the ~~first 20 years of the~~ development ~~trajectory and potentially beyond~~. ~~Any~~ heat network would need to accord with guidance set out in OPDC's Infrastructure Delivery Plan (IDP).

Commented [PF89]: Specific amendment.
Reason: To accord with Mayoral guidance.

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1.112 In non-residential buildings, it is likely that cooling may also be required. In some locations, low carbon cooling networks may be a more efficient way to deliver cooling to buildings particularly where there is a cluster of non-residential developments or buildings with high cooling loads. Cooling networks could enable improved heat rejection efficiencies or rejected heat to be recovered.

~~1.118~~ 1.113 OPDC is seeking to promote the most cost effective and resilient way possible to achieve a strategic approach to low carbon energy provision. A strategic heat network is likely to consist of a series of energy centre clusters and district heat networks. Over time these energy centres would ideally be connected to provide additional resilience and flexibility to support the use of the most cost effective and low carbon energy sources at any time of the day.

~~1.119~~ 1.114 Whilst promoting a strategic site-wide approach, it is important to recognise that this would likely require a more interventionist approach and investment ahead of need. In recognition of the timescales and the costs involved in delivering a strategic area-wide or clustered approach, all new development must continue to comply with London Plan policy and be designed so that it can plug into the low carbon district networks/clusters and deliver on-site heating solutions.

~~1.120 Development densities and the need for homes to be served by low carbon heating and power systems are expected to favour delivery of well-designed heating networks capable of being supplied from low carbon heat sources. The networks themselves should look to sequentially prioritise the most carbon efficient heat and energy sources. The Mayor is promoting the utilisation of heat from local energy sources including secondary heat. In the OPDC area, EfW facilities provide a significant potential for heat. Where developers come forward with EfW schemes these will be supported where they comply with other relevant policy considerations (e.g. air quality) and are designed from the outset to make use of the available heat. Equally, there are other sources of significant waste heat, which could viably contribute to a low carbon heat network, such as plant and datacentres. These should also be designed to connect into, or be future proofed to connect into a low carbon heat network.~~

~~1.121 Continuing decarbonisation of the electricity grid is expected to reduce the carbon saving potential for gas CHP engines, while improving the carbon saving potential for heat pumps. Heat pumps can help to utilise natural low temperature heat sources including air, canals, rivers, deep aquifers, and sewers. Heat pumps operate at greater efficiency when the difference between source and supply temperature is minimised. Lower temperature building heating systems coupled with more efficient thermal insulation help to flatten space heating demand profiles, enabling more efficient base load supply and lower peak generation capacity. These factors favour designing the heating services within buildings and the primary and secondary networks that serve them to operate at lower temperatures.~~

~~1.122~~ 1.115 New technologies and renewable technologies are evolving rapidly including solar hot water, Photovoltaic (PV), and fuel cell technologies. They are also becoming more commercially viable. As these systems evolve it is likely that they will be able to provide low carbon heat and power cost effectively allowing development to move away from fossil fuel based systems.

Commented [KT90]: Regulation 19(1) consultation amendment.
Reference: EU10/14
Reason: To define requirements for delivering low carbon cooling networks.

Commented [TC91]: Specific amendment.
Reason: Removed as repeats supporting text covered above.

Commented [TC92]: Specific amendment.
Reason: Removed as repeats guidance now covered in the new draft London Plan.

~~1.123~~ 1.116 Evidence suggests that where heat networks have been installed, heat is often being lost through poor installation resulting in leakage and heat loss and poor commissioning. The loss can be as high as 40%. This can contribute to overheating of buildings. Systems should be installed in line with industry best practice in order to prevent overheating, keep user costs to a minimum and minimise carbon emissions. The Association of Decentralised Energy and CIBSE have developed the Heat Networks Code of Practice for the UK1 and the GLA have developed the District Heating Manual for London2. The Code of Practice and Heating manual should be adopted or where this has been superseded, the most up to date guidance should be used.

~~1.124~~ 1.117 Heat and cooling networks in the UK are currently unregulated, unlike power and water utilities. This has led to concerns regarding the protection customers receive in terms of levels of service, the price they pay for energy and how vulnerable customers are treated. In the absence of a regulated industry the Heat Trust3 has established a set of customer service standards and customer protection requirements comparable to the quality and performance standards for regulated utilities and which draw on legislation and industry best practice. OPDC will support proposals that protect customers in respect of price of energy provided and the level of service.

~~1.125~~ 1.118 ~~The~~ OPDC's Utilities Study shows there is sufficient transmission capacity within the National Grid network. However, the electricity infrastructure within the area is close to capacity and insufficient to cater for the full demand of the development envisaged over the lifetime of the Local Plan. Electrical power provision is a regulated industry and Distribution Network Operators (DNOs) can only respond to requests for additional capacity as and when they are made. In situations where a large new development is planned the regulated approach can cause issues. Development can be delayed as the costs of increasing step changes in infrastructure can be excessive to a smaller developer who may be put off and wait for another larger developer to come along and fund the infrastructure upgrades. To support timely delivery, applicants for major developments should demonstrate active engagement with OPDC who are seeking to secure investment ahead of need to enable development to proceed. In addition or where a network has not been installed, developers should work with the appointed DNOs and IDNOs to identify spare capacity in the area and where none exists, developers will be expected to demonstrate to OPDC their proposed approach to secure an increase in capacity to support the timely delivery of development.

Commented [PF93]: Specific amendment.
Reason: To support delivery of infrastructure.

DRAFT

POLICY EU11: SMART TECHNOLOGY

a) OPDC will work with partners and stakeholders to position Old Oak and Park Royal as a world leading location for the adoption of smart city technologies, systems and approaches.

b) Development proposals will be supported where they directly provide and demonstrate in their design the flexibility and adaptability to:

i. incorporate smart city technologies and approaches that enable resources, space, systems and materials to be monitored and managed efficiently;

ii. integrate smart city management systems or where available adopt OPDC's smart city management system to provide interoperable, open and usable data;

iii. ensure that any smart city technologies and approaches can be updated over time to respond to innovation;

iv. adopt protocols and systems that are compatible with others used in OPDC in order to allow for the safe sharing of information and data without compromising data protection;

v. ensure open access provision of wired and wireless broadband technologies delivering the highest speeds to provide a wide range of services. Development should prioritise connecting to strategic area wide telecommunications networks when and where they are available; and

vi. support and enable effective and efficient provision of smart services by OPDC, local authorities, statutory undertakers, Independent Distribution Network Operators (IDNOs), social infrastructure providers including health and education services and other organisations that are responsible for managing the public realm and supplying vital services to the area.

Commented [PF94]: Specific amendment.
Reason: To support strategic telecommunications networks.

SUPPORTING TEXT

~~1.126~~ 1.119 The transformative change proposed across Old Oak and Park Royal and the timescales involved requires OPDC to consider how the area will function over the coming decades and what role smart city technology will have. In accordance with Policy SP2, OPDC wishes for the OPDC area to be a place where smart city innovation and technology will be fully embraced and harnessed to create opportunities and address challenges to development. OPDC will expect developers to also contribute to the delivery of this vision.

~~1.127~~ 1.120 OPDC will work with partners and stakeholders to position Old Oak and Park Royal as a global leading location for the exploration and implementation of smart city technology, concepts and systems to:

a) plan, deliver and manage development;
b) improve the quality of life of local people and Londoners;
c) and capture economic, social and environmental opportunities;
d) address challenges and barriers; and
e) give access to place makers and service providers to provide joined up and efficient services that respond to customer needs.

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~~1.128~~ 1.121 OPDC will work closely with the Smart London Board and other stakeholders, including the GLA, British Standards Institute, HyperCat, Catapult Centres, Imperial College and University College London to ensure that the approach adopted is cutting edge and adaptable, accessible and open.

~~1.129~~ 1.122 Open and interoperable data can support the management of space and resources and reduce the carbon footprint of people living and working in the area and enhance the quality of life for all. In providing open and interoperable data, including appropriate digital Building Information Management (BIM) models, proposals will help OPDC achieve its aspirations in delivering an open and secure digital environment. Specifically, this will aid OPDC to plan, deliver and manage development while creating business opportunities, including application development for a range of technologies.

~~1.130~~ 1.123 Smart technology will be used to help provide insights into the area as it evolves and to support the ~~development of the~~ evolving ~~masterplan~~development, iterations of the Local Plan, better decision making, public engagement, governance and resource utilisation.

~~1.131~~ 1.124 Smart City technology, tools and practices are rapidly evolving. OPDC wishes to ensure that smart technology can be easily and economically upgraded to respond to future innovation. It will be important that new development proposals adequately demonstrate how their proposals are sufficiently flexible and adaptable to accommodate future innovation in their design and operation over time to enable the built environment to respond to future environmental and social requirements. Whilst OPDC wishes to provide fast high quality access to smart data and systems, it is also mindful of the need to protect users and their data. Protocols, systems and standards will therefore be established to protect data and vulnerability to misuse. Data will be kept in a secure environment.

~~1.132~~ 1.125 There are existing broadband issues in the OPDC area, in particular, in Park Royal. OPDC is working with broadband and telecommunications companies to overcome these. New development proposals should deliver the highest speeds of wired and wireless broadband, to enable to the Old Oak and Park Royal area to appropriately compete with other businesses on the global stage. Developers should engage early within OPDC to identify existing provision and to design their telecommunications infrastructure to appropriately connect into any area-wide open access network. Specification requires, where known, are included within OPDC's Infrastructure Delivery Plan.

Commented [PF95]: Specific amendment.
Reason: To support strategic telecommunications networks.

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POLICY EU12: EXTRACTION OF MINERALS

Applications for mineral extraction development will be supported where they:

- **a) do not undermine the timely delivery of OPDC's homes and jobs targets or capacity identified in the Places chapter and/or ~~s~~Site A~~a~~llocations;**
- **b) adequately protect the amenity of nearby residents and businesses from the effects of the operations, particularly in regard to air quality, odour and noise and vibration;**
- **c) are sensitive to and conserve and enhance the character of the urban landscape, green infrastructure and designated and non-designated heritage assets;**
- **d) do not have an unacceptable impact on the transport network and provide appropriate site access and routing for heavy vehicles;**
- **e) demonstrate that the proposal would not give rise to unacceptable pollution to land and/or the water environment;**
- **f) adequately control and mitigate greenhouse gas emissions and dust during construction and operation;**
- **g) support the efficient use of resources;**
- **h) contribute to the development of heat and energy recovery or low carbon technologies; and**
- **i) adequately make provision for restoration of the site after development.**

SUPPORTING TEXT

~~1.133~~ 1.126 The OPDC area is not currently covered by Department of Energy & Climate Change (DECC) 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.

~~1.134~~ 1.127 OPDC has ambitious homes and jobs targets to achieve within the Plan period. If mineral extraction is to be appropriate, it would need to demonstrate that it will not prevent OPDC from achieving these targets. As part of this, regard will need to be had to OPDC's indicative site phasing, shown in Figure 3.16. Applications for mineral extraction that result in delays to the delivery of OPDC's indicative phasing and associated housing and jobs targets, are unlikely to be supported.

~~1.135~~ 1.128 The acceptability of any mineral extraction operations will also be judged in terms of the proposals impacts on amenity, on the environment and on the transport network. Pollution to local land and perched waterways would need to be given special consideration as it would create an offence under the Environmental Damage Regulations 2009.

1.129 OPDC will consult with the relevant boroughs ~~in regard to~~regarding any proposals for minerals extraction. Outside the planning system, licences for exploration are dealt with by the Oil and Gas Authority as an executive agency of the Department for Energy and Climate Change (DECC).

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POLICY EU13: LAND CONTAMINATION

Development proposals will be supported where they effectively treat, contain or control any contamination so as not to:

- **a) expose the occupiers of the development and neighbouring land uses including, in the case of housing, the users of open spaces and gardens to an unacceptable risk;**
- **b) threaten the structural integrity of any building built, or to be built, on or adjoining the site;**
- **c) lead to the contamination of any watercourse, water body or aquifer; or**
- **d) cause the contamination of adjoining land or allow such contamination to continue;**

When development is proposed on or near a site that is known to be, or there is good reason to believe may be, contaminated, or where a sensitive use is proposed, development proposals will be required:

- **e) prior to permission being granted to:**
  - **i. carry out a Preliminary Risk Assessment, including a desk-top study and production of a conceptual site model; and**
  - **ii. produce a Site Investigation Scheme**
- **f) following planning permission being granted, to effectively treat, contain or control any contamination, in the following sequential manner:**
  - **i. undertake necessary site investigations;**
  - **ii. refine the conceptual model;**
  - **iii. undertake an options appraisal and evaluate options to define a remediation strategy;**
  - **iv. produce a remediation strategy;**
  - **v. implement the remediation strategy;**
  - **vi. submit a verification study; and**
  - **vii. monitor how well remediation has worked;**
- **g) work collaboratively with OPDC and with other developers to consider the feasibility of a strategic approach to the remediation of land; and**
- **h) treat any contaminated materials on-site and re-use or recycle debris and/or treated materials.**

SUPPORTING TEXT

~~1.137~~ 1.131 The OPDC area contains a significant amount of brownfield land with a long industrial history. Much of this land is expected to be contaminated and require remediation or clean up. Given the scale of regeneration planned, OPDC wants to ensure the impacts of these past and future land uses do not affect the health of people and the environment.

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~~1.138~~ 1.132 Land contamination and remediation is the subject of planning and other regulatory regimes. A key to the successful redevelopment of brownfield land is therefore early and continual engagement between developers, planners and regulators. OPDC will expect developers to work with OPDC, the relevant London Boroughs and the Environment Agency in assessing the risks and the management of contamination, in assessing the suitability of the proposed use for the conditions on that site, and in agreeing any necessary steps for remediation.

~~1.139~~ 1.133 The local authorities hold the specific responsibility for the management of land contamination within their boundary under Part 2A of the Environmental Protection Act 1990 and will have to agree in writing any proposed submissions or actions with regard to the assessment or remediation of land contamination. After remediation under planning, as a minimum, land should not be capable of being determined as contaminated land as defined by Part 2A of the Environmental Protection Act 1990 by the relevant local authority.

~~1.140~~ 1.134 Regulatory advice and guidance is available to identify the principal matters which OPDC, the local authorities and the environmental regulator will look to have~~be~~ undertaken when approaching redevelopment and land contamination. The Environment Agency documents 'Model Procedures for the Management of Contaminated Land' and 'Managing and reducing land contamination: guiding principles' are particularly useful as they highlight the main stages in the process, best practice and refer to further guidance.

~~1.141~~ 1.135 Where land is known or found to be contaminated, or where a sensitive use is proposed or exists, developers will be expected to assess their proposals using the eight stage process out-lined in Table 6.2.

~~1.142~~ 1.136 Brownfield land within a master planned area may have a combination of problems, including contamination that can be addressed more economically and sustainably where developers work with one another to treat, contain and control any contamination. Developers should work with OPDC and other developers to consider the potential for a strategic approach to be taken to the remediation of land, in accordance with Policy SP10. This approach could lead to efficiencies in costs and reduced environmental impacts.

~~1.143~~ 1.137 Sending contaminated soils to landfill is no longer considered to be sustainable, or economic. Sustainable, economic and local alternatives are required. At OPDC the opportunity exists to promote strategic and sustainable risk based approaches to land assessment and remediation based upon current best practice and guidance. In some cases, the polluted layers in a site may contain rubble, rubbish and coarse waste materials. Often, on-site recycling and re-use of debris and treated material is possible and can reduce demand for primary aggregate resources, the need to transport material off-site and reduce the potential risks from pollution. This will be encouraged wherever possible.

1. Preliminary Risk Assessment Comprising a desktop study including details of past and present uses at the site and the surrounding area, to identify any potential sources of contamination, potential risks and sensitive receptors. A conceptual site model should be produced to demonstrate where any pathway connects any potential sources to the sensitive receptors. Information collected by the relevant local authority as part of their preliminary review of historical land uses must be incorporated into the Preliminary Risk Assessment and any risk assessment without this information will not be accepted as complete.
2. Site Investigation Scheme Based upon stage one, setting out how the site investigation will be carried out, how the sources of pollution identified in the conceptual site model will be targeted and to determine the existence of the pathway to the identified receptors.

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3. Site Investigation To be undertaken as defined in stage 2 using current guidance and methods.
4. Risk Assessment A quantitative risk assessment based upon site investigation, which updates the conceptual site model produced in stage one to determine the degree and nature of any contamination on the site and the risks posed by any contamination to human health, controlled waters and the wider environment.
5. Remediation Strategy A detailed method statement for required remediation works identified through stage four, with the aim of breaking any pollutant linkages. The Strategy should support waste minimisation and maximising resource use by promoting the sustainable remediation and re-use of contaminated soils.
6. Unexpected contamination If during development, contamination not previously identified is found to be present at the site, the conceptual site model should be updated and if any remediation is necessary, the strategy detailed in stage 5 should be updated.
7. Verification A report which validates and verifies that all of the works outlined in stage five and six have been undertaken as agreed.
8. On-going monitoring An ongoing monitoring report should be produced where monitoring past the completion of development works is necessary to verify the success of the remediation undertaken as part of stage 5 as well as a verification report upon completion of these works. If monitoring identifies that further remediation is required, the developer will be required to undertake this.

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1 Transport

INTRODUCTION

1.1 Transport is the catalyst for the comprehensive regeneration of Old Oak and plays an integral role in protecting, strengthening and intensifying the Park Royal industrial estate. The transport network at Old Oak and Park Royal must be planned and delivered to support the needs of existing and future communities living, working and visiting the area.

1.2 Transport provision across all modes in Old Oak and Park Royal should be exceptional, creating high quality, safe and accessible movement networks that reduce the need to travel, prioritise sustainable transport modes as set out in the sustainable transport hierarchy in Policy SP7 in Cchapter 3 and enable people to live healthy and active lifestyles. Delivering this high quality transport network will enable the attainment of the Mayor's target for 80% of journeys to be made by walking, cycling or public transport. There is also a need to appropriately manage construction traffic, given the scale of delivery of development and infrastructure envisaged, and to support effective and sustainable freight and servicing, particularly within Park Royal, London's largest industrial estate. The policies in this chapter set out how OPDC expects this to be achieved.

1.3 This chapter does not deal with the spatial aspects of the transport requirements across Old Oak and Park Royal. It should be read in conjunction with the strategic policies and places contained within chapters 3 and 4 and specifically with Policy SP7 (Connecting People and Places)~~, which includes OPDC's sustainable transport hierarchy~~.

Commented [TC1]: Specific amendment.
Reason: To clarify how chapter supports mode share targets and need to appropriately manage construction and freight traffic.

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POLICY T1: ROADS AND STREETS

Development proposals will be supported where they:

a) **support and deliver a street network across Old Oak and Park Royal that encourages and enables behaviour and forms of travel in line with the "Healthy Streets for London" vision.**

b) **support the delivery of a range of new and improved streets that help overcome severance, alleviate congestion and optimise connectivity both within the development area and to surrounding areas;**

c) **ensure all new streets are built and designed to adoptable standards;**

d) **ensure all new streets are built and designed in accordance with ~~all~~ TfL and Local Highways Authority~~relevant~~ guidance/standards, appropriate to local characteristics and demands;**

e) **mitigate the impact of development on the surrounding local and strategic road network;**

f) **implement maximum speeds of 20mph on all ~~local~~ new roads and existing roads where appropriate; and**

g) **promote effective and integrated management of streets to future-proof for changes in the surrounding context, life-style and technological changes.**

Commented [TC2]: Regulation 19(1) consultation amendment.
Reference: T1/22
Reason: To provide further detail of relevant guidance.

Commented [CW3]: Specific amendment.
Reason: To clarify implementation of the policy.

SUPPORTING TEXT

1.4 In accordance with Policy SP7, Old Oak and Park Royal's streets should be the exemplar for delivering the ~~"~~Healthy Streets~~"~~ Approach contained in 'Healthy Streets for London' ~~-~~(published February 2017). The Healthy Streets Approach aims to reduce traffic, pollution and noise~~,~~; create more attractive, accessible and people-friendly streets~~,~~; and improve health and well-being. The Healthy Streets Approach is the framework within which all ~~development~~ transport proposals should be set~~,~~; including freight, accessibility and connectivity.

1.5 There are 10 ~~'~~Healthy Streets~~'~~ Indicators which cover the factors essential for health-promoting, inclusive street environments. These ensure that streets are designed with all potential users in mind, including more vulnerable users with specific requirements ~~including~~ such as disabled and elderly users. Designs ~~will~~ should also consider people who will want to stop and enjoy the street as a place.

1.6 The Healthy Streets Approach looks at the street as a whole, considering its multiple functions from building line to building line and ensuring the needs of different people are considered. This is different to the usual transport approach of focusing on individual transport modes.

1.7 Applicants will be required to use the Healthy Streets guidance to guide street design. They will be expected to use this as a checklist and propose improvements if required. The ~~"~~Healthy Street Check~~"~~ for Designers spreadsheet ~~technical~~ tool and TfL Streets Toolkit should be used to score specific design proposals. This should be evidenced within the transport assessment of a submitted planning application (see Policy T9). This will enable developments to deliver positive outcomes for accessible, inclusive streets which are healthy, safe, welcoming to walk and cycle in, and which promote active travel.

Commented [PF4]: Specific amendment.
Reason: To provide further detail of relevant guidance.

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1.8 In Old Oak, measures to prioritise bus movement, provide segregated facilities for cyclists and create pedestrianised areas will be supported. This will enable the achievement of the sustainable transport hierarchy, as set out in Policy SP7. In Park Royal, the road network will need to support the movement of freight to facilitate business growth by implementing measures to address existing congestion issues. This will need to be carefully planned alongside the need to improve bus movements, improve the environment for pedestrians and cyclists and deliver a healthy street environment. There are also routes within Old Oak and Park Royal which are for pedestrians and cyclists only, such as the canal towpaths and various other key links which are unsuitable for vehicular use. The street network must be coherent and legible which can be achieved by ensuring the layout for vehicles, cycles and pedestrians is continuous along the length of the street.

1.9 ~~Any new through routes created as part of a proposed development to be used by general traffic should~~ be designed to discourage through traffic including traffic calming and controlled crossing facilities~~not allow through traffic.~~ 20 mile per hour speeds will be expected to be implemented through both design features and signage on all new and existing roads, except the A40 and A406 which are part of the Transport for London Road Network (TLRN). Managing vehicle movement and speed will also be achieved through good design and signage. All new and improved roads must be built to adoptable standards and any decision to adopt streets will need to be made in collaboration with the relevant local highway authorities. A design assurance process will be in place – with proposals reviewed by relevant user groups and stakeholders. The designs will be subjected to a robust Road Safety Audit process and ~~compatability~~compatibility with relevant design guidance. ~~e, with t~~Traffic modelling will be required to demonstrate that the proposed street designs cater appropriately for demand from different modes to ensure an appropriate balance in demands on the network is achieved.

~~1.10 As indicated in Policy SP7, a new movement network in Old Oak will be key in creating a Healthy Street environment; including Old Oak High Street, Park Road, Grand Union Street and Wormwood Scrubs Street.~~

~~1.11~~ 1.10 To achieve a connected place and reduce existing severance across Old Oak and Park Royal new and improved bridges and underpasses will be required. In accordance with Policy SP7, it will be important that the bridges and underpasses are integrated into the proposed street network and serve key desire lines. The street network must also be accessible for all users, ensuring that gradients improve on 1:20 and adequate seating is designed in from the outset. Streets should be well-lit and safe environments.

~~1.12~~ 1.11 A successful street network at Old Oak and Park Royal will enable the integration of pedestrian, cycle and public transport links into surrounding areas. Links to the existing street network will provide the potential to unlock additional regeneration in the wider area. This includes links to Harlesden, East Acton, Wembley, Kensal Rise, Kensal Canalside, White City and Alperton.

~~1.13~~ 1.12 The delivery of the sustainable transport hierarchy outlined in SP7 will reduce traffic congestion on roads in Old Oak and Park Royal, reducing peoples need to travel and ensuring that when they do, people walk, cycle or use public transport.

~~1.14~~ 1.13 A new legible street network at Old Oak and Park Royal must be able to evolve over time and be resilient to future technological development, such as new forms of vehicle technology, ownership models and changing lifestyles (see Policy EU7 and EU11).

Commented [AP5]: Specific amendment
Reason: Information on routes which will not allow through traffic are included in the strategic policies and place policies.

Commented [AP6]: Regulation 19(1) consultation amendment.
Reference: T1/5
Reason: To reflected updated homes and jobs capacity information.

Commented [CW7]: Specific amendment
Reason: Deleted as this information duplicates text in SP7 and the place policies.

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POLICY T2: WALKING

Development proposals will be supported where they:

a) **deliver or contribute to new and enhanced walking infrastructure, in line with Policy SP7 on connections and the walking interventions identified within the Infrastructure Delivery Plan (IDP);**

b) **support the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal;**

c) **support the delivery of a high quality pedestrian walking environment to and through new and existing rail stations;**

d) **connect to existing and planned pedestrian links in the wider area; and**

e) **~~contribute~~ make appropriate contributions to the network of Legible London wayfinding signage ~~that~~ to improve~~s~~ legibility across Old Oak and Park Royal.**

Commented [PF8]: Specific amendment.
Reason: To recognise approach to securing contributions for the Legible London signage.

SUPPORTING TEXT

~~1.15~~ 1.14 The regeneration of Old Oak and Park Royal presents an opportunity to enhance the existing and provide new environments for pedestrians across and into the wider surrounding area. OPDC's IDP identifies the key interventions in walking infrastructure required to maximise the number of walking trips through the delivery of a high quality walking environment. These interventions must also be supported by a high quality on-site walking environment. Figure 7.5 shows the indicative future key walking routes in Old Oak and Park Royal. In Old Oak, in addition to the key walking routes identified, other local streets would also contribute towards the walking network.

~~1.16~~ 1.15 Walking provision should be safe, well lit, comfortable, coherent and attractive, ~~-~~in line with Healthy Streets Indicators. It should integrate well with the street environment and desire lines and minimise conflict between different users. Reducing existing issues of severance and ~~encouraging~~ enhancing permeable movement will be key to developing a cohesive walking network. It will be important to provide a number of new links under or over barriers created by the existing infrastructure and topography. Where possible, OPDC will look to secure the early delivery of these connections to help support a shift towards sustainable transport modes, in accordance with OPDC's sustainable transport hierarchy.

~~1.17~~ 1.16 By providing a street network that is safe, attractive and easy to navigate, people will be encouraged to walk more. This will have social, economic, environmental and health and well-being benefits for people living, working and visiting the area and will also support the viability of the development area.

~~1.18~~ 1.17 High quality pedestrian walking routes to, and where possible through, new and existing rail stations will be vital to ensure residents, workers and businesses can benefit from the excellent connectivity provided by improved public transport across Old Oak and Park Royal.

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~~1.19~~ 1.18 Legible London wayfinding measures including signage should be implemented throughout the area to provide clear, comprehensive and consistent information to key destinations. This will also help enable pedestrians to complete more journeys on foot. New connections and wayfinding to both existing and proposed strategic walking routes to surrounding areas such as Harlesden Town Centre, Kensal Rise, Kensal Canalside, East Acton and White City should also be provided.

~~1.20~~ 1.19 The design of new pedestrian infrastructure should be aligned with best practice principles and standards. Examples include pedestrian countdown technology at crossings, appropriate space allocation for street furniture and conformance of all routes to accessibility requirements.

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POLICY T3: CYCLING

Development proposals will be supported where they:

a) **deliver and/ or ~~positively~~ contribute to new and existing ~~and existing~~ cycle networks ~~infrastructure, new cycle superhighways, quietways~~ and infrastructure identified in the ~~IDP, in accordance with the London Cycling Design Standards~~;**

b) **ensure new or enhanced cycle networks, infrastructure and parking accords with the London Cycling Design Standards;**

~~a)~~c) **ensure~~ing~~ that new cycle networks connect into and support the wider, existing cycle network, ~~such as the Grand Union Canal and~~ National Cycle route 6 and the future cycle superhighway route to Wood Lane~~; networks, ensuring they connect into and support the wider cycling network including on Grand Union Canal, National Cycle route 6, the cycle superhighway and Quietways programme and infrastructure interventions identified within the IDP.~~**

~~b)~~d) **deliver a comprehensive, safe, attractive and inclusive cycle network across Old Oak and Park Royal;**

~~c)~~e) **deliver and/ or contribute to new and improved cycling connections to ~~and through~~ rail stations ensuring ~~sufficient cycle infrastructure allows~~ seamless interchange between public transport and cycling;**

~~d)~~f) **deliver and/ or contribute towards signage to improve cycle wayfinding and legibility;**

~~e)~~g) **provide high quality, secure, well located, convenient and accessible cycle parking facilities ~~in accordance with London Cycling Design Standards~~ that meet and where possible exceed the standards set out in the London Plan; and**

~~f)~~h) **deliver and/ or contribute towards the provision of cycle hire across Old Oak and Park Royal, including from independent providers.**

SUPPORTING TEXT

~~1.21~~ 1.20 A significant improvement to cycling infrastructure has been achieved in recent years across London's ~~road~~ street network ~~—~~ with innovative solutions supporting the growth in cycling. Underpinned by the London Cycling Design Standards, this has encouraged a bold approach to making better, more attractive streets and spaces for cyclists. Higher levels of cycling can be achieved through the delivery of infrastructure to create a cycle network that is safe, comfortable, coherent, attractive and adaptable, whilst ensuring consideration is given to the impact of cycling infrastructure on pedestrians.

~~1.22~~ 1.21 OPDC will support the delivery of a comprehensive cycle network that improves cycle permeability throughout the OPDC area. OPDC will seek to enhance ~~provides facilities for cyclists on "quietway" and "superhighway" routes and allows~~ access to rail stations where there should be significant provision for high quality cycling infrastructure. Figure 7.7 shows the indicative future cycle network in Old Oak and Park Royal. In Old Oak, in addition to the key cycle routes identified, other local streets would also contribute towards the cycle network.

Commented [PF9]: Specific amendment.
Reason: To clarify implementation of the policy.

Commented [TC10]: Regulation 19(1)
Reference: T3/7 and T3/5
Reason: Need to reference LCDS

Commented [AP11]: Regulation 19(1)
Reference: T3/30
Reason: To clarify the location of the superhighway

Commented [PF12]: Regulation 19(1) consultation amendment.
Reference: T3/27
Reason: To clarify requirements of the policy.

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~~1.23~~ 1.22 In Old Oak, redevelopment presents an opportunity to provide state of the art and innovative cycling infrastructure and parking facilities that can benefit everyone who lives and works in the area. In particular, rail stations should have sufficient cycling infrastructure that allows seamless interchange.

~~1.24~~ 1.23 For Park Royal, the vast majority of the area's current employees live within 8km of Park Royal and a significant concentration live within 5km or less. This distance is well within cycling distance for those employees; however, only 3% of employees choose to cycle1. It is important to realise a shift towards cycle usage through good design of cycle routes, connections to existing and proposed cycle networks and better cycle infrastructure. This will need to be balanced against the needs of existing and future businesses in Park Royal and their need for securing freight movement. The Healthy Streets Approach provides a framework within which to draw this balance.

~~1.25~~ 1.24 New and enhanced bridges and underpasses, are identified within OPDC's IDP. These are needed where there are currently barriers to movement, such as across the A40, the A406, the various rail lines and the Grand Union Canal. Cycle wayfinding signage will be required to improve the legibility and navigation to, from and through the area and to create legible cycling links to nearby local centres such as Harlesden, White City, Queens Park and Ladbroke Grove, Alperton, East Acton, Kensal Rise and Kensal Canalside and to central London.

~~1.26~~ 1.25 Investments in "end-of-journey" cycle facilities in the form of secure cycle parking, lockers and showers are also vital. Major employers, businesses and landowners should invest in this infrastructure, recognising its value and importance to businesses, tenants and employees. OPDC will work to develop training and guidance and improve awareness of the benefits of cycling to employees, to encourage more cycling. This will be secured in accordance with Travel Plan conditions~~s~~ (see Policy T9).

~~1.27~~ 1.26 Cycle parking should cater for future demand, in line with the quantitative and qualitative requirements set out in the London Cycling Design Standards (2014). Given the proposed density of new homes and jobs and the excellent future accessibility, encouraging increased cycling will be important to ensure a~~-~~ high quality and sustainable transport network. Therefore, OPDC will seek to exceed these cycle parking standards and where possible providing numbers in excess of London Plan minimum standards. This should include private cycle parking for residents and employees as well as generous provision of public parking for visitors and high quality facilities at public transport interchanges. All cycle parking stands must be secure, sheltered and adequately lit, with convenient access to the street. The necessary spatial and design requirements will need to be factored in from the outset and should not impede pedestrian movement.

~~1.28~~ 1.27 A future extension of Cycle Hire into Old Oak and Park Royal would represent a logical expansion westwards. Subject to further analysis, a network of docking stations should be designed ~~in from the start across~~for the area~~s~~ from the outset and built at the appropriate timings. ~~The d~~Docking stations must be appropriately embedded into the public realm in accordance with Policy D2. Funding for the docking stations will be sought from contributions from development. Developers may also need to provide land for docking stations. ~~OPDC will also work with TfL to enhance the network in this area.~~ OPDC will also support proposals for infrastructure which will enable other complementary cycle hire schemes to be developed and implemented across the area.

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POLICY T4: PARKING

a) OPDC will ensure that Old Oak and Park Royal will promote a modal shift towards more sustainable modes and becomes an exemplar of low carbon development, by:

- **i. limiting car parking for residential development to a maximum of 0.2 spaces per residential unit ~~for residential development~~;**
- **ii. strongly encouraging car-free development for residential developments located in areas with PTAL between 4 and 6B;**
- **iii. requiring car-free development for non-residential developments, unless in certain cases limited car parking can be justified when operational or business needs and access to public transport are taken into account; and**
- **iv. securing appropriate blue badge provision for both residential and non-residential uses, in accordance with Mayoral policy; ~~.~~**

b) New residents will be prevented from applying for parking permits for CPZs;

c) When providing car parking, proposals should:

- **i. incorporate 20% active and 80% passive electric charging points for electric vehicles at all new parking spaces;**
- **ii. include appropriate provision for car club vehicles;**
- **iii. be sensitively designed and not take precedence over other street users, or the design and quality of open space, public realm and building frontages; and**
- **iv. be adaptable and demonstrate how they can be replaced by other uses in the future;**

d) Proposals should provide suitable facilities to cater for anticipated demand for taxis and coaches. ~~However, p~~

e) Proposals should adequately address the~~not take precedence over~~ needs of other street users and minimise the impact on the quality of ~~, or the design and quality of~~ open space, public realm and building frontages.

Commented [PF13]: Specific amendment.
Reason: To clarify implementation of the policy.

Commented [PF14]: Specific amendment.
Reason: To clarify implementation of the policy.

Commented [PF15]: Specific amendment.
Reason: To clarify implementation of the policy.

SUPPORTING TEXT

~~1.29~~ 1.28 Old Oak and Park Royal will become one of the most accessible locations in the UK when the proposed public transport investments are delivered. Providing high quality connections through the delivery and effective integration of state of the art transport infrastructure will be a key aspect of the area's success. It provides the rationale for the phased implementation of car-free development.

~~1.30~~ 1.29 OPDC will strongly encourage development to be car free. This approach is justified by the very high level of public transport accessibility resulting from planned and proposed transport investment which supports ~~T~~transit o~~O~~riented d~~D~~evelopment and encourages and enables travel behaviours in line with the Healthy Streets ~~a~~Approach. However, it is recognised that until new public transport infrastructure is delivered, some parts of Old Oak and Park Royal will have inadequate access to public transport and therefore may not be able to support car-free development. Figure 7.10 shows the current PTAL levels for the area, whilst figure 7.11 shows potential future PTAL levels in the OPDC area when all of the transport infrastructure detailed within the local plan has been delivered. This policy will be kept under review.

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1.30 It is recognised that some businesses may require an allowance for a limited number of private vehicles to accommodate out of hours shift working or to support trade and other business requirements and this will be supported. However, this will need to be carefully planned so as to mitigate potential negative impacts from increased traffic. Any car parking provision should be clearly set out within the applicant's Car Parking ~~and~~ Management Plans, required by Mayoral policy.

Commented [PF16]: Specific amendment.
Reason: To align with Mayoral Policy

~~1.31~~

~~1.32~~ 1.31 OPDC will work with the local highway authorities, businesses and local groups to achieve a coordinated approach to the potential implementation of Controlled Parking Zones (CPZs) across the area. It will be important to protect residents living close to stations and high streets and this approach will also discourage journeys made by car, which could be made by more sustainable transport modes. New residents will be prevented from applying for parking permits for CPZs.

~~1.33~~ 1.32 A ~~dense~~ network of car club bays spread across the site will provide a convenient, cost-effective and attractive alternative to owning a private car and will support the optimal use of space (see Policy EU7). Car club bays will need to be designed into the new development areas from the outset. Car club bays should be designed in such a way that they can be adapted for different uses in the future.

~~1.34~~ 1.33 Providing sufficient charging points is essential in encouraging the uptake of electric vehicles. To this end OPDC requires that 20% of all new parking spaces have active provision for electric vehicles and the remaining 80% of all new parking spaces have passive provision for electric vehicles. Charging infrastructure should look to incorporate systems that can be integrated into the local distribution network to help regulate demand and supply and provide energy storage capacity. In applying this policy, developers will need to respond to future technological advances for electric vehicle charging points.

~~1.35~~ 1.34 To encourage the uptake of ~~L~~low e~~E~~mission v~~V~~ehicles and ensure that the Old Oak and Park Royal area is an exemplar of low carbon development, OPDC will work with TfL and their preferred suppliers to deliver the local component of the ~~Source London~~ Electric Vehicle network. OPDC will also work with TfL Taxi and Private Hire and other commercial operators such as car clubs~~OPDC will also work with private hire and other commercial operators such as car clubs~~ to understand their needs for charging infrastructure and ensure that their requirements are included in development proposals. OPDC will also work with highways authorities and local businesses to explore opportunities for the provision of rapid electric charging points for freight vehicles, to reduce emissions from freight.

Commented [KT17]: Regulation 19(1) consultation amendment.
Reference: T4/17
Reason: To provide generic terminology.

Commented [KT18]: Regulation 19(1) consultation amendment.
Reference: T4/25
Reason: To provide reference to TfL.

Commented [PF19]: Specific amendment.
Reason: To clarify implementation of the policy.

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~~1.36~~ 1.35 It will be important to carefully manage onward journeys from stations to encourage walking, cycling or use of the bus network. There is still likely to be a demand for coaches, taxis and private hire vehicles (PHVs) generated ~~by the~~at stations and other land uses such as cultural or leisure uses which needs to be effectively managed. ~~OPDC will work with TfL to deliver fully accessible taxi ranks where required. Where specific development types will attract a large number of visitors, facilities for coach parking and taxi ranks may need to be provided.~~ The coach, taxi and PHV market is deregulated and operators will alight and board customers in any location where there is passenger demand, subject to meeting highway regulations. Therefore, it is important appropriate facilities are provided to avoid the adverse impacts of unplanned coach, taxi and PHV activity. OPDC will work with TfL, HS2 ltd and other stakeholders to deliver coach facilities to support managing potential demand where required. In particular, it is likely that facilities for scheduled coach services in Old Oak (in particular at Old Oak Common Station) will need to be provided. Any coach and taxis facilities should be designed to have a minimal impact on the public realm and open space and should not adversely impact on the movement of pedestrians and cyclists. They should be designed in such a way that they can be adapted for different uses in the future. ~~There may also be potential to provide departure facilities for scheduled coach services in Old Oak that could serve a wider area of north and west London. This could include provision of stop and stand facilities for coach services. Any facilities should be designed to have a minimal impact on the public realm and open space and should not impact on the movement of pedestrians and cyclists. They should be designed in such a way that they can be adapted for different uses in the future.~~

Commented [KT20]: Regulation 19(1) consultation amendment.
Reference: T4/25
Reason: Re ordered and expanded on to clarify implementation of policy.

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POLICY T5: RAIL

Development proposals will be supported where they:

a) **deliver/ contribute towards rail infrastructure and capacity, including the range of rail interventions identified within the Infrastructure Delivery Plan, which aim to enhance rail capacity within Old Oak and Park Royal;**

b) **design new rail stations to deliver outstanding design quality ~~and enable~~ and future proof~~ing of~~ station design~~s~~ to facilitate future technological advances, rail connections and service changes.**

c) **ensure stations contribute to the creation of a destination where people want to spend time ~~and~~ by includ~~ing~~e ~~the provision of~~ retail, culture, leisure, town centre and meanwhile uses;**

d) **appropriately manage the demands of competing transport modes and interchange requirements for walking, cycling, buses and taxis, ensuring adequate space is provided and embedded into the public realm;**

e) **ensure all station entrances have a prominent and positive street presence;**

f) **ensure routes and spaces within stations are integral parts of the local street and movement network, and incorporate active frontages, where feasible and appropriate;**

g) **provide step free access from all entrances to platforms to ensure any route to, from or through the station is accessible to all;**

h) **optimise development opportunities on and/or adjacent to the stations and tracks, where feasible and appropriate;**

i) **ensure the impact of new development adjacent to ~~on existing~~ rail infrastructure ~~is minimised and~~appropriately ~~mitigation~~ mitigates its ~~is provided where appropriate~~impacts on rail services;**

~~i)~~j) **ensure new rail infrastructure is sensitively designed to integrate with surrounding development and existing communities; and.**

~~j)~~k) **support the design operation of stations in Old Oak and Park Royal by ensuring they ~~pioener~~pioneer and respond to technology, innovation and behavioural change.**

SUPPORTING TEXT

1.36 Within the Old Oak and Park Royal area there are four existing rail stations ~~and three proposed new rail stations. The four existing stations include~~ (see figure A1.6 in Appendix A showing area context): North Acton (Central Line), Willesden Junction (Bakerloo Line and London Overground), Stonebridge Park (Bakerloo Line and London Overground) and Harlesden (Bakerloo Line and London Overground). Willesden Junction station, North Acton station, the North London Line and West London Line have been identified as requiring upgrades to increase capacity and enhance the passenger experience. ~~The t~~

1.37 Three new rail stations are proposed ~~stations include~~ (see figure 7.12): Old Oak Common (High Speed, Great Western Main Line and ~~Crossrail~~Elizabeth Line), and the potential London Overground Stations: Old Oak Common Lane ~~(London Overground),~~ and Hythe Road ~~(London Overground)~~.

Commented [TC21]: Specific amendment.
Reason: To clarify requirements of the policy.

Commented [KT22]: Regulation 19(1) consultation amendment.
Reference: T5/19
Reason: To reflect potential status of Hythe Road Station.

DRAFT

1.38 Old Oak will become one of the most connected places in the UK once the proposed new stations are opened. The design, layout and landscaping of ~~the~~ new station spaces must be world class, incorporating soft and hard landscaping, a mix of permanent and temporary commercial activities, places to spend time waiting for trains or meeting people, and a range of different modes of transport, whilst retaining the character of a civic urban public space rather than solely as a transport interchange. Interchange facilities with buses and cycling facilities should all be located around the station entrances ~~and~~ within the public realm. ~~a high street public space~~ creating ~~a~~ vibrant, busy and~~,~~ inviting ~~world class~~ station squares and public realm which is safe and welcoming 24 hours of the day.

Commented [KT23]: Regulation 19(1) consultation amendment.
Reference: T5/19
Reason: To allow greater flexibility in the design of these spaces.

1.39 Entrances and exits to all new stations should be designed to seamlessly connect into surrounding areas. They should be clear and legible and enable comfortable movement, including step-free access. They should have a positive street presence to ensure the station has a prominent impact on the surrounding area and generates activity, informed by the TfL Design Idiom.

1.40 Good rail access at Old Oak and Park Royal should be supported with high quality intermodal interchange facilities. This should include provision of direct and legible step-free access from the station to appropriately sized and well located walking, cycling, bus, taxi and drop off infrastructure. This, combined with active frontages and security enhancements such as CCTV, lighting and ensuring public realm is overlooked will ensure all station entrances have a viable street presence.

1.41 New rail stations and rail lines should support Old Oak becoming a major new commercial and high-density residential centre by optimising development opportunities on and/ or adjacent to stations and tracks. Development close to rail infrastructure must be carefully planned to ensure it does not impact on the ability of TfL or Network Rail to run services. Any changes to rail infrastructure required to support development should be discussed in detail with Network Rail, TfL and OPDC.

1.42 New stations should be designed to be of an outstanding quality, integrating with the surrounding area and with a level of flexibility that will allow changes in the surrounding area and in technology, to be integrated in a practical and efficient manner over time. Designing to retain a level of flexibility may involve incorporating elements of passive provision or 'interim measures' today, but will ensure that the station is able to be modified at a later date.

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POLICY T6: BUSES

Development proposals will be supported where they:

a) **facilitate, deliver and contribute to the existing and future bus network and infrastructure, including the range of interventions identified within the IDP to provide a comprehensive and coherent bus network across Old Oak and Park Royal that is connected into the surrounding area, including priority measures where appropriate;**

b) **ensure that all residents in Old Oak and Park Royal live within 400m of high quality, convenient, safe, sheltered and personally secure passenger waiting and information countdown facilities;**

c) **ensure that where appropriate, streets are designed flexibly to enable them to be served by buses;**

d) **ensure that impacts to bus operations resulting from construction activity are mitigated;**

e) **provide temporary provision for buses, during the phased development of the OPDC area; and**

f) **support the roll out of low and zero emission buses.**

SUPPORTING TEXT

1.43 Development in Old Oak and Park Royal provides a clear opportunity to provide a coordinated and coherent bus network that promotes sustainable and active mobility, in line with the ~~TfL~~ Bus Strategy. The bus network must ensure easy, interchange with good walking, cycling and rail connections and ensure that there is great connectivity with surrounding communities.

1.44 Bus infrastructure provides a local, flexible and ~~more~~ cost effective public transport offer and will play an important role in improving the area's Public Transport Accessibility Level (PTAL), in particular in the early years in advance of large scale rail infrastructure delivery. Specific temporary infrastructure, such as turning or standing facilities, as well as alternative routes may be required during early phases of development until through routes are available.

1.45 Additional infrastructure is required for buses to effectively serve development in Old Oak and Park Royal and link~~s~~ to the wider area (see bus infrastructure interventions identified within the IDP). Bus infrastructure will include bus priority measures such as bus lanes, priority at junctions, bus gates and bus only links as well as suitably located bus stops with countdown facilities, stands and welfare provision for drivers. This bus infrastructure will improve bus reliability, capacity and connectivity and reduce the likelihood of people using their private vehicles. Bus infrastructure will also unlock sites, providing an effective public transport mode that can provide the capacity to move thousands of people per day.

~~1.45~~ 1.46 Figure A1.6 in Appendix A shows the existing bus routes that serve the OPDC area and figure 7.14 shows the potential additional future new or enhanced bus routes that could serve the OPDC area, based on OPDC's Bus Strategy.

~~1.46~~ 1.47 All new roads to be used by buses must allow appropriate highway clearance for the largest double deck vehicles and be built to an adoptable standard with sufficient widths.

Commented [KT24]: Regulation 19(1) consultation amendment.
Reference: T6/14
Reason: To clarify implementation of the policy.

Commented [KT25]: Regulation 19(1) consultation amendment.
Reference: T6/13
Reason: To confirm policy will be implemented in accordance the TfL Bus Strategy.

Commented [TC26]: Regulation 19(1) consultation amendment.
Reference: T6/8
Reason: To clarify implementation of the policy.

Commented [KT27]: Regulation 19(1) consultation amendment.
Reference: T6/6
Reason: Relocated from below to avoid repetition with below paragraph.

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~~1.47~~ 1.48 Any disruption to the bus network affecting operations or passengers should be avoided as the infrastructure and development projects are built out. Mitigation must be provided for any adverse impacts. This will require close liaison with TfL London Buses.

~~1.48 Bus services will be particularly important in the early phases of development before other public transport services such as new rail stations are delivered. Specific temporary infrastructure, such as turning or standing facilities, as well as alternative routes may be required during early phases of development until through routes are available.~~

1.49 London's green bus fleet is the largest in the world, combining the roll-out of new hybrid buses, the early introduction of new Euro VI buses and the retrofit programme, leading to significant improvements in emissions throughout London. OPDC will work with TfL and bus operators to promote the roll-out of greener buses and ensure that the design of transport infrastructure in the OPDC area facilitates environmental improvements to the bus fleet.

Commented [KT28]: Regulation 19(1) consultation amendment.
Reference: T6/6
Reason: To avoid repetition with above paragraph.

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POLICY T7: FREIGHT, SERVICING AND DELIVERIES

Development proposals will be supported where they:

a) provide measures to coordinate and reduce freight, servicing and delivery trips by:

i. providing a forecast of delivery activity associated with the development and relevant movement data that OPDC and TfL can use for dynamic modelling purposes;

ii. producing and implementing a Delivery and Servicing Plan; and

iii. utilising freight consolidation centres where feasible and appropriate;

b) where possible, provide off-street servicing facilities within all existing and new developments;

c) deliver and/ or contribute towards the provision of click and collect space;

d) maximise the use of more efficient and sustainable ways of delivering goods including consolidation, the use of rail, water, electric vehicles, cargo bikes and last mile deliveries by sustainable modes;

e) ensure that the operators of all freight vehicles operating in the area have attained the Silver Fleet Operator Recognition Scheme (FORS) accreditation; and,

f) implement and safeguard for future innovative and smart technologies in relation to freight, servicing and delivery that maximise the efficiency and interoperability of the transport network, including measures such as holding bays optimisation and demand responsive deliveries.

Commented [PF29]: Specific amendment.
Reason: To clarify implementation of the policy.

SUPPORTING TEXT

1.50 Servicing and delivery requirements in Old Oak and Park Royal should have a minimal impact on the surrounding road network.

1.51 A Delivery and Servicing Plan (DSP) must be provided by applicants. This needs to demonstrate how deliveries and servicing requirements will be managed, including:

a) how delivery and servicing trips associated with the development will be reduced;
b) identification of safe and legal loading locations;
c) the use of delivery companies who can demonstrate their commitment to best practice such as FORS members;
d) delivery booking systems, which could be implemented to ensure that deliveries are managed according to the capacity of the loading facilities available;
e) moving deliveries outside of peak or normal working hours;
f) investigating alternative routings to avoid congestion;
g) encouraging the adoption of low emission vehicle options (buying or leasing); and,
h) encouraging collaboration amongst companies.

1.52 To help in the development of servicing and delivery plans, OPDC will create a Freight Quality Partnership (FQP) that will be compulsory for any organisation operating HGVs in the area.

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1.53 There are currently two consolidation centres in West London and additional consolidation centres are being proposed. The use of a consolidation centre would help to minimise vehicle journeys and improve delivery reliability and efficiency and therefore benefit users. Developers must utilise consolidation centres to minimise their impact on the road network. Evidence should be provided within the DSP to demonstrate usage of consolidation centres. Justification should be provided if developers indicate they cannot use a consolidation centre.

1.54 Delivery collection centres will be required at appropriate public transport interchanges in order to minimise the number of vehicular deliveries to residential units.

1.55 In new developments, off street solutions for servicing should be adopted, where possible, utilising different ground levels including basement and void areas within multi storey structures. In existing developments, opportunities for off-street servicing should also be explored, particularly in Park Royal to ensure the street environment is improved. Street frontage servicing should be minimised and restricted to small individual units located on lightly trafficked streets which can be serviced by small delivery vehicles.

1.56 A number of sites within the OPDC area have good access to the canal and rail lines. Opportunities to use rail and water transport for freight should be explored, where appropriate, and evidenced within the DSP.

1.57 FORS is an overarching scheme that encompasses all aspects of safety, fuel efficiency, economical operations and vehicle emissions. FORS accreditation encourages freight operators to become safer, greener and more efficient and has been achieved by operators across London.

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POLICY T8: CONSTRUCTION

Development proposals will be supported where they:

a) provide measures to reduce construction trips by:

i. providing forecast vehicle trip information ~~to OPDC~~;

ii. producing and implementing a Construction Logistics Plan and Construction Code of Practice, consistent with TfL guidance;

iii. utilising construction consolidation centres and lorry holding areas, where appropriate;

~~iii.~~ iv. managinge construction traffic by making use of larger construction vehicles, re-timing deliveries, route planning, and reducing trip generation by using centralised batching plants where feasible

b) coordinate and phase construction projects to enable the transport and environmental impacts to be effectively mitigated;

c) ensure new utilities are planned in such a way as to avoid or minimise the impacts of future utility works on the road network;

d) make maximum use of rail and water transport for construction deliveries and removal of construction waste;

e) activate the space adjacent and around the edges of construction sites to mitigate impacts on surrounding land uses to create successful connections and meanwhile uses;

f) ensure that the operators of all construction vehicles operating in the area have attained the Silver Fleet Operator Recognition Scheme (FORS) accreditation;

~~f)~~g) ensure that construction sites register with the Considerate Constructors Scheme; and

~~g)~~h) ~~take~~ implement appropriate measures to ensure the safety of pedestrians and cyclists while construction is happening.

SUPPORTING TEXT

1.58 Redevelopment in Old Oak alongside major infrastructure projects like HS2, will generate a large amount of construction vehicle movements, exporting waste and importing materials over a number of decades.

1.59 The amount of construction activity planned for the area provides an opportunity for sustainable construction traffic and transport solutions to be adopted. To coordinate construction activity across the development area, OPDC will require forecast construction vehicle trips associated with the development, in a data format OPDC requires. Proposals should also be supported by~~, associated with the development as well as~~ a Construction Management Plan (CMP), that includes a Construction ~~Management~~ Logistics Plan~~s~~ (C~~L~~M~~P~~s) and Construction Code~~s~~ of Practice (CCoP~~s~~), which should be consistent with TfL guidance ~~to be submitted by developers~~. ~~Developers~~ Construction sites will also be expected to ~~sign up to~~register with the Considerate Constructors Scheme and ensure operators of all construction vehicles have attained silver FORS accreditation.

Commented [KT30]: Regulation 19(1) consultation amendment.
Reference: T8/12
Reason: To ensure consistency with TfL guidance.

Commented [CW31]: Specific amendment
Reason: To reflect recommendations from the Construction and Logistics Strategy Supporting Study

Commented [PF32]: Specific amendment.
Reason: To ensure the policy relates to removal of construction waste.

Commented [TC33]: Specific amendment.
Reason: To align with the Construction and Logistics Strategy

Commented [PF34]: Regulation 19(1) consultation amendment.
Reference: T8/12
Reason: To ensure consistency with TfL guidance.

DRAFT

1.60 Construction consolidation centres should be used, where appropriate, to reduce the number of construction vehicles required and the number of construction vehicle movements on the road network. This should be evidenced within the ~~CMP~~ CLMP and justification should be provided in cases where a consolidation centre will not be used.

1.61 Maximum re-use and recycling of waste and construction materials within the area will reduce transport demands (see Policies EU6, EU7 and EU8). This should be evidenced within the ~~CMP~~CLMP.

1.62 There is potential for construction materials and/or waste to be transported by rail and canal and this should be explored. Developers will need to work with OPDC and the Canal and River Trust to ensure the correct process is followed. Issues of local environmental impact and commercial viability will need to be addressed. This should be evidenced within the CLMP.

1.63 Disturbance from development can occur during the construction phase. Measures required to reduce the impact of demolition, excavation and construction works must be outlined in the CMP, including plans to minimise impacts on surrounding land uses.

1.64 Utilities works should be carefully managed and coordinated with other construction activity so that the impact on the street environment is minimised.

1.65 The edge of construction sites should be designed to ensure the public's view of the construction sites are as positive as possible. This could include planting, design work and meanwhile uses to create successful connections and temporary uses amongst and adjacent to construction sites which can help to develop community and identity in Old Oak.

1.66 To mitigate the potential road danger that the vehicles and increased congestion poses to other road users, consideration in CMPs/CLPs must be given to:

a) r~~R~~erouting and retiming of deliveries to mitigate congestion and road danger along the most congested routes and where a danger is created by the type and volume of traffic;
b) v~~V~~ehicles should be fitted with Vulnerable Road User safety equipment;
c) adoption of the Construction Logistics and Community Safety (CLOCS) standards and ensuring drivers are highly skilled/trained;
d) holding areas for vehicles; and

~~a)~~e)~~m~~managing safe egress to and from ~~the~~ sites by construction vehicles in a way that ensures the safety of other road users in particular pedestrians and cyclists, and especially those with lesser sensory or cognitive capacity.

Commented [CW35]: Specific amendment
Reason: To reflect recommendations from the Construction and Logistics Strategy Supporting Study

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POLICY T9: TRANSPORT ASSESSMENTS AND TRAVEL PLANS

Transport assessments and travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance.

SUPPORTING TEXT

~~1.65~~ 1.67 The Transport Assessment will need to assess the transport impact of the development and ensure that measures to reduce and manage a development's transport impacts are identified and planned. The Transport Assessment must also include the Healthy Streets Check for Designers spreadsheet tool ~~tool checklist~~ as evidence that the Healthy Streets ~~a~~Approach has been used (see Policy T1).

~~1.66~~ 1.68 The Transport Assessment will need to detail how transport proposals associated with developments will cater for all users, including disabled and vulnerable users.

~~1.67~~ The Travel Plan will provide a long-term strategy to deliver sustainable transport objectives through an action plan that is regularly reviewed. The Travel Plan should be prepared in accordance with TfL's Travel Planning guidance and set objectives and monitoring requirements along with the measures, management plan and funding details required to meet those objectives. The Travel Plan should be secured appropriately and include ongoing management and monitoring to ensure targets are met. The Travel Plan will need to recognise that as public transport measures are delivered in and around the OPDC area, OPDC will look to shift away from the car to more sustainable modes of transport. Travel Plans should demonstrate how this could be achieved over time.

Proposals for development may come forward which fall below the thresholds for referring applications to the Mayor of London, but may have a significant effect on highway or public transport capacity. In these cases, a Transport Assessment may also be sought. Effective and early pre-application discussions will help to identify whether such a requirement is likely and will be particularly encouraged where a proposal may fall just below the relevant thresholds.

DRAFT

1 Housing

INTRODUCTION

1.1 London is experiencing significant population growth. Housing supply has not kept pace with increased demand, leading to higher house prices and market rents. Home ownership has fallen whilst private renting has increased as more people have found it difficult to afford to buy their own home. There has also been a lack of new housing supply at genuinely affordable levels and one outcome is increased levels of homelessness.

1.2 The regeneration of Old Oak and Park Royal can play an important role in meeting both London wide and local housing need. In creating a new part of London, a whole range of new homes will be delivered to meet a diverse housing need, including private sale, affordable, built-to-rent and specialist homes, all provided as part of a mixed and balanced community.

1.3 A wide range of factors feed into creating high quality, high density housing and a sense of place that help to improve the health and well-being of residents. These include: sustainability, inclusive urban design, flexible internal layouts as well as access to local services and public transport.

1.4 This chapter should be read in conjunction with the rest of the Local Plan, and in particular the Places policies which deal with the housing delivery in the specific places around Old Oak and Park Royal. It should also be read alongside the Policy SP4 (Thriving Communities), which explains how housing will be connected with the new social infrastructure to create inclusive new communities and lifetime neighbourhoods.

POLICY H1: HOUSING SUPPLY

OPDC will support delivery of a minimum of 20,100 ~~22,350~~ new homes during the Plan period. This new housing will be achieved through:

a) **supporting proposals that contribute to the delivery of a minimum annual housing target of 1,005 ~~1,110~~ homes, where these accord with other Local Plan policies;**

~~a)~~b) **supporting the delivery of the ten-year net housing delivery targets for the OPDC area, as set out in the most up-to-date London Plan;**

~~b)~~c) **delivering a minimum of ~~21,400~~18,350 homes on Site Allocations, supporting the achievement of the housing targets identified within the Place policies;**

~~c)~~d) **supporting planning applications for self-build and custom-build, where these accord with other Local Plan policies;**

~~d)~~e) **optimising the use of existing housing, in accordance with Policy H5;**

~~e)~~f) **monitoring delivery annually and publishing information on the rate of housing starts and completions and the trajectory of a deliverable and developable housing supply; and**

~~f)~~g) **working with developers to ensure that wherever possible homes delivered are marketed to and occupied by people who live and work in London.**

SUPPORTING TEXT

1.5 The London Plan identifies that the Old Oak and Park Royal Opportunity Areas have the capacity to deliver at least 25,500 homes. As a Mayoral Development Corporation with a reservoir supply of brownfield land, OPDC can make a substantial contribution towards increasing London's housing supply.

1.6 London's need for housing is identified through the Greater London Authority's 2017~~3~~ Strategic Housing Market Assessment (SHMA) which draws on government guidance to identify London's need for both market and affordable housing. This has identifie~~d~~s that London needs an additional ~~976~~66,000 homes per year between 2016 and 2041~~36~~. Over the 20 year Local Plan period. this would equate to a London-wide need for 1.32 million homes.

1.7 Based on the area's current population of 7,000 people and 2,800 households, OPDC's SHMA (2017) has identified a need for 1,200 homes over the Local Plan period. However, given the scale of the opportunity at OPDC, an alternative SHMA boundary has been identified (see figure 8.2) that covers the combined area of the London Boroughs of Brent, Ealing and Hammersmith & Fulham. This identifies a need for 99,000 homes over the Local Plan period. Development within the OPDC area will contribute significantly to meeting this need as well as strategic pan-London needs.

1.8 OPDC's Development Capacity Study (DCS) identifies that over the next 20 years of this Local Plan, 20,100 ~~22,350~~ homes can be delivered. This constitutes an annual housing target of 1,005~~110~~. OPDC's Absorption Rate Study shows from experience elsewhere that year by year figures are likely to fluctuate based on site-specific phasing, market and political fluctuations. OPDC will support proposals that help to optimise housing provision and contribute to the achievement of this annual average housing target. Table 8.1 provides further details on OPDC's indicative housing supply.

Commented [TC1]: Specific amendment
Reason: To align with OPDC's revised Development Capacity Study

Commented [2]: Specific amendment.
Reason: To align with Draft New London Plan policy H1A and Table 4.1 which sets out 10-year targets for net housing completions by Planning Authority. Also a response to Reg 19(1))consultation comment H1/2

Commented [CH3]: Specific amendment.
Reason: To provide clarity for the intentions of the policy.

Commented [TC4]: Specific amendment
Reason: A new GLA SHMA has been published to support the Draft New London Plan and provides a more up-to-date assessment of housing need in London.

Commented [TC5]: Specific amendment
Reason: To align with OPDC's revised Development Capacity Study

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Table 8.1: Indicative Housing Supply

0 to 5 years	6 to 10 years	11 to 20 years	21+ years
~~5,900~~4,000	~~6,750~~7,000	~~9,700~~9,56100	~~4,500~~6,400

Commented [TC6]: Specific amendment
Reason: To align with OPDC's revised Development Capacity Study

1.9 Additional windfall housing may also increase the overall supply through a variety of sources, including through changes of use of non-residential buildings and conversions of existing residential buildings. Such development proposals will be supported where they are in accordance with the other Local Plan policies.

1.10 In addition to delivering the housing targets in this Local Plan, OPDC will work to achieve the planning authority's net housing targets in the most up-to-date London Plan. The current London Plan sets a target for 1,367 homes to be delivered in Old Oak and Park Royal between 2019 and 2029. OPDC's Development Capacity Study shows that the OPDC area can deliver 1,359 homes per annum over this period. However, OPDC will undertake the following strategies to seek to support the attainment of this Mayoral target, including:

a) working positively with developers and other key stakeholders to support the timely delivery of development, in accordance with Policy DI3;

b) supporting advanced construction methods such as precision-manufacturing, in accordance with Policy SP2;

~~a)~~c) bringing forward development in accordance with, and where possible in advance of, the phasing identified in Figure 3.16, in accordance with Policy SP10 and Policy DI2.

Commented [7]: Specific amendment.
Reason: To align with Draft New London Plan policy H1A and Table 4.1 which sets out 10-year targets for net housing completions by Planning Authority

~~1.9~~ 1.11 Self-build generally refers to people who bring their own building skills to bear as part of the construction process, whereas custom-build more often involves people who can provide professional services such as architecture or project management. Given the historic low supply of self-build and custom-build homes in London and the challenges in bringing high density schemes forward on large plots of brownfield land, it is unlikely that self-build or custom-build at Old Oak and Park Royal will make a significant contribution to meeting housing need. However, self-build and custom-build will be supported where it accords with the policies in this Local Plan.

~~1.10~~ 1.12 Prescribed authorities should plan to meet the needs of people who want to build their own homes; however, responsibility under the Self-build and Custom Housebuilding Act for keeping a register does not fall to Mayoral Development Corporations. Through the Duty to Cooperate, OPDC will work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham to ensure that the area is meeting the needs of people wishing to build their own home.

~~1.11~~ 1.13 Increasing housing supply is not just about building new homes on brownfield land. Converting existing residential dwellings and bringing long-term empty properties back into habitable use can also increase the overall supply of dwellings that can be used to more effectively meet the housing need identified in OPDC's SHMA. Policy H5 provides the policy criteria for assessing conversions and bringing vacant properties back into use.

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~~1.12~~ 1.14 Long-term vacant property underuses London's valuable housing stock and does not help to meet the housing need identified in this Local Plan. OPDC will work with the Mayor, the Homes for Londoners Board and the host local authorities to discourage vacancy. OPDC will work with developers and other relevant stakeholders to ensure that homes built for sale are first marketed to and occupied by Londoners.

1.15 Monitoring new housing delivery will be vital to achieving the broader Local Plan spatial vision and policies. OPDC produces an Authority Monitoring Report (AMR) each year that separately monitors the overall delivery of additional homes and different types of homes (e.g. self-contained homes and other non-self-contained homes). The AMR will also contain a housing trajectory which will show annually updated information on OPDC's 0-5 year, 6-10 year and 11-20 year housing supply. This will measure OPDC's anticipated performance against targets set out in the Key Performance Indicators (KPIs) which can found supporting this Local Plan on OPDC's website.

Commented [CH8]: Specific amendment.
Reason: To provide clarity for the intentions of the policy.

DRAFT

POLICY H2: AFFORDABLE HOUSING

All residential developments, with the capacity to provide more than 10 ~~or more~~ self-contained units (or have a gross internal residential floorspace of more than 1,000 sqm) will be required to provide affordable housing, subject to viability, in accordance with the overarching 50% target set out in Policy SP4, by:

a) applying the threshold and viability approach as set out in the most up-to-date Mayoral policy and/or guidance ~~(except for Build to Rent, see Policy H6)~~;

b) including early and advanced stage review mechanisms in line with Mayoral guidance, to maximise the delivery of affordable housing where development viability improves;

c) providing 30% of affordable housing as London Affordable Rent and 70% as a range of Intermediate housing, including London Living Rent and London Shared Ownership (except for Build to Rent, see Policy H6) and ~~including~~ ensuring intermediate ~~units~~ homes ~~that~~ are affordable to households on average incomes in the host local authorities;

d) providing affordable housing in perpetuity;

e) appropriately distributing the affordable homes~~using~~ throughout a new development and ensuring that they are designed to a high quality, with the same quality of external appearance as for market housing;

~~e)~~f) demonstrably considering at an early stage of pre-application process how the design of proposals supports the delivery or a range of housing tenures;

~~f)~~g) providing affordable housing on-site. In exceptional circumstances and in all proposals under Policy H7, a financial contribution towards the off-site provision of affordable housing may be accepted where ~~by OPDC in order to provide affordable housing off-site where other sites may be more appropriate to provide affordable housing than the site of the proposed development~~it can be demonstrated that this would maximise the total amount of affordable housing to be delivered;

~~g)~~h) applying Vacant Building Credit only where it is verified that:

- **i. a building is not in use at the time the application is submitted;**
- **ii. a building is not covered by an extant or recently expired permission;**
- **iii. the site is not protected for an alternative land use; and**
- **iv. the building has not been made vacant for the sole purpose of redevelopment and has been vacant for at least five years.**

SUPPORTING TEXT

~~1.14~~ 1.17 Housing market evidence demonstrates the high cost of providing housing in London and also the need for more affordable housing. The high cost of renting and buying a home impacts on the range of households who can afford to live and work in the OPDC area, which can impact on the ability to achieve mixed and balanced communities.

Commented [CH9]: Specific amendment.
Reason: To provide clarity for the intentions of the policy.

Commented [KT10]: Regulation 19(1) consultation amendment.
Reference: H2/5
Reason: To reference the latest Mayoral policy on threshold and viability as it changes over time.

Commented [CH11]: Specific amendment.
Reason: To provide clarity for the intentions of the policy.

Commented [CH12]: Specific amendment.
Reason: To provide consistency of terminology with the rest of the Local Plan.

Commented [13]: Specific amendment.
Reason: Additional policy point: London Affordable Rent housing should be considered at an early design stage to ensure that planning applications meet the tenure requirements of this policy.

Commented [CH14]: Specific amendment.
Reason: To strengthen policy.

DRAFT

~~1.15~~ 1.18 All residential developments with the capacity for more than 10 ~~or more~~ units (or have a gross internal residential floorspace of more than 1,000 sqm) will be required to provide affordable housing subject to viability, in accordance with Policy SP4, ~~and OPDC will start negotiations~~ with a target that 50% is delivered as affordable housing ~~subject to viability, in accordance with Policy SP4~~. The percentage of affordable housing should be measured in habitable rooms to ensure that a range of sizes of homes can be delivered, including family housing. OPDC will operate this calculation on the assumption that a 1 bed unit constitutes 2 habitable rooms and a 2 bed unit constitutes 3 habitable rooms. OPDC will apply greater flexibility to the calculations of habitable rooms for 3 bed+ units. However, OPDC would expect these units to be designed in a logical fashion and not in a way that attempts to manipulate the calculations to try and artificially increase the number of affordable habitable rooms.

Commented [KT15]: Regulation 19(1) consultation amendment.
Reference: H2/5
Reason: To reference the latest Mayoral policy.

~~1.16~~ 1.19 OPDC will apply the threshold approach to viability and review in accordance with the most up-to date Mayoral policy and/or guidance when assessing planning applications and will encourage applicants to maximise the amount of affordable homes that can be delivered through the planning system. OPDC will also encourage applicants to make use of affordable housing grant to increase the overall quantum of affordable housing that can be delivered.

Commented [KT16]: Regulation 19(1) consultation amendment.
Reference: H2/6
Reason: To reference the latest Mayoral policy.

~~1.17~~ 1.20 The 50% affordable housing target and threshold approach has been tested as being achievable in certain circumstances and some specific sites through OPDC's Affordable Housing Viability Assessment (AHVA). However, this work does not take full account of the specific costs of unlocking development sites across the area. The full infrastructure costs are not known at this stage and these costs will need to be identified and considered as part of planning applications. The presence of abnormal site constraints ~~is expected to~~should impact on land values; however, ~~and~~ the cost should not necessarily be borne through a reduction in planning obligations (see Policy DI1). However, it is recognised that specific site constraints, infrastructure requirements and financial viability may affect the amount of affordable housing that can be achieved on individual sites and will make the 50% strategic affordable housing target difficult to achieve without the availability of grant. This will particularly be the case on sites that require significant infrastructure to unlock development, such as within Old Oak South and Old Oak North (see chapter 4). ~~.~~The ~~A~~actual affordable housing delivered through planning applications will need to be carefully balanced between infrastructure requirements, the overall amount of affordable housing, the affordability of different tenure types and any public sector support that may be secured (including for example: affordable housing grant, capital infrastructure grant and public borrowing and financing).

Commented [17]: Specific amendment.
Reason: To tie into changes in Policy DI1.

Commented [KT18]: Regulation 19(1) consultation amendment.
Reference: H2/7, H2/32
Reason: To refer to the fact that 50% affordable housing is unachievable on sites that require significant physical infrastructure.

~~1.18~~ 1.21 Applicants should, where appropriate, undertake early discussions with OPDC on financial viability appraisals as part of pre-application discussions, to ensure that the affordable housing policy objectives can be achieved.

~~1.19~~ 1.22 OPDC's SHMA has identified that there is an 86% need for London Affordable Rent or equivalent housing as part of affordable housing need in the area. This does not necessarily mean that these households would qualify for London Affordable Rent housing through their council but is a consequence of the high cost of private renting or buying a home in the area.

~~1.20~~ 1.23 The AHVA has assessed the viability of delivering different levels and types of affordable housing. Delivering London Affordable Rent housing has the greatest impact on viability given the high cost of delivering housing at this level of discount on the market value. Delivering intermediate housing (including London Living Rent and London Shared Ownership) helps to improve the overall viability of delivering affordable housing. Further evidence on tenure, housing need and development viability is available in the supporting Housing Evidence Statement.

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~~1.21~~ 1.24 In order to create inclusive new communities at Old Oak and Park Royal that are mixed and balanced by housing tenure and household income, OPDC's target ratio for affordable housing is:

a) 30% London Affordable Rent;
b) 70% mix of intermediate housing including London Shared Ownership and London Living Rent.

~~1.22~~ 1.25 As can be seen in Table 8.2, and in accordance with Mayoral guidance, affordable homes should be genuinely affordable for the people they are intended for. Applications will be required to include homes that are affordable to households on a range of incomes, including local average income levels in the host Local Authorities. Applicants will also be required to demonstrate, through their Affordable Housing Statement, how the affordability of the proposed tenure mix compares to local average income levels in the host local authorities.

~~1.23~~ 1.26 At the start of the design process, applicants should work positively with OPDC and other relevant stakeholders to consider how the design of proposals can support the delivery of a range of tenures on the site and specifically, the requirements for the delivery of London Affordable Rent housing. Applicants should engage with a Registered Provider partner at the pre-application stage to determine the most appropriate affordable tenure mix on a site.

Commented [19]: Specific amendment.
Reason: Additional supporting text on considering tenure at the earliest design stage to meet the tenure requirements of this policy.

~~1.24~~ 1.27 Starter Homes may be included as part of the affordable housing product range and be considered as an intermediate product in accordance with the requirements of the Housing and Planning Act 2016, once they are in force.

~~1.25~~ 1.28 In accordance with the NPPF, affordable housing should include provisions to ensure that it is secured at an affordable price for future eligible households. In the event that an affordable unit is lost, OPDC will require, secured through a Section 106 agreement, the recycling of any subsidy for replacement provision. Subsidy includes all forms of subsidy that are required to enable the sale or letting of the property at sub-market value. This includes, but is not exclusive to, subsidy from reduced land costs and the developer contribution gained through a Section 106 agreement and grant funding.

Table 8.2: Forms of Affordable Housing

Affordable housing according to the National Planning Policy Framework is for households whose needs cannot be met by the market, either for rent or sale. Additionally affordable housing should be genuinely affordable for the people the unit is intended for and below market prices.		
London Affordable Rent	**London Living Rent**	**London Shared Ownership**
Capped Target Rents set in accordance with government guidance	Benchmark Rents set in accordance with GLA guidance	Household purchases at least 25% stake and pays rent on the retained equity
Affordable to most households but limited to eligible households who have been assessed by the host local housing authority, either Brent, Ealing or Hammersmith & Fulham	Affordable to households on medium incomes who are renting privately and wish to save for a deposit and who ~~who~~ can afford to spend one third of their gross income on rent. Maximum income of £60,000 subject to annual review under the London Plan	Maximum income cap of £90,000 applies subject to review in the London Plan

Commented [KT20]: Regulation 19(1) consultation amendment.
Reference: H2/28
Reason: To provide clarity around definitions.

Commented [KT21]: Regulation 19(1) consultation amendment.
Reference: H2/27
Reason: To provide clarity around definitions.

~~1.26~~ 1.29 Affordable housing should be built to a high standard of design with a quality of materials comparable to the private homes so that it is difficult to spot the difference in the architectural quality of market and affordable units within the same development. This will help to create a more sustainable and successful mixed community and Lifetime Neighbourhoods.

~~1.27~~ 1.30 Normally, affordable housing would be provided on the site of the planning application that it applies to, in order to create communities that are mixed and balanced by tenure and income. However, in exceptional circumstances and where it can be demonstrated that it is more appropriate, the affordable housing provision may be located elsewhere in the OPDC area or through payment in lieu. This will always be the case for applications providing purpose-built shared housing in accordance with Policy H7.

~~1.28~~ 1.31 In 2014 the Government introduced a Vacant Building Credit (VBC) that reduces the requirement for affordable housing where a vacant building is brought back into any lawful use or is demolished to be replaced by a new building. The intention of the VBC is to bring forward sites containing vacant buildings that would not otherwise come forward for development. However, in London, as sites with vacant buildings already typically coming forward for development and affordable housing requirements are already subject to viability testing, the VBC is unlikely to bring forward significantly more development. Given the high demand for affordable housing it will not normally be appropriate to apply VBC to developments. Where it is applied, VBC will only apply to the Gross Internal Area of buildings and will only be applicable to buildings when the criteria set out in the policy are met.

~~1.29~~ 1.32 To demonstrate that a building has not been made vacant for the sole purpose of redevelopment, an applicant will need to show that the building has been vacant for a continuous period of at least five years before the application was submitted and provide evidence that the site has been actively marketed for at least two of those five years at realistic prices. An applicant will not be able to claim Community Infrastructure Levy relief in these circumstances.

Commented [CH22]: Specific amendment.
Reason To comply with Draft New London Plan policy H9.

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POLICY H3: HOUSING MIX

New residential developments should deliver a balanced mix of ~~dwelling~~ housing types and sizes, taking into account the following considerations:

a) **providing 3 or more bedrooms within 25% of all new homes~~units as family housing (3 beds plus);~~;**

~~a)~~b) **providing London Affordable Rent homes in a mix of sizes that accords with ~~including~~ OPDC's most up to date Strategic Housing Market Assessment ~~compliant mix for London Affordable Rent~~;**

~~b)~~c) **optimising the proportion of family housing beyond 25% where this is feasible and appropriate;**

~~c)~~d) **all self-contained housing will be required to meet the London Plan and national housing space standards;**

~~d)~~e) **housing should be appropriately and flexibly designed to respond to changing needs over time; and**

~~e)~~f) **sites should deliver 90% of units as Building Regulation M4(2) 'accessible and adaptable dwellings' and 10% of new housing as Building Regulation M4(3) 'wheelchair user dwellings' across all tenures, except where proposals are delivered in accordance with Policies H7 and H10.**

SUPPORTING TEXT

~~1.30~~ 1.33 Providing a range of different dwelling types and sizes supports the creation of mixed, balanced and sustainable communities and will help to meet the housing need of a range of household types.

~~1.31~~ 1.34 The London Plan recognises the importance of family housing to meeting London's needs and notes that well-designed homes providing 2 or more bedrooms can contribute to this need. However, OPDC's SHMA (2017) identifies a specific need in the local area for 51% and 64% of affordable and market housing respectively to be ~~family housing units~~ homes with at least three bedrooms suitable for families. ~~This is supported by Labour Force Survey data which shows that the proportion of households in London with dependent children is growing.~~ ~~However, o~~On average in London over the last nine years, the housing market and existing planning practice has delivered 20% of all tenures and 24% of affordable tenures as ~~family housing units~~3 bedrooms or more. ~~Further evidence is available in the supporting Housing Evidence Statement.~~

~~1.32~~ 1.35 To help meet needs, ~~A~~applica~~tions~~ nts will be expected to deliver 25% of all ~~units~~ homes as ~~family~~ homesunits providing 3 or more bedrooms. The overall housing mix should include delivering the size mix for London Affordable Rent that is set out in the latest SHMA. The housing mix for market and intermediate homes should be informed by the development site characteristics and the ability of the site to accommodate a mix of housing types and sizes, but should always look to optimise the proportion of family sized housing to meet the identified need. Policy H4 sets out the specific design requirements and appropriate locations within residential developments for family housing. OPDC will encourage early engagement from developers to discuss how family housing need can be met.

Commented [CH23]: Specific amendment.
Reason: To provide consistency of terminology with the rest of the Local Plan.

Commented [CH24]: Specific amendment.
Reason: To make the policy clearer.

Commented [CH25]: Specific amendment.
Reason: To align with Draft New London Plan policy H12.

Commented [CH26]: Specific amendment.
Reason: To clarify that there is a local need for homes that are suitable for families.

Commented [CH27]: Specific amendment.
Reason: To avoid duplication with the supporting Housing Evidence Statement.

Commented [CH28]: Specific amendment.
Reason: To provide clarity of definitions of family housing in this Local Plan.

Commented [CH29]: Specific amendment.
Reason: To provide clarity of definitions of family housing in this Local Plan.

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~~1.33~~ 1.36 While developments are expected to reflect the identified dwelling mix, rigid application of these may not be appropriate in every case and ~~applicants are expected to~~OPDC will take into account the housing type, site characteristics, viability, location and other constraints. This overall approach to 3 bed+ family housing seeks to strike a balance between the need assessed in the SHMA and incentivising developers to increase the level of family housing delivered.

~~1.34~~ 1.37 All self-contained homes will be required to meet the London Plan and national housing space standards. This will ensure that new homes will have adequately sized rooms and efficient room layouts which are functional and fit for purpose.

~~1.35~~ 1.38 London's population is rapidly changing and housing requirements will change, both in the market and affordable sectors. Where feasible, all new housing units in the OPDC area should be designed with in-built flexibility to adapt to residents' changing needs over time. As set out in the Mayor of London's Housing SPG 2016, this includes carefully considering the location of doors, windows and built-in furniture, making rooms large enough to accommodate furniture in a usable way and allowing the potential for spaces to be linked or separated, positioning structural support to allow new openings in internal walls. Housing units should be also be designed to allow for units to expand or contract as household size, type and other circumstances change. It is recognised however, that this will be more feasible on long-term rented units than units built for sale.

~~1.36~~ 1.39 To ensure that homes are flexible enough for people to grow older in, OPDC will require that 90% of new homes are designed to be accessible and adaptable and that 10% are easily adaptable for wheelchair users, in accordance with the Building Regulations, except for purpose-built shared housing and student housing proposals delivered in accordance with Policies H7 and H10. Wheelchair units should be marketed as suitable for wheelchair users and should be provided across all tenures.

Commented [CH30]: Specific amendment
Reason: To make the supporting text clearer.

Commented [CH31]: Specific amendment.
Reason: To provide clarity of definitions of family housing in this Local Plan.

Commented [KT32]: Regulation 19(1) consultation amendment.
Reference: H3/2
Reason: To clarify what is meant by designing in flexibility.

Commented [CH33]: Regulation 19(1) consultation amendment.
Reference: H3/4
Reason: To recognise that it is difficult to build in flexibility to homes that are built for sale.

DRAFT

POLICY H4: DESIGN OF FAMILY HOUSING

New housing developments should deliver family housing in accordance with Policy H3 taking into account the following considerations:

a) Where it is appropriate family housing should be located:

i. at the ground or first floor of developments with direct access to a garden or other secure private and/or communal open space for doorstep play; and

ii. close to usable publicly accessible open space and appropriate social infrastructure.

b) Where family housing is located on other levels, applicants should provide convenient access to secure private and/or communal open space that is suitable for children.

SUPPORTING TEXT

~~1.37~~ 1.40 The Old Oak and Park Royal area will be characterised by large-scale and high-density development. In this context, family sized housing ~~(at least 3 bedrooms)~~ in both the market and affordable sectors has to be sensitively designed and appropriately located to ensure that it is suitable for families with children to live in.

~~1.38~~ 1.41 Homes designed for families with children should have direct, level access to private and secure external open space. This should be well designed and of adequate space for it to be suitable for children of all ages to play in. Ideally, this should be in the form of a garden at ground floor level. Larger (3 bed+) family units should be prioritised at ground and first floor level. ~~However,~~ OPDC acknowledges that through careful design, successful outdoor spaces for family housing can also be provided in other ways, such as child-friendly courtyards and large terraces. Applicants will be expected to demonstrate how their developments will provide adequate open space for the family units.

~~1.39~~ 1.42 The internal layout of family homes should be designed to meet the needs of family life, for example, incorporating generously sized hallways and internal circulation spaces, utility rooms and sufficient space suitable for family members to undertake study or homework in private. There should also be adequate storage space. Where family homes are not entered directly from the street there should be convenient lift access from the ground floor to the front door.

~~1.40~~ 1.43 Family housing should be developed in locations with easy access to publicly accessible open space that is suitable for sports and games activities for children of all age groups and be located in walking distance of other social infrastructure such as schools and childcare providers.

Commented [CH34]: Specific amendment.
Reason: To align with terminology elsewhere in the Local Plan.

Commented [CH35]: Specific amendment.
Reason: Definitions of family housing are clarified in policy H4 and do not need to be repeated here.

Commented [CH36]: Specific amendment.
Reason: To make the policy and supporting text clearer.

Commented [CH37]: Specific amendment.
Reason: To align with terminology elsewhere in the Local Plan.

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POLICY H5: EXISTING HOUSING

OPDC will:

a) resist the loss of existing residential accommodation, unless:

i. it is located within Strategic Industrial Location (SIL);

ii. the proposal would result in new housing being provided at an equivalent or higher density, measured by unit numbers and floorspace; or

iii. its loss is critical to unlock the comprehensive regeneration of the area.

b) work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham and other stakeholders to bring vacant residential properties back into use, including where appropriate, the use of empty dwelling management orders or compulsory purchase powers;

c) permit residential conversions of existing dwellings to two or more dwellings where:

i. the conversion of a family sized home would retain at least one family sized ~~unit~~ home ~~(3 bed+)~~ which has access to secure private and/or communal space ~~is provided through each conversion with access to private or communal open space~~;

ii. the converted dwellings meet the required National and London Plan space standards;

iii. residential conversions maintain the amenity of neighbours, the general character of the surrounding area and do not result in cumulative stress on services, unless it is appropriately mitigated; and

iv. the proposal would not result in adverse impacts on parking and/or other local amenities.

Commented [KT38]: Regulation 19(1) consultation amendment.
Reference: H5/2
Reason: To make clear that the family unit and not the conversion should have access to the private space

SUPPORTING TEXT

~~1.41~~ 1.44 OPDC is seeking to maximise housing supply across all tenures to meet local and London-wide need for more homes. Given the high demand for housing in the area, the loss of residential units from the current housing stock will not normally be acceptable. This includes hostels, accommodation providing an element of care, or dedicated homes for employees such as nurses, police officers or hotel staff.

~~1.42~~ 1.45 Areas identified as Strategic Industrial Location (SIL) provide employment opportunities for local people. Within SIL, OPDC will permit the loss of existing housing stock. Outside of SIL, any proposals on sites with existing residential accommodation will be required to re-provide residential accommodation to the same or higher densities, measured in terms of both unit numbers and floorspace.

~~1.43~~ 1.46 Empty homes can undermine housing supply and negatively impact on residents in the surrounding area. If occupied, these dwellings can help to meet housing need. OPDC will work with the local authorities, landowners and other stakeholders to bring vacant residential buildings back into habitable use. This could include, where necessary, using empty dwelling management orders or compulsory purchase powers (see Policy DI4, Delivery and Implementation chapter).

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~~1.44~~ 1.47 OPDC will work with the London Boroughs of Brent, Ealing and Hammersmith ~~and~~ & Fulham to agree a joint protocol to identify empty homes and work to bring them back into habitable use. This will enable the more efficient use of the existing housing stock by reducing the number of vacant, unfit and unsatisfactory dwellings. It will also enable OPDC to set and monitor targets for bringing properties back into use.

~~1.45~~ 1.48 The area's existing housing stock is limited but conversions can help meet housing need by delivering additional homes. OPDC's SHMA identifies that there is a need for family housing within the area. Therefore, any conversions will be required to include provision of a 3 bed plus housing unit appropriate for families with access to secure open space. Any conversions will have to meet National and London Plan space standards. Also where it is practicable, conversions should aim to meet the Building Regulations to increase the supply of accessible and adaptable dwellings.

~~1.46~~ 1.49 Conversions can also increase the supply of smaller homes. However, the potential cumulative stress from conversions of larger dwellings to smaller homes on both the supply of family sized homes and on on-street parking provision, waste collection and other social amenities needs to be weighed against the wider economic benefits from such conversions and the resultant overall growth in the number of new homes.

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POLICY H6: BUILD TO RENT

OPDC will require new self-contained purpose built Private Rented Sector (PRS) accommodation to:

a) ~~provide affordable housing in the form of intermediate rental products in accordance~~accord with Policy H2 with the exception of part~~s~~ (~~a) and (c)~~ c) of that policy, where instead, affordable should be delivered as intermediate housing, with a preference for London Living Rent housing;

b) be under single ownership and management, subject to a covenant for at least 15 years and in the event that any units are sold out of the Private Rented Sector a clawback mechanism will be used to secure appropriate financial ~~affordable housing~~ contributions towards the delivery of affordable housing;

c) provide an appropriate Residential Management Plan; and

d) offer longer-term tenancies with rent certainty of at least 3 years and no up-front fees.~~s~~

SUPPORTING TEXT

~~1.47~~ 1.50 The Private Rented Sector (PRS) has been the fastest growing housing tenure in London in recent years. PRS now houses 30% of all households in London, up from 14% in 2002/03 according to the English Household Survey. The sector has become increasingly important in supporting labour market mobility, with four in five of those coming to London finding their first home in the PRS. Purpose-built Build to Rent can play an important role in meeting housing need and in supporting employment growth in the OPDC area. Build to Rent can deliver homes quickly to support early place making and OPDC is supportive of proposals for high quality Build to Rent schemes, subject to the proposals according with the other relevant policies in this Local Plan.

~~1.48~~ 1.51 Build to Rent will be required to provide affordable housing in the form of intermediate rent, preferably London Living Rent housing. In accordance with Policy H2, Build to Rent housing will be subject to the Mayor's most up-to-date threshold approach to viability. At the time of publication of this Local Plan, the Mayor's threshold approach to Build to Rent requires schemes to deliver 35% affordable housing and 30% of this affordable housing to be at London Living Rent levels~~housing. and this will be subject to viability.~~ As it is not necessary to be a Registered Provider to deliver or manage intermediate rent, these units can be owned and/or managed by the same Build to Rent landlord as the market rent units. Where Build to Rent delivers units at London Living Rent they will not be expected to be offered to the tenants to buy. ~~In accordance with Mayoral guidance, OPDC will not apply the threshold approach to viability to Build to Rent proposals.~~

~~1.49~~ 1.52 In accordance with the NPPF, affordable housing provided by Build to Rent providers should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing. This will be secured in a Section 106 agreement.

~~1.50~~ 1.53 All homes within a Build to Rent development or block will need to stay under single ownership and management under a covenant of at least 15 years, meaning that individual units cannot be separately sold on and overall ownership of the development or block can only change if the scheme stays as Build to Rent. This will ensure a commitment to invest in place making and will provide better management standards and higher quality homes than much of the mainstream private rented sector.

~~1.51~~ 1.54 The covenant will need to include a clawback mechanism in the event of units being sold out of the Build to Rent sector during the covenanted period.

Commented [39]: Specific amendment.
Reason: To make the policy clearer.

Commented [CH40]: Specific amendment
Reason: To make the policy clearer.

Commented [CH41]: Specific amendment
Reason: To make the policy clearer.

Commented [CH42]: Specific amendment
Reason: To align with Draft New London Plan policy H 13.

Commented [CH43]: Specific amendment.
Reason: To align with Draft New London Plan policies H6 and H13.

Commented [KT44]: Specific amendment.
Reason: To align with Draft New London Plan policies H6 and H13.

DRAFT

~~1.52~~ 1.55 Build to Rent will be required to provide high quality and well-designed self-contained units that are serviceable for long-term renting. Any communal spaces and services also need to be well maintained for the benefit of future residents. It should also be designed in a way that is suitable for the units to be converted into home ownership housing after the covenanted period, subject to future local housing market requirements and market conditions.

~~1.53~~ 1.56 Effective building management enhances and protects the long-term value of a development. Proposed schemes will therefore be required to provide a detailed Residential Management Plan of how the housing will be managed and maintained. Standards will be controlled and maintained as the proposed landlord will be required to register with ~~the Housing Ombudsman~~a recognised ombudsman scheme. As part of their Residential Management Plan, applicants should provide details of how the proposal will be appropriately managed to minimise impacts on surrounding properties. This will be secured through a Section 106 agreement. As a minimum, these should include detailed information on:

a) move-in/out arrangements and how units are maintained during void periods;
b) how individual units will be managed and serviced during a tenancy term;
c) how communal facilities, including landscaping, deliveries and collections will be managed;
d) scheme management arrangements, including arrangements for on-site staff;
e) security and fire safety procedures; ~~and~~
f) procedures for community liaison; and
~~f)~~g) complaints procedure.

~~1.54~~ 1.57 Longer tenancies (three years or more) should be available to all tenants. These should have break clauses ~~for rents~~, which allow the tenant to end the tenancy with a month's notice, any time after the first six months. Within these tenancies there should also be formula linked rent increases that are made clear to the tenant when the property is let and no up-front fees apart from deposits and rent-in advance.

Commented [CH45]: Specific amendment.
Reason: To align with Draft New London Plan policy H13.

Commented [TC46]: Specific amendment.
Reason: To align with Draft New London Plan policy H13.

Commented [CH47]: Specific amendment
Reason: To align with Draft New London Plan policy H13.

DRAFT

POLICY H7: PURPOSE-BUILT SHARED HOUSING AND EXISTING HMOS

Proposals for new purpose-built shared housing schemes will be supported where they:

a) **demonstrate that they contribute to the creation of mixed and balanced communities by not undermining the delivery of conventional self-contained housing supply;**

b) **are located within or directly adjacent to a designated town centre with a PTAL of 4 or higher~~in appropriate locations, well served by public transport,~~ that can absorb intensive usage;**

c) **incorporate a high quality of design and shared space for occupants;**

d) **provide an appropriate Residential Management Plan; and**

e) **~~offer~~ provide a commuted sum in lieu of the provision of on-site affordable housing, in accordance with the most up-to-date Mayoral policy and/or guidance.**

Proposals for conversions or loss of existing shared housing will be supported where they:

f) **no longer meet identified local need for shared housing;**

g) **do not comply with any relevant design standards and that the provision cannot be enhanced to meet any relevant standards.~~, including quality~~;**

h) **~~are not located in areas with a high~~are poorly served by public transport ~~access level~~ and facilities and services such as shops and social infrastructure; or**

i) **give rise to unacceptable impacts on amenity.**

SUPPORTING TEXT

~~1.55~~ 1.58 The overall vision for Old Oak and Park Royal is to provide new communities that are balanced and sustainable and meet a range of housing needs. Purpose-built shared housing schemes can make a contribution to this and support the sharing economy. It can play a role in meeting the housing needs of young professionals requiring employment mobility and others who would benefit from shared facilities.

~~1.56~~ 1.59 Applicants will be required to provide evidence to demonstrate that there is a specific need for purpose-built shared housing. Overprovision of one type of housing would have an impact on the ability to achieve a mixed and balanced community. In addition, overprovision could undermine the overall delivery of standard self-contained housing types in the area. Large concentrations of shared housing may also have an unacceptable impact on the amenity of neighbouring residents.

~~1.57~~ 1.60 Applicants will be required to demonstrate that the proposed location is appropriate and can absorb intensive occupancy rates. This is likely to be in areas of the highest public transport accessibility.

~~1.58~~ 1.61 Homes that have not been designed to comply with London Plan space standards or Building Regulations M4(2) and M4(3) should be well-designed to make the most practical use of the space available. Common shared areas should be appropriate for the intended occupiers and designed to a high quality. Schemes will be required to meet all relevant Housing Act and HMO standards and requirements.

Commented [TC48]: Specific amendment
Reason: To clarify requirements for accessibility to public transport.

Commented [CH49]: Specific amendment
Reason: To provide greater clarity to policy by defining appropriate locations.

Commented [CH50]: Specific amendment
Reason: To align with Draft New London Plan policy H18.

Commented [51]: Specific amendment
Reason: To strengthen policy so that existing shared housing will be protected where it meets relevant design standards.

Commented [CH52]: Specific amendment
Reason: To provide greater clarity and be more consistent with Draft New London Plan policy H18.

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~~1.59~~ 1.62 Applications will be required to provide a detailed Residential Management Plan, secured through a Section 106 agreement showing how the housing will be managed and maintained and that~~to ensure that~~ it continues to provide~~be~~ useable shared ~~open~~ space for future residents and not a cause of nuisance to other people living nearby. Minimum expectations with regards to the management and maintenance plans for shared accommodation are the same as they are for Policy H6 at paragraph 8.554.

~~1.60~~ 1.63 Purpose built shared housing with common shared areas is unlikely to be provided at a price that is affordable for households identified as having an affordable housing need or be suitable for such households. Applicants for purpose built shared housing proposals will be required to provide a commuted sum for the off-site delivery of affordable housing~~, the details of which will be set out in a SPD~~. This will enable more appropriately sized and self-contained affordable housing units to be developed on another site within the OPDC area. The commuted sum should accord with the requirements of the most up-to-date Mayoral policy and/or guidance, which at the time of the publication of this Local Plan requires contributions to be equivalent to 35% of the residential units being provided at 50% of market rent not to undergo the Viability Tested Route.

Commented [CH53]: Specific amendment
Reason: To align with Draft New London Plan Policy H18

~~1.61~~ 1.64 Existing HMOs can make a valuable contribution to the overall housing stock of the area at rents that are affordable to people who cannot access self-contained council housing or market level private rented sector (PRS) housing. These may include students in full-time education, migrant and seasonal workers living away from home and refuges run by voluntary organisations for people suffering from physical violence or abuse.

~~1.62~~ 1.65 Where existing HMOs are not carefully managed, they can pose a health and safety risk to the occupiers and if there is an overconcentration of HMOs in a location, they can negatively impact on the amenity of that location. Where evidence suggests this to be the case, OPDC will consider proposals to either improve the accommodation's standard or accept its loss to an alternative housing use.

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POLICY H8: GYPSY AND TRAVELLER ACCOMMODATION

a) OPDC will safeguard ~~T~~the existing Bashley Road Gypsy and Travellers Site and work positively with London Borough of Ealing to enhance the site where required~~will be protected for its current use~~;

b) OPDC will give careful consideration to the future needs of gypsies and travellers and work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham to secure a sufficient supply of plots/pitches to meet the needs of existing and future gypsy and traveller households (including travelling show people);

c) Any new sites, pitches and/or plots for travellers should:

- **i. be accessible to public transport, services and facilities and be capable of support by local social infrastructure;**
- **ii. be capable of appropriate connection to energy, water and sewage infrastructure;**
- **iii. provide safe access to and from the public~~main~~ road network; and**
- **iv. support the health and wellbeing of the occupiers of the site by providing appropriate facilities, layout and design quality.**

SUPPORTING TEXT

~~1.63~~ 1.66 There is currently one authorised site in the London Borough of Ealing, which falls within OPDC's boundary. As the local planning authority, OPDC is required to allocate sites to meet identified gypsy and traveller accommodation needs. OPDC will safeguard the site at Bashley Way for this purpose. The ~~work with the~~ London Borough of Ealing is responsible for maintaining and managing the site to ensure that it is providing appropriate facilities to support the health and well-being of residents. ~~to protect, safeguard and w~~Where possible, OPDC will work positively with the London Borough of Ealing to improve the existing site so that it continues to provide suitable accommodation for the households who live there.

~~1.64~~ 1.67 The Planning Policy for Traveller sites (PPTS 2015) amended the definitions of gypsies and travelling showpeople for planning purposes, meaning that planning authorities are no longer required to plan and provide pitches for the needs of gypsies and travellers who do not travel for an economic purpose. OPDC has carried out a Gypsy and Traveller Accommodation Assessment (GTAA) to consider the current and future need for pitches and or plots in the OPDC area. This identified that there is no need to provide for additional pitches for gypsies and travellers in the area for the 20 year Local Plan period.

1.68 OPDC's GTAA also identified that there will be 12 newly forming households over the Local Plan period for which there will not be a requirement in planning terms to provide a pitch. These households are referenced in OPDC's SHMA which has assessed the overall need for all types of housing over the Local Plan period. The need from the 12 newly forming households form 0.1% of the total objectively assessed housing need that is identified for the housing market area. The new draft London Plan 2017 has proposed a wider definition for planning purposes in London which includes gypsies and travellers who live in bricks and mortar housing due to the lack of sufficient pitch provision. If this new definition has been adopted, OPDC will have to review the GTAA and this policy.

Commented [KT54]: Regulation 19(1) consultation amendment.CH144
Reference: H8/5
Reason: To provide clarity about roles and responsibilities as planning authority versus the role of local housing authority and site owner.

Commented [KT55]: Regulation 19(1) consultation amendment.
Reference: H8/5
Reason: To provide clarity about roles and responsibilities as planning authority versus the role of local housing authority and site owner.

Commented [CH56]: Specific amendment
Reason: To align with Draft New London Plan Policy H16.

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~~1.65~~ 1.69 The Housing and Planning Act 2016 introduces a new duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) to consider the needs of people with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored.

~~1.66~~ 1.70 The Grand Union Canal Places Policy (D3) includes the policy for meeting the need for houseboat moorings. OPDC will work with the host boroughs through OPDC's Housing Panel and at its Duty to Cooperate meetings to determine any future needs for caravan dwellers and houseboat moorings on inland waterways as and when they arise.

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POLICY H9: SPECIALIST HOUSING

a) OPDC will support the delivery of specialist housing that meets identified needs;

b) Development proposals providing 1,000 or more homes will be required to provide 10% of units as specialist care and supported needs housing for older people and/or vulnerable people;

c) OPDC will require proposals for older persons or other specialist housing units to be:

i. appropriate for the intended occupiers in terms of the standard of facilities, the level of independence and the provision of support or care;

ii. of a high design quality, including inclusive design and provision of adequate internal and external space;

iii. appropriately accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers; and

iv. accompanied by an appropriate Residential Management Plan.

d) Proposals for conversions or loss of existing specialist housing will be supported where they:

i. can demonstrate that there is no longer an identified local need for the specialist housing provision;

ii. can demonstrate that the provision does do not comply with any relevant design standards and that the provision cannot be enhanced to meet any relevant standards; or

iii. the proposal would result in new specialist housing being provided at an equivalent or higher quantum, measured by both unit numbers and floorspace.

Commented [KT57]: Regulation 19(1) consultation amendment
Reference: H9/2
Reason: To make the policy less open ended and ensure that specialist housing is meeting an identified need.

Commented [CH58]: Specific amendment
Reason: To strengthen policy wording.

Commented [CH59]: Specific amendment
Reason: To strengthen policy wording.

Commented [CH60]: Regulation 19(1) consultation amendment
Reference: H9/1
Reason: To provide a policy to assess proposals for conversions or loss of specialist housing.

SUPPORTING TEXT

~~1.67~~ 1.71 The UK's and London's population is ageing and more people are living with long-term health conditions requiring additional care and support. This is a cost to the NHS and also to councils. Councils already spend 30 to 35% of their budgets on adult social care. It is now widely recognised that the quality of life for older people and people of all ages with a physical disability can be increased and support costs reduced if they can live in homes that can foster their independence but easily accommodate any support needs they may have.

~~1.68~~ 1.72 OPDC's SHMA identifies that there is a need for 8,100 new specialist older person housing units within the SHMA area over the Local Plan period using Housing Learning and Improvement Network (Housing LIN) methodology. This represents 6.3% of the total objectively assessed need in the local housing market area covering the three host local authorities. In addition to this need, social care departments in the three local authorities are working with other vulnerable people who would benefit from moving into a specialist housing unit with care attached.

~~1.69~~ 1.73 Dedicated specialist housing units will not be required on every scheme. However, in order to meet the need identified in the SHMA, OPDC will expect large housing developments of more than 1,000 units to provide at least 10% specialist housing units onsite. Large housing developments are more likely to be able to viably provide specialist housing units at scale and provide additional facilities and services that may be able to support the needs of residents.

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~~1.70~~ 1.74 Units provided under this policy will be in addition to the requirements for M4(3) units set out in Policy H3 on housing mix.

~~1.71~~ 1.75 Specialist housing units under this policy will have to be designed to be flexible and achieve a high quality and be appropriate and inclusive for the intended occupants and provide adequate space for living, sleeping and care activities and that takes account of potential mobility issues of residents. Where on-site care and support will be provided adjacent to the residential units, applicants will be required to demonstrate arrangements between developers, support service providers and the NHS and have arrangements in place for the long-term management of the scheme.

~~1.72~~ 1.76 The London Plan benchmarks identify the need for intermediate and affordable rent units for older people, which is expected to form the majority of the specialist housing needs. As such, all forms of specialist housing will be required to provide affordable housing, subject to viability, where they are self-contained housing units behind a lockable front door containing the normal facilities for cooking, eating and sleeping associated with use as a dwelling house i.e. they afford the facilities required for day to day private domestic existence.

~~1.73~~ 1.77 Specialist housing should normally be located in areas that are accessible to public transport and other local facilities such as shops, pharmacies and community facilities for the benefit of the residents themselves but also support staff and visiting family members.

~~1.74~~ 1.78 Applications will be required to provide a Residential Management Plan, secured through a Section 106 agreement. This will need to provide details on how the housing and any space provided for the care and support services will be managed and maintained. Minimum expectations with regards to the management plans include:

a) how regular on-site support and care facilities for residents will be managed and maintained;
b) how ad-hoc requirements for additional support requiring access to the premises will be managed;
c) how communal facilities, including landscaping, deliveries and collections will be managed;
d) security and fire safety procedures; and
e) procedures for community liaison.

1.79 Given the ageing population and need identified in the SHMA, conversions or loss of existing specialist housing will only be supported where proposals can demonstrate that there is no longer an identified local need, where it can be demonstrated that the existing provision does not comply with any relevant standards and it is not feasible for the provision to be improved to meet the relevant standards, or where the proposal would provide replacement specialist housing at an equivalent or higher density.

Commented [CH61]: Regulation 19(1) consultation amendment
Reference: H9/1
Reason: Supporting text for policy assessing proposals for conversions or loss of specialist housing.

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POLICY H10: STUDENT ACCOMMODATION

a) Student housing will be supported where it:

i. meets an identified local or London-wide need and contributes to the vibrancy and diversity of an area, especially in the early phases of the plan period;

ii. is located within or directly adjacent to a designated town centre and has a PTAL of 4 or higher ~~in areas with high PTALwell served by public transport and is easily accessible by non-motorised forms of transport~~ and is close to local amenities ~~and designated town centres~~;

iii. does not undermine the delivery of conventional self-contained housing supply and housing targets;

~~iii.~~iv. provides adequate internal private living space and communal space to meet needs~~:~~ and

~~iv.~~v. does not result in an overconcentration in any one specific location;

b) Proposals must provide an appropriate Residential Management Plan; and

c) Proposals must provide affordable student accommodation subject to the thresholds and viability tests as defined through Mayoral policy and /or guidance and be secured for occupation by~~Where the proposal is not linked to~~ a specified higher educational institution ~~it will need to provide the maximum reasonable amount of affordable student accommodation, subject to viability~~.

SUPPORTING TEXT

~~1.75~~ 1.80 The Mayor's Academic forum has provided projections for the growth of full time students in London from 2011/12 to 2026/27 and the required additional purpose-built student accommodation that this growth generates. These projections estimate that by 2026/27 London's current student population of just over 365,000 will have increased to between 429,391 and 487,317.

1.81 OPDC recognises the many positive benefits that universities and higher education institutions and their students bring to London. Both enhance an area's reputation as a dynamic and vibrant location, create a critical mass for the delivery or goods, services and events, provide local businesses with skilled workers and seasonal workers and can aid place making, regeneration and investment.

~~1.76~~ 1.82 To demonstrate there is a local or London-wide need and ensure the accommodation will be supporting London's higher education institutions, the student accommodation must either be operated directly by a higher education institution or the development must have an undertaking in place from initial occupation, to provide housing for students at one or more specified higher education institutions, for as long as the development is used for student accommodation.

~~1.77~~ 1.83 Provision of purpose built student accommodation will be supported as part of an overall mix of housing types across the area but it must not result in an over-concentration in any one particular location in order to protect the long-term sustainability of local communities. This will avoid issues of:

a) not achieving a mix and variety of housing in a location;
b) overconcentration of one form of dwelling type;
c) directly related noise and management concerns;
d) vacant premises at particular times of the year; and

Commented [CH62]: Regulation 19(1) consultation amendment
Reference: H10/6
Reason: To meet a specific local need for student housing.

Commented [TC63]: Specific amendment
Reason: To clarify the policy in terms of suitable locations for student accommodation and accessibility to public transport.

Commented [KT64]: Regulation 19(1) consultation amendment
Reference: H10/2
Reason: Policy included on design of liveable internal spaces.

Commented [CH65]: Specific amendment
Reason: To align with Draft New London Plan policy H17.

Commented [CH66]: Regulation 19(1) consultation amendment
Reference: H10/6
Reason: To meet a specific local need for student housing.

Commented [KT67]: Regulation 19(1) consultation amendment
Reference: H10/8
Reason: To meet the accommodation needs of a specified educational institution.

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e) pressure on the transport infrastructure at particular times of the year (end/start of terms).

~~1.78~~ 1.84 Proposals for student accommodation will be required to be of high quality in relation to design and size in accordance with Policy D4. Student housing schemes, by virtue of providing a number of units of the same size, can result in monotonous façade treatments which can negatively impact on the public realm. Proposals should specifically seek to deliver interesting and high quality facades, which complement the existing and emerging character of the area. The accommodation layout will be required to provide liveable bedrooms, study areas and other facilities.

~~1.79~~ 1.85 Proposals for student housing should be located within or adjacent to designated town centres with a PTAL of 4 or higher ~~close to transport nodes~~ so that students can easily access public transport, workplaces and amenities ~~services~~. Developments located close to transport nodes will also support with the movement of students especially during the start and end of terms.

~~1.80~~ 1.86 OPDC will expect proposals to be accompanied by a Residential Management Plan setting out how any impact on the surrounding area and the amenity of the neighbouring residents will be mitigated, particularly in relation to noise, disturbance and amenity impacts. These plans must also provide details of the management regime to be implemented on site, from first occupation and on an ongoing basis. Management and maintenance plans should, as a minimum, include detailed information as described in paragraph 8.54 Policy H6 on Build to Rent. Compliance with approved management and maintenance plans will be secured through Section 106 agreements.

~~1.81~~ 1.87 In accordance with the latest Mayoral guidance and/or policy student housing proposals ~~that are not linked to an educational institution~~ should make an appropriate contribution to affordable student accommodation, subject to viability. At the time of publication of this Local Plan, this requires schemes to deliver 35% of accommodation as affordable to benefit from the Fast Track Route.

Commented [CH68]: Specific amendment
Reason: Provides additional wording on designing appropriate internal spaces to support amendment H10/2

Commented [CH69]: Specific amendment
Reason: To provide greater clarity in terms of suitable locations for student accommodation

Commented [CH70]: Specific amendment
Reason: To align with Draft New London Plan policy H6 and H17.

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EMPLOYMENT CHAPTER

E1: PROTECTING, STRENGTHENING AND INTENSIFYING THE STRATEGIC INDUSTRIAL LOCATION

OPDC will protect, strengthen and intensify land within the designated SIL boundary by ensuring proposals:

a) **are comprised of uses suitable for broad industrial type activities as defined in Mayoral policy and/or guidance, that contribute to meeting the strategic target of 40,400 new jobs in Policy SP5 and the relevant place jobs targets in chapter 4;**
b) **achieve no net loss of industrial floorspace and where feasible, intensify the use of sites, in particular on Site Allocations and on other sites identified in OPDC's Park Royal Intensification Study;**
c) **provide a mix of unit sizes and in particular, small business units. Existing small business units should be reprovided;**
d) **provide adequate servicing and delivery space in accordance with Policy T8. Particular consideration should be given to the need for appropriate yard space provision to allow for the viable function of businesses; and**
e) **demonstrate through a Design and Access Statement that they are well designed for their intended purpose having regard to providing flexibility for a range of broad industrial type activities, including appropriate identified future employment growth sectors.**
Adequate floor to ceiling heights should be provided having regard to relevant evidence base studies

SUPPORTING TEXT

London's industrial land is vital to the functioning of its economy, providing goods and services to its businesses and people. Growth in London's economy and population and the densification of the city will mean that London's industrial land will need to work harder and more effectively, to support the efficient functioning of our capital.

Park Royal is the largest reservoir of industrial land in London, and is designated as a Strategic Industrial Location (SIL) (see figure 9.2). Large industrial estates such as Park Royal are one of the few areas that can accommodate uses, including industrial activities, operating 24 hours a day and creating noise, which can lead to land use conflicts elsewhere.

Park Royal has a long history of economic innovation and growth. Today Park Royal is still hugely successful, and is home to around 1,700 businesses, including particularly high concentrations of food manufacturing, transport, logistics and wholesale, creative services/manufacturing businesses and a well established network of artist studios. Combined, these employ 43,100 members of staff, many of which live locally. Evidence demonstrates strong demand for industrial space in the OPDC area, and anticipates that there will be continued demand from a range of broad industrial type activities which are likely to grow and be attracted to Park Royal (see Figure XX). Across Park Royal SIL there is capacity to deliver 5,100 new jobs.

The release of SIL in Old Oak (See Figure XX) and evidence of an accelerated loss of industrial land across London means that the remaining industrial land supply must be protected and used as intensively and efficiently as possible.

The Mayor's London Plan requires the OPDC area to achieve an overall increase in floorspace suitable for broad industrial type activities and intensification in Park Royal will be key to achieving this [footnote to ILR addendum]. This intensification could be achieved through a number of interventions such horizontal/vertical extensions, infill development, development on vacant land and comprehensive development of existing sites [footnote to PRIS]. Design approaches could and should include multi-storey industrial typologies.

Commented [LL1]: MAIN CHANGES

E1 - Original policy focussed on protecting employment uses across whole OPDC area. New E1 just focuses on protecting industrial floorspace in SIL and ensuring fit for purpose industrial units are delivered. Policy reflects requirement in draft London Plan to achieve no net loss of industrial floorspace capacity.

E2 - Original policy focussed on supporting new employment floorspace across OPDC area. New E2 just focuses supporting new employment uses outside of SIL. Policy reflects requirement in draft London Plan to achieve no net loss of industrial floorspace capacity.

E3 – Has been edited to remove duplication of points related to design and unit size covered in E1 and E2.

Commented [LL2]: Regulation 19(1) consultation amendment.
Reference: E1/3, E1/17
Reason: To clarify that this refers to new jobs

Commented [LL3]: Regulation 19(1) consultation amendment.
Reference: E1/11, E2/2
Reason: Tp reflect the introduction of new site allocations support the intensification of SIL

Commented [LL4]: Regulation 19(1) consultation amendment.
Reference: E2/5, E2/8
Reason: To clarify that a Design and Access Statement should demonstrate how the proposal meets the needs of industrial occupiers

Commented [LL5]: Regulation 19(1) consultation amendment.
Reference: E3/11
Reason: To avoid information becoming incomplete or out of date

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Applicants must set out all options explored for intensification in their Planning Statements. OPDC will only accept schemes that do not result in intensification if robust evidence has been provided by the applicant demonstrating that it is not feasible.

There are an array of different space types and sizes across the Park Royal SIL, which helps to make it a competitive and attractive business location [footnote on Industrial Estates Study]. It is important that proposals in Park Royal SIL are well designed and support the effective function of businesses across a wide range of sectors [footnote to FEGGs] and business sizes. To support this, OPDC will look to secure a range of unit sizes that provide opportunities for businesses to start up, scale up and ultimately to remain in the area. The provision of small business units will be particularly important to allow for new businesses to locate and grow in the area. Proposals should provide adequate servicing arrangements to allow for the viable function of businesses and the provision of adequate minimum floor-ceiling heights will ensure that new units are appropriate to a variety of economic sectors, ensuring longer term flexibility and adaptability.

OPDC will apply 'agent of change' principle, in accordance with policy D6, when considering the impact of proposals adjacent to SIL to ensure that development will not harm the functioning of existing or future employment and industrial activities in SIL and vice versa, proposals for broad industrial type activities on the edge of SIL will need to adequately protect the amenity of adjacent mixed use developments.

Design and Access Statements should demonstrate that proposed units are well designed for their intended purpose and should look at a range of issues including the unit size(s); floor to ceiling heights; access and servicing; mitigation measures for noise, emissions etc; exterior environment and frontage; and interior layout. Examples of ideal design specifications for industrial units covering a number of these matters have been the subject of separate research and these should be used as a point of reference by applicants1 [INSERT LLDC STUDY REF].

E2: EMPLOYMENT SITES OUTSIDE OF SIL

Outside of SIL, OPDC will support proposals that:

a) deliver employment floorspace that:

i. contributes to meeting the strategic jobs target of 40,400 in Policy SP5 and the place jobs targets in chapter 4;

ii. is well designed for their intended purpose having regard to providing flexibility for a range of appropriate identified future employment growth sectors, as demonstrated through an applicant's Design and Access Statement; and

iii. accords with the Site Allocations and relevant place policy land use designations in Chapter 4;

b) co-locate floorspace suitable for broad industrial type activities that are compatible with the land use policy relevant to the application site and seek to incorporate existing businesses where possible by:

i. undertaking proactive engagement to identity whether there are any existing businesses on site which it would be feasible and desirable to retain on site; and

ii. providing units of a suitable land use, unit size, design and with appropriate servicing to enable the retention of existing businesses;

c) support any existing businesses that can not be co-located in line with part b) to relocate off site; and

d) **involve the change the use of employment floorspace to other land uses, where it is shown to no longer be economically viable, as demonstrated by accounts data and through competitive marketing for a period of at least 12 months for relevant employment uses without an appropriate offer being received.**

SUPPORTING TEXT

Commented [LL6]: Regulation 19(1) consultation amendment.
Reference: E2/5, E2/8
Reason: To clarify that a Design and Access Statement should demonstrate how the proposal meets the needs of commercial occupiers

Commented [LL7]: Regulation 19(1) consultation amendment.
Reference: E1/2, E1/6, E1/15, E1/16, E1/17, E1/19, E2/10, E2/12
Reason: To clarify requirement for supporting businesses

Commented [8]:

A significant quantum of new homes and new employment floorspace and opportunities for new jobs will be created in areas de-designated from or outside of SIL through the regeneration and redevelopment of Old Oak, North Acton, Park Royal Town Centre and First Central.

On sites outside of the SIL designation, there is capacity to deliver 27,600 new jobs, across a range of economic sectors [footnote to feggs]. The majority of this new employment floorspace will be delivered within the proposed new commercial centre around Old Oak Common station and within the new town centre hierarchy (Old Oak Major Town Centre, North Acton Neighbourhood Town Centre, Park Royal Town Centre and Atlas Junction Neighbourhood Town Centre), but there will be opportunities to deliver employment floorspace elsewhere, as part of mixed use development and in locations that could be unsuitable for residential accommodation. Proposals will be supported that contribute to this target and the relevant place targets (see chapter 4) and Site Allocation targets (see Policy SP10).

Commented [LL9]: Regulation 19(1) consultation amendment.
Reference: E1/3, E1/17
Reason: To clarify that this refers to new jobs

The delivery of high density development outside of designated SIL will mean that some existing employment sites will be redeveloped. However, there are opportunities to co-locate some of the existing uses suitable for broad industrial type activities. There is approximately 87 ha of industrial land and and xxsqm floorspace suitable for broad industrial type activities in the de-designated SIL area [insert footnote to ILR]. OPDC will seek to re-provide as much of this floorspace as is feasible and where compatible with the Place and land use policies. This, along with the industrial intensification in Park Royal SIL (see Policy E1) will help support the provision of an overall net gain of floorspace suitable for broad industrial type activities across the OPDC area, as required by the Mayor's London Plan. OPDC will monitor the loss/gain of industrial floorspace through its Authority Monitoring Report (AMR) to ensure that overall, development is resulting in a net gain in floorspace suitable for broad industrial type activities.

The requirement for the co-location (or re-provision) of floorspace suitable for broad industrial type activities will ensure that the legacy of economic, creative and cultural activity and vibrancy can continue as part of the area's future. Retaining uses such as creative industries could help establish identity and support community cohesion, particularly during the early years of the development.

OPDC will assess the compatibility and potential for co-location of existing employment uses within new development, having regard to the following factors:

- whether access requirements and servicing needs can be adequately accommodated;
- whether potential transport, environmental and amenity impacts can be effectively mitigated (i.e. mixing uses can be less problematic if industrial uses are not noxious, quieter and don't require regular servicing); and
- whether the existing broad industrial type activity requires a land-take/floorspace that would compromise the delivery of identified housing targets.

To accord with part E2 b) and c), applicants should submit a Business Relocation Strategy as part of their Planning Statements. This should include:

- Analysis to understand existing businesses on site including their use classes/ type of activity, potential compatibility with proposed land uses, size of the business premises, number of employees and lease arrangements.
- Evidence of robust engagement with the affected businesses throughout the pre-application process, to ascertain whether businesses wish to be retained in suitable premises on site or relocated off site and what their requirements might be i.e. location, size and type of premises

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required, fit out and servicing requirements, location of consumers and suppliers. Where a business wishes to cease trading instead, then a signed statement from the business should confirm this position. Where the building is vacant, applicants should engage with approved workspace providers and employment sectors to make sure the new employment space is appropriately designed to meet the needs of a range of appropriate business sectors.

- A strategy detailing:
  - On-site retention – how the applicant will work with businesses that wish to be retained to ensure on site provision is designed flexibly to meet their needs. Consideration should be given to how the phasing of development supports on-site retention. Applicants will be encouraged to consider the potential for 'meanwhile' premises that would be available on site on an interim basis that would meet the needs of business before it could be relocated permanently on-site (see Policy TCC9). If appropriate, on-site retention could be provided within affordable workspace (see Policy E3); and
  - Off-site relocation - how the applicant will explore options with businesses who want or need to be relocated and confirmation of what assistance will be provided. This should confirm when relocation would need to occur and identify suitable, available alternative locations in accordance with the following sequential approach: the OPDC area; the 3 host boroughs (Brent, Ealing and Hammersmith and Fulham); west London; and then the rest of London and beyond. .

Both before and after the comprehensive redevelopment, there may be interest from developers to change the use of employment premises. In such circumstances, OPDC will expect evidence of competitive marketing of the premises in appropriate publications for a prolonged and continuous period without an appropriate offer being received, before accepting the change of use from employment to alternative uses.

E3: SUPPORTING SMALL BUSINESSES AND START UPS

OPDC will require proposals which generate new employment floorspace to:

a) incorporate an appropriate quantum of:
   - **i. affordable workspace offered at below market rate;**
   - **ii. shared workspaces; and/or**
   - **iii. small business units;**

b) demonstrate that any affordable workspace provided under part a) would be managed by an appropriate workspace or studio provider and/or be supported by an appropriate Management Scheme; and

c) demonstrate that the affordable workspace delivered provides an appropriate security of tenure.

SUPPORTING TEXT

Spaces suitable for small businesses and/or start-ups will play a role in informing the sense of place, and in supporting employment growth sectors identified in the Future Employment Growth Sectors Study (2017) and in developing Old Oak and Park Royal as a centre for innovation and enterprise.

Access to small business units or flexible and shared workspaces, such as co-working spaces, incubator spaces, accelerator spaces, creative/artist spaces and makerspaces, can provide more affordable opportunities for smaller businesses and start ups. Shared workspaces also support the sharing economy [footnote to CnS Economy study]. In recent years shared workspaces have become a popular type of employment space provision for small start-ups. They often have flexible terms and provide business support which can be attractive to new businesses. Smaller units are not necessarily low cost, but they can have cost advantages for smaller businesses as they provide the 'right' amount of space. Examples of ideal design specifications for smaller employment spaces have been the

Commented [LL10]: Regulation 19(1) consultation amendment.
Reference: E1/16
Reason: To clarify that on site retention of can include the provision of affordable workspace

Commented [LL11]: Regulation 19(1) consultation amendment.
Reference: E1/19
Reason: To clarify requirement for supporting businesses

Commented [LL12]: Regulation 19(1) consultation amendment.
Reference: E2/6
Reason: To clarify that the delivery of small business units could also support small businesses and start ups

Commented [LL13]: Regulation 19(1) consultation amendment.
Reference: E3/5, E3/10, E3/12
Reason: To clarify that an Management Scheme would also be acceptable.

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subject of separate research which could provide a useful point of reference for applicants1 [INSERT LLDC STUDY REF].

Workspace or studio providers can ensure that the affordable workspace secured through the planning process is properly managed over the longer term and will ensure that the intended objective to support small/start up businesses is met. Their role will include providing appropriate rental terms, actively managing the selection of occupiers and occupier turnover, and putting in place and maintaining business support. Workspace or studio provider should meet required criteria, this could include:

a) having experience in, and sustainable operating model for, providing and actively managing the turnover of low cost or managed workspace;
b) having a strong record of successfully supporting business tenants, including start-ups, and across some or all of the identified growth sectors; and/or
c) demonstrating an ability to add local value, such as offering training or events which are open to the public.

OPDC will approve a workspace or studio provider either by going through a process to evaluate and select providers to develop an approved workspace or studio provider list or by determining the suitability of the proposed workspace or studio provider(s) on a case by case basis, against the above criteria. This approval will be required in order to ensure that workspaces will be managed appropriately.

The arrangements for affordable workspace including the quantum, type, rent levels, management and timescales will be secured via a legal agreement. Affordable workspace should also accord with relevant London Plan policy requirements.

POLICY E4: WORK LIVE UNITS

Work-live units will only be acceptable where:

a) **there is demonstrable demand specifically for work-live or they are to be delivered as a meanwhile use on a temporary basis;**
b) **they are outside of SIL;**
c) **the residential and employment uses are intrinsically linked (either in the same building or tethered);**
d) **where both work and live uses are occurring within a single unit, there is some internal division between the living and working spaces;**
e) **where both work and live uses are occurring within a single unit, the spatial arrangement, design and building type is predominantly commercial in character;**
f) **the access arrangements allow for visible and direct access for business visitors and suitable servicing by heavy goods vehicles;**
g) **the environmental performance meets targets for residential accommodation, particularly with regards to sound proofing, energy and insulation;**
h) **where appropriate, spaces of interaction between occupiers are incorporated within the building;**

Commented [LL14]: Specific amendment
Reason: To clarify that meanwhile uses are temporary.

Commented [LL15]: Specific amendment
Reason: To provide clarity on intended objective.

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i) it would be managed by an OPDC approved provider with a proven and successful track record of delivering work-live units and an appropriate management plan is secured;

j) they can support a mix of businesses, working across a wide range of sectors, particularly for the identified employment growth sectors in Figure 9.~~3~~2;

k) businesses have active frontages and a visible street presence for branding opportunities; and

l) the tenure arrangements can demonstrate an intrinsic link between the both uses and appropriate protection and enforcement is in place to prevent residential reversion.

Commented [LL16]: Specific amendment
Reason: To clarify that this arrangement would be secured as part of the planning process.

SUPPORTING TEXT

Work-live opportunities have been considered as they could help deliver affordable workspace alongside housing. However, the demand for this type of accommodation has not been established, so this provision would need to be analysed against alternatives, such as affordable or managed workspace or other forms of housing. The protection of industrial land is an absolute priority, and work-live accommodation will not be acceptable in SIL; but this form of development could be appropriate on sites outside of, but adjacent to, SIL. Suitable locations for work-live accommodation will be assessed on a case by case basis.

Work/live units, if designed well, could be useful to a wide range of people, working in a wide range of disciplines. This could include families and social tenants, as well as the more obvious artists, makers and start-up businesses. The daily activity generated by multiple tenants occupying a property throughout the day could also provide a place making opportunity that can contribute to a vibrant street-scene.

To be considered acceptable, an applicant would need to provide an accurate demand analysis to support an understanding of the viability of any proposal. In circumstances where they may be considered acceptable, OPDC will expect proposals to be designed and managed to ensure adequate protection and enforcement of the employment use.

To avoid residential reversion and support business activities, the design should take into account the following:

a) be finished in robust material finishes, high ceilings (above 2.8m), large access doors, clear business signage and wayfinding, robust access routes including deck access, 'shell fit outs' for tenants to take responsibility for finishes and allow customisation, use of robust materials such as concrete, steel and masonry;
b) provide a clear physical separation between residential accommodation and the workspace to prevent 'residential reversion' of employment floorspace, where the employment use is not suited to being completely 'open' to living accommodation. For units which contain both living and working space with a single point of access, mezzanine levels can be a useful method of dividing uses. In this case, access to the premises should lead directly into the workspace to prevent visitors needing to pass through residential areas;
c) suitable commercial access arrangements need to be designed in;

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d) the spatial layout of work-live accommodation should assist in supporting opportunities for business-to-business networking and place making. Spaces of interaction can provide an opportunity for active frontages. These should be considered in all dual use accommodation and may include cafés, business support areas, galleries and deck access particularly where tenants are able to utilise external areas and dedicated yard spaces. This balance between general public visibility and visibility amongst tenants and visitors only, must be carefully considered in response to the site context and proposed uses or tenants; and

e) privacy is important to both residential and business activities and inadequately insulated spaces may lead to sound pollution, high utilities bills and even lack of demand. The environmental performance of dual use accommodation should meet or exceed targets for residential properties to ensure they do not provide a poor quality of ~~residential~~ accommodation.

Commented [LL17]: Regulation 19(1) consultation amendment.
Reference: E4/4
Reason: To clarify that environmental performance for these units (including air quality and noise) should be the same or exceed the requirements for residential units.

In order to maximise the potential neighbourhood impact of work-live schemes, ground floor, street-facing business space is preferable, although this may not be suited to all uses.

A rented tenure can contribute to retention of employment uses in work-live arrangements, as part of a landlord management programme. Where both uses are occurring within a single unit, a predominantly commercial lease that permits residential use will be required, to ensure the development is employment-focused. Home ownership work-live tenures will normally be resisted.

Planning conditions and legal agreements will be used to secure the required arrangements.

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POLICY E5: LOCAL ACCESS TO TRAINING, EMPLOYMENT AND ECONOMIC OPPORTUNITIES

For ~~M~~major development proposals, a Local Labour, Skills and Employment Strategy and Management Plan will be required. The Local Labour, Skills and Employment Strategy and Management Plan must be developed ~~to work~~ in partnership with relevant stakeholders and subject to ~~develop a Local Labour, Skills and Employment Strategy and Management Plan for~~ approval by the OPDC.

Commented [LL18]: Specific Amendment
Reason: To provide clarity on arrangements for developing LLSESMP

SUPPORTING TEXT

OPDC's Socio Economic Baseline Study (2016) highlights that the area has lower household incomes, higher rates of unemployment and lower than average skill levels. Some of the areas to the north and south east of the OPDC area are shown to be in the 10% most deprived locations within the country. In light of this, getting more local people into sustained employment is key to the successful regeneration of Old Oak and Park Royal. Maximising access to local employment and training is a key priority for OPDC. Employment uses and associated education and training opportunities can play a fundamental role in improving on the existing socio economic baseline. Businesses can also take direct action and an important step towards addressing in-work poverty and promoting economic fairness, by paying the London Living Wage and conducting gender pay audits to help reduce and eliminate the pay gap between men and women (See Policy SP5).

It is vital that change is planned so that local people (including existing and future residents and businesses) will be able to benefit from the employment opportunities that will come forward. OPDC intends to play an active role in implementing and coordinating initiatives to secure employment, training and apprenticeships through its own activities, through development proposals and through partnership working with the boroughs and employment and skills providers. However, new developments across the whole area need to play their part by providing employment and training opportunities. An informed and skilled local community can also provide the local labour force that existing employers need to help grow current businesses.

To ensure proposals for major developments are meeting OPDC's socio-economic regeneration priorities, a Local Labour, Skills and Employment Strategy and Management Plan (LLSESMP) should be developed, incorporating predictions on labour demand forecasts and likely skills requirements. The LLESMP will be secured through a Section 106 Agreement. The strategy element should cover the following key areas:

f) Jobs - ways to help local people benefit from employment opportunities throughout the development timeframe, including:
g) a commitment to advertise job vacancies locally in local labour and business schemes and job centres;
h) funding Workplace Co-ordinators and bolstering existing local labour and business schemes/job brokerages;
i) providing new, on-site skills training centres;
j) maximising the use of local labour for construction and end use job vacancies.
k) This should include ways to proactively encourage applications from women, Black and Minority Ethnic (BAME) groups, Disabled people and ex-offenders. It should also seek to pay employees the London Living Wage (see Policy SP5).

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l) Skills - The provision of construction apprenticeships and vocational training (on site and/or through outreach support) to be delivered directly by the main contractor and subcontractor/supply chain, or through a shared apprenticeship scheme to help increase skills in the local labour pool;
m) Supply chain – procedures to ensure small and medium sized local businesses (local SMEs) and social enterprises have appropriate access to tender opportunities for the procurement of goods and services generated by the development both during and after construction; and
n) Mitigating impacts – strategy to minimise disruption for existing businesses and residents within the site, and adjacent to it.

The management plan element of the LLSESMP should set clear targets, an action plan, an agreed programme of activities and monitoring measures. Using local labour, skills and suppliers will contribute towards reducing overall commuting journeys, minimising vehicle mileage and associated emissions. Given these benefits, the LLSESMP will form a key part of the measures required to mitigate transport and environmental impacts and therefore necessary to make development acceptable. The obligations would be related to the construction and/or ~~operation~~ end use of the development and would be linked to the scale and nature of the proposals i.e. local construction labour costs could be calculated based on the total value of the construction contract(s). Further details on the requirements and scope of the LLSESMP will be provided in the Planning Obligations Supplementary Planning Document (SPD).

Commented [LL19]: Regulation 19(1) consultation amendment.
Reference: E4/4
Reason: To clarify that obligations are related to end use of the development.

In delivering its own regeneration priorities, OPDC is currently envisaging working with stakeholders to support the following:

o) Brokering training, apprenticeship and jobs with employers, contractors, public, private and third sectors to link local young people and adults into training and sustainable jobs;
p) Working with schools, the further education (FE) and higher education (HE) sector and businesses to deliver a high quality educational offer that responds to employers' needs, raises young peoples' aspirations and provides them with the knowledge and skills that they will need to compete effectively within a world city, whatever their chosen career; and
q) Using procurement of works and services to promote local employment, training and apprenticeships and encourage supplier diversity and SME involvement in supply chains.

OPDC will also work with partners and stakeholders, including:

r) HS2 Ltd, other transport bodies and their supply chains and end use employers to share labour forecasting data on construction and end-use requirements to help plan for local employment and skills offers; and
s) developing with partners, demand led, localised employment and training initiatives, including brokerage schemes so that employers are able to benefit from a local workforce that is appropriately trained and local people have access to job, training and apprenticeship vacancies.

Applicants should engage early and work in partnership with OPDC, the boroughs, local businesses or business partnerships, local communities and other stakeholders to develop complementary strategy objectives and programmes of activity. This could include links with Job Centre Plus, local schools and colleges adult education & learning services, higher education institutions and voluntary and community organisations.

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1 Town Centre and Community Uses

INTRODUCTION

1.1 Town centre and community facilities provide the key services that people need. They can include facilities such as shops, cafes, restaurants, public houses, cultural and leisure venues, cinemas, museums and sports centres, hotels, schools, libraries, health centres, places of worship and community centres. Providing convenient access to these facilities is vital to creating lifetime neighbourhoods. The successful spatial distribution, design, delivery and operation of these facilities will ensure access for all members of society, help to reduce the need to travel, supporting transit oriented development, contribute to a layered city and encourage social interaction and leisure activities that improve health and well-being. They can also support place making by creating on-street activity and can enhance the economic prosperity of the area.

1.2 New town centre and community uses should be of a high quality and meet a diverse range of needs. The policies in this chapter set out how OPDC expects this to be achieved.

1.3 This chapter should be read in conjunction with the strategic policies contained within the Strategic Policies chapter (Chapter 3), specifically with Policy SP6 (Places and Destinations), which includes OPDC's town centre hierarchy and with the places chapter (Chapter 4), which deals with the character of designated town centres and which sets out appropriate clusters for town centre uses.

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POLICY TCC1: LOCATIONS FOR AND IMPACTS OF TOWN CENTRE USES

To support, complement and avoid significant adverse impacts to the role and function of OPDC's designated town centres and the surrounding town centre hierarchy, proposals for town centre uses:

a) ~~should be focussed~~**will be supported in OPDC's designated town centres;**

b) **will be supported outside of designated centres** ~~will be supported where they are located~~ **within clusters identified as appropriate for town centre uses in the Places chapter and in accordance with the clusters' associated policy;**

~~c)~~ **will be supported on the edge of or outside of designated centres** ~~will be supported only~~ **where the** ~~proposed site is the best location in adopting the~~ **sequential approach to site identification has been applied,** ~~,~~ **in accordance with the NPPF sequential test, except for in the Strategic Industrial Location where town centre uses will only be supported where they do not have an unacceptable adverse impact on the functioning of SIL by::**

~~d)~~**c)** ~~will be supported within the Strategic Industrial Location (SIL), where they:~~

i. **providing walk-to services for SIL workers, such as cafes or creches, which demonstrably meet a need for walk-to services within the proposed use class;**

ii. **being of a small-scale by not exceeding 80sqm of floorspace;**

iii. **not resulting in the clustering of town centre uses; and**

i. **where feasible, supporting the viability of the industrial businesses' operation;**

ii. ~~reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network;~~

iii. ~~do not have an unacceptable impact on the functioning of SIL; and~~

iv. ~~do not have an unacceptable adverse impact on and support the role of designated town centres.~~

~~e)~~**d)** **will be supported, where they provide meanwhile space, in accordance with Policy TCC9;**

e) should be supported by a Town Centre Uses Statement, where they provide over:

i. **5,000sqm of town centre uses in the Old Oak Major Town Centre; or**

ii. **2,500sqm of town centre uses elsewhere;**

f) should be supported by an impact assessment in accordance with the NPPF and NPPG, where proposals are providing retail, leisure or office development that exceeds the thresholds in e)i. and ii.; and

~~f)~~**g) contributing, where appropriate, to measures that will support the continuing vitality and viability of Harlesden District Town Centre, when providing town centre uses that exceed the thresholds in e)i. and ii..**

SUPPORTING TEXT

1.4 OPDC has designated a town centre hierarchy set out in Policy SP6, which focusses town centre uses, which generate high footfall, in accessible locations for those working in, living in and visiting the area. The town centre hierarchy looks to focus town centre uses into four principle locations:

Commented [PF1]: Specific amendment.
Reason: To better reflect policy content

Commented [TC2]: Regulation 19(1) consultation amendment.
Reference: SP1/8, TCC3/15
Reason: To make it clearer that the requirements of TCC1 are to avoid significant adverse impacts to OPDC's and the surrounding town centre hierarchy.

Commented [PF3]: Specific amendment.
Reason: To align with London Plan SIL guidance.

Commented [PF4]: Regulation 19(1) consultation amendment.
Reference: TCC1/1
Reason: To align with London Plan SIL guidance.

Commented [PF5]: Specific amendment.
Reason: To align with definition of small units in TCC3 and Retail and Leisure Needs Study.

Commented [TC6]: Specific amendment:
Reason: to minimise impact on functioning of SIL, to avoid repetition with other policies and relocation of some text to policy lead in.

Commented [KT7]: Regulation 19(1) consultation amendment.
Reference: TCC3/11 and TCC3/12
Reason: Relocated from TCC3 to apply to all town centre uses.

Commented [KT8]: Regulation 19(1) consultation amendment.
Reference: TCC3/11 and TCC3/12
Reason: Relocated from TCC3 to apply to all town centre uses to accord with NPPF and NPPG requirements

Commented [KT9]: Regulation 19(1) consultation amendment.
Reference: TCC1/3 and TCC1/4
Reason: Relocated from TCC3 and places chapter to support implementation of policy objectives.

a) a new major town centre ~~at Old Oak High Stree~~in Old Oak~~t~~; and
b) three neighbourhood centres at North Acton, Park Royal Centre and Atlas ~~Roundabout~~Junction.

1.5 Details about the appropriate uses for each of these town centres can be found in the Places chapter (chapter 4). The Places chapter also identifies clusters, focussed at key destinations and on key movement routes. Some of these are within designated town centres and are therefore appropriate for town centre uses. Some clusters have been identified outside of town centres and certain clusters have been identified as being appropriate for smaller scale "walk to" town centre uses. Proposals for town centre uses in these clusters would need to accord with the cluster's associated policy in the Places chapter (chapter 4).

1.6 OPDC endorses the 'town centre first' approach to the development of new town centre uses, as a central component to maintaining the character of successful and diverse centres and optimising accessibility to these uses. However, OPDC recognises the need for flexibility to meet changing needs. It may be appropriate for edge or out of centre town centre uses to help meet the area's town centre use needs over the next 20 years. This could also include the potential need for temporary or meanwhile space to serve needs in early phases and town centre uses needed to support the construction community, associated with the construction of HS2 and other large schemes in the OPDC area. Where proposals for town centre uses are located outside of a designated centre, OPDC will expect the applicant to demonstrate a sequential approach to site selection, focussing uses firstly on the edge of designated town centres.

~~1.7 1.1 In early development phases, meanwhile uses will play a critical role in providing services to communities and in place making and proposals for meanwhile town centre uses will be supported, where they accord with the requirements set out in Policy TCC9.~~

1.7 OPDC acknowledges that small-scale walk-to town centre uses can help manufacturing businesses in Park Royal that may wish to sell their produce on their premises, help to serve the needs of workers. ~~OPDC recognises the benefits that this might bring to the viability of Park Royal's businesses~~ and help to improve the character and vibrancy of the area. Proposals for this sort of operation will therefore generally be supported, but will be considered against the policy criteria, which seek to ensure that any negative impacts on the transport network are minimised and that they do not have a detrimental impact on the vitality and viability of designated town centres. Any such uses should be small-scale, consisting of no more than 80sqm, which is defined as the threshold for small units in OPDC's Retail and Leisure Needs Study.

1.8 In early development phases, meanwhile uses will play a critical role in providing services to communities and in place making and proposals for meanwhile town centre uses will be supported, where they accord with the requirements set out in Policy TCC9.

1.9 The OPDC area is relatively unique in that the designated town centres at Old Oak, North Acton and Atlas Junction either do not yet exist or are at a very early phase of their development. To ensure that the growth of these centres is carefully managed, OPDC will require development proposals that meet the relevant thresholds to include within their Planning Statement a Town Centre Uses Statement. The Town Centre Uses Statement should include:

Commented [PF10]: Specific amendment.
Reason: Relocated below to better reflect policy structure.

Commented [PF11]: Specific amendment.
Reason: To reflect amendments to policy wording.

Commented [PF12]: Specific amendment.
Reason: Relocated from above to better reflect policy structure.

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a) a vision statement, explaining the rationale and intended market profile of the development, including plans for how it will be presented to the market and its long-term management (for example, there might be a single entity managing the asset in a similar way to Covent Garden, Marylebone High Street or Regent Street). The statement should include (but not be limited to):
   i. evidence on target market;
   ii. details of unit specification (i.e. size, height, depth);
   iii. examples of comparable tenants the scheme will target; and
   iv. planning conditions or obligations being proposed by the applicant; and
b) a masterplan detailing:
   i. the proposed quantum and phasing of town centre uses;
   ii. the proposed spatial distribution and mix of town centre uses;
   iii. how these would relate to the existing and planned town centre uses on adjacent sites; and
   iv. a statement outlining how the proposals would support the wider vision and place making objectives of this Local Plan.

1.10 Impact assessments are a national requirement for retail, leisure and office schemes outside of designated town centres. An impact assessment is not usually required within designated town centres but OPDC's Retail and Leisure Needs Study concludes that given that three out of four of OPDC's designated centres are either non-existent or in an early phase of their gestation, there is a need for a greater degree of scrutiny of town centre use proposals as they emerge, to ensure that any proposals complement designated centres within OPDC and its wider hinterland. OPDC will require a full impact assessment for those applications that are caught by the relevant threshold in the policy. This should address the requirements of the NPPF and its associated National Planning Practice Guidance (NPPG), specifically, ensuring that the scale of the development is appropriate within the wider hierarchy of centres. Where necessary, impact assessments will need to take into account the cumulative effect of permissions. The assessment will assess the likelihood of a significant adverse impact on the investment within existing centres, and on their vitality and viability, taking into account the health of the existing centres. Any mitigation being proposed by the applicant should be set out clearly.

1.11 Harlesden is the closest town centre to the OPDC boundary. The centre is designated as a District Town Centre. OPDC's Retail and Leisure Needs Study shows that due to its scale and proximity, the centre is likely to be the most impacted by the new town centre hierarchy within the OPDC area. There will be significant opportunities for Harlesden to try and capture trade from the new population and there is also a need to ensure that any risks to the functioning of the centre are appropriately mitigated. To explore and support opportunities for the centre, schemes caught by the relevant threshold will need to engage early with OPDC and the London Borough of Brent to consider, where required, contributions to measures that would potentially support the continuing viability and viability of the centre. This should include, where relevant:

a) details of how proposed links with Harlesden would be designed, delivered and their timescales; and
b) financial contributions to measures that would mitigate any identified significant adverse impacts to the centre.

Commented [PF13]: Regulation 19(1) consultation amendment.
Reference: TCC1/3, TCC1/4, TCC3/11 and TCC3/12
Reason: Relocated from TCC3 to apply to all town centre uses and ensure consistency with the NPPF and NPPG.

POLICY TCC2: VIBRANCY

a) Applications for town centre uses will be supported where they:

i. maximise the proportion of the ground floor fronting a street as a positive and/or active frontage. Servicing areas and blank façade should be avoided on ~~main~~ key routes; and

ii. support flexibility and adaptability so that uses can expand and/or change between use classes subject to demand and appropriate permissions/agreements~~;~~.

b) Applications providing outdoor uses such as eating and drinking uses with outdoor seating, event space or street markets will be supported where they do not detract from residential amenity and transport connectivity. Any proposals for event space and/or street markets would need to be accompanied by an appropriate management plan;

c) ~~Planning permission~~ Applications for new betting shops, pawnbrokers, payday loan stores and games arcades will be supported unless they would result in ~~no~~ more than one betting shop, pawnbroker, payday loan store or games arcade within 400m walking distance of the same use; and

d) ~~Planning permission~~ Applications for new hot food takeaways will be supported where they:

i. are located outside of 400 metres walking distance of the entrance/exit of an existing or permitted secondary school;

ii. are located outside of 200 metres walking distance of the entrance/exit of an existing or permitted primary school;

iii. result in no more than 6% of the units within a designated centre or frontage being ~~A5~~ hot food takeaway units;

iv. result in no less than two non A5 units between hot food takeaways; and

v. operate in compliance with the Healthier Catering Commitment scheme and Government Food Buying Standards for food and catering services.

SUPPORTING TEXT

10.12 Town centre uses within the OPDC area will play a critical role in place making. To support this, developers will be expected to maximise the proportion of ground floors of town centre uses fronting onto streets or public spaces that are active, by taking steps to reduce the amount of dead frontage and space given over to building servicing and management such as bin stores and plant. Proposals must ensure that town centre uses are accessible and are designed to the highest quality, considering how proportions, materials and detailing relate to and complement their surroundings, particularly when considering the design of A-class uses in designated town centres.

Commented [KT14]: Regulation 19(1) consultation amendment.
Reference: TCC2/11
Reason: To ensure the policy is effective.

Commented [PF15]: Specific amendment.
Reason: To clarify policy terminology.

Commented [TC16]: Regulation 19(1) consultation amendment.
Reference: TCC2/6
Reason: To ensure the policy is effective.

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10.13 Given the scale of development envisaged within the OPDC area and the timescales over which this development is anticipated for delivery, it will be important for proposals to be designed to be sufficiently flexible to allow for changing conditions and needs, in accordance with Policy SP2. OPDC will encourage proposals that allow for flexibility in their size, for example by providing for expansion through the future creation of mezzanines or the subdivision/amalgamation of units. OPDC will also support proposals that, through their design, consider the ability for units to readily change use class. This flexibility should be demonstrated as part of a planning application submission.

10.14 Uses that help to activate the public realm will play an important role in place making. However, the impacts on the amenity of residents and workers would need to be carefully considered. Any proposals for street markets would need to be accompanied by a management plan that identifies its hours of operation and storage arrangements when not in use, types of traders, advertising, servicing and pedestrian and transport impacts. Event spaces will also require a management plan regarding types of events, frequency of use, noise levels, advertising, servicing and pedestrian transport impacts.

10.15 The "Health on the High Street" report published by The Royal Society for Public Health in 2015 provides a range of sources of evidence about the negative health impact of betting shops, payday loan shops, pawnbrokers, games arcades and fast food takeaways and the positive health impacts of health services, pharmacists, leisure centres/health clubs, libraries, museums and art centres and pubs and bars. There has been a growing concern in recent years about the proliferation and over-concentration of betting shops, pay-day loan shops, pawn brokers and amusement arcades and their impacts on mental health and the vibrancy and vitality of town centres. In 2015 Government re-classified betting shops and pay-day loan shops within a separate use class. OPDC's Healthy Town Centres Study identifies the impacts that betting shops, pawnbrokers, payday loan stores and games arcades can have on the health and well-being of a community and in accordance with the aspirations for development in the OPDC area to promote healthy and active lifestyles as set out in Policy SP3, OPDC will look to manage these uses.

10.16 OPDC's Healthy Town Centres Study also identifies the growing concerns about the growth in hot food takeaways (Class A5 uses) and their impact on health, in particular, regarding the proximity of takeaways to schools and the impact that this has on childhood obesity. The type of food on sale nearest to schools can influence the diet of schoolchildren and the availability of "unhealthy" foodstuffs can make healthier choices less likely. To support the health and wellbeing of communities, OPDC will resist proposals for new takeaways in close proximity of secondary and primary school entrances and will accept the loss of existing takeaways within these areas. In addition, OPDC will resist proposals that would result in the clustering of A5 uses to the detriment of the character and function or vitality and viability of a designated centre. Data will be published as part of OPDC's Authority Monitoring Report showing the location and proportion of hot food takeaways in town centres.

10.17 The Healthier Catering Commitment is a scheme supporting food businesses in London to offer ~~healther~~healthier food options. The scheme promotes a reduction in ~~consumptoin~~consumption of fat, salt and sugar and ~~increaseds~~increases in availability of fruit and vegetables and a logo is awarded to those outlets that meet the set criteria. OPDC will condition all permitted applications involving A5 uses to require the operator to achieve, and operate in compliance with, the Healthier Catering Commitment standard. Public Health England's Food Buying Standards aim at ensuring that ~~of~~ food buyers maintain good standards of welfare, nutrition, environmental sustainability and ethics. In accordance with OPDC's and the Mayor's Good Growth aspirations, OPDC will condition all A5 uses to ensure operators are complying with these standards.

Commented [TC17]: Regulation 19(1) consultation amendment.
Reference: TCC2/6
Reason: To ensure the policy is effective.

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POLICY TCC3: A-CLASS USES

A-class uses should serve the needs of the area and complement existing town centres. To support this approach OPDC will require:

a) **existing A-class uses (except for A4 uses) to be protected, unless:**
   i. **it is no longer economically viable as demonstrated by accounts data and through competitive marketing for a period of at least 12 months; or**
   ii. **the facility can be appropriately replaced or provided elsewhere in the locality; or**
   iii. **the facility is giving rise to unacceptable impacts on residential amenity and/or the transport network.**

b) **proposals for new A-class floorspace to have regard to the up to date retail and leisure needs study for the OPDC area including the recommended distribution of A-Class uses across the area;**

c) **primary shopping areas to comprise of ~~predominantly~~ at least 50% A1 (shop) units;**

d) **the delivery of A-class uses to be phased so that they are delivered in accordance with demand created by the delivery of homes and jobs; and**

e) **planning applications for A-class uses to provide a mix of unit sizes. Applications including more than 1,000sqm of A-class uses should include at least 10% of floorspace for units of 80sqm or less to support independent/start-up retailers. These should be focussed, where feasible, within secondary retail frontages and applicants should actively market these units within the local communities for a sustained reasonable period prior to letting.~~:~~**

~~**proposals to submit a Town Centre Uses Statement including a retail impact assessment, where they provide over:**~~

~~**5,000sqm of town centre uses in the Old Oak High Street Major Town Centre; or**~~

~~**2,500sqm of town centre uses elsewhere.**~~

Commented [PF18]: Regulation 19(1) consultation amendment.
Reference: TCC3/11
Reason: Relocated to TCC1 to apply policy requirement to all town centre uses

SUPPORTING TEXT

10.18 A-class uses provide vital services to support the needs of communities and include uses such as shops, banks, restaurants and cafes and takeaways. Where existing uses remain viable and do not give rise to unacceptable impacts, OPDC will look to protect existing A-class facilities, or require their replacement within the locality. The requirements for the protection of A4 uses are covered in Policy TCC7.

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10.19 OPDC's Retail and Leisure Needs Study (RLNS) identifies the likely A-class needs to serve those living, working and visiting the OPDC area. The RLNS identifies that upon the completion of development in Old Oak and Park Royal, it is likely that the A-class need will be between 74,300-90,500sqm ~~71,300sqm and 85,600sqm~~ of gross floorspace and that the need in the Local Plan period is likely to be approximately 6~~8~~4,500sqm of gross floorspace. A summary table of the requirements over the Local Plan period is provided in Table 10.1. The floorspace calculations balance the needs generated by the development and the requirement to ensure that the existing network of centres can also benefit from spending growth, providing wider benefits to the network of centres. It should be noted that these figures are estimates, based on current development capacity figures, population projections and estimates of expenditure retention and up to date information should be taken into account in relation to development proposals. Table 10.1 identifies the recommended distribution of this floorspace need over the town centre hierarchy, as a guideline. Subsequent updates to the A-class needs figures will be included in OPDC's Authority Monitoring Report (AMR).

10.20 It is important to keep concentrations of shops together at the heart of a town centre to make it easy to compare goods between retailers. This critical mass of shops is necessary to encourage shoppers into a centre and to encourage its vitality. Town centres are, however, about more than just shopping. They are preferred locations for other town centre uses, uses which support the area's function as a place to live and which to work, and uses such as restaurants and bars, which draw people into the centres and encourage them to linger. OPDC will expect primary shopping areas (which can be viewed on OPDC's Policies Map) to be predominantly made up of retail premises (Use Class A1), but will take a more flexible approach to the delivery of town centre uses outside of these primary shopping areas, in recognition of the diverse and vibrant mix of uses that can help support the vitality of OPDC's town centre network.

Commented [PF19]: Specific amendment.
Reason: To clarify policy implementation.

10.21 OPDC recognises that these differing roles are served by different parts of the area's town centres. The primary shopping areas which should provide the critical mass of shops, and the secondary retail frontages, while still containing significant numbers of shops, which contain a greater diversity of town centre uses serving non-shopping needs of visitors and OPDC will take a more flexible approach to the provision of town centre uses in these locations. Taken together, the primary and secondary retail frontages will provide the range of town centre uses necessary to make the area's centres diverse and successful places.

10.22 In order to complement the surrounding town centre hierarchy and mitigate impacts, A-class uses should be phased in accordance with the provision of homes and jobs. It is recognised that in early development phases, A-class uses can support the activation of the area and place making and OPDC will take a more flexible approach to the phasing of A-class uses when considering these early development sites. This is particularly the case for proposals providing catalyst and/or meanwhile uses. The requirements for these are covered in policies TCC8 and TCC9.

Table 10.1: A-class floorspace requirements during the Local Plan period (Retail and Leisure Needs Study, 2018~~7~~)

Commented [TC20]: Specific amendment.
Reason: Updated to reflect revised retail and leisure need arising from the Retail and Leisure Needs Study addendum.

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	A1 retail	A1 service and A2	A3, A4 and A5	Total
Old Oak ~~High Street~~ (including within Old Oak Common Station)	~~27,250~~25,600	~~14,000~~12,850	15~~6~~,000	~~57,250~~53,450
North Acton	~~2,000~~1,850	1,750	1,000	4,~~750~~600
Park Royal Centre	500	1,500	1,000	3,000
Atlas Junction	1,~~500~~450	1,000	1,000	3,~~500~~450
Total	~~31,250~~29,400	~~18,500~~17,100	~~19,250~~18,000	6~~8~~,500

10.23 Within the OPDC area, it will be important to provide a variety of retailers in order to create vibrancy and ensure the long term vitality of its designated centres. OPDC recognises that chain stores are likely to form a key part of the spine of the area's town centres, but there is a risk that without appropriate interventions to support independents, the area's town centres could become 'cloned' town centres. To support diversity, OPDC will expect A-class proposals to provide for a range of unit sizes for A-class floorspace and as part of major A-class use proposals providing over 1,000sqm, OPDC will require at least 10% of floorspace for units of 80sqm or less (defined in the London Small Shops Study 2010), which will help support the establishment of SMEs and independent retailers in the OPDC area, who tend to operate in smaller units. Locating these on secondary retail frontages will help assist with their affordability.

~~The OPDC area is relatively unique in that the designated town centres at Old Oak High Street, North Acton and Atlas Roundabout either do not yet exist or are at a very early phase of their development. To ensure that the growth of these centres is carefully managed, OPDC will require development proposals that meet the relevant thresholds to submit a Town Centre Uses Statement. The Town Centre uses statement should include:~~

~~a vision statement, explaining the rationale and intended market profile of the development, including plans for how it will be presented to the market and its long-term management (for example, there might be a single entity managing the asset in a similar way to Covent Garden, Marylebone High Street or Regent Street). The statement should include (but not be limited to):~~
~~evidence on target market;~~
~~details of unit specification (i.e. size, height, depth);~~
~~examples of comparable tenants the scheme will target; and~~
~~planning conditions or obligations being proposed by the applicant;~~
~~a masterplan detailing:~~
~~the proposed quantum and phasing of town centre uses;~~
~~the proposed spatial distribution and mix of town centre uses;~~
~~how these would relate to the existing and planned town centre uses on adjacent sites; and~~
~~a statement outlining how the proposals would support the wider vision and place making objectives of this Local Plan; and~~
~~a retail impact assessment.~~

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~~Retail impact assessments are a national requirement for schemes outside of designated town centres. A retail impact assessment is not usually required within designated town centres but OPDC's Retail and Leisure Needs Study concludes that given that three out of four of OPDC's designated centres are either non-existent or in an early phase of their gestation, there is a need for a greater degree of scrutiny of town centre use proposals as they emerge, to ensure that any proposals complement designated centres within OPDC and its wider hinterland. OPDC will require a full retail impact assessment for those applications that are caught by the relevant threshold in the policy. This should address the requirements of paragraph 26 of the NPPF and its associated National Planning Practice Guidance (NPPG), specifically, ensuring that the scale of the development is appropriate within the wider hierarchy of centres. Where necessary, this will need to take into account the cumulative effect of permissions. The assessment will assess the likelihood of a significant adverse impact on the investment within existing centres, and on their vitality and viability, taking into account the health of the existing centres. Any mitigation being proposed by the applicant should be set out clearly.~~

~~Schemes providing over 5,000sqm of town centre uses in the Old Oak South, Old Oak North and Willesden Junction places will also be required to produce a Harlesden Enhancement Strategy. Please see these place policies in chapter 4 for further details.~~

Commented [KT21]: Regulation 19(1) consultation amendment.
Reference: TCC3/11
Reason: Relocated to TCC1 to apply policy requirement to all town centre uses.

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POLICY TCC4: SOCIAL INFRASTRUCTURE

OPDC will seek to secure a range of high quality social infrastructure facilities for existing and new residents and workers by:

a) protecting existing social infrastructure facilities unless:

i. the facility would be replaced or reprovided on-site or in an equal or better location to serve local needs and in both cases, to an equivalent or better quantum and quality; or

~~i.~~ii. there is demonstrably no longer an identified need for the current use of the facility. In such circumstances, the applicant must provide evidence to demonstrate:~~; or~~

A) ~~the facility has been~~ competitive~~ly~~ market~~ing~~ed for a period of at least 12 months for alternative forms of social infrastructure without an~~d~~ appropriate offer being received; ~~or~~ and

~~A)~~ that the ~~proposal~~loss of the facility would not lead to a shortfall in provision for the specified use ~~in~~for the ~~local area~~population that it serves;

~~B) the facility would be appropriately replaced or provided elsewhere in the locality; or~~

~~C)~~B) ~~the facility is giving rise to unacceptable impacts on residential amenity and/or the transport network;~~

b) supporting proposals for new and/or enhanced social infrastructure facilities where:

a. it can be demonstrated that the facility is meeting needs in the local area; and

b. the proposal accords with other relevant planning policies and including the need to achieve homes and non-residential floorspace targets in Site Allocations;

~~b)~~c) securing the delivery of, or contributions towards, enhanced or new social infrastructure facilities to meet the needs ~~of the~~arising from development. Social infrastructure facilities should meet the specification requirements outlined in OPDC's Infrastructure Delivery Plan (IDP), unless otherwise agreed by OPDC and the relevant service provider;

~~c)~~d) locating new social infrastructure:

i. in locations identified in the Places chapter and/or OPDC's IDP, unless the on-site facility can be provided on an alternative site, if this is agreed by OPDC and the service provider and it is shown that the delivery of the facility on an alternative site meets the needs of the development and is deliverable;

ii. in locations that are highly accessible by sustainable forms of travel to ~~both the existing and new communities in the area~~the populations that they serve ~~and in locations that do not give rise to unacceptable impacts on residential amenity and/or the transport network~~;

iii. health facilities and community facilities within or in close proximity to designated town centres or clusters;

iv. education facilities in areas with good access by foot, cycle and public transport and close to areas of public~~l~~y accessible open space; and

Commented [PF22]: Regulation 19(1) consultation amendment.
Reference: TCC4/17
Reason: To require facilities reprovided to be of the same or higher quality

Commented [PF23]: Regulation 19(1) consultation amendment.
Reference: TCC4/17
Reason: To require facilities reprovided to be of the same or higher quality

Commented [PF24]: Regulation 19(1) consultation amendment.
Reference: TCC4/17
Reason: Relocated to i. and revised to require facilities reprovided to be of the same or higher quality

Commented [PF25]: Specific amendment.
Reason: To avoid repetition with policies D6 and SP7.

Commented [KT26]: Regulation 19(1) consultation amendment.
Reference: TCC4/1, TCC4/3, TCC4/22
Reason: To support the provision of social infrastructure facilities, subject to them meeting local needs and subject to them according with other relevant policies.

Commented [KT27]: Regulation 19(1) consultation amendment.
Reference: TCC4/5
Reason: To support the effective implementation of the policy.

Commented [KT28]: Specific amendment.
Reason: To avoid repetition with policies D6 and SP7.

DRAFT

v. **emergency service facilities with direct access onto unrestricted highways.**

~~d)~~**e) requiring high quality design of new or enhanced social infrastructure that:**

i. **is accessible and inclusive to all sections of the community;**

ii. **adheres to the latest national and regional design guidelines; and**

iii. **colocates facilities and uses where appropriate and feasible;**

~~e)~~**f) working with service providers and other stakeholders to identify funding sources for the long-term management and maintenance of social infrastructure and where necessary and viable, securing contributions towards this from development proposals.**

SUPPORTING TEXT

10.24 Good quality social infrastructure facilities can have a significant bearing on the quality of life and health and well-being of a community. They encourage social interaction, promote learning and provide support services to those living, working and visiting an area. Figure 10.5 identifies the different types of social infrastructure facilities, which broadly fall into four categories – education, health, community and emergency facilities.

10.26 There are a number of existing social infrastructure facilities within the OPDC area, identified in Appendix A, Figure A1.8. OPDC will look to protect these facilities unless it can be demonstrated that the facility is no longer required, through competitive marketing and through ~~due to~~ there being evidence of sufficient capacity within existing or planned provision, as long as it can be demonstrated that there is sufficient certainty the planned ~~facility~~ provision will be delivered. Where this is not the case, OPDC will require social infrastructure facilities to be replaced~~, either~~ onsite. ~~or in the vicinity.~~

Commented [PF29]: Specific amendment.
Reason: To better align with policy wording.

10.27 OPDC will work positively with social infrastructure providers wishing to deliver new or expanded facilities that help to meet existing and future needs within the OPDC area and its surrounds. OPDC will also support facilities that better meet the needs of the area's existing population and will work positively with other local authorities in accordance with the Duty to Cooperate to consider how OPDC can help address wider needs for social infrastructure provision arising from development, where necessary and appropriate and so long as OPDC is able to achieve its homes and jobs targets, particularly in site allocations (see chapter 4). Given the significant scale of regeneration planned in the area, OPDC has identified a need for a significant amount of new social infrastructure facilities to serve the population arising from development in the area. These requirements are set out in OPDC's Infrastructure Delivery Plan (IDP). OPDC is working closely with social infrastructure providers to develop a preferred approach to the delivery social infrastructure facilities. This includes considerations such as:

Commented [PF30]: Specific amendment.
Reason: To reflect amendments to policy wording.

a) the merits of enhancing existing social infrastructure facilities in the area versus the provision of new social infrastructure;
b) the potential needs for temporary or meanwhile facilities to serve earlier development phases in advance of the delivery of more permanent facilities;

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c) the potential for early development sites to front-load the provision of social infrastructure and/or provide more infrastructure than is needed to meet the needs of the development. This could support early place making. In such circumstances contributions would be secured from future developments or other funding sources and a payback mechanism would be agreed with the developer delivering the facility; and
d) the need for flexibility to respond to the changing requirements of service providers and the needs of people over time.

10.28 The ~~Local Plan Places chapter (see Chapter 4)~~IDP identifies the specific ~~sites and~~ places required to deliver education, health, community and sports and leisure facilities. Development proposals will need to have regard to this and ensure that land required for these facilities is safeguarded in accordance with policy SP10. Where development proposals are having to provide social infrastructure to meet a significantly greater need than that of just their own development, OPDC will look to employ a retrospective pooling contribution mechanism, to provide additional planning contributions towards delivery of the facility from other developments which benefit from the social infrastructure.

Commented [TC31]: Specific amendment.
Reason: To reflect that the most up-to-date requirements will be set out in the IDP.

10.29 OPDC's ~~Education and Health~~Social Infrastructure Needs Study (2018) outlines the current approach to the provision of education, ~~and~~ health, community and emergency service facilities in the OPDC area. The study has calculated needs based on the affordable housing policy and housing mix policy in this Local Plan (Policies H2 and H3, chapter 8) and on the maximum development capacity figures in OPDC's Development Capacity Study in order to identify the appropriate education, ~~and~~ health, community and emergency service infrastructure provision to support the needs of the projected development over the Local Plan period. The study identifies existing schools, ~~and~~ health and emergency service facilities that may have the potential for off-site expansion to meet the needs of the development in early phases. Proposals for the expansion of these facilities is not yet committed and OPDC will be working with the relevant service providers to further investigate the potential for these facilities to be expanded. OPDC will secure appropriate contributions from development proposals towards the expansion of any facilities. Applicants should engage early with OPDC and service providers to discuss the potential for any off-site expansion to meet the needs of their development and if off-site expansion proves infeasible, alternative provision would need to be made on-site.

Commented [TC32]: Specific amendment.
Reason: To reflect updates to OPDC's evidence base.

10.30 Given the scale of regeneration and development envisaged, there are also significant needs for the on-site provision of social infrastructure. ~~of education and health facilities.~~

10.31 In respect of education, ~~the~~ current modelling shows the need for on-site provision of:

a) ~~2 x~~a 4 form entry (FE) primary school~~s~~, including early years provision;
b) ~~A~~ a 9FE secondary school, including further education provision; and
c) four super nurseries.~~and~~
~~A 4FE all through school, including both early years and further education provision.~~

DRAFT

10.32 The trigger years for required on-site facilities have been matched against OPDC's phasing trajectory in order to derive which sites are likely to be being constructed in the year the facility is required, which sites are available for their delivery and which sites are the most appropriate, based on an assessment against a set of criteria. The ~~Education and Health~~Social Infrastructure Needs Study identifies that based on current modelling, the ~~1st~~ primary school should be delivered within the Cargiant site allocation, ~~the Cargiant site allocation, the 2nd primary school should be delivered in Old Oak South and~~ the secondary school should be delivered within the Acton Wells East site allocation ~~site allocations~~ and the four super nurseries should be spread across the OPDC area, with one each in Old Oak South (P1), Old Oak North (P2) and North Acton and Acton Wells (P7) with the fourth location to be kept under revision. ~~The trigger year for the all-through school falls outside of the Local Plan period. There is not a need to allocate a site for this at this time, but the need for this facility will be kept under review and considered as part of future iterations of the Local Plan.~~

10.33 In respect of health, the modelling shows the on-site need for space within the Local Plan period is for ~~approximately approximately 4,500sqm~~1,564sqm of on-site health facility space. The Local Authorities and Clinical Commissioning Groups (CCGs) have confirmed that the preferred approach for the delivery of this floorspace is within one building, which allows the provision of health services at scale and provides for cost efficiencies. The ~~Education and Health~~ Social Infrastructure Needs Study has assessed the on-site needs for this facility, which shows the need for this facility within the Cargiant site allocation, based on current projections.

10.34 In respect of community space, modelling shows the need for ~~approximately 5,200sqm~~two community hubs, each of 2,600sqm. ~~of community floorspace to meet the needs of development in the area. In order to minimise maintenance costs and provide an efficient delivery model with an appropriate critical mass of community space uses, this space should be focussed within two community hubs, one within Old Oak South place (P1) and one within Old Oak North place (P2).~~ The community hubs should provide for a variety of community facilities and could include facilities such as public toilets, a community café, faith space, youth space and halls for hire. Current modelling shows that one of these community hubs should be located in Old Oak North (P2) and the other in Old Oak South (P1). The Social Infrastructure Needs Study also identifies a need for on-site emergency service provision – see the IDP for further details. Requirements for sports and leisure facilities are set out in further detail in Policy TCC6.

Commented [KT33]: Regulation 19(1) consultation amendment.
Reference: TCC4/29, TCC4/20
Reason: To clarify that community space to meet the needs of development should provide a variety of functions including public toilets, halls for hire, youth space and faith space.

10.35 It is recognised that the identification of appropriate on-site provision of social infrastructure is based on current assumptions on affordable housing, family housing and on the likely phased delivery and capacity of sites. As development proposals come forward OPDC will gain greater certainty about the required needs for social infrastructure, meaning the requirements for social infrastructure are likely to change over time. OPDC will monitor delivery on an ongoing basis, to ensure that the facilities proposed are the right size to meet needs. Any changes to the size requirements for the social infrastructure outlined above would need to be agreed by OPDC and the relevant service provider.

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10.36 Given the timescales over which the plan is proposed and the complexity of delivery, there is a need for a degree of flexibility in the approach to on-site provision of social infrastructure. It is therefore likely that the place specific requirements for ~~schools~~ education and health facilities in particular will need to be kept under regular review, particularly for facilities identified within later development phases. In recognition of this need for flexibility, on-site facilities may be located on alternative sites if this is agreed by OPDC and service providers. The most up-to-date position on all required social infrastructure provision is set out in OPDC's IDP.

10.37 Social infrastructure facilities tend to be locations for social interaction and will play an important role in terms of integrating existing and new communities in the area. When planning for the location of new social infrastructure services, consideration needs to be given to how the location of new social infrastructure helps to facilitate this by if feasible, or appropriate, being located in ~~locations~~ areas where both new and existing communities will be able to access facilities.

10.38 When providing new social infrastructure facilities, OPDC will require that health and community facilities are within or in close proximity to designated town centres, where they will easiest to access. In the case of education facilities, the priority will be to ensure that facilities are located close to publicly accessible open spaces. For early years through to higher education, this will provide opportunities for the potential use of sports and play facilities within open spaces. The University of the Arts London (figure ~~10.8~~xx) provides a good example of the benefits of providing higher education facilities close to open spaces, having dual benefits both for the space by activating it and for the students, by providing space for leisure and relaxation. For any on-site emergency service provision, the priority should be to locate facilities close to unrestricted highways in order that emergency services are able to respond as quickly as possible to emergencies. Proposals for large-scale social infrastructure~~, such as for health or education institutions~~ that are not required to meet the needs of development and are not included in OPDC's IDP, would also be considered against the criteria in the catalyst uses policy (see Policy TCC8).

10.39 When providing new or enhancing existing social infrastructure facilities, OPDC will expect the highest standards of design. Facilities should be accessible and should be inclusive and welcoming to people from a wide variety of cultures and ethnicities, in accordance with Policy D3. For many social infrastructure facilities, Central Government publishes design guidelines for their construction, such as Building Bulletins for schools. Proposals will be expected to adhere to these guidelines, as well as any regional guidelines published by the Mayor of London.

10.40 Opportunities to co-locate social infrastructure (placing two or more facilities together to share resources) should be taken where feasible. This can have significant added benefits in terms of making efficient use of space and saving on management and maintenance costs, creating a critical mass in terms of usage and in the case of health facilities and leisure and sports facilities, helping to promote health and wellbeing and provide a community hub.

Commented [KT34]: Regulation 19(1) consultation amendment.
Reference: TCC4/35
Reason: To correct referencing error.

Commented [35]:

Commented [KT36]: Regulation 19(1) consultation amendment.
Reference: TCC4/9
Reason: To clarify policy implementation.

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10.41 Reductions in funding have made it more challenging for service providers to maintain and operate social infrastructure facilities. These costs can in part be reduced through collocating facilities, but OPDC will also need to work closely with service providers to consider appropriate funding sources for both the existing and new community facilities in the OPDC area. This will include innovative approaches to funding such as private sector sponsorship and the community ownership and management of assets (see Policy DI3). Where necessary and feasible, OPDC will also secure planning contributions towards the management and maintenance of facilities from developers.

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POLICY TCC5: CULTURE AND ART

OPDC will support the provision of a high quality cultural offer in the OPDC area and Cc~~c~~ultural ~~q~~Quarter in Old Oak by:

a) protecting existing cultural space unless:

i. it is no longer economically viable as demonstrated by accounts data and through competitive marketing for a period of at least 12 months for alternative cultural uses without an appropriate offer being received; or

ii. the facility ~~can be~~is ~~appropriately~~ replaced or reprovided on-site or elsewhere in the locality to an equivalent or better quantum and quality; ~~or~~

~~iii. the facility is giving rise to unacceptable impacts on residential amenity and/or the transport network;~~

~~b)~~ supporting applications for new cultural space, where they ~~:~~

~~c) are located within designated town centres or areas of high public transport access and do not give rise to unacceptable impacts on the transport network;~~

~~d)~~b) meet meets current and/or future identified needs~~identified needs; and do not give rise to unacceptable impacts on residential amenity;~~

~~e)~~c) supporting the retention of existing, and the provision of new, artist studios in accordance with the requirements of policies E1, E2 and~~-~~ E3;

~~f)~~d) securing contributions towards and/or the provision of public art; and

~~g)~~e) requiring schemes providing over 2,500sqm of town centre uses to submit an appropriate Cultural Action Plan.

SUPPORTING TEXT

10.42 The Mayor's draft Culture Strategy ~~Cultural Strategy~~ promotes London as the world's cultural and arts capital and how this role can help widen the reach of and access to culture and art, support education skills and careers and enhance the physical environment. As London's largest regeneration project, OPDC can play a central role in delivering new cultural and arts facilities to help consolidate London's position as a global leader for culture and art.

10.43 OPDC's Cultural Principles document shows how important culture is to place making and how it can help integrate existing and new communities and provides case study examples of how the provision of culture, particularly in early development phases, can help to shape an area's identity and can attract businesses, people and investment to an area.

10.44 To support the creation of a high quality cultural area, OPDC will generally be supportive of new cultural facilities and will look to protect existing facilities, where they remain viable.

Commented [PF37]: Specific amendment.
Reason: To clarify that the marketing should be for alternative culture uses

Commented [PF38]: Specific amendment.
Reason: To clarify that requirement is that facility is delivered.

Commented [PF39]: Specific amendment.
Reason: To clarify provision can include on-site

Commented [PF40]: Specific amendment.
Reason: To clarify what is meant by 'appropriately'

Commented [PF41]: Specific amendment.
Reason: To avoid repetition with policies D6 and SP7.

Commented [TC42]: Specific amendment.
Reason: Removed to avoid duplication of other policies

Commented [PF43]: Specific amendment.
Reason: To clarify policy requirements.

Commented [PF44]: Specific amendment.
Reason: To avoid repetition with policy D6.

Commented [KT45]: Regulation 19(1) consultation amendment.
Reference: TCC5/2
Reason: To reflect updated Mayoral guidance.

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10.45 Artists contribute to vibrancy, identity and place making and can encourage wider social value through mentoring, work experience, apprenticeships and volunteering opportunities, open studios, public performances/exhibitions, events, festivals, school arts programme or community workshops. OPDC's Future Employment Growth Sectors Study notes that the OPDC area has a well-established community of artists, which OPDC will look to protect and/or re-incorporate studios within new developments, in accordance with Policies E1 and~~cy~~ E2~~1~~. OPDC will also support the provision of new artist studio space, subject to the policy criteria being satisfied. In accordance with Policy E3~~2b)iii~~, OPDC will look to secure a proportion of low-cost and/or open workspace provision ~~(as set out in Policy E3)~~ from ~~major~~ development proposals.

10.46 Public art can play a particularly important role in early place making, helping to celebrate both the past and future of the area and helping to establish a distinctive character. OPDC will generally support applications for public art, but consideration would have to be given to the impact any proposal has on the legibility of the public realm, that the proposed public art is coordinated across the OPDC area and complements surrounding proposals and that consideration has been given to the longer term maintenance of any installations.

10.47 There are a number of local artists within and close to the OPDC area and developers will be encouraged to work with these artists and with local communities to develop ideas for a wide range of public art projects.

10.48 OPDC's Cultural Principles document identifies how cultural space can provide valuable facilities for the local area and needs and also help play an important role in continuing London's position as the globe's cultural capital. To support this, proposals providing in excess of 2,500sqm of town centre uses will be required to include within their Planning Statement ~~to submit~~ a Cultural Action Plan that sets out how their scheme will contribute to the cultural offer in Old Oak and Park Royal. The Cultural Action Plan should include details such as:

a) the proposed locations for public art – on buildings and within the public realm;
b) proposed activities and projects that will support the creation of a cultural quarter in Old Oak;
c) proposed uses that will help to support culture in the OPDC area;
e) proposed work with local communities and cultural partners;
f) how the developer will engage with artists to help shape their proposal's design;
g) how the development will support the delivery of the Mayor's Cultural ~~Strategy~~Infrastructure Plan; and
h) where the development impacts on existing cultural infrastructure, how the developer will accord with the 'agent of change' principle (see Policy D6).

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POLICY TCC6: SPORTS AND LEISURE

OPDC will support the provision of a range of high quality public and private sports and leisure facilities by:

a) protecting existing indoor and outdoor sports and leisure facilities, including playing fields unless:

i. ~~it is no longer~~the facility is surplus to requirements, evidenced by an up-to-date and robust assessment showing other facilities in the local area that can demonstrably meet needs if the facility is lost, in terms of their capacity, access, quality, function and affordability ~~economically viable as demonstrated by accounts data and through competitive marketing for a period of at least 12 months~~; or

ii. the facility can be appropriately replaced or provided in an equal or better location and to an equal or better quantum, quality and range of sport and leisure functions to serve needs~~elsewhere in the locality~~; or

iii. the ~~facility is giving rise to unacceptable impacts on residential amenity and/or the transport network~~development is for an alternative sports and leisure facility, the identified needs for which outweigh the loss and whose quantum, quality and function demonstrably meet or exceed the provision within the existing facility;

b) supporting enhancements to existing indoor and outdoor sports and leisure facilities and the provision of new private facilities, where the proposal:

~~i. does not result in unacceptable impacts on the transport network and on amenity;~~

~~ii.~~i. meets current and/or future identified needs; and

~~iii.~~ii. achieves the "Inclusive Fitness Initiative Mark" accreditation;

c) requiring proposals to contribute towards and/or deliver ~~new~~ public access and affordable indoor and outdoor sports and leisure facilities, including playing pitches, that:

i. provides public access for all ages;

ii. provides appropriate concessions access;

iii. ensures that 1 sports court is provided for every 3,200 residents and 1sqm of swimming pool space is provided for every 90 residents; and

iv. delivers ~~two~~ new public sports and leisure centres in locations identified in the ~~Places chapter~~Infrastructure Delivery Plan (IDP).

~~d)~~

Commented [PF46]: Regulation 19(1) consultation amendment.
Reference: TCC6/1
Reason: To protect existing and contribute towards new outdoor sports space, including playing pitches.

Commented [KT47]: Regulation 19(1) consultation amendment.
Reference: TCC6/3, TCC6/15
Reason: To strengthen policy to align with the NPPF.

Commented [KT48]: Regulation 19(1) consultation amendment.
Reference: TCC6/4
Reason: To align with the NPPF.

Commented [KT49]: Regulation 19(1) consultation amendment.
Reference: TCC6/5
Reason: To align with the NPPF.

Commented [PF50]: Specific amendment.
Reason: To clarify policy requirements.

Commented [KT51]: Regulation 19(1) consultation amendment.
Reference: TCC6/5
Reason: To avoid repetition with Policy T1 and D6.

Commented [PF52]: Specific amendment.
Reason: To clarify policy requirements.

Commented [KT53]: Regulation 19(1) consultation amendment.
Reference: TCC6/1
Reason: To protect existing and contribute towards new outdoor sports space, including playing pitches.

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SUPPORTING TEXT

10.49 Sports and leisure are vital facilities for promoting people's health and well-being, helping people to live active lifestyles and de-stress. OPDC is keen for the Old Oak and Park Royal area to be well served by a range of facilities, to support the needs of those living and working in the area. Applications for the loss of existing facilities will normally be refused unless one or more of the policy criteria in part a) can be satisfied. Assessments justifying the loss of a facility should form part of applicant's Planning Statements and should accord with Sport England's Playing Pitch or Assessing Needs and Opportunities Guidance.

Commented [PF54]: Specific amendment.
Reason: To clarify policy requirements.

10.50 Applications for the enhancement of existing facilities and provision of new facilities will generally be supported, subject to them being designed to a high quality and not giving rise to unacceptable impacts on amenity and on the transport network and public realm. ~~To ensure that there is adequate access for all, OPDC will require improvements to existing facilities and the provision of new facilities to be fully accessible and to give consideration to the needs of people of different cultures, ethnicities and ages.~~ The English Federation of Disability Sports' Inclusive Fitness Initiative (IFI) has been established for over 10 years, supporting leisure centres to become more welcoming and accessible environments to disabled people. Facilities across the country have been awarded the 'IFI Mark' accreditation, which helps leisure facilities to get more disabled people physically active.

Commented [KT55]: Specific amendment.
Reason: To avoid repetition with Policy D3

10.51 Sports and leisure facilities are likely to be privately operated and run. OPDC recognises the role these private facilities can play in meeting needs. However, it will also be important to secure affordable concessions access to sport and leisure facilities, particularly for those on lower incomes and for families with young people and children, who are often restricted from accessing private facilities.

10.52 ~~To secure appropriate affordable access to sports and leisure facilities, OPDC will look to secure the delivery of and/or contributions towards concessions access sports and leisure centres.~~ Specific large-scale public access facilities should be provided in the ~~Old Oak South place (P1) and Old Oak North place (P2)~~locations identified in OPDC's Infrastructure Delivery Plan (IDP). Fulham Pools (figure 11.2) provides a good example of such a facility, which is run by a commercial operator with private membership and certain members only facilities, but also provides public access for all ages and affordable concessions access to the swimming pool, gym, all weather courts and other ancillary facilities.

Commented [TC56]: Specific amendment.
Reason: To avoid repetition with policy and shorten text.

10.53 As part of the provision of these concessions access facilities, particular consideration will be given to the need to secure access to public and affordable sports courts and swimming pools. ~~In 2014, Sport England undertook an assessment of the need for public sports halls and swimming pools for Hammersmith and Fulham Council. Evidence has~~The study identified deficiencies in access to sports courts in the OPDC area. This~~It~~ identified that a population increase of 3,200 would generate a demand for one additional sports court (the size of a badminton court). Current projections estimate that development is likely to generate an additional population of approximately 60,000 residents, giving rise to the need for an additional 19 sports courts in the area. ~~For swimming pools, the study identified the~~The OPDC area ~~as being~~is deficient in access to public swimming pools. The Sports Courts and Swimming Pools ~~England s~~Study identified that approximately 90 people gives rise to the need for 1sqm of pool space. Based on current population projections, this would result in a need for gives rise to an approximate need for 650sqm of public pool space during the plan period, which would equate to approximately two 12x25m pools or one 50x12m pool.

Commented [TC57]: Specific amendment.
Reason: To shorten supporting text.

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10.54 OPDC will also support applications for and secure the delivery of and/or contributions towards outdoor sports and leisure facilities including playing pitches, that serve needs and provide public and affordable access.

Commented [KT58]: Regulation 19(1) consultation amendment.
Reference: TCC6/1
Reason: To protect existing and contribute towards new outdoor sports space, including playing pitches.

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POLICY TCC7: PUBLIC HOUSES

OPDC will support the loss of public houses where:

a) **the public house has been competitively marketed:**

i. **for 24 months as a public house and for an alternative local community facility;**

ii. **at an appropriate price following independent valuation;**

iii. **in appropriate publications and through specialised licensed trade agents;**

iv. **in a condition that allows the premises to continue operating as a pub or as a community facility; and**

~~i.~~v. ~~**and there has been**~~**with no interest in either the freehold or leasehold either as a public house or as a community facility falling within the 'D1' use class;**

~~b) the public house has been offered for sale in appropriate publications and through specialised licensed trade agents;~~

~~c) all reasonable efforts have been made to preserve the facility, including all diversification options explored and evidence supplied to illustrate this;~~

~~d) the CAMRA Public House Viability Test, or a similar objective evaluation method, has been employed to assess the viability of the business and the outcomes demonstrate that the public house is no longer economically viable;~~

~~e)~~b) **an assessment has been made of alternative licensed premises within easy walking distance of the public house and premises are identified which offer similar facilities and a similar community environment to the public house which is the subject of the application;**

~~f)~~c) **the proposed alternative use will not detrimentally affect the character and vitality of the area and will, where appropriate, retain as much of the building's defining external fabric and appearance as a pub as possible; and**

~~g)~~d) **there has been public consultation to ascertain the value of the public house to the local community and the proposal does not demonstrably constitute the loss of a service of particular value to the local community; and**

~~h) if registered as an Asset of Community Value, the premises can be shown to have been offered for sale to local community groups and no credible offer has been received from such a group at a price that is reflective of the condition of the building and its future use as a public house.~~

SUPPORTING TEXT

10.55 Public houses act as hubs for community life, and are important for mental health and well-being. They provide a social space and promote community cohesion, provide economic benefits by providing jobs, support local food suppliers, bringing activity to ~~high streets~~town centres and can also provide heritage value. Within the OPDC area there are currently three public houses:

a) The Castle, North Acton;
b) The Fisherman's Arms, Old Oak Lane; and
c) The Grand Junction Arms, Acton Lane.

Commented [PF59]: Specific amendment.
Reason: To reflect best practice in managing loss of public houses.

Commented [KT60]: Regulation 19(1) consultation amendment.
Reference: TCC7/5
Reason: To avoid repetition with other components of the policy.

Commented [KT61]: Regulation 19(1) consultation amendment.
Reference: TCC7/6
Reason: To avoid reference to specific interest groups.

Commented [KT62]: Regulation 19(1) consultation amendment.
Reference: TCC7/10
Reason: To avoid repetition with legislation relating to Assets of Community Value.

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10.56 OPDC's Heritage Strategy identifies all three facilities as being of important heritage value and OPDC are proposing that they are locally listed.

10.57 There has been growing concern about the loss of public houses in the UK and OPDC will seek to retain such premises, unless all the policy criteria can be satisfied. OPDC's policy requirements accord with the Campaign for Real Ale (CAMRA) guidance. The competitive marketing requirements for public houses are longer than for other town centre uses in recognition of the smaller number of public house operators and as a consequence, the need for a longer marketing period to identify an appropriate operator.

~~In April 2015, central Government changed the permitted development rights to provide a greater level of protection to pubs listed as Assets of Community Value (ACV). Developers must also now submit a written request to the local authority to determine whether the building has been the subject of an ACV nomination prior to carrying out any development that has the benefit of permitted development rights and no development can be carried out or a period of 56 days following the date of the request to the local authority. At the time of the production of this Local Plan, none of the three public houses are listed as ACVs.~~

Commented [KT63]: Regulation 19(1) consultation amendment.
Reference: TCC7/10
Reason: To avoid repetition with legislation relating to Assets of Community Value.

DRAFT

POLICY TCC8: CATALYST USES

a) Planning applications that satisfy the below criteria will be required to submit a Catalyst Uses Statement:

i. a use and/or building or a cluster of uses/buildings that together would function as a single facility, that occupy inclusive of associated public realm, in excess of 10,000sqm and / or 0.25 hectares of land; and

ii. within the following types of buildings and/or land uses:

- **Sports stadia and facilities;**
- **Retail and leisure;**
- **Culture, education and health; or**
- **Business and conference space.**

b) The Catalyst Uses Statement should demonstrate how the proposal performs positively against the five following objectives and associated criteria set out in Table 10.2:

i. Is part of a holistic offer;

ii. Is financially sustainable;

iii. Complements the wider environment;

iv. Generates momentum in delivering the comprehensive redevelopment of the area; and

v. Leverages HS2 and Crossrail.

SUPPORTING TEXT

10.58 Regeneration of the OPDC area and in particular Old Oak will result in large-scale development of brownfield land in a location that will be well connected. This is likely to make the area suitable for a number of larger scale destination or catalyst uses.

10.59 These sorts of uses, if planned well, can help to stimulate significant and positive change, helping to support economic growth, increase market confidence and create a recognisable identity. OPDC defines these uses as catalyst uses. Catalyst uses tend to broadly fall into four categories:

a) Sports stadia and facilities;
b) Retail and leisure;
c) Culture, health and education; and
d) Business and conference space.

10.60 King's Cross and Stratford provide two recent examples in London of how these sorts of uses can catalyse and shape the identity of major regeneration projects. In King's Cross, the University of the Arts London and Francis Crick Institute have helped to create a vibrant district centred around the education, health and culture sectors. In Stratford, a wider range of uses includes the Olympic legacy venues, Westfield Stratford, Here East and the future planned Cultural and Education District.

Commented [KT64]: Regulation 19(1) consultation amendment.
Reference: TCC8/2
Reason: to clarify that where it is a cluster of uses or buildings, the policy requirement for a catalyst uses statement need only be applied where the cluster of buildings that together create a single facility

DRAFT

10.61 OPDC's Catalyst Uses Study notes that the scale of opportunity at Old Oak and Park Royal will allow differing character areas to emerge. The different areas could house multiple and complementary catalyst uses. It will be important to ensure these uses support the wider regeneration aspirations for the area, as set out in OPDC's spatial vision, strategic policies and place policies.

10.62 Catalyst uses can be small, medium and large-scale. OPDC's Catalyst Uses Study identifies that small facilities could be readily incorporated in development plots and are unlikely to have a significant impact on OPDC's ability to achieve its homes and jobs targets. These facilities would still need to be considered in accordance with other Local Plan policies. However, larger facilities, defined as being of over 10,000sqm of floorspace and/or 0.25 hectares of land, are likely to have a more significant impact on homes and jobs targets and on shaping the identity of the OPDC area and therefore merit greater scrutiny. To support this, the Catalyst Uses Study identifies a set of qualitative and quantitative criteria, against which these larger facilities should be assessed, in order to ensure that the facilities complement the wider regeneration of the area. These criteria are set out in Table 10.2.

10.63 The five strategic objectives in Table 10.2 set out OPDC's key ambitions and expectations for any proposed catalyst in the OPDC area. More details on the expectations in relation to the five strategic objectives can be found in OPDC's Catalyst Uses Study. For the qualitative criteria, the applicant's Catalyst Uses Statement should demonstrate how the proposal supports these objectives. For the quantitative criteria, the Statement should assess the scheme against relevant comparable proposals identified in OPDC's Catalyst Uses Study and against other projects comparable to the proposed catalyst, which could be from London, the UK or overseas. These comparable projects should be discussed and agreed with OPDC prior to the submission of the Statement. Catalyst Uses Statements would not be required for facilities identified in OPDC's IDP, which are necessary to meet the needs of development, such as a school or primary care centre.

Commented [KT65]: Regulation 19(1) consultation amendment.
Reference: TCC8/2
Reason: To clarify that the catalyst uses policy will not be applied to infrastructure identified in OPDC's IDP.

Table 10.2: Strategic Objectives for Catalyst Uses

Objective	Qualitative Criteria	Quantitative Criteria
Part of a holistic offer	It supports the delivery of the spatial vision and strategic policies; It complements other existing or planned catalysts and surrounding uses; It does not inhibit development on surrounding sites; and It supports place making and identity.	It does not impact on the delivery of OPDC's housing target; It does not have a negative impact on land values of adjacent uses; It contributes to the quantum, quality and design of public realm and open space; It optimises the number of hours/days the catalyst is utilised per annum; and It optimises the proportion of active and/or positive frontage.
Financially sustainable	It is financially deliverable; It does not negatively impact on the viability of the surrounding area, in terms of affordable housing delivery and infrastructure requirements; Arrangements are in place for its long term stewardship and management; and It helps to leverage investment.	It is supported by appropriate capital and revenue expenditure on the facility and identified funding sources; The catalyst does not have unacceptable requirements for infrastructure to the detriment of securing funding and financing for other priority infrastructure; and The proposed catalyst provides appropriate contributions towards the costs of infrastructure requirements to support catalyst use.

Complements wider environment	It complements London and West London's needs and growth aspirations; it complements the local characteristics and meets the needs of and provides benefits for the local population; and it adds value to local economic activity	It optimises total direct and indirect jobs; It optimises full time equivalent (FTE) jobs; It has a high overall Gross Value Added (GVA) and average GVA per employee; It optimises direct, indirect and FTE jobs per hectare; It provides a range of direct, indirect and FTE jobs by sector and skills level; and It supports the delivery of additional (non-displacement) jobs within: the OPDC area; the boroughs of Brent, Ealing and Hammersmith and Fulham; and Greater London.
Generates or sustains momentum	It helps to kick-start and/or sustain development, investment and awareness.	It scores positively when compared against other comparable examples of other catalysts and statistical evidence of their impact on development, investment and awareness.
Leverages HS2 and Crossrail	It capitalises on the connectivity, identity and the large number of people that will be brought to the area by the planned HS2 and Elizabeth Line station.	It optimises net additional Gross Value Added (GVA) to London and the UK; and It optimises footfall per annum.

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POLICY TCC9: MEANWHILE USES

a) OPDC will support proposals for meanwhile uses where the proposed use:

- **i. contributes positively to the character and early activation of an area;**
- **ii. reinforces the longer term uses planned for the area. Where appropriate, mechanisms should be put in place to support meanwhile occupiers securing permanent spaces within developments;**
- **iii. would not impact on the deliverability of Site Allocations identified in ~~the Places chapter (Chapter 4)~~Table 3.1; and**
- **iv. does not give rise to an unacceptable impact on residential amenity and on the transport network;**

b) All major development proposals will be required to submit an appropriate Meanwhile Feasibility Study and if feasible, an appropriate Meanwhile Strategy.

Commented [PF66]: Specific amendment.
Reason: To clarify policy requirements.

SUPPORTING TEXT

10.64 The value of meanwhile uses has been recognised across the property and regeneration industry, not least as a strategy for enabling early delivery of longer-term regeneration and development proposals. Meanwhile uses provide the opportunity for early wins by quickly bringing life and activity to an area before permanent development begins and enabling a period of testing project ideas and establishing uses, which will ultimately inform the final scheme brief and design.

10.65 Meanwhile uses are likely to play a huge role in early place making in the OPDC area, particularly in Old Oak, where there will be many temporarily vacant land parcels awaiting development in the longer term and where meanwhile uses can help provide facilities to support its designation~~ed~~ as a Cultural Quarter (see Policy SP6).

Commented [PF67]: Specific amendment.
Reason: To support delivery of a Cultural Quarter.

10.66 OPDC will be generally supportive of meanwhile uses. However, it will be important to ensure that any meanwhile use does not result in an unacceptable impact on residential amenity and that the uses do not prevent development sites from being brought forward for development in a timely fashion. Ideally meanwhile uses would occupy spaces which are available for at least five years, in order to offset the start-up costs and establish viable businesses or organisations.

10.67 Through occupying temporary land or buildings, meanwhile uses can be low cost and low-risk, making them attractive to business start-ups, community groups and the creative and cultural sectors. To support these, OPDC will work with~~require~~ developers to ~~put in place appropriate mechanisms~~secure appropriate arrangements ~~to~~ that could support occupiers of meanwhile spaces to secure space within permanent structures. Further details on the requirements for this are outlined under the requirements for the Meanwhile Strategy below.

Commented [KT68]: Regulation 19(1) consultation amendment.
Reference: TCC9/1
Reason: To clarify policy requirements.

10.68 All major development proposals will be required to ~~be submit~~produce a Meanwhile Feasibility Study, which should be included within an applicant's Planning Statement ~~at application stage, for approval by OPDC~~. The Study should identify whether the land or buildings affected by the development proposal are appropriate for meanwhile activities. This should:

Commented [PF69]: Specific amendment.
Reason: To clarify policy requirements.

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a) clearly set out the proposed phasing of the site and the points at which land and/or buildings are likely to be vacant;
b) identify other opportunities and constraints to the provision of meanwhile facilities; and
c) make clear recommendations on the appropriateness of land and/or buildings on the site for different meanwhile uses, including but not limited to business space, retail, eating and drinking establishments, leisure, culture and sports space, public art and open space.

10.69 If appropriate for meanwhile activities, OPDC will secure a Meanwhile Strategy through a planning condition or Section 106 agreement, which should identify the proposed steps to promote meanwhile activities on the site. This should identify:

a) the types of meanwhile uses considered most appropriate for the site and how these can meet needs and support regeneration, early place making and the longer term success of the development;
b) the proposed approach to how these meanwhile uses would be taken forward, including details on timescales, phasing and how the proposal would complement surrounding developments and the longer-term place making vision for the area;
c) the proposed approaches to engaging with potential occupiers of the meanwhile space. This should focus on looking to incentivise business start-ups and local businesses and organisations to occupy spaces; and
d) the proposed approaches to enable meanwhile uses to occupy the permanent structures in the development. This ~~c~~should include providing business support, staggered rental rates and offering right of first refusal.

Commented [TC70]: Regulation 19(1) consultation amendment.
Reference: TCC9/1
Reason: To clarify policy requirements.

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POLICY TCC10: VISITOR ACCOMODATION

OPDC will contribute to London's visitor infrastructure and London's overall need for ~~an additional 40,000 high quality~~ hotel bedspaces ~~by 2036~~ by:

- **a) supporting proposals for new and expansions to existing visitor accommodation where they:**
  - **i. are located in accordance with the NPPF sequential test and~~/or~~ close to public transport, in particular rail stations, and do not give rise to unacceptable impacts on the transport network;**
  - **ii. ~~do not result in an unacceptable impact on residential amenity~~are accompanied by an appropriate management plan;**
  - **iii. provide at least 10% of hotel bedrooms as wheelchair accessible and submit Accessibility Management Plans;**
  - **iv. are not permanently occupied; and**
  - **v. do not compromise the delivery of housing targets and support the delivery of job targets, particularly within Site Allocations;~~supply of housing.~~**
- **b) supporting a range of types of visitor accommodation over a range of affordabilities; and**
- **c) supporting the provision of business hotels and multi-functional convention facilities.**

SUPPORTING TEXT

10.70 The London Plan identifies a London-wide need for an additional ~~40,000~~58,000 hotel bedrooms by ~~2036~~2041. Due to the OPDC area's high public transport accessibility providing access to London at the rest of the UK, as well as its proximity to destinations such as the West End and Heathrow, it is likely to be an attractive location for visitor accommodation. To minimise impacts on residential amenity and to reduce reliance on private cars, the location of visitor accommodation should be delivered in accordance with the sequential test set out in the NPPF and~~/or~~ should be located in areas with good access to public transport, in particular rail stations. OPDC will be particularly supportive of hotels close to the new Old Oak Common rail station and the potential for these to meet the need for more business hotels (see Policy P1).

10.71 OPDC will also require developers to demonstrate that proposals do not have a detrimental impact on the amenity of neighbours, particularly residents and will require developers to submit management plans, secured through a Section 106 agreement, demonstrating how potential impacts will be minimised and mitigated against.

10.72 Conditions will be applied to ensure that any hotel space is not permanently occupied. Hotel accommodation does not contribute to OPDC's housing supply, so as part of the determination of applications, OPDC will consider whether the proposal impacts on the ability of OPDC to achieve its housing target, particularly if the proposal is within OPDC's Site Allocations (see chapter 4).

Commented [KT71]: Regulation 19(1) consultation amendment.
Reference: TCC10/2
Reason: Removed and referenced in supporting text to align with Draft New London Plan figures.

Commented [KT72]: Specific amendment.
Reason: Deleted to avoid duplicating Policy D6

Commented [KT73]: Regulation 19(1) consultation amendment.
Reference: TCC10/3
Reason: To require that proposals would not compromise the delivery of housing targets and would support the delivery of jobs targets,

Commented [KT74]: Regulation 19(1) consultation amendment.
Reference: TCC10/2
Reason: To align with Draft New London Plan figures.

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10.73 Applicants will be required to provide at least 10% accessible hotel bedspaces to meet the needs of disabled guests. Accessibility Management Plans should commit to providing an enhanced level of customer care to disabled guests and, at the same time, optimise the use of the accessible rooms.

10.74 OPDC will welcome proposals over a wide range of affordabilities, from high end 5* hotels down to value and budget hotels in order that a wide variety of tourists will be attracted to the area and to London.

10.75 There is a particular need in London for high quality business visitor accommodation and the Old Oak area will be particularly well suited to providing for this need with good connections to Heathrow, Gatwick, Central London and the north of England. Business accommodation should include provision for conference facilities and in large hotels, convention centre facilities, for which there is currently an under-supply in west London.

10.76 Providing high quality facilities is essential as the quality of hotel accommodation often shapes visitors' perceptions of the capital and encourages recommendations and/or repeat visits. OPDC will encourage developers to join national quality assurances such as VisitEngland's National Quality Assessment Scheme.

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POLICY TCC11: NIGHT TIME ECONOMY

a) Planning permission for town centre uses, either as the main or as the ancillary use, will be the subject of conditions controlling hours of operation to minimise their impact on residential amenity;

b) There will be a presumption that town centre uses:

- **i. within designated town centres should close by 00:00; and**
- **ii. outside of designated centres should close by 23:00;**

c) Proposals for extended opening hours beyond the limits outlined under b) would need to demonstrate that;

- **i. there would be no detrimental harm to the amenity of neighbours resulting from the use itself or from those travelling to and from the facility; and**
- **ii. the proposal would not result in harmful cumulative impacts in association with other late licensed properties; and**

d) Where there are proposals for new residential properties and they are located within mixed use schemes or in close proximity to established or planned uses with late night licences, the proposed residential use will need to demonstrate that it is capable of mitigating against the impact of established or planned use such that the amenity of the future residents is protected.

SUPPORTING TEXT

10.77 The night-time economy is worth £26.3 billion a year to the London economy and is part of the reason that London is an attractive place to live, work and visit. Town centre uses such as eating and drinking establishments and culture, sports and leisure uses can play a key role in contributing to the vibrancy and vitality of the OPDC area alongside adding activity to the public realm and supporting the local economy. The Mayor of London has published a 24 hour vision for London, which sets out the ambition for the capital to become a trailblazing city at night, competing with the likes of Berlin, Tokyo and New York. The Mayor's ~~draft~~ Culture and Night Time Economy Supplementary Planning Guidance (SPG) (2017) identifies that to support the mayor's 24 hour vision, opportunities should be taken to extend the opening hours of activities and uses. This could include more traditional night time economy uses such as eating and drinking establishment, alongside uses usually associated with the day time, such as shops, cafes, recreational, community and leisure facilities, helping to create a 'bridge' between day time and night time economy uses.

10.78 OPDC will work with applicants to support the delivery of these uses in the OPDC area. However, if not appropriately mitigated, these uses can result in night-time activity which can give rise to impacts on amenity, particularly for residents.

10.79 OPDC will look to apply the 'agent of change' principle to appropriately manage the impacts of late night premises (see Policy D6).

Commented [KT75]: Regulation 19(1) consultation amendment.
Reference: TCC11/2
Reason: To reference the Mayor's 24 hour London Vision.

Commented [TC76]: Regulation 19(1) consultation amendment.
Reference: TCC11/2
Reason: To reference the Mayor's 24 hour London Vision.

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10.80 When a town centre use is the 'agent of change', OPDC will look to condition planning permissions. Proposals for late licences will be assessed in terms of the use's impact on residential amenity and will consider issues such as noise within the premises, smells, light pollution and the impact of those going to and from the facility, such as traffic, car parking and anti-social behaviour.

10.81 Conversely, under 'agent of change' principles, if a town centre use is in place before a residential development, as the 'agent of change', the residential development is responsible for militating against potential residents' complaints, licensing restrictions or the threat of closure. Residential uses within or close to town centre locations, where there is potential for late night activities, should carefully consider the locations of habitable rooms and in particular bedrooms. They should also clearly demonstrate how noise attenuation measures have been included and designed to the highest standards. This approach is necessary to ensure both a vibrant night-time economy and high quality residential environment.

10.82 As part of mixed use proposals, OPDC will look to ensure that any proposed town centre use is appropriately mitigating its impacts on any residential use. Appropriate mitigation will include the use of planning conditions limiting the hours of operation. Any proposed residential units within mixed use proposals would also need to be designed so that they are mitigating potential impacts arising from town centre uses.

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11 Delivery and Implementation

INTRODUCTION

11.1 The regeneration of the Old Oak and Park Royal area represents one of London's and the UK's largest and most complex regeneration projects. The redevelopment of the area will be the responsibility of a number of stakeholders and the responsibility for its successful regeneration does not rest solely on OPDC as a planning authority. However, there are a number of strategies that OPDC can look to employ as statutory local planning authority, to help facilitate and coordinate the areas' successful regeneration, including:

a) balancing the priorities set out in planning policy and securing appropriate funding and financing to support infrastructure delivery through the planning process;
b) supporting the timely delivery and optimised approach to the phasing of the development in the area to realise, and where feasible, exceed OPDC's homes and jobs targets;
c) undertaking engagement with a wide range of stakeholders and being a proactive local planning authority; and
d) utilising other planning functions that support the timely regeneration of the area, including development management powers, compulsory purchase powers and producing, monitoring and updating planning policy.

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POLICY DI1: BALANCING PRIORITIES AND SECURING INFRASTRUCTURE DELIVERY

To support the successful regeneration of the area, OPDC will:

a) ~~appropriately~~ **balance the priorities for affordable housing, infrastructure delivery, other non-infrastructure related planning obligations and sustainability standards with site specific constraints and the needs for deliverability and securing the timely regeneration of the area**

b) secure the delivery of infrastructure necessary to support sustainable development, meet the needs of development and where nec~~c~~essary, mitigate the impacts of development as identified in the Local Plan policies and/or in the Infrastructure Delivery Plan (IDP) by:

- **i. securing appropriate on-site enabling and development works;**
- **ii. negotiating s106 contributions which are necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development to ensure that the appropriate infrastructure to support the Local Plan and proposed development is delivered;**
- **iii. securing off-site highway works where this is necessary;**
- **iv. charging CIL on developments in accordance with the CIL Charging Schedules of the Mayor of London and OPDC;**
- **v. working with relevant service providers to secure infrastructure funding;**
- **vi. working with developers and infrastructure providers to establish commercial opportunities for private sector operators (e.g. ESCOs) or public authorities to deliver infrastructure; and**
- **vii. where appropriate, considering potential alternative funding and financing mechanisms.**

SUPPORTING TEXT

11.2 The redevelopment of Old Oak and the regeneration of Park Royal have the potential to deliver a significant number of new homes and jobs to help meet local and London-wide needs. Catalysed by the planned HS2/Elizabeth Line and National Rail station at Old Oak Common, the regeneration of the area will take place over many decades. There are significant challenges that will need to be overcome in achieving this, including;

a) housing and employment delivery, in particular affordable housing as a key Mayoral priority;
b) prioritising, funding and financing the delivery of infrastructure and other non-infrastructure related planning obligations; and
c) bringing forward the planned scale of development across a series challenging sites in a timely fashion that also achieves the Mayor's aspirations for sustainability, health and well-being and place making.

Commented [KT1]: Regulation 19(1) consultation amendment.
Reference: DI1/6
Reason: To clarify implementation of the policy.

Commented [KT2]: Regulation 19(1) consultation amendment.
Reference: DI1/1
Reason: To clarify that site specific constraints such as land contamination should impact land values and that the costs for addressing these issues should not necessarily be borne through reduced planning obligations or sustainability standards, in accordance with the Affordable Housing and Viability SPG.

Commented [KT3]: Regulation 19(1) consultation amendment.
Reference: DI1/1
Reason: To clarify that site specific constraints such as land contamination should impact land values and that the costs for addressing these issues should not necessarily be borne through reduced planning obligations or sustainability standards, in accordance with the Affordable Housing and Viability SPG.

DRAFT

11.3 There is a strong symbiotic relationship between these issues. Housing and employment density, affordable housing, infrastructure delivery and other planning obligations, site constraints and ambitious sustainability standards all have associated costs. There will be a need to consider the ability of each site to contribute its fair share towards infrastructure (physical and social), affordable housing and sustainability standards, whilst ensuring new development is viable and that the market is appropriately incentivised to deliver, where possible. This includes ~~When considering the policies in this Local Plan, OPDC will need to~~ taking~~e~~ account of different site specific ~~requirements~~constraints, which at the time of writing this Local Plan may not be fully understood. Site constraints may include exceptional or abnormal costs relating to issues such as high levels of contamination, requirements to divert major utilities or poor ground conditions necessitating special foundations or ground works. The presence of such issues will be expected to impact on land values and the costs for addressing these issues should not necessarily be borne through a reduction in planning obligations or sustainability standards. In taking a balanced approach, to these above issues, OPDC would always need to be satisfied that the proposal delivers on the principles of sustainable development set out in the NPPF. ~~There will be a need to consider the ability of each site to contribute its fair share towards infrastructure (physical and social), affordable housing and sustainability standards, whilst ensuring new development is viable and that the market is appropriately incentivised to deliver, where possible.~~

11.4 The timely delivery of regeneration in the OPDC area is intrinsically linked with the need to deliver the infrastructure necessary to enable development and provide facilities and services to meet the needs of those living, working and visiting the area. A critical factor in the timely delivery of infrastructure is how it is funded and financed.

11.5 The single most important piece of infrastructure being delivered in the OPDC area during the lifetime of the Local Plan will be the new Old Oak Common station, connecting HS2, the Elizabeth Line and National Rail services. The station forms part of HS2 and will be delivered by the statutory powers in the High Speed Rail (London – West Midlands) Act 2017, which secured Royal Assent in February 2017. This is being funded by central government and this new station will be the primary catalyst for regeneration in the OPDC area. This station is planned to open in 2026.

11.6 The challenge for OPDC is securing funding and financing for a complementary package of infrastructure investments that can be delivered over time to support the Old Oak Common station and facilitate an optimised approach to the regeneration and redevelopment of the OPDC area. While many of these investments may be comparatively small-scale, they will over time, constitute a substantial package.

11.7 OPDC's Infrastructure Delivery Plan (IDP) identifies the key infrastructure required to unlock the comprehensive regeneration of the area. The IDP is an important supporting document for this Local Plan and will be updated regularly to stay 'live' to the infrastructure delivery requirements and challenges that implementing this Local Plan will entail. The IDP updates will be informed by phasing and capacity information that will also be regularly monitored as the development comes forward in the OPDC area.

11.8 The scale of infrastructure required to support the regeneration of the OPDC area is significant. OPDC's Development Infrastructure Funding Study (2015) estimates that infrastructure could total approximately £1.5 billion.

Commented [PF4]: Specific amendment.
Reason: Relocated from below to better reflect policy structure.

Commented [KT5]: Regulation 19(1) consultation amendment.
Reference: DI1/1
Reason: To clarify that site specific constraints such as land contamination should impact land values and that the costs for addressing these issues should not necessarily be borne through reduced planning obligations or sustainability standards, in accordance with the Affordable Housing and Viability SPG.

Commented [KT6]: Regulation 19(1) consultation amendment.
Reference: DI1/11, DI1/13
Reason: To clarify that any balance would need to deliver on the principles of sustainable development outlined in the NPPF.

Commented [PF7]: Specific amendment.
Reason: Relocated to above to better reflect policy structure.

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11.9 The priority for securing funding, will be securing appropriate contributions from developments in the form of Section 106 aAgreements and Community Infrastructure Levy payments, but this alone will not be able to pay for all the infrastructure required. Given the scale and nature of the investment needed, it is expected that both the public and private sector will need to play a role and that in addition to conventional funding and delivery arrangements there will be the opportunity to consider use of more innovative financing mechanisms that have been employed on similar larger regeneration schemes. OPDC will work with a variety of stakeholders to secure appropriate alternative funding sources to support the successful regeneration of the area. Details on the approaches to infrastructure delivery and sources of funding and financing are set out in the proceeding paragraphs.

11.10 A substantial amount of the infrastructure required for the sustainable development of the area will be provided through on-site development. This includes (but is not be limited to) items such as enabling works (demolition, site clearance, decontamination, decking, sewerage), internal roads, public realm, open space and street greening. It is expected that developers will directly fund any enabling works needed prior to the main development of a site. In addition to activities such as demolition, site clearance and decontamination, there are sites across the OPDC area where enabling works may include 'infrastructure type investment' such as structural ground works and decking structures. As these costs are taken into account when assessing the commercial viability of the site, there may be exceptional circumstances where alternative funding and financing options are explored to enable development to progress.

11.11 Section 106 of the Town and Country Planning Act 1990 allows a local planning authority, such as OPDC, to enter into legal agreements (that bind the relevant development site) with land owners/developers. A local planning authority can only enter into a Section 106 aAgreement where it is satisfied that to do so would meet the legal tests set out in regulation 122 of the Community Infrastructure Regulations 2010 (as amended). These legal tests are also set out in the policy. A Section 106 aAgreement can control a range of matters such as the amount of affordable housing provided in the approved planning permission and/or, subject to restrictions on pooling of contributions, items of infrastructure or financial contributions towards their delivery, such as new schools and increased transport network capacity. Non-financial contributions may include employment and training opportunities being made available on the development site. The basis for negotiations of Section 106 aAgreements and the range of obligations sought will be set out in OPDC's Planning Obligations SPD. In accordance with OPDC's Validation Checklist, applicants should submit Planning Obligations Heads of Terms as part of their planning application material, to provide clarity on how they propose to appropriately contribute to infrastructure provision identified in OPDC's IDP.

Commented [PF8]: Specific amendment.
Reason: To clarify requirement to submit a Planning Obligations Heads of Terms, as required in OPDC's Validation Checklist.

11.12 Off-site highway works may also be required, where the developer pays the local highways authority to design and undertake scheme-specific highway works needed to satisfactorily tie in a scheme to the road network, or to mitigate adverse impacts which would otherwise arise in the immediate vicinity of the site. These works are often provided through Section 278 aAgreements. Examples of the works covered by Section 278 aAgreements are vehicular crossovers and drop kerbs, or major highway works such as traffic lights or junction improvements, where a scheme is estimated to generate a large number of vehicular movements. A Section 278 aAgreement can either be a standalone agreement or form part of the Section 106 aAgreement. Section 278 aAgreements are not subject to the pooling restrictions that limit Section 106 obligations.

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11.13 The Community Infrastructure Levy (CIL) is a levy on new development 'of an amount per square metre Gross Internal Area (GIA)' of net additional floorspace. It is usually set at a different rate for different types of floorspace and can be set at different rates for different areas. These variations in rates reflect differences in development viability and thus profitability for different types of land use. OPDC is the CIL charging authority for the OPDC area. The infrastructure projects or types of infrastructure that a CIL charging authority intends to spend CIL income on is set out in a 'Regulation 123' List. Infrastructure in a Regulation 123 List cannot also be funded by money raised through Section 106 agreements, to avoid double dipping, i.e. a developer being required to pay twice for the same piece of infrastructure. OPDC's draft CIL charging schedule and Regulation 123 list are available on OPDC's website.

11.14 The Mayor of London's CIL is also chargeable in the OPDC area. At the time of this Local Plan's publication, this Mayoral CIL rate stands at £35/m² in the London Boroughs of Brent and Ealing and at £50/m² in Hammersmith & Fulham and in broad terms applies to all development other than for education and health facility uses.

11.15 The increased population living and working in the area will result in increased taxes (income tax, council tax and business rates) and expenditure on services. This provides the potential for funding from the relevant service provider. OPDC is holding discussions with these service providers (see Policy DI3) to make them aware of the anticipated new population coming to the area, the phased programme for delivery and the anticipated infrastructure needs in order to identify potential funding to contribute towards infrastructure requirements. OPDC will work with the GLA, TfL, the local authorities and central Government to consider the most appropriate opportunities.

11.16 Some types of infrastructure will be able to be run on a commercial basis and this can provide infrastructure funding and financing. An example of this is where an energy service companies (ESCOs) is set up to invest in new energy facilities configured in such a way as to reduce the energy cost of a building. The building occupants, or landlord, then benefit from the energy savings and pay a fee to the ESCO in return. Another example is sports facilities run on commercial terms, but with concessions access for people living or working in the local area. Fulham Pools provides a local example of a facility run on this basis (see figure 11.2).

11.17 Where neither development nor public or private service providers can meet the anticipated costs of development, the public sector can look at borrowing monies to finance infrastructure. In the case of the OPDC area, there is currently a funding gap and OPDC has been in discussions with Central Government about potential borrowing and other options.

11.18 A funding model incorporating retention of future tax increases is one potential approach. This is where additional revenue gains from taxes (in theory domestic or business property) generated within a defined area of development are used to repay borrowing for new infrastructure judged to be necessary to unlock regeneration in an area – often referred to as Tax Incremental Financing (TIF). In the UK, growth in future business rates will be used to repay borrowing for upfront infrastructure (the northern line extension to Battersea being the most notable example). An Enterprise Zone could also be used as a mechanism to capture the uplift over a long period of time from a set base (importantly assuming no resetting of the baseline) within a designated zone.

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11.19 The use of a revolving investment fund could also be considered where there is a mismatch between the timing of delivery and funding. This is where funds are raised, possibly alongside some public grant, to deliver a rolling programme of works on the expectation that future development contributions generated will repay.

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POLICY DI2: TIMELY DELIVERY AND OPTIMISED PHASING

To support the timely delivery of development in the area, OPDC will work with landowners, developers, infrastructure providers and other relevant stakeholders to:

- **a) ensure development proposals are being brought forward as early as possible, subject to the necessary infrastructure requirements to support the development being secured, in accordance with Policy SP10;**
- **b) secure the timely delivery of infrastructure required to support the needs of development; and**
- **c) ensure any barriers to the successful and timely regeneration of the area can be appropriately addressed and overcome.**

SUPPORTING TEXT

~~11.20~~ Policy SP10 recognises the importance of timely delivery and figure 3.16 provides an overview of OPDC's indicative phasing plan, which is heavily influenced by the planned delivery of the new Old Oak Common station in 2026. The approach to phasing is set out in OPDC's Development Capacity Study (DCS). The DCS accords with the NPPF and National Planning Practice Guidance (NPPG) and identifies the sites within the OPDC area that are considered to be 'deliverable' and capable of being brought forward in the next five years and sites that are considered to be 'developable' and identified as contributing to OPDC's supply of homes and jobs over 5-20 years. OPDC is engaging positively and proactively with the landowners and developers of the identified development sites in the DCS, to support the timely and coordinated delivery of these sites. Further details on this engagement is set out in appendices A and B of the DCS and information will be updated annually as part of OPDC's Authority Monitoring Report.

11.20

Commented [TC9]: Specific amendment.
Reason: To clarify OPDC's delivery strategy for the timely and coordinated development of identified development sites.

11.21 OPDC will support the early delivery of development, wherever possible. This approach will deliver much needed new homes and jobs, help to change the character of the area from industrial to mixed use, and will build confidence in the future of the area. The majority of land identified as 'deliverable', or 'developable' in 0-10 years, on which early development could commence in advance of the opening of the Old Oak Common station, is located in the Places of Old Oak North (Policy P2), Scrubs Lane (Policy P10), Willesden Junction (Policy P11), Old Oak Lane and Old Oak Common Lane (Policy P8), North Acton and Acton Wells (Policy P7), and Park Royal West (Policy P4).

11.22 Whilst early development is supported, a large number of these sites are challenging and will require infrastructure investment (public transport, utilities and social) to unlock their comprehensive redevelopment at the scale of development promoted in this Local Plan. This infrastructure will be needed to connect early development into its surroundings to ensure the integration of new and existing communities. OPDC is working with a variety of stakeholders, service providers, developers and landowners (see Policy DI3) to ensure that infrastructure necessary to support the development of these sites is being appropriately secured and delivered.

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11.23 Following the opening of Old Oak Common station in 2026 (and potentially in advance of that where feasible) sites needed to support the development of the station and other complex sites could have the potential for redevelopment. This is land is predominantly located in Old Oak South (see Policy P1), North Acton and Acton Wells (Policy P7) and Channel Gate (Policy P9):

a) The HS2 construction sites will be capable of being brought forward for development in a timely fashion around the time of the opening of Old Oak Common station.
b) In the longer term, The Elizabeth Line Depot and sidings could be brought forward for development. These will be complex to deliver and will require solutions to existing rail uses, taking into account future operational needs, to facilitate development. This would likely require either the full or partial relocation of the depot and/or decking the depot and sidings to enable development.
c) In the longer term, OPDC would support development at both the Intercity Express Programme (IEP) depot and North Pole East depot sites, if solutions to their rail use could be found and agreement with all relevant bodies reached.

Commented [KT10]: Regulation 19(1) consultation amendment.
Reference: DI2/3
Reason: To recognise that long-term redevelopment of operational rail facilities would need to take account of future operational needs.

11.24 This list is not exhaustive and as a fuller understanding of development potential within the area emerges other development opportunities and solutions will continue to be identified. Further details on site specific requirements for development, phasing and infrastructure can be found in Table 11.1 and within the relevant place policies in chapter 4. Further details on the key stakeholders who OPDC will need to engage with to support the timely and successful regeneration of the area are also provided within the DCS and Policy DI3.

Table 11.1: Opportunities and Challenges for Delivery within the OPDC Places

Place	Homes Capacity	Jobs Capacity	Key Landowners	Justification
Old Oak South (P1)	~~3,000~~350	~~41,300~~15,200	DfT, TfL, and Network Rail	Old Oak South will be a complex site to develop that will require joint working between a variety of public sector bodies. It will be important that different public sector landowners work together to ensure development over and around existing infrastructure is coordinated and can create a coherent new place. The High Speed Rail (London – West Midlands) Act 2017, which was granted Royal Assent in February 2017, establishes the parameters within which the Old Oak Common station would be built out. To support the delivery of the Act, an associated planning regime (Schedule 17) has been developed. This establishes the approvals process and sets out the grounds for OPDC to determine submissions for proposals such as construction arrangements, plans and specifications of proposed buildings and restoration of sites. The consideration on any approval for works to be carried out in relation to Phase One of HS2 are limited to those set out in Schedule 17. OPDC recognises the extent of High Speed 2 Limited's powers, land interests and scope as set out in the Act. OPDC as local planning authority will work positively with HS2 and DfT to realise this and ensure the station and its associated interchange facilities are delivered in a timely fashion and is appropriately embedded into its surroundings. Securing longer term development on land around the station will likely only take place once construction land is no longer needed to support the construction of the station. This Local Plan establishes clear policy support for development around the station, and the detail for how the development of this site will come forward in time.

				To the north of the station and associated construction site is the Elizabeth Line Depot and sidings, and to the south is the Intercity Express Programme (IEP). Both are operational transport depots. This Local Plan does not identify either site as likely to come forward for development in the Plan period. However, should a solution be found that facilitates redevelopment that all parties can agree on, OPDC would support the principle of mixed use development on these sites. The Elizabeth Line Ddepot and Sidings site will be challenging to deliver and the feasibility, timing and development capacity on this site will require ongoing monitoring and consideration as part of future reviews of this Local Plan. OPDC is working with TfL and DfT to consider options for its full and/or partial relocation/decking to support development. Any deck structure would artificially raise the ground level of the site and the subsequent challenge of knitting this site into its surroundings (in particular the HS2 station) would need to be addressed through detailed design. ~~In the southern part of Old Oak South is the Intercity Express Programme (IEP) depot, which is an operational transport depot. This Local Plan does not identify this site as likely to come forward for development in the Plan period. However, should a solution be found that facilitates redevelopment that all parties can agree on, OPDC would support the principle of mixed use development on this site.~~ Likewise, OPDC will need to monitor the potential phasing and capacity of the IEP depot site through future iterations of the Local Plan. Securing access to Wormwood Scrubs would require the delivery of new connections over and/or under this depot to connect the regeneration of Old Oak into this important metropolitan open space.
Old Oak North (P2)	~~6,300~~6,500	~~5,100~~3,600	Cargiant, LBHF and Network Rail	Old Oak North is not required for HS2 construction and so early development can be supported and can make a significant contribution to OPDC's homes and jobs targets. The majority of the land in Old Oak North is in the ownership of Cargiant and the successful and timely delivery of this site and the relocation of the existing business will require close working with this key landowner. Other key sites include a triangle of land owned by the London Borough of Hammersmith and Fulham and the European Metal Recycling site. The area is currently poorly connected into its surroundings and will require significant transport improvements to address this, including new and improved public transport, streets and bridges. The Local Plan safeguards the Old Oak Sidings (Powerday) site as a waste facility to meet LBHF's waste apportionment (see policy EU6) and it is therefore not identified as contributing to OPDC's homes and jobs targets within this Local Plan.
Grand Union Canal (P3)	N/A	N/A	Canal and River Trust	The Grand Union Canal is managed by the Canal and River Trust (CRT). This Place does not have a homes and jobs target; however, the Local Plan does identify a series of new and enhanced bridge connections and utilities crossings over the Grand Union Canal. Delivery of these will require agreement with CRT and landowners on either side of the canal. The canal can also play an important role as a transport corridor, as well as assisting with the management of surface water drainage and as an important leisure, and social destination that could become a focal point across the area.

Commented [KT11]: Regulation 19(1) consultation amendment.
Reference: DI2/1
Reason: To clarify approach to delivery of depots

Commented [PF12]: Specific amendment.
Reason: Relocated from below to better reflect policy structure.

Commented [PF13]: Specific amendment.
Reason: Relocated to above to better reflect policy structure.

Park Royal West (P4)	1,200	~~4,100~~3,600	Segro, Fairview Homes, London and Quadrant (L&Q)	Park Royal West is 320 ha in size and is in a variety of mixed ownerships. 250 ha of this land is SIL, which the Local Plan continues to protect. The largest industrial landowner within Park Royal is Segro who have significant landholdings. They own the freehold for a number of industrial estates, including the recently constructed Origin Business Park. There are opportunities to intensify employment space within Park Royal West to deliver more jobs. OPDC has been proactively engaging with landowners and businesses to demonstrate how they could make best use of their assets. OPDC has also been engaged with the host local authorities and the Park Royal Business Group to identify infrastructure requirements in Park Royal West and these requirements are included in OPDC's IDP. Fairview Homes and L&Q jointly own the First Central site within the Brewery Cluster (see Policies P4 and P4C1), which is identified as contributing to OPDC's 0-5 year supply (see figure 3.16). There are also a number of smaller non-SIL sites located around the site that could accommodate mixed use residential-led development.
Old Park Royal (P5)	0	~~1,400~~1,600	Mixed ownership	Old Park Royal is 40 ha in size, all of which is SIL. The Local Plan continues to protect this. The area consists of mixed land ownership, which reflects the areas' fine grain of streets and buildings. Similar to Park Royal West, deliverability will largely be contingent on intensification of the industrial area. The Park Royal Intensification Study shows how sites within this placespace could be brought forward and contribute to OPDC's jobs target. OPDC has been actively engaged with the host local authorities and the Park Royal Business Group to identify infrastructure requirements in Old Park Royal.
Park Royal Centre (P6)	650	1,400	ASDA, NHS, mixed ownership, and existing residential	Park Royal Centre is a neighbourhood town centre and is predominantly in the ownership of ASDA and the NHS, who own Central Middlesex Hospital and OPDC is actively engaging with these landowners to consider the future aspirations and requirements for their respective landholdings. The delivery of new homes and jobs in the place is largely contingent on redevelopment at the ASDA site ~~(see Policy P6C1)~~. The site has development potential and has been shown within OPDC's 6-10 year housing supply (see figure 3.16) and can also better manage the relationship between SIL and non-SIL uses within this neighbourhood town centre. The key infrastructure requirements for the place are related to the realignment of the vehicular junction in the centre of the place.
North Acton and Acton Wells (P7)	6,000	~~4,300~~4,600	Segro, Mixed ownership	The place is in mixed landownership, but Segro are a major landowner holding the freehold for the Victoria Road Industrial Estate. North Acton has already experienced significant redevelopment in recent years with a number of sites in the area having already progressed significantly through the planning process. To the south, land can be brought forward in the next 0-10 years. To the north of the place in Acton Wells, development is likely to be longer term. The majority of this land is required for HS2's construction and is therefore unlikely to be brought forward until post 2026. There are also significant infrastructure requirements for these sites, including a new access to North Acton station, a new London Overground station at Old Oak Common Lane and the ~~potential~~ need for a spur line from the Elizabeth Line to connect to the West Coast Main Line. The Acton Wells sites are also identified for the delivery of a new secondary school, which

				will provide for the early and medium term on-site secondary school place requirements resulting from development in the area.
Old Oak Lane and Old Oak Common Lane (P8)	~~2,600~~2,800	~~1,100~~1,600	Segro, mixed ownership and existing residential	The area is predominantly in mixed ownership with a variety of different business sizes and residential areas along its length, including existing residential neighbourhoods such as Wells House Road and Midland Terrace. This Place will be impacted upon by the construction of HS2 with high levels of construction traffic passing through this place. The area's capacity to deliver new homes and jobs is limited largely to land in and around the Westway Estate and land around the Atlas Junction neighbourhood town centre, including the Oaklands site.
Channel Gate (P9)	0	7,600	Mixed (but being acquired by HS2 for HS2's construction)	Channel Gate is currently in mixed land ownership, but is being acquired through the High Speed Rail (London – West Midlands) Act 2017 for the construction of the HS2 route and station at Old Oak Common. The area is unlikely to be brought forward for development until the land is no longer required to support construction of the Old Oak Common station, which is currently programmed to open in 2026. OPDC's Place policy identifies that the majority of the area is safeguarded as Strategic Industrial Location (SIL) and this land use will be retained. There is the potential for an optimised and comprehensive approach to the longer term delivery of new SIL compliant employment development on this land. The place has the potential to contribute significantly to OPDC's jobs target and deliver high density, high quality innovative industrial uses. To support the optimised delivery of this site, new infrastructure will be required, particularly new roads links into the site and new bridge links over the Grand Union Canal.
Scrubs Lane (P10)	~~2,000~~2,600	~~1,100~~1,200	Cargiant, mixed ownership	Scrubs Lane is in mixed land ownership, although Cargiant own three sites. OPDC is in active discussions with several landowners along Scrubs Lane about the early delivery of development sites in this place. The area is relatively unencumbered by infrastructure and is not directly impacted by HS2's construction so is largely available for redevelopment in the first 0-5 years of the Plan period. The western side of the place has a direct relation to the Old Oak North place and will require a coordinated approach between landowners to ensure that development is delivered in a timely fashion, is optimised and that infrastructure requirements are appropriately planned for and delivered.
Willesden Junction (P11)	~~600~~0	~~200~~0	Network Rail	There are some smaller development opportunities on land around the station, whereby there may be opportunities for ~~early~~ development. Currently development is expected outside of the plan period. Upgrading Willesden Junction station in terms of capacity, interchange, and legibility will be a key requirement to the future success of this place and the wider area of Old Oak. Network Rail own the majority of land in Willesden Junction. OPDC will work closely with Network Rail to help support an optimised approach to development capacity and ensure the timely delivery of upgrades to Willesden Junction Station. Connecting this Place into both Harlesden and Old Oak North will be challenging but will be important to improve connectivity

				and reduce severance. This will also help to increase public transport accessibility levels on surrounding development sites. Larger scale development opportunities to the east of the station around the Willesden Train Maintenance Depot will be dependent on resolving how existing land is used for transport functions. Some sites may be particularly challenging to bring forward as they may involve decking over live railway tracks and/or transport depots and/or relocation.
Wormwood Scrubs (P12)	N/A	N/A	LBHF	Wormwood Scrubs is owned by LBHF and is protected as Metropolitan Open Land (MOL) and by its own act of parliament, the Wormwood Scrubs Act (1879). There are no plans to deliver homes or jobs in this place. New accesses and sensitive enhancements to the Scrubs will be required in order that the Scrubs can positively fulfil the function of a ~~district and~~ metropolitan park and can be accessed by future people living, working and visiting Old Oak and Park Royal. To facilitate this, OPDC will work closely with LBHF and with the Wormwood Scrubs Charitable Trust, who are responsible for the running and upkeep of the Scrubs and who have responsibility for approving any works to the Scrubs. It will also be important to engage fully with local residents, businesses and interested groups.

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POLICY DI3: STAKEHOLDER ENGAGEMENT AND BEING A PROACTIVE PLANNING AUTHORITY

OPDC will proactively engage with stakeholders and encourage active participation in the planning and delivery of development in the OPDC area by:

- **a) working with a variety of key stakeholders to support the timely and successful regeneration of the area;**
- **b) reviewing OPDC's Statement of Community Involvement every two years;**
- **c) supporting Neighbourhood Forums in the development of Neighbourhood Plans;**
- **d) supporting community build, ownership and management programmes; and**
- **e) requiring developers and/or management companies of major development proposals to undertake a post-occupancy survey.**

Commented [KT14]: Regulation 19(1) consultation amendment.
Reference: DI3/3
Reason: To cover potential for community right to build.

SUPPORTING TEXT

11.25 The timely delivery of development and infrastructure within Old Oak and Park Royal will require a coordinated and integrated approach. To facilitate this, OPDC is working collaboratively with a wide range of stakeholders, including landowners and developers, public sector bodies and service providers and communities (residents and business groups).

11.26 Figure 11.3 identifies the key landowners within the OPDC area, at the time of writing this plan but landownerships will likely change over time. Table 11.1 provides an overview of each of these land holdings, within each of the 12 Places as per chapter 4.

11.27 Across Old Oak approximately 70% of the developable land is currently within public sector ownership. This public sector land has the capacity to accommodate approximately ~~11,400~~10,304~~50~~ homes and ~~54,300~~45,900 jobs, of which ~~7,100~~4,500 homes and ~~53,200~~26,300~~1~~ jobs could be delivered within this Local Plan period (2018-38). This provides the public sector with significant opportunities to realise the optimal value from these assets and unlock significant opportunities for investment in homes, jobs, infrastructure and other economic benefits. To achieve this it will be important for the public sector to work collaboratively. The remaining developable land in Old Oak is in a mixture of different private ownerships of which Cargiant is the largest single landowner at 15%. As a local planning authority OPDC will need to play an key role in coordinating the delivery of this land to ensure it complements and supports the wider plans for the area.

11.28 Across Park Royal, land ownership is predominantly privately owned and is more piecemeal. The homes and jobs targets in Park Royal are much lower than in Old Oak but there is still a clear need to work with developers and landowners in the area to ensure that development is optimised and that a coordinated approach to development and infrastructure is taken.

11.29 To facilitate this and to support the coordinated delivery of development in Old Oak, OPDC has established a Developer Forum, which convenes to share information, and discuss cross-site infrastructure requirements. Within Park Royal, OPDC is supporting the role of the Park Royal Business Group.

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11.30 A wide range of public sector bodies and stakeholders will each play a key role in facilitating the delivery of this Local Plan. There are a number of policy areas within the Local Plan that require joint working with adjacent local planning authorities, other public sector bodies and public and private service providers. OPDC is working closely with these authorities and bodies, liaising on policy, development management and infrastructure delivery matters.

11.31 In respect of planning policy, in accordance with the Duty to Cooperate, OPDC meets on a bi-weekly basis with the host local authorities of Brent, Ealing, ~~and~~ Hammersmith and Fulham and with the Royal Borough of Kensington and Chelsea, TfL and the GLA. OPDC also meets regularly with other local authorities as part of wider sub-regional groups such as the Association of London Borough Planning Officers (ALBPO) and the London Waste Planning Forum (LWPF). In accordance with the Duty to Cooperate, OPDC also meets regularly with other key public sector stakeholders in the preparation of planning policy, including groups like the Environment Agency, Historic England and Natural England. Further details on OPDC's activities in relation to the Duty to Cooperate can be found in OPDC's Duty to Cooperate Statement, a copy of which can be found online.

11.32 OPDC works closely with a number of bodies in the consideration of planning applications. The host local authorities are actively involved in pre-application discussions with developers. OPDC also involves other public bodies, where appropriate, in the pre-application process, including groups such as the GLA, TfL, Environment Agency, Historic England, Natural England and key service providers. Once applications have been submitted, public bodies are appropriately consulted and comments received are considered by officers in the determination of planning applications.

11.33 In respect of infrastructure, OPDC has been working in close collaboration with a variety of public sector bodies and service providers across both the public and private sectors to identify the infrastructure required to support the needs of development, when and where, identify its preferred delivery model and identify funding and financing options as follows:

a) Transport: OPDC has been working jointly with a number of bodies to consider how transport improvements can be made to meet the needs of new development, support transit orientated development and deliver a highly connected new part of London. This includes groups such as the GLA, TfL, local authorities, DfT, HS2 and MH~~D~~CLG;

b) Social infrastructure: Education ~~and~~ health and emergency service providers have been closely involved in the production of the ~~Education and Health~~Social Infrastructure Needs Study, which is informing the education, ~~and~~ health and emergency service facility requirements set out in this Local Plan and/or in the IDP. In respect of health, OPDC has been working with the local Clinical Commissioning Groups (CCGs), local authority public health departments and NHS England to derive the appropriate healthcare provision for the area and OPDC will continue to work with these groups to secure the appropriate delivery of healthcare infrastructure. In respect of education, OPDC has worked closely with the Local Education Authorities (LEAs) and the Education and Skills Funding Agency to identify education facility requirements. OPDC is also working with the local authorities and other social infrastructure service providers ~~(e.g the Metropolitan Police and London Fire Brigade)~~ to identify the other social infrastructure requirements associated with development in the area and these requirements are set out in this Local Plan and in the IDP;

Commented [KT15]: Regulation 19(1) consultation amendment.
Reference: DI3/17
Reason: To provide reference to the Education and Skills Funding Agency as a funding provider.

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c) Utilities infrastructure: Requirements will be significant to support the needs of the new development in the area. In support of the Local Plan, OPDC has developed a Utilities Study and as part of this, has engaged with a wide variety of utilities stakeholders to ascertain the likely infrastructure requirements to support the development of the area. This includes, for example, organisations such as National Grid and UK Power Networks (UKPN) for gas and electricity supply and Thames Water and the Environment Agency in respect of water infrastructure; and

d) Green infrastructure: OPDC's approach to green infrastructure is informed by OPDC's Environmental Standards Study, but also has close synergies with OPDC's Integrated Water Management Strategy, Public Realm, Walking and Cycling Strategy and Sites of Importance for Nature Conservation Area Statement. In developing these studies, OPDC has been actively engaged with the local authorities and other key bodies such as Natural England, Environment Agency, Thames Water, Historic England and the GLA.

11.34 Community participation will be a defining factor in the delivery of successful regeneration in the OPDC area. Policy SP2 notes the importance of engaging with local communities, both residents and businesses, in informing policy and development proposals for the area. Local residents, workers and businesses are often experts for the area in which they live and/or work. As occupants of recent developments, they are well placed to advise planning authorities of their successes and failures to inform future learning.

11.35 OPDC's Statement of Community Involvement (SCI) sets out how OPDC plans to be exemplar in terms of community engagement. It recognises the importance of community involvement and sets out how OPDC will engage with communities in the preparation of local planning policy documents. It also sets out how developers should ~~to~~ proactively engage with the local community, both pre and post the submission of planning applications and demonstrate how proposals have responded to comments received. To be successful and responsive to changing needs, the SCI should not be seen as a static document and OPDC is committed to undertaking a review of its SCI every two years.

11.36 The Localism Act (2011) introduced neighbourhood planning, giving local communities the powers to establish neighbourhood forums and to develop neighbourhood plans for their local area. Neighbourhood planning is a valuable tool, giving local communities a powerful say on how they wish to see their area regenerated. To support the delivery of this Local Plan, OPDC is committed to working closely with and providing support to emerging and established Neighbourhood Forums in the development of their neighbourhood plans. Further details on this can be found in OPDC's SCI.

11.37 In recent years there has been a growth in interest from community groups to deliver and operate facilities and buildings. Examples include ~~community led housing project such as the~~ Community Land Trust<u>s, set up to develop and manage homes, Community Right to Build introduced through the Localism Act and allowing communities to build local facilities they need and Community Asset Transfer, where a community facility's management is transferred to local community groups. An example of a</u> ~~and~~ community run social infrastructure facility<u></u>~~ies, such as~~<u>is</u> the Tottenham Hale Community Space "The Engine Room"2, which is operated by the Diocese of London. OPDC will work with service providers, local authorities, developers, community groups and other relevant stakeholders to promote th<u>ese</u>~~is~~ model<u>s</u> of delivery and management in the OPDC area ~~and~~<u>,</u> will provide support to interested community groups <u>and will secure appropriate funding arrangements to support community ownership initiatives</u>.

Commented [KT16]: Regulation 19(1) consultation amendment.
Reference: DI3/3
Reason: To cover potential for community right to build.

Commented [KT17]: Regulation 19(1) consultation amendment.
Reference: DI3/24
Reason: To clarify that OPDC will secure appropriate funding opportunities with developers, service providers and community groups for community ownership initiatives.

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~~11.38~~ Continual learning and dissemination of acquired knowledge holds the key to delivering high standards of development. To support this, OPDC will require developers or management companies of major developments to undertake a post-occupancy survey.

~~11.39~~ 11.38 The survey should look at the performance of buildings and the public realm to help to:

a) highlight any immediate teething problems that can be addressed and solved;
b) identify any gaps in communication and understanding that impact on building operation;
c) support the delivery of lifetime neighbourhoods and the creation of a resilient city, responsive to change;
d) provide lessons that can be used to improve design and procurement on future projects; and
e) act as a benchmarking aid to compare across projects and over time.

~~11.40~~ 11.39 OPDC has produced a template for the post occupancy survey, which can be found on OPDC's website. OPDC will also be developing a Supplementary Planning Document to provide further guidance.

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POLICY DI4: PLANNING POWERS AND MONITORING

To support the timely, coordinated and comprehensive regeneration of the area, OPDC will:

- **a) utilise development management functions, including pre-application discussions and involving partner organisations where appropriate;**
- **b) where ~~necessary and appropriate, and~~ there is a compelling case in the public interest, use compulsory purchase powers to facilitate land assembly and the acquisition of all necessary rights to carry out development;**
- **c) prepare supplementary planning documents (SPDs), ~~-~~development briefs and best practice guidance where necessary; and**
- **d) to measure the success of the Local Plan, produce an Authority Monitoring Report, monitoring against OPDC's Key Performance Indicators (KPIs).**

SUPPORTING TEXT

~~11.41~~ 11.40 To support the successful regeneration over the lifetime of the Local Plan, OPDC will use its development management functions to support development in a timely fashion, in accordance with the policies of this Local Plan and in accordance with national and regional policy. These functions include:

a) pre-application advice;
b) review of proposals by OPDC's Place Review Group;
c) application validation and determination of planning applications; and
d) use of enforcement powers.

~~11.42~~ 11.41 OPDC offers a pre-application advice service geared towards proactive and positive engagement with applicants. This will involve an applicant being provided with informal advice at an early stage in the planning process from a planning officer employed by OPDC. The benefits to an applicant seeking pre-application advice include:

a) the opportunity to explore and understand the implications of relevant planning policies for their proposal;
b) early identification of potential issues and/or constraints affecting a particular site;
c) the ability to improve on and achieve high quality design;
d) early discussions about matters such as affordable housing and Section 106 Agreements;
e) saving time and money and the likelihood of a quicker decision once the application is submitted; and
f) a greater chance of achieving and negotiating a positive outcome once a planning application is submitted.

~~11.43~~ 11.42 ~~For major applications, as part of the pre-application process, OPDC will expect applicants to positively engage with the local community.~~ OPDC's Statement of Community Involvement (SCI) sets out guidance for how applicants should engage proactively with local communities prior to the submission of planning applications (see Policy DI3).

Commented [TC18]: Specific amendment.
Reason: To clarify CPO powers

Commented [KT19]: Regulation 19(1) consultation amendment.
Reference: DI4/6
Reason: To avoid duplication with OPDC's SCI

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~~11.44~~ 11.43 OPDC is committed to embedding place making within the plan making and development management process, and to achieving the highest standards of design in new development. As part of this, an independent and impartial Design Review Panel called the OPDC PLACE Review Group ('OPRG') has been established to advise OPDC on planning policy and development proposals.

~~11.45~~ 11.44 'PLACE' stands for planning, landscape architecture, conservation and engineering. Panel members are professionals with experience in architecture, landscape architecture, urban design, environmental sustainability, inclusive design, development economics and delivery. OPRG reviews proposals at pre-application stage and post-submission before they are reported to OPDC's Planning Committee. Further information about the PLACE Review Group's purpose and function can be found on OPDC's website.

11.45 OPDC are also in the process of establishing a Community Review Group, which would sit in parallel to OPRG. It will be formed of residents and employees and similarly to OPRG, would consider proposals at pre-application stage and post-submission before they are reported to OPDC's Planning Committee.

Commented [TC20]: Regulation 19(1) consultation amendment.
Reference: DI4/3
Reason: To reflect establishment of OPDC's Community Review Group

11.46 OPDC has developed a Validation List, which is a list of information that must be submitted with a planning application for it to be deemed valid. This list is published on the OPDC website.

11.47 Once a planning application has been submitted and validated by OPDC, the planning application is considered against relevant planning policy contained in the development plan taking account of any material considerations. This Local Plan, the Mayor's London Plan, the West London Waste Plan (WLWP) and any neighbourhood plans form the development plan. Material considerations will include the NPPF and Supplementary Planning Documents.

11.48 Where necessary, OPDC will also use its planning enforcement powers to ensure that unacceptable development built without planning permission or other consents does not compromise OPDC's abilities to realise the spatial vision and the policies set out in this Local Plan.

11.49 Compulsory purchase is the power that enables public bodies to acquire land, or rights over land, compulsorily and affected landowners and persons with an interest in land will be entitled to make a claim for compensation. Land ownership boundaries can restrict delivery of the comprehensive development required to deliver the spatial vision and policies of the Local Plan. Compulsory purchase is an important tool to assemble land (and rights over land) needed to help deliver social, environmental and economic change.

It may be in the interests of the proper planning and delivery of the Local Plan for Old Oak and Park Royal for OPDC~~the Mayor~~ to acquire land using compulsory purchase powers to deliver its aims and objectives as a regeneration body, where~~,~~ ~~if this would facilitate the achievement of the spatial vision and policies of the Local Plan and~~ there is a compelling case in the public interest to use such powers. Such circumstances would include:

- supporting a comprehensive and coordinated, rather than piecemeal, approach to the development of land;
- unlocking land to facilitate development in a timely fashion; and

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- supporting the delivery of infrastructure identified in OPDC's Infrastructure Delivery Plan (IDP), and the creation of development opportunities arising from the provision of that infrastructure.

Commented [TC21]: Specific amendment.
Reason: to clarify CPO powers

11.50 In exercising its CPO powers, the Mayor must have regard to the DCLG guidance 'Compulsory Purchase and the Crichel Down Rules October 2015'.

11.51 Along with the Mayor's London Plan, OPDC's Local Plan is the main Development Plan Document (DPD) for the area. This Local Plan has been written some three~~two~~ years into the life of what may be a 30 year regeneration programme. A significant evidence base has been prepared to support the policy positions set out in this Local Plan. The Local Plan establishes a set of strategic policies to guide the development and regeneration of the area. It is important that policies put in place now do not unduly restrict positive feasible outcomes. As an increasingly detailed understanding of this complex brownfield site emerges updated planning policy and guidance will be needed.

11.52 OPDC is able to develop other planning guidance documents that will play an important role in providing clarity to stakeholders and helping to bring forward development in a timely and coordinated manner. Known as Supplementary Planning Documents (SPDs), these would be prepared to provide further guidance to the Local Plan and help deliver its planning policy objectives. Updated information on OPDC's proposed scope and timetable for production of SPDs is provided within OPDC's Local Development Scheme.

Commented [TC22]: Specific amendment.
Reason: to clarify where updated information can be viewed.

11.53 In order to measure the success of the policies within this Local Plan and help to identify any potential need for a review of all or part of the Local Plan, OPDC will produce an Authority Monitoring Report on an annual basis to measure and assess the effectiveness of Local Plan policies and identify if alterations are necessary. The Key Performance Indicators (KPIs), which can be found on OPDC's website, will be used as the basis for this assessment.

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1 GLOSSARY

Accessibility	Refers to the extent to which employment, goods and services are made available to people, either through close proximity, or through providing the required physical links to enable people to be transported to locations where they are available. It also refers to the extent of barriers to movement for users who may experience problems getting from one place to another, including disabled people.
Accessible Design	Design which creates an environment where employment, goods and services are made available to people, either through close proximity, or through providing the required physical links to enable people to be transported to locations where they are available.
A-class uses	Uses of buildings/land are categorised for planning purposes, these categories are known as use classes. A range of uses may fall within each use class. The 'A' use class includes the following uses: Shops (A1 use) Financial and Professional (A2) Food a3nd Drink (A3) Drinking Establishments (A4) Hot Food Takeaways (A5) Collectively, this document refers to these as 'A class uses'.
Active Electric Charging Units	These are parking spaces designed to accommodate electric vehicles. Active electric charging units are fully wired and connected, ready to use, points at parking spaces.
Active frontages	Making frontages 'active' adds interest, life and vitality to the public realm. This means: frequent doors and windows, with few blank walls; narrow frontage buildings, giving vertical rhythm to the street scene; articulation of facades, with projections such as bays and porches incorporated, providing a welcoming feeling; and, on occasion, lively internal uses visible from the outside, or spilling onto the street.
Affordable Home Ownership	Affordable housing products where a dwelling (or part share of a dwelling) is made available for purchase at sub-market rates.
Affordable housing	This includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Agent of Change	Principle that whoever causes a change in the environment (agent of change) is responsible for managing the impacts of this change. Therefore, following this principle, incoming/new development should mitigate against potential issues arising from existing uses/development (i.e. new residential uses should address the noise impacts from existing entertainment/music venues)
Air Quality Management Areas (AQMA)	Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.
Amenity	The desirable or useful features of a building or place which support its ongoing use and enjoyment by building occupants, residents, visitors, workers etc. It is usually understood to mean visual and aural amenity. Factors relevant to amenity include the general characteristics of the locality (including the presence of any feature of historic, architectural, cultural or similar interest), daylight, sunlight, outlook, privacy, air quality, effects of wind, odour, noise and vibration. Amenity should be preserved, so potential impacts need to be assessed and managed.
Approved Provider (Housing)	A body, either not-for-profit or for-profit, included on the Homes and Communities Agency's statutory register of social housing providers and local authority housing providers.
Approved Workspace or Studio Provider	A workspace or studio provider which has been approved either through a process to evaluate and select providers to develop an approved workspace or studio provider list or by determining their suitability on a case by case basis, against set criteria.
Assets of Community Value (ACV)	Land determined to be of community value because it furthers the social wellbeing or social interests of the local community (which include cultural, sporting or recreational interests). Local groups can nominate land/buildings for listing, and can bid to buy listed assets when they are to be sold.
Attenuation	The process of water retention on site and slowly releasing it in a controlled discharge to a surface water or combined drain or watercourse.
Autonomous/automated vehicles	Autonomous/automated vehicles are capable of navigating between destinations as a means of transport, with minimal or no (self-driving) human input.
B Use Class Employment Floorspace or Premises	Space dedicated to B-use class employment uses.
B Use Class Employment Uses	Those uses described in Part B of the Town and Country Planning (Use Classes) Order 1987 (as amended). Typically, Strategic Industrial Locations accommodate B1, B2 and B8 use classes.
Basins (Canal)	An expanse of waterway alongside, or at the end of a canal, which allows for boats to moor or unload cargo without impeding the progress of other traffic. Basins should also allow room for a canal to turn.
Biodiversity	This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society

Biodiversity Action Plan	A plan outlining a set of future actions that will lead to the conservation or enhancement of biodiversity.
Blue Badge Holders	The Blue Badge scheme helps you park closer to your destination if you are disabled. Blue Badge parking permits let disabled drivers and passengers park nearer to where they're going.
Broad Industrial Type Activities	Uses which fall within the following descriptions: • general industrial, • light industrial, • storage and logistics/distribution, • other industrial type functions, services and activities including secondary materials and waste management; utilities infrastructure; land for transport related functions and wholesale markets. • Flexible B1c/B2/B8 premises suitable for occupation by SMEs Small-scale 'walk to' services for industrial occupiers such as workplace creches or cafes.
Building Information Modelling (BIM)	Building Information Modelling (BIM) models and manages information as well as graphics for sharing information through construction and the whole building lifecycle, eliminating the need to re-enter data, and avoiding data loss, miscommunication, and translation errors.
Built to Rent	A development, or block/ phase within a development, under unified ownership and management which are held under a Built to Rent covenant for at least 15 years.
Business	A commercial operation or company.
Car club	A car club provides its members with quick and easy access to a car for hire. Members can make use of car club vehicles as and when they need them.
Catalyst uses	Uses which can stimulate significant and positive change.
Character	Character is created by the interplay of different elements, including the physical or built elements that make up the place, the cultural, social and economic factors which have combined to create identity, and the people associated with it through memories, association and activity.
Circular Economy	Circular economy is an alternative to a traditional linear economy (make, use, dispose) in which resources are kept in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and recycling products and materials at the end of each service life.
Clean Air Zones (CAZ)	The CAZ concept, developed by DEFRA to help the UK achieve compliance with EU NO2 limits, is an area-based initiative to encourage the cleanest vehicles through levels of access control and the application of vehicle emissions standards, with the local authority working in collaboration with others to achieve the necessary outcomes.
Co-Living	A form of community housing where residents share spaces and facilities.

Commented [LL1]: Specific amendment.
Reason: To reflect definition in draft London Plan

Combined Heat and Power/Combined Cooling Heat and Power (CHP/CCHP)	The combined production of electricity and usable heat. Steam or hot water, which would otherwise be rejected when electricity alone is produced, is used for space or process heating.
Commercial Schemes or Development	Proposals to create floorspace/ premises which are to be used wholly or mainly for business and by businesses.
Communal Open Space	Open spaces forming part an estate or block intended for use by residents of the respective estate or block. They are distinguished from publicly accessible open spaces or other public land open to members of the public by clearly defined boundaries.
Community facilities	Facilities such as libraries, places of worship, halls for hire, youth space and training and meeting space. This list is not exhaustive and other uses can be included.
Community Infrastructure Levy (CIL)	Standard charge determined by the Local Planning Authority and levied on new development (an amount per square metre). The monies raised will be used to pay for infrastructure.
Comparison retail	Floorspace dedicated to providing a range of comparison goods, including clothing, shoes, furniture, household appliances, tools, medical goods, games and toys, books and stationery, jewellery and other personal effects.
Competitive Marketing Strategy	A Competitive Marketing Strategy should demonstrate the approach and methodology for marketing land or property where required in policy or associated justification text. This should set out the approach that a developer has taken to marketing land or property which maximises the chance that it will be used for its consented purpose which include an appropriate marketing period (minimum of 12 months) and that the land or property was offered at a market rate with appropriate fit out, rent free period and lease terms for the use proposed.
Connectivity	Refers to the number of connections and their integration, layout and relationship to one another and the impact this has on getting from A to B, by foot, bicycle and vehicle.
Conservation Area	This is an area of special architectural or historic interest (the character of which it is desirable to preserve or enhance) designated by a Local Planning Authority under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990. A Conservation Area is a type of designated heritage asset.
Consolidation centres	Locations where larger vehicles unload materials and goods which are transported to their final destination by smaller vehicles.
Construction Logistics Plan	Plans which aim to improve the sustainability of construction freight movements by establishing site management and procurement processes to reduce the impact of construction traffic on the road network.
Contaminated land	Previous industrial processes disposed of waste by tipping it on the land; raw materials and fuel were often spilt 'contaminating' the land at the sites. Pollution to rivers, groundwater, lakes etc can occur by the leaching of contaminants out of the soil into water courses through the natural drainage of the soil, or through surface runoff of water eroding and transporting contaminant materials into water courses. This in turn can have negative impacts on aquatic plant and animal life,

	and affect the quality of human drinking water. Typically, such sites are 'cleaned up' during the planning process.
Context	The way in which places, sites and spaces inter relate with one another whether physically, functionally or visually, or the way in which they are experienced sequentially and understood.
Convenience retail	Floorspace dedicated to providing a range of convenience goods such as food and non-alcoholic beverages, tobacco, alcoholic beverages, newspapers and periodicals and non-durable household goods.
Creative Industries	Industries that are based on individual creativity, skill and talent with the potential to create wealth and jobs through developing intellectual property.
Data Infrastructure	Digital infrastructure which may include technology, processes or organisations which manage and assess data.
Decentralised Energy	Networks supplying heat, cooling and electricity from a central/local source directly to homes and businesses.
Defence Infrastructure Organisation	An operating arm of the Ministry of Defence, which supports and manages the built infrastructure of the Armed Forces.
Delivery and Servicing Plans	Plans which aim to improve the sustainability of freight and servicing by working with suppliers, clients and the freight industry to reduce the number of deliveries required, while ensuring remaining deliveries are made as safe and as environmentally friendly as possible.
Density ~~(Density Matrix, plot ratio)~~	Indicative housing density range has been provided to enable OPDC to define development capacity in accordance with national guidance. Within the OPDC area the indicative density range is 300 (low density) to 600 (high density) units per hectare. ~~Provided to interpret the London Plan sustainable residential quality density matrix for the Old Oak and Park Royal local context. The density ranges are:~~ ~~Highest - Old Oak Common Station and surrounds: in the region of 600 units per hectare;~~ ~~High - Stations and key destinations: in the region of 550 units per hectare;~~ ~~Medium - Residential led areas: in the region of 405 units per hectare; and~~ ~~Lower - Sensitive edges: in the region of 300 units per hectare.~~ Commercial densities are measured using the Homes and Communities Agency Employment Densities Guide (2010).
Designated Heritage Asset	A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.
Development	Development, as defined under the 1990 Town and Country Planning Act, is "the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land". Most forms of development require planning permission.

Commented [LL2]: Specific amendment.
Reason: To reflect updated information within the Development Capacity Study.

Development Plan Document (DPD)	Planning policy documents which make up the Local Plan. They guide development within a local planning authority area by setting out the detailed planning policies, which are used in determining planning applications.
District centre	Provide convenience goods and services for local communities and are accessible by public transport, walking and cycling. Typically they contain 10,000–50,000 sqm of retail, leisure and service floorspace.
Duty to Cooperate	The duty to cooperate is a legal requirement set out in the Localism Act 2011. It requires local planning authorities and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
Edge of centre	For retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange.
Elizabeth Line	The Elizabeth Line is the new high frequency, high capacity service linking stations in Reading, London and the South East. This includes new connections and stations between Reading and Heathrow in the West to Shenfield and Abbey Wood in the east. Prior to being to being named the Elizabeth Line, the route called “Crossrail”. The term Crossrail now refers to the construction project and activity related to the delivery of the Elizabeth Line.
Employment	The state of having paid work or a job. Employment capacity is how many jobs are being provided and Employment density is a measure of how many jobs per square metre of space being created.
Employment Uses	Uses which directly generate B use class employment through business activities.
Energy efficiency	Making the best or most efficient use of energy in order to achieve a given output of goods or services, for example in heating, lighting or providing other power output for use within buildings.
Energy from Waste (EfW)	The process of creating energy, in the form of electricity and/or heat, from incinerating waste.
Energy hierarchy	The Mayor’s approach to reducing carbon dioxide emissions in the built environment. The first step is to reduce energy demand, the second step is to supply energy efficiently and the third step is use renewable energy.
Energy Systems Catapult	A leading technology and innovation centre set up to help the UK navigate the transformation of our whole energy system and capture the new commercial opportunities created, covering electricity, heat and combustible gases.
Equitable Equalisation Mechanism	An arrangement to ensure that each developer contributes appropriately and proportionately to infrastructure provision. The arrangement would consider funding, provision of land or the direct delivery of infrastructure as a contribution and would look to attach a value to each of these, in order that contributions between different developers can be compared and fairly distributed.
Family Housing	Housing which has 3 or more bedrooms.

Future Growth Sectors	A particular form or branch of economic or commercial activity (referred to as a 'sector') where there is scope for continued growth in the future.
Genuinely Affordable	Housing that are affordable to the types of households that they are aimed at and are below market prices.
Greater London Authority (GLA)	The GLA is the strategic citywide government for London. It is made up of a directly elected Mayor (the Mayor of London) and a separately elected Assembly (the London Assembly).
Green Belt	Policy designation that helps to contain development, protect the countryside and promote brownfield development.
Green Grid	A network of green spaces and features such as street trees and green roofs that is planned, designed and managed to provide benefits to people and the environment.
Green Infrastructure	The multifunctional, interdependent network of open and green spaces and green features (e.g. green roofs). It includes the blue infrastructure and the Blue Ribbon Network but excludes the hard-surfaced public realm. This network lies within the urban environment and the urban fringe, connecting to the surrounding countryside. It provides multiple benefits for people and wildlife including: flood management; urban cooling; improving physical and mental health; green transport links (walking and cycling routes); ecological connectivity; and food growing. Green and open spaces of all sizes can be part of green infrastructure provided they contribute to the functioning of the network as a whole.
Green Points System	A checklist of green and blue infrastructure options for developers to use to achieve a minimum level of green/blue space. See also: Green Space Factor
Green Roofs (Intensive and Extensive)	A green roof is a roof or deck onto which vegetation is intentionally grown or habitats for wildlife are established. An extensive green roof is a roof with shallow substrate depths with limited vegetation, formed typically of grasses. An intensive green roof has an substantial substrate depth, allowing for a greater variety of and intensity of vegetation to be planted.
Green Space Factor	A planning policy tool that has been adopted by a number of city authorities to increase greening of the built environment, by establishing minimum requirements for new development projects. See also: Green Points System
Green Streets	Streets that, through a variety of design and operational treatments, give priority to pedestrian circulation and green infrastructure and which may be considered as public accessible open space. Green Streets should not be accessible to vehicles, aside from limited access for servicing and deliveries where appropriate.
Greenfield Runoff Levels	The rate of rainwater runoff which takes place before a site is developed.

Greywater	Wastewater generated from use in hand basins, baths and showers. Grey water generally excludes water used in toilets, the kitchen or for cleaning use, which has a greater concentration of contaminants.
Gross Value Added (GVA)	A measure in economics of the value of goods and services produced in an area, industry or sector of an economy.
Habitable Rooms	Any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bath or toilet facilities, service rooms, corridors, laundries, hallways, utility rooms or similar spaces are excluded from this definition.
Healthy Streets	The Healthy Streets Approach is the system of policies and strategies to help Londoners use cars less and walk, cycle and use public transport more.
Heavy Goods Vehicle (HGV)	Trucks/ Lorries with a maximum gross vehicle weight of more than 3.5 tonnes.
Heritage asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets fall into two categories: designated (such as Conservation Areas and Statutory Listed Buildings); and non-designated (such as Locally Listed Buildings, Areas of Local Character and Buildings of Local Heritage Interest)
High Speed 2 (HS2)	High Speed 2 is a planned rail line dedicated for high speed trains that will connect London to Birmingham from 2026 and then, along a Y shaped route, to Crewe and Manchester in the West and the East Midlands, South Yorkshire and Leeds in the East from 2033.
Holistic Offer	An Holistic Offer is where a major development scheme or catalyst project complements wider regeneration efforts and development proposals. An holistic offer should: support the delivery of the spatial vision and strategic policies; complement other existing or planned catalysts and surrounding uses; not inhibit development on surrounding sites; and support place making and identity.
Hot Food Takeaways	Premises where the primary purpose is the sale of hot food for consumption off the premises.
Houses in Multiple Occupation (HMO)	Small HMOs are shared dwelling houses occupied by between three and six unrelated individuals as their only or main residence, who share basic amenities such as a kitchen or bathroom. Where it is more than 6 people, this is classified as a large HMO.
Housing tenure	Housing Tenure broadly falls into two categories: 1) Owner-occupied; and 2) Rented. Owner-occupied includes accommodation that is owned outright or with a mortgage. Shared ownership can also be included under this category. Rented Accommodation can be: 1) privately rented – all non-owner occupied property other than that rented from a local authority or housing association.

	2) Social rented from private registered providers or Local Authorities (these include social rent, affordable rent (up to 80% of the market) and intermediate rent).
Housing type	Types of housing can include: 1) House (detached, semi-detached, terraced); 2) Bungalow; and 3) Maisonettes (duplex flats) and flats (purpose build or converted).
Housing Zone	Housing Zones are a partnership between the Mayor, the GLA and London Boroughs to accelerate new housing delivery in tightly defined locations. Stakeholder resources are aligned to speed up the delivery of new housing. There are currently 20 Housing Zones across London.
Inclusive design	Inclusive design creates an environment where everyone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers that create undue effort, separation or special treatment, and enables everyone to participate equally in mainstream activities independently, with choice and dignity.
Industrial Business Park (IBP)	Strategic Industrial Locations (SIL) that are particularly suitable for activities that need better quality surroundings including research and development, light industrial and high value general industrial, some waste management, utility and transport functions, wholesale markets and small scale distribution. They can be accommodated next to environmentally sensitive uses.
Industrial Floorspace	Space dedicated to uses which can be categorised as broad industrial type uses.
Industrial Land or Areas	Land in Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites.
Industrial Uses	Broad industrial type uses which are suited to industrial areas. These can include: general industrial; light industrial; research and development; storage and distribution; waste management and recycling; some transport related functions; utilities; wholesale markets; and other industrial related activities (i.e. some creative industries).
Infrastructure	Services that are necessary for the day-to-day functions of the community and economy such as roads, railways, and social and community facilities. Infrastructure includes open spaces, utility services, transport, schools, health and leisure services, and energy.
Interchange	The ability, and place, for people to efficiently transfer between transport modes. This can include transferring between different modes of transport such as rail/tube, bus, cycle, taxi etc.
Internet of Things	A network of devices (things) which can communicate with one another, and collect and exchange data. This could help to make it easier to control and automate tasks. For example, a fridge automatically generating a shopping list and sending a supermarket order (i.e via mobile phone) for approval.
Interoperability	The ability of the component parts of a system to operate successfully together. For example, the ability for systems to communicate and share information and data openly. This is important for the emerging Smart Cities and Internet of Things sectors.

Key Views	Views seen from places that are publicly accessible and well used. They include significant buildings or urban landscapes that help to define the wider regional area.
Legibility	The degree to which a person understands and recognises characteristics about an area which help them to navigate around an area.
Legible London	Legible London is an easy-to-use pedestrian signage system that presents information in a range of ways, including maps and directional information, to help people find their way and encourage walking journeys.
Legible Street Network	A street network that includes easy-to-use signage systems that presents information in a range of ways, including maps and directional information, to help people find their way. A legible network is one which makes navigation and movement easy and seamless, helping improve people's understanding, enjoyment and experience.
Life Chances	An approach that promotes bringing residents together rather than dividing them, enabling people to realise their potential and aspirations and make a full contribution to the economic success of their city. It aims to achieve equal life chances for all.
Lifetime neighbourhoods	A lifetime neighbourhood is designed to be welcoming, accessible and inviting for everyone, regardless of age, health or disability, is sustainable in terms of climate change, transport services, housing, public services, civic space and amenities making it possible for people to enjoy a fulfilling life and take part in the economic, civic and social life of the community.
Light Goods Vehicle (LGV)	Vans/ pick-ups with a maximum gross vehicle weight of up to 3.5 tonnes.
Local Character Areas	Small local areas, as identified in the OPDC Heritage Strategy and OPDC Character Areas Study, which have been defined based on predominant land use, building type or historical associations.
Local Economy	The economy the OPDC Area and surrounding communities.
Local Heritage Listing	Local Heritage Listings are non-designated heritage assets. Within the OPDC area they comprise the Local List and Buildings of Local Heritage Interest.
Local Parks	Open Spaces greater than 2 hectares providing for court games, children's play, sitting out areas and/or nature conservation areas. Such spaces may accommodate both hard landscaped civic places and/or green landscaped places.
Local Plan	The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
Local Views	Linear Views are narrow views to a defined object from an urban space of a building or group of buildings within a local setting.

Commented [LL3]: Specific amendment.
Reason: To reflect updated heritage information in the proposed Local Heritage Listings documentation.

London Affordable Rent	Low-cost rented homes intended for low-income households, typically nominated by London Boroughs, who are unable to secure or sustain housing on the open market.
London Living Rent	An intermediate Rent to Buy product with locally specified, sub-market rents on time-limited tenancies.
London Living Wage	The London Living Wage is an hourly rate of pay, as estimated by the Greater London Authority, to give a worker in London and their family enough to afford the essentials and to save. However, unlike compulsory wages, businesses choose to pay their employees the London Living Wage.
London Plan	The Spatial Development Strategy for London prepared by the Mayor of London, which the Local Plan must be in general conformity with.
Londoners	People who work and/or live in London.
Low Carbon	Causing or resulting in only a relatively small net release of carbon dioxide into the atmosphere.
Low Cost Workspaces	Spaces charged at subsidised rents for the occupiers or to the workspace provider (who must pass onto occupier). The provision of low-cost workspace should normally go beyond “shell and core” and include adequate power to all parts of the premises; basic lighting, floor and wall finishes together with WCs provided within the unit or communal WCs. Heating should also be provided where appropriate for the user. These works will avoid substantial fit out costs for potential occupiers and enable the workspace to be more affordable for smaller businesses.
Low Emission Neighbourhood (LEN)	A Mayoral, area-based scheme that includes a package of measures focused on reducing emissions (and promoting sustainable living more generally). A LEN is delivered by a borough with support from Transport for London (TfL), the Greater London Authority (GLA) and the local community. The LEN concept was introduced in TfL’s Transport Emissions Roadmap (TERM).
Low Emission Zone (LEZ)	The Low Emission Zone (LEZ) operates to encourage the most polluting heavy diesel vehicles driving in London to become cleaner. The LEZ covers most of Greater London and is in operation 24 hours a day, every day of the year.
Low Temperature District Heating Systems	Strategically planned heat networks that can draw on various low carbon heat sources, designed for low temperature operation to support the efficient use of heat pump technology as the electricity grid decarbonises.
Major development	Development involving any of the following: 1) Mineral working and deposits; 2) Waste development; 3) The provision of dwellings where: 10 or more dwellings are being provided; or if number not given, development on a site of over 0.5ha; 4) the creation of more than 1,000sqm of floorspace; or 5) development on a site of 1 or more hectares.
Major Town Centre	Typically serve a borough wide catchment, and contain over 50,000 sqm of retail, leisure and service floorspace with a relatively high proportion of comparison goods. They may also have significant employment, leisure, service and civic functions.

Major Town Centre	As per Annex B of the London Plan, Major Town Centres are typically found in inner and some parts of outer London with a borough wide catchment. They generally contain over 50,000 sq.m of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions.
Masterplan	Depiction of how an area could be developed.
Mayoral Development Corporation	An organisation created by the Mayor of London under the Localism Act 2011.
Meanwhile Uses	A catch all title adopted in recent years to describe a diverse range of temporary uses on land and property awaiting longer term development. Meanwhile uses could include shops, cafes, bars, business space and culture, sports and leisure space. They can also include hoardings or open space or food growing space.
Medium Businesses	Businesses employing less than 50 people.
Metropolitan Open Land	Strategic open land within the urban area that contributes to the structure of London with the same planning status as Green Belt.
Metropolitan Town Centre	Serve wide catchment areas which can extend over several Boroughs. Typically they contain at least 100,000 sqm of retail, leisure and service floorspace, and a significant proportion of comparison retail. These centres generally have a very good accessibility and significant employment, leisure, service and civic functions.
Mixed use development	A well integrated mix of different land uses which may include retail, employment, leisure and other service uses) with decent homes of different types and tenures to support a range of household sizes, ages and incomes.
Modal/Transport Hierarchy	Modal/transport hierarchy is all about the hierarchy of users in the planning and design processes for new developments and proposed traffic management schemes. It places pedestrians at the top, followed by cyclists then public transport, with unaccompanied private car-users last.
Moorings (Canal)	A space within a canal where a canal vessel may be secured.
National Planning Policy Framework (NPPF)	Published on 27 March 2012, the NPPF sets out the government's planning policy framework for England and how these are expected to be applied. It sets out the government's requirements for the planning system. It provides a framework within which local people and their accountable local planning authorities can produce their own distinctive Local and Neighbourhood Plans, which reflect the needs and priorities of their communities.
National Planning Practice Guidance (NPPG)	The NPPG provides more detailed information on topics covered by the National Planning Policy Framework.
Native Species	Any species that has made its way to the UK naturally, not intentionally or accidentally introduced by humans.
Neighbourhood Plans	A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area.
Neighbourhood Town Centre	Typically serves a localised catchment often most accessible by walking and cycling and includes local parades and small clusters of shops, mostly for convenience goods and other services. It may include a small supermarket

	(typically up to around 500 sqm), sub-post office, pharmacy, laundrette and other useful local services. They are below District Centres in the Town Centre Hierarchy so they could contain up to 10,000 sqm.
Neighbourhoods	Potential smaller areas within the twelve places (see Chapter 4). These have yet to be identified and will emerge over time.
Night Time Economy	Economic activity which occurs between the hours of 6pm to 6am and involves the sale of alcohol for consumption (eg, bars, pubs and restaurants).
Non-Designated Heritage Asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest, but not otherwise designated under legislation.
Non-preclusion	This relates to the requirement for development currently being planned to not prohibit the delivery of long-term aspirations.
OPDC Area	The area of land located within the administrative boundary of the OPDC.
OPDC Environmental Modelling Framework	An Environmental Modelling Framework created by OPDC, identifying which methodologies are most effective in measuring appropriate levels of amenity in high density areas as per Policy D6 (Amenity) of the Local Plan.
OPDC Heritage Themes	These comprise five key heritage themes which relate to the majority of the heritage assets within both Old Oak and Park Royal: Grand Union Canal heritage Rail heritage Industrial heritage Historic residential enclaves Historic open spaces
OPDC Region	The OPDC area, as well as a wider surrounding area that comprises 35 MSOAs or 25 Wards (including the three in the OPDC Area).
Open space	All land that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a broad range of types of open space, whether in public or private ownership and whether public access is unrestricted, limited or restricted.
Open workspace	Workspace typologies designed and managed to support small, medium and micro enterprises. These typologies are usually flexible, with shared facilities and low-cost or managed workspaces and can include office space with flexible rental terms, co-working spaces, incubator spaces, accelerator spaces, creative/artist spaces and makerspaces. They tend to be flexible, and can be affordable and are ideally managed by an appropriate workspace provider.
Opportunity Area	London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, each typically has capacity for more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.
Out of Centre	A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Passive Electric Charging Units	These are parking spaces that are easily adaptable to accommodate electric vehicles. Passive provision requires the necessary underlying infrastructure (eg capacity in the connection to the local electricity distribution network and electricity distribution board, as well as cabling to parking spaces) to enable simple installation and activation of a charge point at a future date.
Payback Mechanism	A mechanism whereby the developer will cover the cost of providing a facility, and is then reimbursed by OPDC over a period of time through planning contributions from other development schemes.
Permitted development	Permitted development rights are a national grant of planning permission which allow certain building works and changes of use to be carried out without having to make a planning application. Permitted development rights are subject to conditions and limitations to control impact and to protect local amenity.
Place	Permitted development rights are a national grant of planning permission which allow certain building works and changes of use to be carried out without having to make a planning application. Permitted development rights are subject to conditions and limitations to control impact and to protect local amenity.
Place making	Recognising the distinctiveness of individual locations in plans, policies and proposals, and responding accordingly.
PLACE Review Group	The PLACE (acronym for Planning, Landscape, Architecture, Conservation and Engineering) is an independent review group tasked with improving the quality of development proposals and embedding place making into planning policy at the OPDC. The group operates according to the recommendations set out in the Government commissioned Farrell Review of architecture and the built environment.
Places	Areas which currently and / or have the potential to exhibit local distinctiveness that creates a unique sense of place. For the OPDC area, these are suggested to be: Old Oak South Old Oak North Grand Union Canal Park Royal West Old Oak Park Royal Park Royal Centre North Acton and Acton Wells Old Oak Lane and Old Oak Common Lane Channel Gate Scrubs Lane Willesden Junction Wormwood Scrubs
Positive Frontage	Building frontage which responds positively to the public realm in terms of orientation, design and uses. An example of positive frontage could include an industrial building which focuses ancillary office uses to the street frontage, providing regular windows and doors at a street scale.
Private Open Space	Private outdoor space, accessible by an individual dwelling unit, in the form of gardens, balconies, roof terraces and / or glazed ventilated winter garden.

Public realm	This is the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.
Public Transport Accessibility Level	A detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. PTALs reflect: walking time from the point-of interest to the public transport access points; the reliability of the service modes available; the number of services available within the catchment; and the level of service at the public transport access points - i.e. average waiting time. PTALs do not consider: the speed or utility of accessible services; crowding, including the ability to board services; or, ease of interchange.
Publically Accessible Open Space (or Public Open Space)	Spaces such as public parks, commons, heaths and woodlands, civic spaces and other open spaces with established and unrestricted public access. Publically Accessible Open Space may be owned and/or managed by either a local authority or private agency.
Publicly Accessible Private Realm	Land which is owned privately but is proposed to be made available to the public on the basis of Local Plan Policy D2.
Purpose Built Shared Housing	Housing schemes developed for the specific purpose of co-living or other forms of shared accommodation, where occupants have private bedroom suites, but share communal facilities including kitchens and dining areas, entertainment spaces and social spaces, and leisure and servicing facilities.
Quiet Ways	A well-signed network of radial and orbital routes outside central London, mainly on low-traffic back streets, for those wanting a more relaxed cycle journey.
Quantitative Tracking Survey	A survey to be undertaken by OPDC to track the perceptions of the development of the OPDC area over the next 20/30 years of both the resident and business community.
Rail Accessibility	The level of access provided by rail services.
Referable Schemes	An application is referable to the Mayor if it meets the criteria set out in the Mayor of London Order (2008). The criteria includes: development of 150 residential units or more development over 30 metres in height (outside the City of London) development on Green Belt or Metropolitan Open Land
Reflected Glare	Reflected glare occurs when bright beams of natural or artificial light reflects off of smooth surfaces into people's visual cone or onto other surfaces (e.g., work surfaces, streets). In buildings, this influences both visual comfort and thermal load.
Retail Impact Assessment	An assessment which measures the potential impact of a proposed development on: existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made.

Commented [LL4]: Specific amendment.
Reason: To reflect new supporting study.

Retail Price Index (RPI)	Retail Price Index - measure of inflation published monthly by the Office for National Statistics.
Review mechanism	Legal clauses which provide trigger points to review planning obligations and the ability to re-assess the level of relevant affordable housing contributions (i.e. if viability improves due to increases in land/sales values).
Roads Task Force	The Roads Task Force (RTF) is an independent body set up by the Mayor of London in 2012 to tackle the challenges facing London's streets and roads. They have developed a long term vision for how London can cope with major population growth and remain one of the most vibrant, accessible and attractive world cities.
Secondary Materials	Manufactured material that has already been used at least once, and is to be used again after recycling
Section 106 agreement	Section 106 of the Town and Country Planning Act 1990 allows a consenting authority such as OPDC to enter into legal agreements with developers to fund or deliver certain works to make development proposals acceptable in planning terms. This might include the amount of affordable housing which would be included in the development or an item of infrastructure or financial contribution towards it, such as a new school, employment and training support or increased transport network capacity.
Section 278 agreement	These are agreements made under the Highways Act 1980 for the developer to carry out scheme-specific highway works needed to satisfactorily tie in a scheme to the road network, or to mitigate adverse impacts which would otherwise arise in the immediate vicinity of the site. Examples of the works covered by S.278 agreements are vehicular crossovers and drop kerbs (standard for most developments), or more major highway works such as traffic lights or junction improvements, where a scheme is estimated to generated a large number of vehicular movements.
Shared Facilities	Facilities provided as part of residential or employments schemes which support the sharing economy within that building. Within residential developments, such facilities may include communal kitchen areas, leisure spaces, toilets and washing areas, or study areas; In workspaces, shared facilities may include assembly area, storage areas for tools, or machinery which is shared between users.
Sharing Economy	The sharing economy involves the sharing of goods, technology or services by groups of people and organisations to make better use of goods, skills, services, capital and spaces, sharing access and so reducing the need for ownership.
Silver Fleet Operator Recognition Scheme (FORS)	A voluntary accreditation scheme that promotes best practice for commercial vehicle operators. FORS encompasses all aspects of safety, efficiency, and environmental protection by encouraging and training fleet operators to measure, monitor and improve performance.
Site of Importance for Nature Conservation (SINC)	SINCs are a non-statutory designation, designated by the local planning authority. In London, SINCs are designated as one of a hierarchy of types: Sites of Metropolitan Importance are selected on a London-wide basis.

	Sites of Borough Importance (grade 1 and 2) are selected from candidates within each borough, so ensuring that each borough has some sites identified. Sites of Local Importance are the lowest tier of sites, selected to redress any remaining local deficiencies
Site Waste Management Plans (SWMP)	A plan prepared in advance of the commencement of any construction project outlining each waste type expected to be produced, the quantity of each different waste type expected to be produced, and the waste management action proposed for each waste type.
Small and Medium Enterprise (SME)	Businesses which may be considered either small or medium.
Small Business Units	Units that are equals to, or less than, 500 sqm or existing open workspaces.
Small Businesses	Businesses employing less than 10 people. Small businesses can occupy small units or studios (typically less than 500 sqm source: LLDC) but they can also operate from incubator and accelerator spaces, as well as larger co-working/co-making or studio spaces (collectively referred to as open workspaces – see separate definition later in this paper.
Small Residential Development	A residential development of less than 10 units.
Smart (city) technology	Considered to be a diverse range of contemporary and emerging technologies which can be utilised to improve the quality of life for local people, support economic growth and enhance the environment.
Social Infrastructure	Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.
Soundmarks	Soundscape design encompassing the preservation of certain sounds.
Soundscapes	The overall quality of an acoustic environment as a place for human experience.
Specialist Housing	Housing intended for those with specialist needs, including: housing for disabled or older people; accommodation for those who are homeless, or at risk of being homeless; move-on accommodation; or other forms of supported and specialised housing.
Starter Homes	A government initiative that aims to help first time buyers under 40 to buy a home. The new homes will be sold at a discount of at least 20% of the local market value, and at less than the price cap of £450,000.
Strategic Industrial Location (SIL)	These comprise Preferred Industrial Locations (PILs) and Industrial Business Parks (IBP) and exist to ensure that London provides sufficient quality sites, in appropriate locations, to meet the needs of industrial and related sectors including general and light Industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions.

Street Rhythm	Typical urban patterns and characteristics which are evident in a street scene. This may include the massing and proportion of buildings and building elements, the quality and type of street frontages, and the quality and types of public spaces.
Street Scene	All spaces and features which form the street environment, including buildings, street furniture, fittings and finishes and green infrastructure and open spaces
Streetscape	Streetscape is a term used to describe the natural and built fabric of the street, and defined as the design quality of the street and its visual effect, particularly how the paved area is laid out and treated. It includes buildings, the street surface, and also the fixtures and fittings that facilitate its use – from bus shelters and signage to planting schemes.
Supplementary Planning Document (SPD)	Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.
Supplementary Planning Guidance (SPG)	An SPG (sometimes called supplementary guidance) gives guidance on policies in the London Plan. It does not form a part of the statutory plan. It can take the form of design guides or area development briefs, or supplement other specific policies in the plan. However, it must be consistent with national and regional planning policy. It should be clearly cross-referenced to the relevant plan policy or proposal that it supplements. Public consultation should be undertaken and SPGs should be regularly reviewed. While only the policies in the London Plan can have the status that the GLA Act 1999 (as amended) provides in considering planning applications, SPGs may be taken into account as a further material consideration.
Sustainability (sustainable development)	This covers development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The NPPF sets out three elements of sustainable development: economic, social and environmental.
Sustainable Drainage Systems (SuDs)	Sustainable drainage systems (SuDS) are a natural approach to managing drainage in and around properties and other developments. Sustainable drainage measures are ones which avoid adding to flood risks both at a development site and elsewhere in the catchment by replicating natural drainage processes. SuDS work by slowing and holding back the water that runs off from a site, alleviating flooding and allowing natural processes to break down pollutants.
Systems of Systems	A collection of task-oriented or dedicated systems that pool their resources and capabilities together to create a new, more complex system which offers more functionality and performance than simply the sum of the constituent systems.
Tall buildings	~~Buildings that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor of London.~~Within the OPDC area, tall buildings are defined as being above 15 storeys or above a minimum of 48 metres above ground level.
Through Routes	A route which is used as a thoroughfare to get to another location. The origin and destination are connected with the through route

Commented [LL5]: Specific amendment.
Reason: To reflect information within the new Tall Buildings Statement

Town centre hierarchy	Town centres are identified according to their role and function as part of the following hierarchy: International centres Metropolitan centres Major centres District centres Neighbourhood/local centres The scale and catchment of the centres (amount of retail floorspace, distance people are prepared to travel to them) decreases as you move down the hierarchy.
Town centre uses	Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities; the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
Transit Oriented Development	The creation of compact, walkable, pedestrian-oriented, mixed use communities centred around high quality public transport infrastructure.
Transport Assessment	This is prepared and submitted alongside planning applications for developments likely to have significant transport implications.
Travel Plans	Plans promoting and providing guidance on sustainable transport options for a given location with the aim of promoting sustainable and environmentally friendly modes.
Typology	A form or type of development, for example mews, terraces, stacked maisonettes and mansion blocks are examples of residential typologies.
Ultra Low Emmisions Zone (UZEZ)	The Ultra-Low Emission Zone (ULEZ) is an area within which all cars, motorcycles, vans, minibuses, buses, coaches and heavy goods vehicles (HGVs) will need to meet exhaust emission standards (ULEZ standards) or pay a daily charge to travel.
Urban Greening	Urban greening describes the green infrastructure elements that are most applicable in central London and London's town centres. Due to the morphology and density of the built environment in these areas, green roofs, street trees, and techniques such as soft landscaping, are the most appropriate elements of green infrastructure.
Urban Heat Island	The phenomenon of how dense urban areas tend to get warmer than less built-up areas, and to cool more slowly.
Use Class	Uses of buildings/land are categorised for planning purposes, these categories are known as use classes. A range of uses may fall within each use class (as sub categories), as follows: A use class – shops (A1); financial and professional services (A2); food and drink (A3); drinking establishments (A4); and hot food takeaways (A5). B use class – business (B1); general industry (B2); and storage or distribution (B3). C use class – hotels (C1); residential institutions (C2); dwelling houses (C3); and houses of multiple occupation (C4). D use class – non-residential institutions (D1); and assembly and leisure (D2).

	Sui Generis – uses which do not fall within other use classes.
Vacant Building Credit	National policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace.
Waste apportionment	A target (tonnes per annum) set by the Mayor of London for the amount of waste which needs to be managed by individual London boroughs.
Waste Apportionment	An arrangement allowing boroughs that do not have the capacity to manage the amount of waste required to contribute to self-sufficiency targets to arrange for waste to be managed elsewhere within London.
Wayfinding	Better wayfinding means improving the ease with which people can navigate themselves to, from and within an interchange facility or zone.
WELL Building Standard	The WELL Building Standard is an evidence-based system for measuring, certifying and monitoring the performance of building features that impact health and well-being. The standard is unique and was developed over a number of years by the International Well Building Institute, in collaboration with the Green Business Certification Inc (which administers LEED) and with support for the Clinton Foundation. The development of the standard has involved a detailed peer review process. The standard is the first certification process to look specifically at the impact of key building elements on health and well being. It covers the impact of buildings and indoor environments across a range of issues like air, water, light quality, design and fitness, comfort and mental health.
Winter Gardens	Private outdoor space designed to be used all year round.
Work-Live Units	Accommodation that combines both living and working spaces, with the workspace forming a permanent component of the accommodation. This is different from ordinary home working in its nature and in the intensity of business use that may be involved. This may be in terms of the amount of space devoted to the work use or that the work element is designed to accommodate more workers than just the resident and may be designed in a flexible form to encourage business expansion. Work live units/buildings should be designed successfully to achieve this definition (see Policy E4).
Youth Play	Play space for children over 12 provides spaces for young people to congregate together, socialise and participate in informal recreation or physical activity. This can include adventure playgrounds, sport courts, skate and bike parks, fitness equipment, outdoor stages, youth shelters and supervised facilities such as youth clubs.
Zero Carbon	Zero carbon is defined as at least a 35% reduction in carbon emissions beyond Building Regulations 2013 Part L requirements on-site.
Zero Emmisions Network (ZEN)	The ZEN is a free to join network, currently in place in the City Fringe Area, that helps businesses and residents reduce the impact they have on air quality.

APPENDIX: BACKGROUND AND CONTEXT

BACKGROUND TO OPDC

A1.1 The Mayor of London established Old Oak and Park Royal Development Corporation (OPDC) on 1 April 2015 as a 'Mayoral Development Corporation' under powers of the Localism Act (2011). OPDC is the second of its kind in London, the first being the London Legacy Development Corporation (LLDC).

A1.2 The OPDC has a number of key aims, including:

a) transforming one of London's most inaccessible areas into a well-connected, world-class transport interchange;
b) enabling delivery of new housing and commercial development, surrounded by sustainable and thriving neighbourhoods and valued open space;
c) protecting, intensifying and strengthening Park Royal; and
d) protecting and improving Wormwood Scrubs.

A1.3 OPDC is the local planning authority for the area and as such is responsible for plan-making including the production of a Local Plan. The OPDC Local Plan sets out OPDC's strategy for the sustainable development of its area as a whole, including the general amount, type and location of new development it considers could take place and the policies to which applications for planning permission should conform.

A1.4 Its planning powers, including preparing and implementing the Local Plan, represent one part of the OPDC's role as a Development Corporation. Working with its partners, including the host Boroughs of Brent, Ealing and Hammersmith & Fulham and the local community, OPDC will help implement projects and bring about change that will help meet the Corporation's key aims.

STATUS OF THE LOCAL PLAN

Legal Status

A1.5 This document is a Development Plan Document (DPD) and is part of the Government's planning policy system introduced by the Planning and Compulsory Purchase Act 2004.

A1.6 Part 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the procedure for the production of Local Plans. This version of the Local Plan constitutes the consultation required under Regulation 19 and is the second Regulation 19 consultation.

Policy Status

A1.7 Alongside the National Planning Policy Framework (NPPF), London Plan, Old Oak and Park Royal Opportunity Area Planning Framework, West London Waste Plan DPD, any 'made' Neighbourhood Plans and any adopted Supplementary Planning Documents (SPDs), OPDC's Local Plan, once adopted, will be a key planning policy document against which planning applications within the OPDC area will be assessed (see figure A1.1).

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A1.8 The policies in this Local Plan are consistent with the National Planning Policy Framework (NPPF) and in general conformity with the London Plan. Further, the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) adopted by the Mayor in November 2015 as Supplementary Planning Guidance (SPG) to the London Plan has helped to inform the policy themes and policies in this Local Plan.

A1.9 In order to keep the OPDC Local Plan spatial and succinct, the Plan does not seek to repeat policies already contained in the NPPF and London Plan save for where such policies are particular to the area or type of development proposed or it is of particular importance to reflect them. This Local Plan should therefore be read in conjunction with the NPPF, the associated National Planning Practice Guidance (NPPG) and the London Plan. The policies contained within this plan are considered to comply with the NPPF and take a positive approach reflecting the overall presumption in favour of sustainable development.

Relation to Local Authority Planning Documents

A1.10 Until OPDC adopts its own Local Plan for the OPDC area, the development plan documents (DPDs) from the London Boroughs of Brent, Ealing and Hammersmith and Fulham, that applied to the OPDC area and that that were either adopted, or in production, at the time of OPDC's establishment (1st April 2015), will continue to form part of OPDC's Development Plan.

A1.11 As OPDC progresses its Local Plan, the weight of these Local Authority DPDs covering parts of the OPDC area will diminish as they are superseded by the growing material weight of OPDC's Local Plan. The exception to this rule is the West London Waste Plan, which was adopted by OPDC Board in July 2015 as a DPD.

Relationship with the Old Oak and Park Royal Opportunity Area Planning Framework

A1.12 The Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) was adopted by the Mayor in November 2015 as Supplementary Planning Guidance (SPG) to the Mayor's London Plan. As SPG to the London Plan, the document is a significant material consideration in the determination of planning applications in the OPDC area. This existing OAPF has helped to inform the policy themes and policies in this Local Plan. The OAPF should be read in conjunction with the Local Plan, but as this draft Local Plan progresses through its various regulatory stages, its policies accrue greater weight than the guidance and principles in the OAPF.

Relationship with the High Speed Rail (London- West Midlands) Act (2017)

A1.13 High Speed 2 (HS2) is the Government's proposal for a new, high speed north-south railway. Phase One of the scheme will connect London to the West Midlands and will run through the OPDC area. Part of the project involves delivery of the new station at Old Oak Common where there will be a connection to the Elizabeth Line and the national rail services.

A1.14 The High Speed Rail (London- West Midlands) Act (2017) grants deemed planning permission for phase 1 of the HS2 project. Matters such as the principle for the railway works, their limits, and matters of principle relating to mitigation are determined through the Parliamentary Act, rather than the normal Town and Country Planning Act process. The level of detailed design necessary to enable the development to be constructed has yet to be carried out, so the deemed planning permission is subject to a series of items that require the approval of local planning authorities on the route, known as Schedule 17 approvals. OPDC as the planning authority for the Old Oak and Park Royal area will be responsible for such approvals. The considerations of any approvals for works to be carried out in relation to Phase One of HS2 are limited to those set out in Schedule 17.

Duty to Cooperate

A1.15 The Duty to Cooperate is a legal requirement set out in the Localism Act. It requires local planning authorities and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The duty to cooperate is not a duty to agree, but 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.

A1.16 The bodies covered by the Duty to Cooperate are prescribed in National Planning Practice Guidance and in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). In accordance with the Duty to Cooperate, OPDC has been working closely with such authorities and bodies in the production of this Local Plan and in the preparation of other planning policy and development management and infrastructure delivery matters. Details on OPDC's engagement with such bodies are set out in OPDC's Duty to Cooperate Statement, which can be found as a supporting study to the Local Plan on OPDC's website.

HOW TO USE THE DOCUMENT

A1.17 Figure A1.2 identifies how the Local Plan is structured and the broad interrelationships between the different elements of the Local Plan.

Spatial Vision

A1.18 The Spatial Vision is OPDC's vision for what the different places of Old Oak, Park Royal and Wormwood Scrubs will be like in twenty years at the end of the 'plan period'. It both leads and is informed by the policy content of the Local Plan to set out how the OPDC area is intended to benefit local people, the local economy and the built and natural environment. It also complements the wider OPDC Vision and Mission.

A1.19 The Spatial Vision is comprised of the overarching Vision Statement and the Vision Narratives. The Vision Statement provides an overarching view of the future considering strategic elements. The Vision narratives seek to provide further detail by expanding the Vision Statement to define outcomes of development and regeneration at both the national and regional scale by 'thinking big', and to set out how local people will benefit from change and how neighbourhoods will improve by 'going local'.

A1.20 These three elements provide the structure and the key themes for the policies of the Local Plan. The objectives for how the Spatial Vision will be delivered are embedded in the Strategic Policies and Place Policies that, alongside the Development Management Policies will drive and guide future development and Supplementary Planning Documents.

Strategic Policies, Places and Delivery and Implementation Policies

A1.21 The strategic policies, place policies and delivery and implementation policies (chapters 3, 4 and 11) form OPDC's strategic policies for the area and establish the framework for fulfilling the spatial vision for the future of the OPDC area. The strategic policies dovetail with the OPDC's corporate priorities and outline how the OPDC area will be transformed over the plan period.

A1.22 Chapters 3, 4 and 11 will be treated as OPDC's strategic policies when considering the general conformity of neighbourhood planning policies.

Development Management Policies

A1.23 The strategic aims of the Local Plan will be promoted through the development management policies, which plan positively to ensure development within OPDC accords with the Spatial Vision and strategic objectives. The more detailed development management policies, which are contained in chapters 5-10, are effectively subsets of the strategic policies and should not be read in isolation of the strategic policies.

A1.24 The development management policies set out detailed planning policies against which the OPDC will assess planning applications within its area. When considering development proposals, the OPDC will take a positive approach that reflects the overall presumption in favour of sustainable development contained in the NPPF and will work with applicants to secure development that improves the environmental social and economic well-being of its area. Planning applications that accord with the policies in the Local Plan will be approved unless material considerations indicate otherwise.

Policy Structure

A1.25 Figure A1.3 outlines the Local Plan's policy structure. The policy itself is contained in a coloured box. This is followed by two boxes that highlight the policies' interdependencies with other Local Plan policies, as well as key supporting studies, which should be read alongside the policy. This is followed by supporting text, which provides further elaboration to the policies and justification for the approach being taken in the policy. The supporting text follows the ordering of the criteria in the policy.

Figures and Photos

A1.26 Figures in the Local Plan should be treated as indicative. The exact boundaries for spatially specific policies are set out in OPDC's Policies map.

A1.27 Photos in the document have been referenced to identify their location and are generally either of locations within the OPDC area or are of precedents from elsewhere in London, the UK or internationally.

Route, infrastructure and place names

~~A1.27~~A1.28 To aid with the readability of the Local Plan, routes, pieces of infrastructure such as open spaces and bridges and places, that do not yet exist, have been given names (e.g Old Oak Street). These names should be treated as indicative and OPDC will be developing a separate Naming Strategy for new routes, spaces and places which will be used to inform their official naming

Commented [TC6]: Specific amendment
Reason: To clarify the purpose of naming infrastructure and places

Supporting Studies

~~A1.28~~A1.29 The Local Plan is supported by a number of supporting evidence documents (see figure A1.4). These supporting studies have been referenced below the relevant Local Plan policies and where relevant in the supporting text to policies or in footnotes. All the supporting studies are available to view online or hard copies can be viewed at identified locations. As part of the Regulation 19 consultation, representations can be made on these studies. Where appropriate and relevant, supporting studies may be updated. Updates to supporting studies will be provided on OPDC's website.

~~A1.29~~A1.30 The Local Plan is supported by an Integrated Impact Assessment (IIA). The IIA fulfils the statutory requirements for a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (in a manner that incorporates the requirements of the European Union's SEA Directive (2001/42/EU) and the transposing UK Regulations, the Environmental Assessment of Plans and Programmes Regulations 2004). The approach also fulfils the requirements for Health Impact Assessment, Equalities Impact Assessment and Community Safety Impact Assessment. As per the other supporting evidence documents, the IIA can be viewed online or in hard copy at identified locations.

~~A1.30~~A1.31 Under Article 6 of the Habitats Directive, an assessment is required where a plan or project may give rise to significant effects upon any Natura 2000 sites (also known as 'European sites'). There are no European sites within the OPDC area; however, there are seven sites which form part of the Natura 2000 network that could potentially be affected by the proposals of the Local Plan. A Habitats Regulation Assessment (HRA) screening has been undertaken to support the Local Plan to meet these requirements. As per the other supporting evidence documents, the IIA can be viewed online or in hard copy at identified locations.

Glossary

~~A1.31~~A1.32 The Local Plan is accompanied by a glossary to the rear of the Local Plan, which provides a definition for terms used throughout the Local Plan.

WIDER CONTEXT

Strategic Context

~~A1.32~~A1.33 The OPDC area and particularly Old Oak is set to be transformed with the opening of Old Oak Common Station, which will connect Elizabeth Line and National Rail services to the newly built High Speed 2 (HS2) line. The station will be nearly the size of Waterloo, accommodating approximately 250,000 passengers a day and putting Old Oak within 10 minutes journey time of London Heathrow, the City and the West End and 38 minutes of Birmingham.

~~A1.33~~A1.34 Catalysed by this new station, the OPDC area can play a significant role in supporting good growth in London through the delivery of a new commercial ~~hub~~centre, a new major town centre, new high density residential neighbourhoods, protecting and enhancing the Park Royal industrial location and providing a full range of supporting ancillary uses. ~~.~~The scale of development envisaged currently represents one of the UK's largest regeneration projects, identified in the London Plan as being capable of delivering a minimum 25,500 homes and 65,000 jobs and with the potential for development to generate an additional £7.6 billion per annum of gross value added to the UK economy.

~~A1.34~~A1.35 Figure A1.5 shows the OPDC area in West London. Regeneration in Old Oak and Park Royal will play a key role in driving growth in West London, contributing over 12% of new homes and over 20% of new jobs for this area.

~~A1.35~~A1.36 The new station at Old Oak Common, along with other transport infrastructure improvements including two potential new London Overground stations will place the Old Oak and Park Royal as key transport hubs that will offer exceptional connectivity to many of west London's key locations for growth. Consequently, the regeneration of Old Oak and Park Royal has the potential to bring significant benefits to the west London sub-region and act as a beating heart and driving force for its economy.

Local Context

~~A1.36~~A1.37 OPDC's more immediate context contains some of the most deprived areas in the country. Locations such as Harlesden and Stonebridge are ranked within the top 10% most deprived wards nationally and have issues with income deprivation and health. It is important that development at Old Oak and Park Royal brings tangible benefits for local communities and offers life improving opportunities.

~~A1.37~~A1.38 Within the more immediate area there are some significant development opportunities. The OPDC area is in close proximity to other Opportunity Areas including White City, Wembley and Kensal Canalside and other large development areas such as Acton, Ealing and Alperton.

~~A1.38~~A1.39 Rail and road infrastructure within and bordering the OPDC area currently separate many of the communities bordering the OPDC area. New development has the opportunity to overcome this severance and knit together this part of west London. The scale of transformation planned in the OPDC area can further spur their regeneration and help to unlock additional development and growth.

~~A1.39~~A1.40 OPDC will work with local authorities, landowners and communities across the area to achieve the successful integration of the OPDC area into the wider hinterland. Below is a list of the those largescale areas for regeneration in the wider region where joint working will be required to ensure that the benefits of the regeneration can be fully captured.

- White City Opportunity Area is currently being transformed with the expansion of Westfield, development of Imperial College's White City Campus and redevelopment of the BBC Television Centre. The White City OAPF was published in 2013 and development in this area is well underway. Coordinated public realm improvements could deliver better connectivity between the OPDC area and White City. Economic synergies will also be explored such as the potential for Imperial College to continue to grow its west London campus into the OPDC area;
- Harlesden Town Centre is a designated District Town Centre, providing much needed town centre facilities for people living in the area. The centre and its surroundings currently suffer from economic deprivation, falling within the top 10% most deprived wards nationally when measured against the Index of Multiple Deprivation (2015). Improved connections between it and the OPDC area provide significant opportunities for residents and businesses in Harlesden to benefit from regeneration. OPDC and Brent Council have established a Harlesden sub-group to coordinate projects and strategies for the area;
- Kensal Canalside Opportunity Area is immediately to the east of the OPDC area and is identified in the London Plan as having the capacity to deliver 2,000 new jobs and a minimum of 3,500 new homes. The Royal Borough of Kensington and Chelsea are lobbying the Mayor of London and TfL for a new Elizabeth Line station at Kensal, which could further increase the area's development capacity. There will be opportunities to improve connections between Kensal Canalside and the OPDC area and OPDC will work with the Royal Borough of Kensington and Chelsea to explore ways that this can be achieved;
- Alperton located to the west of the OPDC area in Brent has been identified as a 'Housing Zone' by the Mayor of London with additional funding for the delivery of affordable housing. The Alperton housing zone is identified as having the capacity to deliver over 3,000 homes;

- Wembley Opportunity Area is less than 2 miles from the OPDC area and is west London's second largest Opportunity Area after Old Oak. Wembley has the potential to deliver 11,500 homes and 11,000 jobs. In the future, Wembley could potentially be better connected to Old Oak through the provision of a spur to the West Coast Main Line, but there are also other opportunities for more short-term solutions to better connect Wembley to the OPDC area; and
- Centres in the wider area such as Ealing, Southall, Acton, Wembley, Hammersmith and Kensington, will be influenced by the scale of development proposed at Old Oak and Park Royal. There is a need for close collaboration with the surrounding and host local authorities to consider what these influences might be and ensure that measures are taken to capture opportunities and mitigate any potential impacts.

OPDC AREA CONTEXT

Key Neighbourhood Features and Facilities

~~A1.40~~A1.41 The OPDC area covers approximately 650 hectares in inner north-west London within Zones 2 and 3. Today, the area is predominantly industrial in nature, with large amounts of land used for transport functions as well as some small residential communities and important amenity and heritage assets.

~~A1.41~~A1.42 Figure A1.7 provides an historic timeline for the area, more details of which can be found in OPDC's Heritage Strategy. The area's industry was borne largely as a result of being on the periphery of early 20th century London and the location of rail and canal infrastructure, helping to support the area's growth. Today the OPDC area houses 1,700 businesses, employing 43,100 workers.

~~A1.42~~A1.43 Figure A1.8 provides a context map for the area. Today the 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 between Old Oak, Park Royal and surrounding areas.

~~A1.43~~A1.44 In Old Oak, which is 190 ha is size and includes North Acton, the area is dominated by rail lines and the Grand Union Canal, with large industrial sites to the north and land for transport functions to the south of the canal. Wormwood Scrubs, at 68 ha, lies further to the south and is a valued ecological and amenity asset, protected by the Common Act its own Wormwood Scrubs Act and categorised as Metropolitan Open Space. The Park Royal area, at 381 ha, is overwhelmingly industrial in nature and operates as one of the largest industrial estates in London, although there are also pockets of new and old residential areas and open spaces across the area.

~~A1.44~~A1.45 The OPDC area is currently poorly served by community services. The only established town centre is in the centre of Park Royal, which includes a large ASDA superstore, Central Middlesex Hospital and some smaller retail facilities.

~~A1.45~~A1.46 The area surrounding Old Oak and Park Royal is made up of established residential neighbourhoods and town centres, including Harlesden, North Kensington, Acton, Stonebridge and Alperton. Hammersmith Hospital and Wormwood Scrubs Prison are located south of the Woodwood Scrubs, with White City to the south of the A40. 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 OPDC boundary and these help to serve the needs of the existing workers and residents in the OPDC area.

Figure A1.9: Economic, Social and Environmental Features

Economic	Social	Environmental
The OPDC area, primarily the Strategic Industrial Location (SIL) at Park Royal, is the location of over 43,000 workers across over 1,700 enterprises, and is estimated to deliver over £2.1 billion of economic activity per annum to the UK economy[1]; The OPDC area accounts for 30 per cent of employment in the local region and 1 per cent of all employment within London[2]. Wholesale Trade, primarily food, is the largest industry in the OPDC area, accounting for 14.5% of private enterprise. The other main sectors include: Professional and Technical Services (11.4%); Retail (9.6%); Information and Communications (8.9%); Business Administration (8.7%); Manufacturing (8.2%); Construction (8.0%); and Motor Trades (5.6%). Over 80% of all enterprises in the OPDC area are micro enterprises, employing less than 10 people. This is lower than the London average of 90%, however this is offset by higher than average levels of small (16%) and medium (2.5%) size enterprises. The proportion of large enterprises at 0.5% is similar to the London average of 0.4%. Food production and food wholesale are a major element of Park Royal's economic activity, with over 30% of London's food produced in the area.	The local area 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[2]; Residents in the local area are less likely to own their own home and more likely to socially rent. 46.7% of households in the OPDC area are socially rented, compared to 23.6% of households in the three adjoining boroughs. The area also has higher than average levels of household overcrowding. The median household income across the three host Boroughs of Brent, Ealing and Hammersmith and Fulham is £35,671[3]. Residents in the OPDC Area are more likely to be long term unemployed, with 2.8% of residents long term unemployment compared to the London average of 2%; Residents in the local area are less likely to have a degree level qualification compared to the average across London. The health of the community in the OPDC region is below London average levels, with high rates of disability, long-term health problems and childhood obesity, alongside lower than average life expectancy.	Wormwood Scrubs, covering almost 68 ha is located at the south of the OPDC area. It is a major recreational and environmental asset for west London and is protected as Metropolitan Open Land (MOL) and by its own act of parliament, the Wormwood Scrubs Act (1879); The Grand Union Canal runs through both Old Oak and Park Royal and is an environmental site of metropolitan importance, conservation area and a significant amenity asset. North Acton Cemetery is located within the OPDC area, while St Marys Cemetery, Kensal Green Cemetery and Little Wormwood Scrubs are located outside the area to the east. There are also some small public and private open spaces within the OPDC area. Within the OPDC area, there are 19 Sites of Importance for Nature Conservation[4] (See Figure 6.3), with one of these (Grand Union Canal) of Metropolitan Importance. The multiple railway sidings running throughout the area also act as important wildlife corridors. Parts of Old Oak and Park Royal suffer from high levels of air and noise pollution, arising from heavy industrial uses and the primary transport corridors running through and adjacent the area[5].

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